

CONSULTATION: STEERING CONDUCT REQUIREMENT

Google's Mobile Platform

30 June 2026

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1. INTRODUCTION

- 1.1 Google's Play Store is a vital gateway for app developers to distribute their native apps.¹ Many businesses today use a native app as a key part of their digital offering – from transport to takeaways, retail, finance and fitness. These businesses range from large corporates to small start-ups across many different sectors of the UK economy, including in key growth areas such as gaming and FinTech. Accordingly, Google's app store rules affect hundreds of thousands of businesses across the UK economy who use native apps to market and sell their products and services.
- 1.2 It is therefore crucial that rules which affect how developers communicate and transact with their customers in their native apps do not inappropriately restrict developers' ability to make meaningful choices.
- 1.3 This consultation document sets out our proposals for a Steering conduct requirement (the proposed **Steering CR**). It includes the following:
- (a) Chapter 2: The Aim of our proposed Steering CR;
 - (b) Chapter 3: Our proposed Steering CR and Interpretative Notes;
 - (c) Chapter 4: Provisional effectiveness assessment of our proposed Steering CR;
 - (d) Chapter 5: Provisional proportionality assessment of our proposed Steering CR;
 - (e) Chapter 6: Questions for consultation.
- 1.4 For more information about the digital markets competition regime or Google's designation with Strategic Market Status (**SMS**) in Mobile Platforms² see our case page;³ and for the framework for the assessment of CRs see Appendix A in this document.

The issues we are seeking to address: Google's steering rules

- 1.5 Google uses its position of SMS to impose terms and conditions which limit or prevent developers from informing end-users⁴ about offers and making purchases

¹ In the UK in 2024, there were [2-3] million native apps on the Play Store, [0-1] million developers distributing via the Play Store and [2-3] million users downloaded a native app on the Play Store each day. See [Strategic Market Status Investigation into Google's Mobile Platform: Final Decision \(SMS Decision\)](#), 22 October 2025.

² Mobile Platform is defined in the Definitions section of Chapter 3.

³ [Strategic Market Status Investigation into Google's Mobile Platform: Final Decision \(SMS Decision\)](#), 22 October 2022.

⁴ The term 'user,' in relation to the Act, includes both developers (creators of digital content for mobile platforms) and end-users (consumers of digital content on their mobile device).

of digital goods and services outside of Google's Play Store. This reduces competition while restricting developer and end-user choice, resulting in Google being able to charge higher fees, offer lower quality services, or invest less (and exclude rivals in areas such as payment processing).⁵ In turn, this means that end-users may have less choice and face higher prices than would be the case absent the restrictions.

1.6 Our 2025 SMS Decision found that developers distributing digital content and services have to use Google's Mobile Platform in order to reach a large and distinct user base.⁶ These findings are consistent with the assessment that Google faces very limited competition when competing for content providers.⁷ Until recently, Google charged a headline commission of 30% for payments of digital goods and services made via Google Play Billing (**GPB**).⁸ The Play Store's annual average commission rate on Mobile Devices⁹ per transaction in the UK between 2020 and 2024 was [20-30]%.¹⁰

1.7 Given Google's position of SMS as described above, we have concerns relating to restrictive Play Store terms and conditions in the UK which Google places on developers. Developers who make apps available on the Play Store which distribute digital goods and services¹¹ in the UK are generally¹² not allowed to:

⁵ For example, our SMS Decision found that the Play Store faced limited competition on fees; see paragraph 6.103, [Strategic Market Status Investigation into Google's Mobile Platform: Final Decision \(SMS Decision\)](#), 22 October 2025.

⁶ [Strategic Market Status Investigation into Google's Mobile Platform: Final Decision \(SMS Decision\)](#), 22 October 2025, page 130.

⁷ [Strategic Market Status Investigation into Google's Mobile Platform: Final Decision \(SMS Decision\)](#), 22 October 2025, paragraph 8.76(c)(i).

⁸ [Strategic Market Status Investigation into Google's Mobile Platform: Final Decision \(SMS Decision\)](#), 22 October 2025, paragraph 6.106.

⁹ Mobile Device is defined in section Definitions of Chapter 3.

¹⁰ [Strategic Market Status Investigation into Google's Mobile Platform: Final Decision \(SMS Decision\)](#), 22 October 2025, paragraph 6.107(b).

