

Fair Ranking Conduct Requirement

Google's general search services

17 June 2026

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The Competition and Markets Authority has excluded from this published version of the decision information which the CMA considers should be excluded having regard to the three considerations set out in section 244 of the Enterprise Act 2002 (specified information: considerations relevant to disclosure). The omissions are indicated by [✂].

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1. Introduction and summary

- 1.1 Where a firm has strategic market status (**SMS**) in a digital activity linked to the UK, the CMA can impose proportionate requirements as to how that firm must conduct itself in relation to that digital activity (conduct requirements or **CRs**).
- 1.1 On 10 October 2025, we designated Google as having SMS in general search services. On 28 January 2026, we published for consultation our proposal for a CR to address concerns about fair ranking for Google’s general search services, given Google’s role as a key gateway through which businesses and content creators can reach consumers.¹
- 1.2 Publishers² expressed the following main concerns about Google’s approach to ranking organic search results:
- (a) Google may uprank or downrank content for unfair reasons;
 - (b) Google does not provide sufficient notice or information when it implements a change to its ranking algorithm;
 - (c) Google may not sufficiently take into account the impact of its ranking or presentation policies on markets; and
 - (d) Google does not provide effective means for publishers to raise concerns and ensure that these are effectively dealt with.
- 1.3 We identified a range of consequences resulting from these concerns, including a lack of trust in Google’s ranking, which could deter investment, and result in publishers being subject to avoidable costs, which has a detrimental impact on their confidence to invest in products and services which may benefit UK consumers.
- 1.4 Following the launch of our consultation we have engaged with Google and third parties through roundtables, bilateral meetings and other routes, in parallel with considering the written responses to our consultation.³
- 1.5 This document explains how that process has informed our decision to impose the CR in its final form (the **Fair Ranking CR**). It should be read in

¹ [CMA consultation on proposed Fair Ranking CR](#).

² Given the wide range of businesses and creators for whom Google Search is important, we use the term publisher to refer to all parties that make content available on the web.

³ See responses to the [consultation on proposed Fair Ranking CR](#) and [conduct requirement roundtables](#).

conjunction with our consultation document.⁴ The text of the Fair Ranking CR is set out in the Fair Ranking **CR Notice** and is supplemented by the Fair Ranking **Interpretative Notes (INs)** which explain the CMA's interpretation of the Fair Ranking CR. The Fair Ranking **Compliance Reporting Notice** sets out how Google must report to the CMA on its compliance with the Fair Ranking CR.⁵

- 1.6 The sections of this document follow the steps set out in our guidance, reflecting the requirements of the Digital Markets, Competition and Consumers Act 2024 (the **Act**), which states that when imposing CRs we will: (i) identify what the CR is intended to achieve (the aim); (ii) consider whether the CR would be effective in achieving the aim; and (iii) consider the proportionality of the CR.⁶
- 1.7 In summary, the Fair Ranking CR has three parts:
 - (a) a requirement on Google to rank organic search results based on **objective and non-discriminatory criteria**, including in search generative AI features;⁷
 - (b) a requirement on Google to provide **transparency** over how it ranks organic search results, and provide sufficient notice and information about material changes that could impact publishers and reduce avoidable costs; and
 - (c) a requirement on Google to enable publishers to **effectively raise concerns** about manual actions and material changes that may have a **material adverse distortive or other adverse impact on UK markets**.
- 1.8 Taken together, we consider that these parts mean that the Fair Ranking CR will effectively and proportionately achieve our aim of ensuring that Google provides fair ranking in its delivery of organic search results.
- 1.9 We will continue to engage with Google and have direct oversight of its development and implementation of changes to comply with the Fair Ranking CR. The periodic compliance reports Google is required to provide to us, and

⁴ [CMA consultation on proposed Fair Ranking CR](#).

⁵ The **CR Notice**, **INs** and **Compliance Reporting Notice** are available on the [Fair Ranking CR page](#) and can also be accessed via the [case page](#).

⁶ See our [Digital markets competition regime guidance \(CMA194\)](#), paragraph 3.20.

⁷ See the CR Notice for the definition of search generative AI features.

our ongoing ability to gather evidence using formal powers if necessary, will allow us to act quickly if we identify any concerns with Google's compliance.

1.10 We also have a statutory duty to keep under review the effectiveness of CRs and the extent to which Google is complying with them, as well as whether to impose, vary or revoke any CR.⁸ We will engage closely with Google, publishers and other relevant stakeholders to keep under review whether our Fair Ranking CR is effective in achieving our aim and facilitating expected benefits, such as supporting:

- (a) consumer confidence that Google ranks results based on what content is most relevant and highest quality in response to their query;
- (b) a reduction in business costs that translates to either enhanced products or lower prices for consumers; and
- (c) the effective functioning of markets due to the elimination or mitigation of material distortions caused by Google's ranking changes.

1.11 On 19 May 2026, Google announced a number of changes to Search, including updates to search generative AI features and further integration of AI technologies (such as AI agents) into Search.⁹ The Fair Ranking CR covers ranking and presentation of organic results within search generative AI features, and will therefore apply to further generative AI integration and innovation within Google's general search services.

1.12 We will keep the implementation of these changes under close observation, noting our obligation to keep the Fair Ranking CR under review. We will also continue to engage with stakeholders to hear their views on the Fair Ranking CR and the need for any further measures. This includes possible measures related to the fair treatment of specialised search services and ensuring greater transparency in search advertising, both of which were part of our roadmap of possible measures to improve competition in general search.¹⁰

⁸ Section 25 of the Act.

⁹ Google, [A new era for AI Search](#), May 2026.

¹⁰ CMA, [Roadmap of possible measures to improve competition in search](#), June 2025.

2. The aim of the Fair Ranking CR

- 2.1 As set out in our consultation document,¹¹ the aim of the Fair Ranking CR is to ensure that Google provides fair ranking in its delivery of organic search results by:
- (a) ranking search results based on objective and non-discriminatory criteria (eg relevance and quality of response to the user's query);
 - (b) providing transparency over how it ranks search results, and sufficient notice of changes that could impact businesses;
 - (c) seeking to minimise material distortions to other markets resulting from its search rankings and presentation policies; and
 - (d) providing an effective mechanism for parties to raise complaints with Google and have them addressed.
- 2.2 Any conduct requirement must pursue one or more of three statutory objectives and fall within an exhaustive list of 'permitted types' set out in the Act. The Fair Ranking CR pursues the statutory objectives of fair dealing and trust and transparency.¹² Its components fall under the permitted types in:
- (a) section 20(2)(d) of the Act: requiring Google to give explanations and a reasonable period of notice to users before making changes likely to have a material impact on users;
 - (b) section 20(2)(b) of the Act: requiring Google to have effective processes for handling complaints by and disputes with users; and
 - (c) section 20(3)(a) of the Act: preventing Google from applying discriminatory terms, conditions or policies to certain users.
- 2.3 Before imposing a conduct requirement, the CMA must have regard in particular to the benefits for consumers that it considers would likely result (directly or indirectly) from the conduct requirement.¹³ As explained in greater detail in our consultation document, we consider that the Fair Ranking CR is likely to lead to consumer benefits in several ways:

¹¹ CMA consultation on proposed Fair Ranking CR, page 15.

¹² In sections 19(6) and 19(8) of the Act respectively.

¹³ Section 19(10) of the Act.

- (a) We expect consumers will benefit from greater confidence that Google ranks results based on what content would be of most relevance and highest quality in response to the user's query.
- (b) We expect consumers will also likely benefit indirectly from a reduction in business costs that could free up resources for businesses to spend more on improving and/or offering new products or reducing prices.
- (c) Consumers could also benefit from more effective functioning of markets due to the elimination or mitigation of some of the distortions caused by Google's ranking changes.

2.4 The direct and indirect importance of the Fair Ranking CR may increase as Google continues to evolve its general search services with further or more prominent search generative AI features. For example, it may help to improve business trust and confidence in Google's general search services, and may prevent disruption for businesses as the ways in which end users interact with content in search continues to evolve.

3. Effectiveness of the Fair Ranking CR

- 3.1 Our assessment is that the Fair Ranking CR will be effective in achieving the aim set out above. It is designed to provide:
- (a) publishers with confidence that Google ranks search results based on objective and non-discriminatory criteria, including in search generative AI features;
 - (b) transparency over how Google ranks search results, and provide greater notice of changes that could impact publishers; and
 - (c) publishers with effective means to raise concerns about manual actions and material changes to Google's general search services that may have a material adverse impact on UK markets (eg distortions).
- 3.2 To achieve this, effective compliance monitoring requirements will be critical to secure trust and confidence in how Google ranks search results. Below we identify the key issues raised in consultation responses on the effectiveness of the Fair Ranking CR and provide our response to them.

Scope of the Fair Ranking CR

- 3.3 Many of the consultation responses supported the proposed scope of the Fair Ranking CR including the ranking and presentation of organic search results; and in particular, the majority of stakeholders commenting on the scope supported the inclusion of search generative AI features.¹⁴ However, several respondents suggested that the CR's scope ought to extend further to paid-for content and/or Google's access to and design of specific search features.¹⁵ A few respondents pointed to the increased blurring between organic and paid-for content on the search engine results page¹⁶ and one respondent pointed to the introduction of search generative AI features¹⁷ to support their position.

¹⁴ [Responses to the CMA's consultation on proposed Fair Ranking CR](#): OpenAttribution.org, pages 1-2; MoneySuperMarket, pages 2-3; Siinda, page 2; Guardian Media Group, page 10; European Publishers Council, page 11; Platform Leaders, page 2; News Media Alliance, page 18; News Media Association, page 3; Shaping Competition in the Digital Age, page 11; Trainline, page 2; Yelp, page 2; Movement for an Open Web, pages 4 and 21; Skyscanner, page 6; Anonymous, page 2; Anonymous 9, pages 1-2.

¹⁵ Responses to the CMA's consultation on proposed Fair Ranking CR: easyJet, page 1; Lovehoney Group, pages 1-2; Anonymous 9, page 2; Kelkoo Group, page 2; Siinda, page 2; Corint Media, pages 8-9; Trainline pages 2-3; Anonymous 4, page 1; Yelp, page 3.

¹⁶ Responses to the CMA's consultation on proposed Fair Ranking CR: Bachtrack, page 2; MoneySuperMarket, page 2; Trainline, pages 2-3; Redbrain Ltd, page 2.

¹⁷ Response to the CMA's consultation on proposed Fair Ranking CR: Jim Hales, page 1.

- 3.4 Google submitted that the CR should be amended to exclude Google’s live traffic experiments pre-launch, as these experiments form part of Google’s search quality approval process [X].¹⁸
- 3.5 In designing the scope of the proposed CR set out in the consultation document, we carefully considered similar arguments to those put forward by stakeholders in consultation responses.¹⁹ We have not been presented with new evidence or arguments that convince us to broaden its scope.
- 3.6 We have, however, clarified in the INs that the Fair Ranking CR:
- (a) applies to all products within the scope of Google’s SMS designation in respect of general search services, including, for example, Google Discover;
 - (b) applies to both the ranking and presentation of organic results in traditional search results and search generative AI features, despite the technical differences between them; and
 - (c) does not apply to the testing and development of search features prior to launch (being the period before Google takes a formal launch decision), provided that this testing is limited to a small subset of general search traffic in the UK.

Non-discrimination and objective ranking

- 3.7 The Fair Ranking CR requires Google to rank organic search results based on objective and non-discriminatory criteria. In its relevant ranking systems, policies and procedures, Google must not take account of irrelevant or unfair considerations, including whether a publisher has chosen to advertise or otherwise enter into commercial agreements with Google; or whether a publisher has exercised a contractual or statutory right. Google must also apply the same, objective criteria to third-party content that it applies to its own content.
- 3.8 In the consultation, we recognised in paragraph 6 of the proposed INs that new search features are likely to require testing and development by clarifying

¹⁸ Google submission to the CMA.

¹⁹ See CMA consultation on proposed Fair Ranking CR, paragraphs 1.26-1.35.

that nothing in the Fair Ranking CR should reduce or undermine Google's ability to introduce such new features.²⁰

Summary of responses

- 3.9 Two stakeholders submitted concerns about the reference to new search features in the INs. One respondent suggested that the language was too broad and general, and insufficiently qualified, and that the innovation exemption should not enable Google to innovate in a way that is exclusionary of rivals.²¹ Another respondent considered that the proposed CR did not constrain innovation in ranking systems, but rather prevented discriminatory application of those systems.²²
- 3.10 Google submitted that, although it welcomed the reference in paragraph 6 of the proposed INs, the wording should be included in the CR itself, to be clear that the obligation does not apply to Google's experimentation with new search features, as Google needs a period of time to test and assess fair presentation for such features. Otherwise, this could inadvertently chill Google's incentive to develop and launch improvements and innovations for general search in the UK.²³
- 3.11 Google submitted that the CR should include an exemption for innovation with the following parameters:
- (a) It would cover experimentation on all search feature launches (including new features and improvements to existing search features).
 - (b) It would be limited to the minimum period necessary, up to a maximum of six months after Google's launch process has completed (when it is available to all end users), where Google would notify, but not require the prior approval of, the CMA of any extensions beyond six months before expiry of the initial six-month period.
 - (c) Google would provide periodic reporting to the CMA, but not third parties, on any reliance on the innovation exemption.²⁴

²⁰ CMA consultation on proposed Fair Ranking CR, paragraph 6, page 21.