¹¹ It is important to note that these concerns relate only to digital goods and services distributed via the Play Store. Transactions relating to physical goods and services (for example, groceries on the Tesco app or rides on the Uber app) are subject to different Play Store terms. For example, apps selling physical goods and services do not face restrictions on steering and are able to choose their own payment processor, can link off the app to provide information, and do not have to pay a commission.

¹² Two limited exceptions apply:

(i) Developers who make apps available on the Play Store which distribute digital goods and services are allowed to provide digital goods and services without paying a commission where the apps are 'consumption only' (ie apps which use goods and services purchased elsewhere). In these cases, digital goods and services cannot be sold within the app. Developers offering consumption only apps can communicate with their end users, by for example, providing additional information about purchasing options without direct links, including using language like 'you can purchase this book directly on our website.'; see [Understanding Google Play's Payments policy](#), accessed 8 April 2026.

(ii) Developers are allowed to provide digital goods and services at a 4% reduced commission if they enrol in the User Choice Billing programme, which allows developers to offer an additional billing system alongside Google Play's billing system for their end users. This is a pilot scheme available to a number of regions, including non-gaming mobile or tablet apps with users in the UK; see [Payments - Play Console Help](#), accessed 7 April 2026 and [Understanding user choice billing on Google Play](#).

- (a) charge for Play-distributed apps or in-app features and services without using Google Play's billing system as the method of payment for those transactions;¹³ or
- (b) provide buttons, links, messaging, advertisements, or other calls to action to lead users to other payment methods.¹⁴

1.8 We have received evidence from a wide range of developers (from large global to small UK-based developers) that by acting as the intermediary between the developer and its customers, and by using this position to prevent developers from directly communicating and developing relationships with their customers Google is able to:

- (a) **Limit the choice** that developers have about what they sell, the pricing structures they adopt, and how they distribute or sell digital goods and services on Google's platforms.¹⁵ This reduces the ability and incentive of developers to innovate, for example through combining digital and physical services, integrating their customer support across platforms, or increased personalisation to individual customer's needs.
- (b) **Disintermediate** developers from their customers, limiting developers' ability to build relationships with their customers. Google can manage these relationships itself and gather data from developers' customers. This means that developers have, for example, limited access to customer information (eg regarding demographics or tax information), no say in whether to offer a refund, or directly help customers when an issue arises.¹⁶
- (c) **Restrict the competitiveness** of developers that compete with Google's own first-party apps given the need to pay commission and inability to direct users to other, lower cost distribution channels.¹⁷ Further, as noted above, these developers are prevented from having a direct relationship with their customers as they do not handle the transaction or control the payment process, potentially limiting their ability to respond to customers' requests and thus reducing the effectiveness of the developer as a competitor (and providing Google with the customer relationship and some customer data

¹³ See [Understanding Google Play's payments policy](#), [Payments - Play Console Help](#), [Understanding user choice billing on Google Play](#), accessed 7 April 2026.

¹⁴ [Payments - Play Console Help](#), accessed 19 May 2026, paragraph 4.

¹⁵ 8 responses to section 69 notices [redacted]. 7 responses to voluntary requests for information [redacted]. The European Publishers Council's [response to Invitation to Comment](#) dated 23 January 2025, (pages 2 and 3). The Coalition for App Fairness response to [Proposed Decision on the CMA's strategic market status investigation into Google's mobile platform](#) August 2025, page 4.

¹⁶ 7 responses to section 69 notices; [redacted] 8 responses to voluntary requests for information; [redacted].

¹⁷ 2 responses to section 69 notices; [redacted] response to call for evidence dated 1 April 2026 [redacted]. Response to voluntary request for information [redacted]. The Coalition for App Fairness response to the [Call for evidence on Proposed commitments from Apple and Google](#), 10 February 2026, paragraph 6c.

instead). Together, this could potentially **exclude** such developers and weakens the constraint on Google's first-party apps.