²¹ Response to the CMA's consultation on proposed Fair Ranking CR: Movement for an Open Web, page 28.

²² Response to the CMA's consultation on proposed Fair Ranking CR: Siinda, page 2.

²³ Google, [Response to the CMA Consultation on Proposed Search Conduct Requirements](#), February 2026, paragraph 33.

²⁴ Google submission to the CMA.

Our view

- 3.12 Having considered consultation responses, and our further engagement with Google on our proposed approach, we continue to consider that the Fair Ranking CR should not prevent Google from innovating in general search through the launch of new search features. We also recognise the benefit of providing certainty around the parameters for experimentation in the CR itself. However, any exemption must not undermine publisher trust and confidence in the effectiveness of the Fair Ranking CR, and therefore must have appropriate limits and safeguards.
- 3.13 We have therefore amended the Fair Ranking CR to include an exemption that:
- (a) Applies to new search features and search generative AI features, but not to improvements to existing features. We have included in the INs the possibility for Google to apply to the CMA for approval for the exemption to also apply where it is necessary to test a material improvement to an existing feature.
 - (b) Only applies to paragraph 4.b. of the Fair Ranking CR (ie the obligation to ‘apply the same, objective criteria in relation to its own products and services and the equivalent products and services of third parties’), which may otherwise prevent Google from experimenting to identify the most appropriate ranking position (based on user utility) for a new search feature.
 - (c) Only applies for the minimum period necessary to determine the appropriate ranking of the new search feature, up to a maximum period of six months. In the INs we have clarified that Google may seek approval from the CMA for an extension to this period, but only where strictly necessary to determine whole page utility.
 - (d) Only applies to the minimum extent strictly necessary to determine the new search feature’s utility and relevance and to collect the data necessary to apply the relevant ranking criteria and policies.
- 3.14 As part of the CMA’s ongoing monitoring, Google will be required to provide the CMA with details about its use of the exemption through its periodic reporting on its compliance with the Fair Ranking CR (see the Compliance Reporting Notice).

Other issues

3.15 Stakeholders also asked the CMA to reconsider and clarify other aspects of this part of the proposed CR, including:

- (a) **Clarifying the meaning of ‘objective’ criteria:** A few stakeholders submitted that the term ‘objective’ should be more clearly defined and that the objective criteria should be grounded in externally verifiable standards and capable of independent scrutiny.²⁵
- (b) **Adding further, explicit restrictions on factors Google can take account of:** A few responses suggested that we add to the obligation on Google to apply objective and non-discriminatory criteria, including:
 - (i) to require Google to apply the same, objective criteria between different (or different categories of) third-party businesses;²⁶ and
 - (ii) not to take into account whether a publisher has agreed AI licensing arrangements with Google or otherwise made a decision to be included in search generative AI features or other search features.²⁷

Our view

3.16 Having considered consultation responses, we consider that the meaning of ‘objective’ is sufficiently clear through a plain reading of the term not to warrant a stand-alone definition, and the obligations set out in paragraph 4 of the Fair Ranking CR already sufficiently cover the factors raised.

Transparency

3.17 At consultation, the proposed CR required Google to provide sufficient information about how it ranks and presents search results and sufficient notice and information in advance about any material changes to the key ranking criteria, policies and procedures that affect how it ranks and presents search results.

²⁵ Responses to the CMA's consultation on proposed Fair Ranking CR: Lovehoney Group, page 3; Skyscanner, page 18; Trainline, page 6; Anonymous 4, pages 3-4.

²⁶ Response to the CMA's consultation on proposed Fair Ranking CR: Lovehoney Group, pages 3-4.

²⁷ Responses to the CMA's consultation on proposed Fair Ranking CR: Football Writers Association, page 2; Anonymous 4, page 2; Redbrain Ltd, page 2.

Definition of material change

3.18 In the consultation, the proposed INs clarified that ‘material changes’ covered changes that were:

- (a) actionable (eg those in response to which publishers could take action to avoid or reduce the impact of the change on their ranking);
- (b) made to meet a specific policy objective (eg preventing spam); or
- (c) made to comply with a regulatory requirement.

3.19 We also clarified that material changes would not include minor everyday ranking improvements.

Summary of responses

3.20 Several stakeholders provided representations on the meaning and scope of ‘material change.’ A few submitted that the concept should be defined clearly and operationally in the CR or INs, with reference to changes reasonably likely to produce significant effects on visibility, ranking, traffic or commercial impact²⁸ and the cumulative impact of updates.²⁹ In terms of scope, we received arguments that it should include changes to the ranking or presentation of search features³⁰ and how search generative AI features select, weigh and present content.³¹

3.21 In its consultation response, Google submitted that to ensure transparency for all stakeholders and promote legal certainty for how Google’s disclosures should operate, these exclusions in the IN should be part of the CR itself.³² However, it queried the meaning of changes ‘made to meet a specific policy objective’ and the meaning of changes ‘made to comply with a regulatory

²⁸ Responses to the CMA's consultation on proposed Fair Ranking CR: Lovehoney Group, page 5; Independent Media, page 1; Affiliate and Partner Marketing Association, pages 7-8; Trainline, page 9.

²⁹ Responses to the CMA's consultation on proposed Fair Ranking CR: OpenAttribution.org, page 2; Independent Media, pages 1-2; Platform Leaders, page 3; Trainline, page 7.

³⁰ Responses to the CMA's consultation on proposed Fair Ranking CR: Independent Media, pages 1-2; Siinda, page 3; Platform Leaders, page 3; Anonymous 3, page 3; Trainline, page 7; easyJet, page 3.

³¹ Responses to the CMA's consultation on proposed Fair Ranking CR: OpenAttribution.org, page 2; Siinda, page 3; Platform Leaders, page 3.

³² Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraph 45.

requirement', and submitted that these two additional categories of disclosure should be removed from the proposed CR.³³

- 3.22 Google submitted that 'material changes' should capture two categories of changes:
- (a) **actionable changes:** This would include changes in response to which publishers could take action to avoid or reduce the impact of the change on their ranking, including for example 'specific, discrete action' that a publisher could take in a relatively short time, such as adjusting specific site behaviours.
 - (b) **significant explainable updates:** This would include updates that are not minor, inconsequential, everyday or general improvements, for which Google can provide an explanation that does not necessarily include guidance on how individual rankings might change and/or how publishers can make changes to their websites to improve their ranking after the update.³⁴

Our view

- 3.23 Having considered consultation responses, and our further engagement with Google on our proposed approach, we consider there is value in providing more clarity on the meaning of 'material changes' in the Fair Ranking CR.
- 3.24 We have therefore decided to define 'material changes' in the Fair Ranking CR with reference to two further definitions:
- (a) '**actionable change**', which means a change to Google's ranking criteria, policies and procedures in response to which publishers may take action to avoid or reduce the impact of the change on their ranking; and
 - (b) '**significant and explainable change**', which means a change to Google's ranking criteria, policies and procedures which may result in significant shifts in ranking and for which Google can explain both what is changing and why it is changing.
- 3.25 We consider that these two descriptions of changes are sufficiently clear and comprehensive, such that both Google and publishers will be able to identify

³³ Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraph 46.

³⁴ Google submission to the CMA.

whether a change is 'material' for the purpose of the Fair Ranking CR, as demonstrated below by reference to a few examples:

- (a) the introduction of the Site Reputation Abuse Policy, the Back Button Hijacking policy or changes to how the default in SafeSearch operates would likely have been **actionable changes**;³⁵ and
- (b) the introduction of BERT or the intelligent Search Box³⁶ and the recent Discover Core Update introducing changes to how locally relevant content is surfaced from websites based on their country would likely have been **significant and explainable changes**.³⁷

3.26 We have also provided some additional clarity on the meaning of those defined terms in the INs.

Clarification of sufficient information

3.27 In the consultation, we proposed that Google should provide 'sufficient information' about how it takes relevant ranking and presentation decisions, as well as about the nature of any material changes it introduces to how it ranks search results.

3.28 We also recognised in the INs that there may be legitimate reasons not to require Google to publish information that would undermine the legitimate aim of the policy or ranking decision or involve disclosure of commercially sensitive information.³⁸

Summary of responses

3.29 A few stakeholders provided representations on what should constitute 'sufficient information'.³⁹ In particular, most respondents submitted that they require sufficiently clear and accessible information regarding ranking systems, policies and changes affecting visibility, traffic and presentation within general search.⁴⁰ Some stakeholders further submitted that such

³⁵ Google also submitted that it would consider these examples to be actionable changes: Email from Google to the CMA.

³⁶ Google, [Understanding searches better than ever before](#), October 2019; Google, [A new era for AI Search](#), May 2026.

³⁷ Google, [February 2026 Discover core update](#), 5 February 2026.

³⁸ Paragraph 10 of the proposed INs as set out in the CMA consultation on proposed Fair Ranking CR, page 22.

³⁹ Responses to the CMA's consultation on proposed Fair Ranking CR: Bachtrack, page 1; Lovehoney Group, pages 4-6; Platform Leaders, page 5; Anonymous 9, page 2.

⁴⁰ Responses to the CMA's consultation on proposed Fair Ranking CR: Lovehoney Group, pages 4-6; Platform Leaders, page 5.

information should be sufficiently concrete and operational to enable businesses to understand the principal factors affecting ranking outcomes and to assess the likely impact of the changes.⁴¹

- 3.30 Google submitted that it already provides substantial transparency regarding its ranking policies and that it is prepared to supplement that material by publishing an external version of the Fair Wholepage Composition Policy and an explanation of how search results are fairly presented within AI Overviews and AI Mode.⁴²
- 3.31 Google also submitted that the CMA should clarify the ‘sufficient information’ obligation directly in the CR, specifying what it should not be required to disclose, which, in addition to the information already covered in the proposed INs, ought to include:
- (a) proxy signals relied on to inform ranking scores; and
 - (b) information that could lead to manipulation of Google’s search results.⁴³

Our view

- 3.32 Having considered consultation responses, we have decided to further clarify the obligation to provide sufficient notice in relation to ‘material changes’ in the INs. We have therefore clarified that Google is not expected to provide information about minor everyday ranking improvements; information that could lead to the manipulation of search results or otherwise undermine the legitimate aim of the material change; or commercial information where its disclosure might significantly harm Google’s legitimate business interests.

Clarification of notice requirements for material changes

- 3.33 In our consultation, we proposed that Google should provide ‘sufficient notice’ in advance of introducing material changes. We set out in the consultation

⁴¹ Responses to the CMA's consultation on proposed Fair Ranking CR: Lovehoney Group, page 5; Anonymous 9, page 2.

⁴² Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraphs 34-35. Annex 3 to Google’s consultation response also summarises further information which Google publishes about its ranking policies.

⁴³ Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraph 45.

document that we considered sufficient notice would constitute at least 30 business days.⁴⁴

Summary of responses

- 3.34 Many stakeholders supported the inclusion of minimum notice periods for material changes in the CR or INs,⁴⁵ with a few supporting periods of at least 30 business days for routine or material changes,⁴⁶ and a few proposing longer periods for major changes, including three to six months.⁴⁷
- 3.35 Google submitted that systemic delays for search improvements should be limited to avoid negative consequences for UK users, such as diminished user experience and increased exposure to harmful spam or malware and therefore that:
- (a) for **actionable changes**, 30 business days would provide publishers with ample time to take potential specific, discrete actions within a short period of time, such as adjusting specific site behaviours. Depending on the complexity of the required actions, Google would provide more notice to publishers, referring to its recent spam policy announcement on back button hijacking two months before enforcement was due to begin (in June 2026); and
 - (b) for **significant and explainable changes**, publishers cannot take specific and discrete actions in a short period of time, and therefore 15 business days would be appropriate to ensure publisher awareness of the change without unnecessarily delaying their implementation.⁴⁸

Our view

- 3.36 Having considered consultation responses, and our further engagement with Google, we have provided greater clarity on what we would consider to be sufficient notice in the Fair Ranking CR.

⁴⁴ CMA consultation on proposed Fair Ranking CR, paragraph 4.11(b).

⁴⁵ Responses to the CMA's consultation on proposed Fair Ranking CR: easyJet, pages 4-5; Independent Media, page 2; Anonymous 2, page 2; Anonymous 1, page 2; DMG Media, page 18; Genie Ventures, page 5; Affiliate and Partner Marketing Association, pages 7-8; Yelp, page 3; Trainline, pages 8-9; News Media Association, page 2.

⁴⁶ Responses to the CMA's consultation on proposed Fair Ranking CR: Independent Media, page 1; Genie Ventures, page 5; Affiliate and Partner Marketing Association, pages 7-8; News Media Association, page 2.

⁴⁷ Responses to the CMA's consultation on proposed Fair Ranking CR: Anonymous 2, page 2; DMG Media, page 18; easyJet, page 4.

⁴⁸ Google submission to the CMA.

- 3.37 Given the nature of the two categories of ‘material changes’, we recognise that, where publishers cannot take specific action, there is more limited utility of additional notice of changes. We are also mindful of the need to avoid delaying benefits to UK consumers from new and improved products and services. We have therefore updated the Fair Ranking CR to specify a minimum of 30 business days’ notice before actionable changes are introduced in the UK, and 15 business days’ notice before significant and explainable changes are introduced in the UK. We have also clarified in the INs that a change will be ‘introduced in the UK’ at the beginning of its rollout in the UK, after Google has taken a formal decision to launch.
- 3.38 The notice requirements in the Fair Ranking CR should be considered a minimum requirement. Although not expressly provided for in the Fair Ranking CR or INs, where a material change is likely to have more extensive impact, we consider it would be valuable for Google to offer more advance notice to ensure UK publishers are able to prepare and mitigate avoidable costs.