- (d) **Limit the choice** developers have to use alternative payment processors and means of managing and completing transactions (such as merchant of record services)¹⁸ which could compete with Google's billing systems. This can reduce innovation in in-app payment systems (for example, streamlining of account and payment management systems) and reduce the incentives for developers to use alternative payment systems which better fit the developer's needs, or from using their own existing payment infrastructure.¹⁹

1.9 As a result, the terms and conditions described above prevent developers offering digital goods and services from informing end-users about offers (which could include providing in-app links) outside of Google's Play Store in order to complete a transaction elsewhere (sometimes referred to as restrictions on 'steering'). A 'steered transaction' is one in which the developer has provided information or a link in order to direct the end-user out of the app and onto an alternative location (eg on the web).

1.10 The proposed Steering CR seeks to address the issues described above by providing developers with a viable steering option that they can confidently adopt. Ensuring that developers can steer and giving them the option to communicate directly with their customers can:

- (a) open up opportunities for innovation, in terms of investment in new products, new entry, new opportunities to offer more seamless services, as well as new opportunities to offer bundles of digital and physical goods;
- (b) improve developers' ability to manage relationships with their customers; and
- (c) increase revenue for developers which could be passed onto end-users and other third parties in the form of reduced prices.

1.11 The scope for benefits because of this additional freedom is significant, with potential benefits for both the many UK developers that use the Play Store²⁰ and UK end-users, who spend £[0–5] billion in apps on digital products and services (supplied by both UK developers and global developers) on the Play Store.²¹

¹⁸ A merchant of record provides a wider range of services to a seller beyond payment processing. For example, it takes the financial and legal liability for the sale from the developer. When digital goods and services are sold using Google's Google Play Billing, Google acts as the merchant of record.

¹⁹ 8 responses to section 69 notices; [redacted]. 8 responses to voluntary requests for information; [redacted].

²⁰ In 2025 there were [redacted] UK-based developers on the UK Play Store. Of these, [redacted] paid a commission. Response from Google to section 69 notice [redacted].

²¹ In 2024 the value of customer billings on the Play Store was £[redacted][0-5] billion. [Appendix A to Strategic Market Status Investigation into Google's Mobile Platform: Final Decision \(SMS Decision\)](#), 22 October 2025, paragraph A.72.

- 1.12 The additional freedom that developers have will also benefit developers who compete directly with Google’s first-party apps, as well as payment processors that face limitations.
- 1.13 Finally, in addition to the objectives described in the earlier paragraph, one outcome of the restrictions that Google imposes is a lack of competitive constraint on the commission fees that it sets for the Play Store. Giving developers the option to steer through alternative, lower cost distribution channels could exert downward pressure on wider Play Store commission fees. High commission rates for transactions of digital goods and services on the Play Store were specifically raised by many developers as an issue, with developers noting that were they able to either pay lower commissions or use an alternative, lower-cost way to transact with their users they would be able to:
- (a) offer lower prices for their end-customers in the UK;²²
 - (b) increase investment in quality, new features, and/or new apps (which will benefit both UK developers of apps, as well as UK end-users who use apps);²³ and/or
 - (c) develop or expand their range of products, including through offering combinations of digital and physical goods and services (which will benefit both UK developers of apps, as well as UK end-users who use apps).²⁴
- 1.14 We note that Google has announced new global terms and conditions for its Play Store, which came into effect in the UK on 30 June, 2026.²⁵ These changes include:
- (a) Introducing a new “Registered App Stores” programme, which has the stated aim of making it easier for users to download third-party app stores directly from the web, provided those app stores meet certain quality and safety standards;
 - (b) In jurisdictions where it is not currently available, developers will have the option to use their own payment systems in their apps, alongside Google’s GPB, subject to terms and conditions;

²² 2 responses to section 69 notices; [redacted]. 8 responses to voluntary requests for information. [redacted]. Note of meeting with [redacted]. 1 response to call for evidence dated 1 April 2026 from [redacted]. (page 2). Submission from [redacted]. xigxag, ‘[The App Tax shows who really holds power in Britain’s digital economy.](#)’ 1 June 2026, accessed 1 June 2026.

²³ 4 responses to section 69 notices [redacted]. [redacted] response to follow up questions [redacted]. 10 responses to voluntary requests for information [redacted]. Note of meeting with [redacted]. 3 responses to call for evidence dated 1 April 2026 [redacted].

²⁴ 1 response to section 69 notice [redacted]. 2 responses to voluntary requests for information [redacted].