Non-distortion and complaints

- 3.39 In the consultation, we proposed an obligation to introduce a complaints process for publishers to raise concerns about potential adverse impacts to the functioning of markets arising from Google’s ranking policies and to provide the CMA with a regular summary of such complaints. Then, if those complaints indicated that the relevant policy may be having a material adverse impact on the functioning of a UK market, Google would be required to produce and publish a report examining whether there are any such impacts and if so, what steps, if any, it proposes to take to mitigate them.

Scope of complaints process

Summary of responses

- 3.40 There was broad support across consultation responses for introducing a requirement on Google to have clear and accessible complaints processes.⁴⁹ Several respondents argued for additional clarity or to strengthen the proposed complaints and dispute resolution mechanisms, including to cover discriminatory ranking outcomes and algorithmic application of policies, as

⁴⁹ Responses to the CMA’s consultation on proposed Fair Ranking CR: Anonymous 4, page 5; Anonymous 3, pages 3-4; News Media Association, pages 1-3; easyJet, pages 1 and 4; Platform Leaders, page 3; DMG Media, pages 2 and 18; News Media Alliance, page 19; Anonymous 9, page 2; Shaping Competition in the Digital Age, pages 13-14; Anonymous 2, page 2; Trainline, pages 9-12; Siinda, pages 3-4.

well as structural or cumulative distortions affecting businesses' visibility or commercial performance.⁵⁰

- 3.41 Google submitted that it has a strong incentive to receive, consider and address viable complaints to ensure the effectiveness of general search ranking for its users and that it is committed to engaging constructively with, and remedying, publishers' complaints. It referenced its existing complaints channels and processes – including its existing spam, SafeSearch, and informal mechanisms for raising concerns with Google.⁵¹
- 3.42 Google further submitted that the CMA has not provided evidence of any shortcomings of its existing complaints processes and therefore any requirement to expand them would be unfounded.⁵² In relation to the scope of the proposed complaints processes, Google submitted that the proposed mechanism risked requiring Google to log every complaint about any change to ranking and that it was therefore unworkable in practice and required clear parameters to make it effective.⁵³
- 3.43 Google submitted that a proportionate mechanism would cover Google's existing reconsideration processes for instances where publishers are subject to manual actions (eg spam and SafeSearch policies) and provide an alternative dispute resolution mechanism for publishers manually excluded from the search index.⁵⁴
- 3.44 Additionally, Google submitted that any mechanism for publishers to raise concerns should focus on inadvertent impacts on the functioning of any UK market, and exclude complaints about publishers' individual ranking relative to other publishers.⁵⁵

⁵⁰ Responses to the CMA's consultation on proposed Fair Ranking CR: OpenAttribution.org, page 2; Lovehoney Group, pages 6-7; Siinda, page 3; News Media Alliance, pages 19-21; Anonymous 4, page 5; Anonymous 6, page 3; Trainline, pages 9-12.

⁵¹ Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraphs 21 and 58.

⁵² Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraphs 59-60.

⁵³ Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraphs 61-62.

⁵⁴ Google submission to the CMA.

⁵⁵ Google submission to the CMA.

Our view

- 3.45 Having considered consultation responses, and our further engagement with Google, we consider that the Fair Ranking CR should provide:
- (a) clear and accessible processes for publishers to provide feedback to Google where any material change has had, or may have, a material adverse distortive or other adverse impact on the functioning of any UK market in which they are active, where such impact does not reflect the purpose of the material change;
 - (b) clear and accessible processes for receiving, handling and issuing substantive responses to individual reconsideration requests from publishers relating to manual actions taken by Google; and
 - (c) an alternative dispute settlement mechanism for publishers that have been manually excluded from Google's general search index.
- 3.46 To provide further clarity on the scope of the process to provide feedback on distortions (paragraph 3.45 (a) above), we have adopted the 'material changes' defined term (see paragraph 3.24 above) and clarified that the process is not intended to capture feedback that relates:
- (a) to the express purpose of, or policy behind, the material change itself (as articulated by Google as part of the transparency obligations); or
 - (b) solely to an individual publisher's content's change in ranking relative to another publisher's content as a result of the material change.

Monitoring and evaluating distortions

- 3.47 The consultation responses also contained representations on how Google should use complaints processes to monitor and evaluate concerns relating to Google's ranking systems and policies. This included arguments that the proposed complaints mechanisms should be complemented by broader monitoring and oversight measures, including requiring Google to provide performance metrics, independent monitoring, reporting obligations and expedited escalation procedures where ranking or presentation changes create immediate and significant commercial harm.⁵⁶

⁵⁶ Responses to the CMA's consultation on proposed Fair Ranking CR: Lovehoney Group, pages 6-9; Siinda, pages 3-4; Platform Leaders, pages 2-3; Anonymous 6, page 3; Trainline pages 10-11.

- 3.48 Google raised concerns about the proposed requirement for it to examine whether a policy or procedure is having a material adverse impact on the functioning of any market in the UK. It suggested that mandating this requirement would shift analytical responsibilities that more appropriately reside with the CMA.⁵⁷
- 3.49 In respect of issues the CMA has considered as part of its investigation to date, Google proposed to engage in regulatory dialogue with the CMA during the implementation period for the CR regarding three policies (Site Reputation Abuse Policy, SafeSearch, and Discover Core Update), including carrying out an assessment of potential inadvertent impacts of the policies on UK markets based on data available to Google.⁵⁸

Our view

- 3.50 Having considered consultation responses, and our further engagement with Google, we agree that the CMA is better placed to evaluate market impacts.
- 3.51 The amended mechanism set out in the Fair Ranking CR therefore ensures that Google facilitates clear and accessible processes for publishers to share feedback about any material change that has had, or may have, a material adverse distortive or other adverse impact. We have included in this feedback mechanism a clear threshold for Google to engage further with the CMA and specified in the INs that, if the CMA identifies a potential material adverse impact, it expects to engage in regulatory dialogue with Google. Such dialogue would not be with a view to second-guessing the policy objective underlying the change, but to identifying solutions that mitigate or remove any adverse impacts that affect publishers and end users in UK markets.
- 3.52 During the implementation period, we intend to engage in regulatory dialogue with Google in relation to specific policies where we have heard concerns. As part of those discussions, we will consider these issues fully and what action, if any, is needed to address these concerns.

⁵⁷ Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraphs 64-68.

⁵⁸ Google submission to the CMA.

Reporting thresholds

3.53 Respondents to the consultation also requested clarity on what may constitute a ‘material’ adverse impact on the functioning of a market in the UK. For example:

- (a) a few stakeholders submitted that materiality should be assessed primarily with reference to commercial and competitive impact, rather than complaint volumes alone;⁵⁹ and
- (b) several stakeholders suggested that relevant indicators of business impacts may include sustained losses in discoverability, reduced click-through rates and revenue or increased dependency on paid advertising.⁶⁰

3.54 Google submitted that a requirement for it to assess the nature and size of impacts on individual complainants would impose a highly subjective, onerous and counterproductive burden.⁶¹ Google indicated that a volume threshold could support Google to target its resources effectively. It submitted that any reporting requirement of the impacts of material changes should be triggered only where it receives 50 pieces of feedback focussing on similar issues by unique complainants about the same material change.⁶²

Our view

3.55 Having considered consultation responses, and our further engagement with Google, to ensure that the basis on which Google and the CMA will engage in regulatory dialogue to consider distortions arising from material changes and ways to address them remains targeted and proportionate, we consider that Google should monitor feedback volumes through formal channels and notify the CMA if it receives feedback from at least 50 different publishers on a material change within 30 business days of that change becoming effective.

3.56 We have also clarified in the INs that:

⁵⁹ Responses to the CMA's consultation on proposed Fair Ranking CR: easyJet, page 4; Independent Media, page 2; Siinda, page 3; Platform Leaders, page 3; Trainline, page 10.

⁶⁰ Responses to the CMA's consultation on proposed Fair Ranking CR: easyJet, page 4; Independent Media, page 2; Siinda, page 3; Platform Leaders, page 3; Anonymous 3, pages 3-4; Trainline, page 11.

⁶¹ Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraph 64.

⁶² Google submission to the CMA.

- (a) the 30 business days will start when a material change's rollout in the UK is complete; and
- (b) multiple pieces of feedback from the same publisher will be counted as one piece of feedback, but distinct publisher brands and sites should be counted as different publishers, even if they fall within the same overall corporate group.

Service standards and appeal mechanisms

- 3.57 In response to the consultation, several stakeholders supported the inclusion of a more structured complaints framework, including clearly defined complaint pathways, review stages, escalation mechanisms and appeal rights.⁶³ One stakeholder also proposed defined timelines or service levels for complaints handling, including response periods of no more than 14 calendar days in certain cases.⁶⁴
- 3.58 A few stakeholders argued that complaints and appeal rights should extend beyond cases involving manual exclusions from Google's search index.⁶⁵ Several stakeholders considered that these complaints mechanisms should support access to independent appeals or alternative dispute settlement mechanisms where complaints remain unresolved or publishers experience significant financial harm.⁶⁶
- 3.59 Google supported the inclusion in the proposed CR of the alternative dispute settlement mechanism that it currently offers in the EU, and suggested that [X] day service level standard [X] responding to complaints about spam policies and to all of its policies that are currently subject to reconsideration requests (including SafeSearch), with the caveat that in some circumstances, Google may need longer – for example if a complaint raises complex issues.⁶⁷

⁶³ Responses to the CMA's consultation on proposed Fair Ranking CR: Guardian Media Group, page 12; European Publishers Council, page 11; DMG Media, pages 18-19; Anonymous 4, page 5; Redbrain Ltd, page 1; Yelp, page; Trainline, pages 10-11.

⁶⁴ Response to the CMA's consultation on proposed Fair Ranking CR: DMG Media, page 18.

⁶⁵ Responses to the CMA's consultation on proposed Fair Ranking CR: Lovehoney Group, page 8; DMG Media, page 19; News Media Alliance, page 20; Yelp, page 3.

⁶⁶ Responses to the CMA's consultation on proposed Fair Ranking CR: Lovehoney Group, pages 8-9; Guardian Media Group, page 12; Platform Leaders, page 3; DMG Media, pages 2 and 19; News Media Alliance, pages 20-21; Yelp, page 3; Trainline, pages 9-12.

⁶⁷ Google submission to the CMA.

Our view

- 3.60 Having considered consultation responses, and our further engagement with Google, we consider that our proposal to require Google to offer an alternative dispute settlement mechanism for manual exclusions from the general search index (as provided for in the proposed CR at consultation), and the [X]14 business day service level standard across reconsideration requests for manual actions (as now introduced in the INs), are both effective and proportionate.

Territorial scope of the Fair Ranking CR

- 3.61 In our consultation, we proposed to define ‘publisher’ as ‘any party that makes content available on the web to UK users’.⁶⁸
- 3.62 We consider it important to clearly define the territorial scope of the Fair Ranking CR so that the obligations are effective in addressing the issues we have identified, while avoiding unintended consequences. In particular, it ensures that the same requirements and protections apply to all results being ranked alongside each other and shown to UK end users and it allows for practical implementation, since the location of the end user is readily identifiable and something that Google already monitors.⁶⁹
- 3.63 We have therefore amended the Fair Ranking CR to make clear that the obligations apply to search results shown to natural or legal persons located in the UK.

Implementation and compliance

- 3.64 This section summarises responses on the implementation of and how the CMA will monitor compliance with the Fair Ranking CR. Requirements on Google with regard to compliance are set out in the Compliance Reporting Notice.

⁶⁸ CMA consultation on proposed Fair Ranking CR, paragraph 1(d) of the proposed CR.

⁶⁹ See, for example, Google, [Understand & manage your location when you search on Google - Computer - Google Search Help](#), not dated (accessed on 20 May 2026).

Summary of responses on monitoring and compliance

- 3.65 We received broad feedback from Google and third parties on our proposed approach to monitoring and securing effective compliance with the Fair Ranking CR. The feedback from third parties focused on three aspects:
- (a) **Implementation period:** Two respondents considered that the proposed six-month implementation period was longer than necessary and would unnecessarily delay relief from harms and benefits to consumers and businesses.⁷⁰
 - (b) **Monitoring and compliance method:** A few stakeholders expressed support for rigorous monitoring of Google's compliance and stressed the importance of CMA oversight to assess compliance.⁷¹ The proposal to mandate an independent baseline audit was also supported to help build trust in Google's compliance with the Fair Ranking CR.⁷² It was also suggested that publishers' feedback provided to the CMA should play a key role in supporting ongoing monitoring and compliance supervision.⁷³
 - (c) **Content for compliance report:** A few respondents offered suggestions on what information the CMA should request from Google to monitor compliance, including criteria such as analysis of internal data combining level of zero-click searches and more detailed information to verify compliance whilst protecting commercially sensitive information.⁷⁴
- 3.66 Google submitted that the proposed compliance requirements across the proposed CRs would be burdensome and disproportionate to the aim of the requirements, and risked diverting resources from continued innovation and investment in the UK.⁷⁵ It submitted that appointing an independent third party to carry out a baseline compliance audit would be unnecessary and inefficient. Instead, it proposed a Google-led baseline audit based on an internal audit

⁷⁰ Responses to the CMA's consultation on proposed Fair Ranking CR: Skyscanner, pages 15-16; News Media Association, page 4.