²⁵ Google, [A New Era for Choice and Openness](#), 4 March 2026. Google, [Expanded billing choice and lower fees on Google Play](#), 24 June 2026.

- (c) Developers will be able to steer their users outside of their Play app to complete a transaction; and
- (d) Google has also introduced a series of changes to the fees it charges app developers, including:
 - (i) Separating GPB fees from app store service fees, with a market-specific rate for use of GPB of 5% in the UK, EEA and US;
 - (ii) For in-app transactions, setting headline service fees of 25% for existing installs and 20% for new installs (rising to 30% and 25% respectively when a user chooses to transact using GPB);
 - (iii) A service fee of 10% for recurring subscriptions in all circumstances;
 - (iv) New programmes – ‘App Experience’ and an updated ‘Google Play Games Level Up’ – in which steered transactions will attract a 15% fee, and for in-app transactions, participating developers will be charged a 20% service fee for existing installs, and 15% for new installs, plus 5% where GPB is used;
 - (v) A fee of 10% on the first \$1 million of annual earnings, for both steering and in-app transactions in all circumstances (plus 5% where GPB is used for in-app transactions);^{26, 27} and
 - (vi) For non-recurring steered transactions over the first \$1 million of annual earnings, a service fee of 20%.

1.15 During the next phase of our work, we will assess the likely impact of these recent changes including by reference to the evidence we receive through this consultation.

Case study: impact of steering restrictions on a small UK business

- As part of our work, we have gathered evidence from a wide range of businesses.
- The experience of one UK-based app developer provides a useful illustration of the impact of Google’s restrictions. This developer is a family run business which provides an innovative, AI-powered app aimed at simplifying processes and saving time and

²⁶ CMA, [Views sought: Recent developments in relation to Apple’s and Google’s app store rules](#), 1 April 2026, paragraph 17.

²⁷ Google, [A New Era for Choice and Openness](#), 4 March 2026. Google, [Enrolling in the billing choice program](#), accessed 25 June 2026.

money for other small businesses.²⁸ The developer earns over \$1m per year so pays the higher commission rate.²⁹

- The developer explained how Google’s restrictions on steering have prevented it from offering innovative pricing structures, integrated cross-platform billing solutions, informing users of alternative ways to subscribe to their service. Losing 30% of its revenue also prevented it from reinvesting back into its business and impacted decisions on hiring new staff.³⁰
- The developer wants to expand its services to small businesses in adjacent sectors and would also consider expanding globally but worries about falling behind competitors in other international markets where action on Google’s restrictions is already being taken.³¹

Relationship with other potential interventions

1.16 Steering, and app distribution more broadly, has been an area of focus in recent years for authorities, regulators, courts, and legislators in numerous jurisdictions, including:

- (a) the EU, following the introduction of the Digital Markets Act;
- (b) the US, following court findings in private litigation;
- (c) Japan, following the introduction of the Mobile Software Competition Act;
- (d) India, through an investigation by the Competition Commission of India;
- (e) Australia, through private litigation; and
- (f) the UK, through private litigation.

1.17 We note that many of these processes have not yet been fully resolved, eg the investigation/case is still ongoing (including through appeals or remedies), or the relevant authority is still assessing compliance.

1.18 In April we sought views on recent developments in relation to Apple and Google’s app store rules,³² in order to inform our own thinking, and have incorporated this evidence into our proposed design and assessment. We also discuss these

²⁸ Note of meeting with [redacted].

²⁹ Note of meeting with [redacted].

³⁰ Note of meeting with [redacted].

³¹ Note of meeting with [redacted].

³² CMA, [Views sought: Recent developments in relation to Apple’s and Google’s app store rules](#), 1 April 2026.

actions and measures in more detail in the 'Consistency with existing and expected laws and regulations' section of Chapter 4.

- 1.19 As noted in the Roadmap of possible measures to improve competition in mobile ecosystems,³³ there are a range of potential interventions into app distribution that could be pursued with the aim of increasing competitive pressure on Google in this activity.
- 1.20 We have prioritised steering as we consider that it would be a key mechanism to ensure that developers can reach their customers on fair and reasonable terms with a wide range of services and content, and we consider those benefits could be realised quickly. We also consider it to be an effective, targeted and timely way to introduce greater competitive pressure on the Play Store commission fees and deliver the benefits that would result in terms of innovation, price, range and quality of services available to end-users.
- 1.21 We will continue to keep broader measures in relation to app distribution under review (such as alternative app distribution methods or directly constraining Google's commission fees), in particular if a steering intervention does not have the intended effect.