⁷¹ Responses to the CMA's consultation on proposed Fair Ranking CR: Skyscanner, pages 15-17; Anonymous 3, page 3; Trainline, page 11.

⁷² Responses to the CMA's consultation on proposed Fair Ranking CR: Professional Publishers Association, page 8; Guardian Media Group, pages 12-13; Anonymous 1, page 1; Skyscanner, page 17; Trainline, page 9; European Publishers Council, page 12; Movement for Open Web, page 2.

⁷³ Response to the CMA's consultation on proposed Fair Ranking CR: Guardian Media Group, page 13.

⁷⁴ Responses to the CMA's consultation on proposed Fair Ranking CR: Trainline, page 10; Guardian Media Group, pages 13-14; Movement for Open Web, page 35.

⁷⁵ Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, page 14.

framework and appropriate metrics with CMA oversight, which it submitted would better achieve the objective.⁷⁶

- 3.67 Google submitted concerns about the proposed six-monthly reporting cadence, instead proposing an annual reporting cycle supplemented with ad hoc updates which it considered would be sufficient to evidence compliance.⁷⁷

Our view

Implementation period

- 3.68 We recognise the importance of delivering impact at speed. Google will be required to be compliant with the Fair Ranking CR within six months following the publication of the CR Notice, as previously proposed. We consider this to be a reasonable amount of time that ensures the Fair Ranking CR comes into force quickly whilst allowing Google sufficient time to adopt measures necessary to comply with it (eg internal processes to monitor compliance).
- 3.69 We expect Google to provide an implementation plan (see below) during the first month following publication of the CR Notice, and to engage constructively with the CMA and third parties to develop and implement changes to comply with the requirements.

Monitoring and compliance method

- 3.70 We consider that effective monitoring and compliance requirements are essential to demonstrate Google's ongoing compliance with the Fair Ranking CR and to secure trust and confidence in how Google ranks organic search results.
- 3.71 We note the range of views on our proposed approach to compliance monitoring, including third-party support for an initial baseline audit of Google's internal processes related to ranking of search results. We also note concerns raised by Google in relation to the proportionality of our approach to compliance monitoring, in particular in relation to the proposed independent baseline audit.

⁷⁶ Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, pages 13-14.

⁷⁷ Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, pages 14-15.

- 3.72 Our objective is to make sure we can effectively monitor Google’s ongoing compliance with the Fair Ranking CR, but without imposing undue costs. We have considered the consultation responses with this in mind, in addition to the following elements of the Act and our digital markets competition regime guidance:⁷⁸
- (a) it is the responsibility of the SMS firm to comply with all requirements under the regime and the CMA expects firms to be able to demonstrate their compliance;⁷⁹
 - (b) the CMA expects a Nominated Officer to be responsive to requests by the CMA to discuss compliance issues, to ensure the SMS firm complies with its obligations in relation to compliance reports, proactively informing the CMA of any issues related to the SMS firm’s compliance as soon as practicable after they become aware of any such issue(s) and to engage as reasonably appropriate with relevant stakeholders about the SMS firm’s compliance;⁸⁰
 - (c) the CMA has an obligation to keep under review the extent to which the SMS firm is complying with each CR to which it is subject;⁸¹ and
 - (d) the CMA has the ability to monitor a range of quantitative and qualitative evidence, which may include information gathered from the SMS firm or other organisations through its statutory information gathering powers.⁸²
- 3.73 Instead of requiring an initial independent baseline compliance report, we have decided, in the first instance, to require Google to provide an implementation plan and to share further specific information with the CMA in relation to:
- (a) the internal policies Google will develop and apply to comply with the Fair Ranking CR;
 - (b) how Google will technically monitor and enforce its internal policies; and
 - (c) the governance and oversight systems Google will put in place.

⁷⁸ See Chapter 6 of the Digital markets competition regime guidance (CMA194), paragraphs 6.22-6.26 for Google and the CMA’s role in monitoring compliance and CR effectiveness.

⁷⁹ Digital markets competition regime guidance (CMA194), paragraph 6.23.

⁸⁰ See section 83 of the Act and the Digital markets competition regime guidance (CMA194), paragraph 6.36.

⁸¹ Section 25(b) of the Act.

⁸² Digital markets competition regime guidance (CMA194), paragraph 6.8.

- 3.74 We expect this to include explanations of, for example:
- (a) how Google will give effect to the non-discrimination requirement in the development and implementation of its search generative AI features (eg AI Overviews and AI Mode);
 - (b) what public material Google will make available in relation to its general search ranking policies; and
 - (c) any changes Google intends to make to its complaints process or feedback channels to meet the non-distortion and complaints requirement
- 3.75 The CMA will conduct a rigorous review of information presented to it by Google, including implementation plans, routine compliance reports, and other information it receives in relation to compliance monitoring. Should the CMA have compliance concerns it will make use of the wide range of regulatory tools available to it, as appropriate. This may include formal information gathering, the commissioning of skilled persons reports, and/or the launching of investigations into any suspected breaches. We will also gather feedback on Google's approach to compliance from third parties on an ongoing basis.

Compliance reports: frequency and content

- 3.76 Google is also required to provide periodic reporting to the CMA. The Compliance Reporting Notice sets out the manner, form and contents of Google's ongoing compliance reports for the Fair Ranking CR.
- 3.77 Google will be required to provide compliance reports to the CMA every six months in the first year following the imposition of the Fair Ranking CR. Thereafter and for the remainder of the designation period, Google will be required to provide compliance reporting annually, subject to the CMA being generally satisfied with Google's compliance.
- 3.78 We consider this approach will allow the CMA to reduce the burden of compliance reporting where we are generally satisfied with Google's compliance, but with the potential to increase oversight if concerns arise.
- 3.79 We will require Google to submit a confidential version of the compliance report to the CMA with detailed metrics. We expect to require Google to publish a summary or a non-confidential version of the report on its website.

We also expect to engage with third parties when evaluating Google's compliance.⁸³

- 3.80 In determining what information and metrics Google must provide as part of its compliance report, we have considered the feedback we have received during the consultation and the changes we have made to the Fair Ranking CR. The information and metrics set out in the Compliance Reporting Notice include:⁸⁴
- (a) In relation to the non-discrimination and objectivity requirement, an explanation of how Google has complied over the relevant period, including details of all relevant internal policies and procedures Google has put in place to ensure compliance.
 - (b) In relation to the transparency requirement, an explanation of how Google has complied over the relevant period including details of the information Google has provided to publishers about its ranking systems and how it has made this information available.
 - (c) In relation to the non-distortion and complaints requirement, an explanation of how Google has complied over the relevant period including details of the feedback mechanism and metrics relating to the volume of feedback received.
 - (d) Details of engagement Google has had with third parties in relation to the Fair Ranking CR, including how Google has consulted on any changes to comply with the Fair Ranking CR, compliance concerns raised by third parties and any further action taken by Google in response to stakeholder engagement.

Monitoring the effectiveness of the Fair Ranking CR

- 3.81 Alongside our monitoring of Google's compliance, in line with our statutory duty, we will keep the effectiveness of the Fair Ranking CR under review. This will include assessing whether the Fair Ranking CR is effective in achieving its aim and facilitating expected benefits such as those outlined in paragraph 1.10.
- 3.82 To inform this assessment, we will collect information from Google and other affected parties, including through the use of our formal investigatory powers

⁸³ Digital markets competition regime guidance (CMA194), paragraph 6.8.

⁸⁴ See the Compliance Reporting Notice.

where appropriate. We did not receive any consultation responses proposing specific metrics to measure effectiveness. A key part of our approach to monitoring effectiveness will be seeking views from Google and other affected parties. To avoid imposing undue costs, wherever possible this will be done in conjunction with our compliance monitoring.

- 3.83 Additionally, we will monitor changes in circumstances, including Google's continued evolution of its general search products, which may influence the effectiveness of the Fair Ranking CR in meeting its aim.

CRs that could be equally effective

- 3.84 We did not identify any equally effective possible CRs.

4. Proportionality assessment for the Fair Ranking CR

- 4.1 In our consultation, we set out our view that the proposed CR would be proportionate and would provide benefits to a large number of stakeholders.⁸⁵ We noted that the proposed CR would deliver benefits through: increased confidence in the fair operation of Google’s organic search ranking, leading to increased investment and innovation; and through reduced costs to businesses.⁸⁶ We recognised that the proposed CR would lead Google to incur some limited additional costs.⁸⁷ Overall, we were satisfied, subject to consultation, that the proposed CR would not produce disadvantages disproportionate to the aim.
- 4.2 In this section, we update our evaluation of the proportionality of the Fair Ranking CR we are imposing. We first account for the changes since the consultation and then turn to our overall assessment.

Adjustments to the Fair Ranking CR

- 4.3 The new evidence received through the consultation has led to substantive changes in relation to the notice requirement for significant and explainable changes within the transparency element (paragraph 6.b. of the Fair Ranking CR) and the changes to Google’s obligations to monitor and evaluate distortions (paragraphs 7 and 8 of the Fair Ranking CR). We have also made several other clarifications in the Fair Ranking CR and INs as summarised above. We have reflected this in our updated assessment of its proportionality.
- 4.4 The Fair Ranking CR now specifies that Google must provide sufficient information at least 15 business days before making a significant and explainable change. While reducing the length of this notice requirement may reduce the cost to Google, we expect any impact to be minimal because it does not affect which changes Google has to provide information on or the information that Google needs to provide. Any impact from this change on the benefits expected from the Fair Ranking CR is also expected to be minimal because of the limited marginal utility of any additional notice beyond 15 business days for changes in response to which publishers cannot take specific action.

⁸⁵ CMA consultation on proposed Fair Ranking CR, paragraph 5.38.

⁸⁶ CMA consultation on proposed Fair Ranking CR, paragraph 5.20.

⁸⁷ CMA consultation on proposed Fair Ranking CR, paragraph 5.38.

- 4.5 In relation to the approach taken to monitoring and evaluating distortions, as set out in paragraph 3.50, we have concluded that the CMA is better placed to consider any such issues. We have also set out an amended feedback mechanism. We consider these changes have minimal impact on the overall cost of this part of the Fair Ranking CR, because the overall cost of monitoring and evaluating any such issues is likely to be similar to the costs set out at consultation in respect of the equivalent part of the proposed CR (with some of the cost shifting from Google to the CMA). Furthermore, we would expect that only a relatively small number of material changes would trigger regulatory dialogue over the designation period. We expect the benefits from the CR will be unchanged as the Fair Ranking CR is still intended to result in the identification of what steps, if any, can be taken to address distortive impacts.
- 4.6 As set out in the above effectiveness section, we have also provided more certainty regarding how various aspects of the Fair Ranking CR will work, including that specific parts of the non-discrimination and objectivity element are not intended to impact Google's ability to innovate in general search, how certain terms should be interpreted and the territorial scope of the Fair Ranking CR. While these clarifications will offer Google and publishers more certainty on how the Fair Ranking CR will work, thereby making it more effective, they do not materially change the assessment of the costs as set out in the consultation.

Overall assessment of the proportionality of the Fair Ranking CR

- 4.7 Among the small number of stakeholders that explicitly addressed the proportionality of the proposed CR, all considered that the benefits would outweigh the costs.⁸⁸
- 4.8 Google submitted that the proposed CR would not be proportionate and the proportionality assessment in the consultation understated its costs and overstated its benefits.⁸⁹ Google's main concerns included:⁹⁰

⁸⁸ Responses to the CMA's consultation on proposed Fair Ranking CR: easyJet, page 1; Siinda, page 2; MoneySuperMarket, page 3.

⁸⁹ Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraph 71.

⁹⁰ Google also noted that paragraph 5.30 of the CMA's consultation document considered the potential for the CR to increase the value of Google Search and Ads and that Ads were not within scope of the CR. We note that excluding the value of Google Ads still results in a required increase in value of Google's general search of less than 0.01% to outweigh the costs of the CR. See: Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraph 80.

- (a) that the assessment of costs to Google was unrealistic and incomplete, highlighting that, based on its experience in other jurisdictions, the cost of the non-distortion part of the proposed CR would be considerably higher than estimated;⁹¹ and
- (b) that there was insufficient specification or evidence to support the expected benefits, including reduced search engine optimisation costs, increased investment and reduced distortions from Google's ranking changes.⁹²

- 4.9 As set out in the effectiveness section above, having considered representations from third parties and Google on our proposed approach to non-distortion and complaints, we have clarified and adjusted the requirements on Google under the Fair Ranking CR. We consider that these changes address Google's concerns in the consultation that the costs will be higher than expected. In relation to expected benefits, contrary to Google's representations, the CMA carefully considered the evidence set out in our consultation to identify the concerns that form the basis for the expected benefits of the CR. With these changes, we consider that the expected benefits of the Fair Ranking CR would exceed its costs.
- 4.10 Overall, we therefore remain satisfied that the Fair Ranking CR will not produce disadvantages disproportionate to the aim.
- 4.11 Having carefully considered all the evidence, we consider it proportionate to impose the Fair Ranking CR for the purposes of the fair dealing and trust and transparency statutory objectives, having regard to its aim (as set out in Section 2 above).

⁹¹ Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraphs 74-75.

⁹² Google, Response to the CMA Consultation on Proposed Search Conduct Requirements, February 2026, paragraphs 72-73, 78-79 and 81.