³³ CMA, [Strategic market status investigation into Google's mobile platform: Roadmap of possible measures to improve competition in mobile ecosystems](#), 23 July 2025.

2. THE AIM OF OUR PROPOSED STEERING CR

- 2.1 Taking into account the nature and extent of the concerns set out above, we propose to introduce a CR to: (i) ensure that developers can make meaningful choices over how they communicate with their end-users within an app, including directing them to channels outside of Google’s app store ecosystem, and (ii) support end-users’ ability to make informed and effective decisions between purchasing options.
- 2.2 Steering in this form is not possible on Google’s Mobile Platform because Google imposes rules that restrict such communication and redirection (see Chapter 1 for further details) preventing developers from making effective use of alternative transaction channels.
- 2.3 Enabling effective steering is a key mechanism through which developers would be able to establish and manage direct relationships with their end-users (including billing, refunds, and support), structure pricing and offers independently, choose their own payment processors, and reduce reliance on Google’s in-app payment systems and associated commission fees.
- 2.4 In introducing our proposed Steering CR, we have carefully considered what our proposed intervention should be seeking to achieve:
- (a) for steering to be effective we need to ensure that there are no unnecessary or inappropriate prohibitions, restrictions or limitations put on developers which would impede their ability to use steering in practice. The removal of such prohibitions, restrictions and limitations would facilitate the necessary and appropriate take up of steering by developers which would in turn enable them to further invest and innovate in the ways described above and ultimately benefit end-users through greater choice, higher quality, and lower prices (as more fully explained at paragraphs 2.5–2.6 below); and
 - (b) it is also important for us to ensure that Google’s incentives to invest and innovate in its app store are adequately protected, and that it receives fair remuneration for the services it provides. We have also considered how best to mitigate other potential risks that could affect Google’s Mobile Platform (eg any legitimate concerns relating to security and privacy).
- 2.5 Specifically, our aim is to ensure that developers can make meaningful choices regarding steering to end-users and trade on fair and reasonable terms with Google, including through:
- (a) **ability to communicate with and direct end-users**, including around the existence of alternative purchasing options while enabling them to access and complete transactions outside the Play Store environment;

- (b) **freedom from restrictions that limit effective steering**, including the removal of existing contractual or technical restrictions and the absence of new restrictions that would prevent or undermine developers' ability to steer end-users in practice. This includes ensuring that developers can reduce reliance on Google's in-app payment systems and associated commission fees, choose their own payment processors, establish and manage direct relationships with their end-users, and structure pricing and offers independently;
- (c) **ability to implement steering effectively in practice**, including in a manner that allows end-users to engage with alternative purchasing options without undue friction, deterrence, or distortion arising from Google's commercial terms (including the setting of each fee offered, payable or proposed), design choices or technical constraints; and
- (d) **appropriate safeguards to protect legitimate platform interests**, including ensuring that the design and implementation of steering measures takes account of the need to adequately protect Google's investment and innovation incentives and mitigate potential risks to Google's Mobile Platform, including in respect of security and privacy.

2.6 Enabling developers to direct end-users to alternative payment channels outside the app (for example, via websites) using effective steering will therefore enhance competition by:

- (a) expanding developers' choice about what they sell, pricing structures they use and how they distribute goods and services, thereby increasing their ability and incentive to innovate and ultimately improve end-user experience while providing them with greater choice;
- (b) improving relationships between developers and end-users (for example by allowing for more direct interaction, better understanding of behaviours, and increased ability to provide customer support); and
- (c) improving competitiveness:
 - (i) between Google and developers (where those developers compete with Google's own first-party apps);
 - (ii) between Google and third party payment processors; and
 - (iii) by exerting downward pressure on wider Play Store commission fees through enabling end-users' access to other, lower cost distribution channels.

Statutory objective(s)

- 2.7 The Digital Markets, Competition and Consumers Act 2024 (the **Act**) provides that CRs must seek to achieve one or more of three statutory objectives: fair dealing, open choices and trust and transparency.³⁴
- 2.8 The proposed Steering CR would pursue the fair dealing and the open choices objectives (sections 19(6) and section 19(7) of the Act respectively):
- (a) the proposed Steering CR would pursue the fair dealing objective by:
 - (i) ensuring that developers, as users of Google’s app distribution services, are treated fairly and can interact with Google on reasonable terms. In particular, the proposed Steering CR would address prohibitions and restrictions that limit developers’ ability to communicate with end-users about alternative purchasing options and to direct them to complete transactions outside the Play Store environment. The proposed Steering CR would also seek to prevent Google from imposing contractual terms, technical restrictions, design requirements, commercial conditions, or other measures that undermine or materially impede developers’ ability to exercise steering effectively in practice. To that end, the proposed Steering CR would seek to ensure that the setting of each fee offered, payable or proposed in connection with steered transactions must be fair and reasonable.
 - (ii) addressing the imbalance of bargaining power arising from Google’s position in app distribution and in-app payment systems. By enabling developers to steer users to alternative purchasing mechanisms, the proposed Steering CR would support developers’ ability to communicate and transact with users on terms that are not solely determined by Google, including in relation to payment processing, pricing structures, billing relationships, and refunds.
 - (b) the proposed Steering CR would pursue the open choices objective by:
 - (i) ensuring that developers are able to provide end-users with informed and meaningful choices regarding how and where they engage with purchasing options. In particular, the proposed Steering CR would seek to ensure that users are able to access and use alternative purchasing mechanisms without undue friction, deterrence, or distortion arising from Google’s design choices, technical constraints, user interface measures, or commercial terms; and

³⁴ Section 19(5) of the Act.

- (ii) supporting end-users' ability to make informed and effective decisions between purchasing options, including by enabling developers to present pricing information, alternative offers, and other relevant transactional information in a clear and effective manner. In doing so, the proposed Steering CR would also support innovation by enabling developers to design and offer new or differentiated commercial models which may not be viable under current fee structures.

Permitted type(s)

2.9 Each CR must fall within an exhaustive list of 'permitted types' set out in the Act.³⁵

2.10 The components of the proposed Steering CR would fall under the permitted types set out in sections 20(2)(a), 20(3)(a), 20(3)(f) and 20(3)(h) of the Act. They would be for one or more of the following purposes:

- (a) requiring Google to ensure that the terms and conditions (both pricing and non-pricing) on which developers access and use steering are fair and reasonable.³⁶ In particular, the proposed CR would prevent Google from imposing contractual, technical, or other terms that restrict or undermine developers' ability to steer end-users,³⁷ including by:
 - (i) ensuring that developers can communicate with end-users and direct them to alternative purchasing mechanisms (see paragraph 3 of the proposed Steering CR);
 - (ii) preventing the imposition of prohibitions or restrictions that limit the effective exercise of steering, including applying certain pricing principles aimed to ensure that each fee offered, payable or proposed in connection with steered transactions is fair and reasonable (see paragraphs 3–5 and 9–13 of the proposed Steering CR); and
 - (iii) ensuring that developers are not subject to discriminatory or retaliatory treatment when exercising steering (see paragraph 14 of the proposed Steering CR).
- (b) requiring Google to allow developers to use alternative payment processing services and ensuring that developers are able to implement steering effectively in practice, including by securing that each steering fee is fair and

³⁵ Sections 19(9) and 20 of the Act.

³⁶ Falling within the permitted type requiring a designated undertaking to trade on fair and reasonable terms (section 20(2)(a)).

³⁷ Falling within the permitted types of preventing a designated from: (i) applying discriminatory terms, conditions or policies to users (section 20(3)(a)) (ii) restricting whether or how users can use the relevant digital activity (section 20(3)(f)); (iii) restricting the ability of users to use products of other undertakings (section 20(3)(h)).

reasonable by reference to a set of pricing principles (see paragraphs 9–13 of the proposed Steering CR) and to enable end-users to access and complete transactions outside Google’s in-app payment systems without undue friction or distortion (see paragraphs 6–8 of the proposed Steering CR).³⁸

Consumer benefits likely to result from this CR

- 2.11 Before imposing a CR, the CMA must have regard in particular to the benefits for consumers³⁹ that the CMA considers would likely result from the CR.⁴⁰
- 2.12 The CMA provisionally considers that the proposed Steering CR would lead to consumer benefits in several ways. In particular:
- (a) allowing developers to steer and giving them the option to communicate directly with their customers can open up opportunities for innovation (such as investment in new products, new entry, new opportunities to offer more seamless services, as well as new opportunities to offer bundles of digital and physical goods) leading to greater or higher quality options for consumers;
 - (b) end-users would benefit from greater flexibility and choice in how they make purchases, including access to alternative payment methods and transaction channels;
 - (c) by enabling developers to establish direct relationships with end-users, the proposed Steering CR would support improved customer experience, including in relation to billing, refunds, and support; and
 - (d) while Google permits certain forms of steering and alternative billing arrangements in the UK, these were subject to important limitations.⁴¹ By enabling developers to communicate more effectively with users and to better facilitate transactions outside of GPB, the proposed Steering CR is likely to increase competition in payment processing and apply downward pressure

³⁸ Falling within the permitted types of preventing a designated undertaking from: (i) restricting whether or how users can use the relevant digital activity (section 20(3)(f)) and (ii) preventing a designated from restricting the ability of users to use products of other undertakings (section 20(3)(h)).

³⁹ Section 118 of the Act. A ‘consumer’ has the meaning given by section 129(1) of the Enterprise Act 2002 (**EA02**). A ‘consumer’ means any person who is (a) a person to whom goods are or are sought to be supplied (whether by way of sale or otherwise) in the course of a business carried on by the person supplying or seeking to supply them; or (b) a person for whom services are or are sought to be supplied in the course of a business carried on by the person supplying or seeking to supply them; and who does not receive or seek to receive the goods or services in the course of a business carried on by him.

⁴⁰ Section 19(10) of the Act.

⁴¹ For example, gaming developers were excluded from participating in Google’s User Choice Billing programme.

on Google's wider Play Store commission fees, contributing to lower prices and improved offers for end-users.

- 2.13 The CMA provisionally considers that these benefits would arise from enabling developers to operate on fair and reasonable terms and reducing constraints currently imposed on developers. We discuss these benefits further, alongside our assessment of proportionality, in Chapter 5.

3. OUR PROPOSED STEERING CR AND INTERPRETATIVE NOTES

- 3.1 Having identified our aim (see Chapter 2) based on the concerns identified in Chapter 1, we are proposing to impose the following proposed draft Steering CR on the basis of the effectiveness and proportionality analysis set out in Chapters 4 and 5 below respectively.

Proposed steering conduct requirement

Definitions

1. For the purpose of interpreting this conduct requirement and accompanying interpretative notes:
 - a. except in so far as the context otherwise requires, words or expressions shall have the meaning assigned to them in paragraph 2, and otherwise any word or expression shall have the same meaning as it has in the Digital Markets, Competition and Consumers Act 2024;
 - b. headings and titles shall be disregarded;
 - c. expressions cognate with those referred to in this conduct requirement shall be construed accordingly; and
 - d. the Interpretation Act 1978 shall apply as if this conduct requirement were an Act of Parliament.
2. For the purposes of this conduct requirement and accompanying interpretative notes:
 - a. **Browser** means an application which enables an End-user to access the world wide web, view web pages and navigate by hyperlink.
 - b. **End-user** means a consumer based in the United Kingdom who uses Google's Mobile Device or the Mobile Platform to access and engage with digital content and/or services.
 - c. **Developer** means an app provider, owner and publisher (as applicable) of apps to the extent that those apps are made available to, or accessed by, End-users in the United Kingdom. This definition includes an app provider, owner and publisher (as applicable) who outsources the coding of those apps.

- d. **Mobile Platform** means the combination of the following digital activities carried out by Google on Mobile Devices:
- **Mobile Operating System** (currently known as Android), which means a mobile operating system or equivalent, which acts as an intermediary between hardware and software on the Mobile Device, enabling software applications and services to run on the Mobile Device;
 - **Native App Distribution** (currently known as the Play Store) a service which enables the installation, distribution and operation of Native Apps on Mobile Devices; and
 - **Mobile Browser** (currently known as Chrome), which means a Browser running on a Mobile Device and **Browser Engine** (currently known as Blink), which means the underlying technology which applications (including Browsers) on a Mobile Device use to transform a web page source code into content with which End-users can engage.
- f. **Mobile Device** means an electronic device that can be held easily in the hand and has been designed with portability in mind. This definition includes a smartphone and tablet but excludes the following devices: (i) personal computer (both laptop and desktop), (ii) wearable device such as a smart watch, (iii) gaming console, and (iv) e-reader.
- g. **Native App** means applications written to run on a specific Mobile Operating System and, as such, interact directly with elements of the Mobile Operating Systems in order to provide relevant features and functionality.
- h. **Neutral Language** means language that does not include warning or risk-based wording, highlight potential harms or loss of protections, or use framing that may increase perceived risk or uncertainty or create an asymmetry between different options.
- i. **End-user Redirection Mechanism** means a feature, prompt, or functionality within an app that enables, or is reasonably likely to encourage, an End-user to access an alternative destination, including through buttons, hyperlinks, text prompts, or other interactive or non-interactive elements.
- j. **Steered Transaction** means a transaction for a digital good or service completed by an End-user through an alternative purchasing mechanism different from Google's in-app purchase system, where the End-user used the End-user Redirection Mechanism.

- k. **Steering Fee** means a monetary charge, commission, levy or other financial consideration imposed by Google on a developer in connection with, or by reference to, a Steered Transaction, or any other such fee which, by its level, structure or operation, has an equivalent effect in relation to a Steered Transaction.

Effective steering rights

- 3. Subject to the provisions of this conduct requirement, Google must not prevent, restrict or limit a developer from one or more of the following:
 - (a) communicating with an End-user, including in response to information provided by that End-user to the Developer as part of the account registration within the app; and
 - (b) including within its apps and associated metadata an End-user Redirection Mechanism which redirects an End-user to external websites to complete a Steered Transaction, except where such conduct is strictly necessary for an objectively justifiable purpose of preventing malware, fraud, unlawful content or content harmful to children.
- 4. Paragraph 3 of this conduct requirement applies to an action or omission by Google, whether direct or indirect, and irrespective of the means by which it is implemented, including contractual terms, technical design requirements, app review processes, enforcement practices, or other measures.
- 5. Without prejudice to the generality of paragraph 3, the following conduct may constitute a prevention, restriction or limitation within the meaning of paragraph 3:
 - (a) preventing, restricting or limiting the form or functionality of an End-user Redirection Mechanism as applicable, including in respect of the use of external links;
 - (b) preventing, restricting or limiting the use of links generated based on the End-user's transaction, context or selected product and links that embed user-authorized information (as applicable) for the purpose of completing a Steered Transaction; and
 - (c) preventing, restricting or limiting the level or form of prices that a Developer offers through an End-user Redirection Mechanism.

Equal treatment of End-user Redirection Mechanisms

- 6. Subject to paragraph 7, Google must ensure that the way in which an End-user Redirection Mechanism is presented, accessed and used in relation to a Steered

Transaction is the same or equivalent to the way in which Google's in-app purchase system is presented, accessed and used.

7. Google may introduce a single interstitial screen where an End-user is directed through an End-user Redirection Mechanism. An interstitial screen must:
 - (a) only contain information that is strictly necessary to inform an End-user that they are moving outside of Google's in-app purchase system; and
 - (b) be presented using Neutral Language and neutral visual design, be the same or equivalent in visual design, prominence and interaction to the experience offered within Google's in-app purchase system and not have the purpose or effect of discouraging an End-user from completing a transaction outside of the in-app purchasing system.

8. Except for the interstitial screen referred to in paragraph 7, Google must not introduce additional frictions that discourage an End-user from using an End-user Redirection Mechanism relative to Google's in-app purchase system, including:
 - (a) preventing the display of pricing information or other information an End-user may consider when making a decision (such as non-price promotional benefits or bonuses) at the point of decision making, including where an End-user is deciding whether to complete a Steered Transaction through Google's in-app purchase system or an End-user Redirection Mechanism;
 - (b) requiring additional steps for an End-user to access an End-user Redirection Mechanism; and
 - (c) presenting warnings, disclosures, or other messaging using language, formatting, or prominence that has the purpose or effect of discouraging an End-user from completing a Steered Transaction through an End-user Redirection Mechanism.

Setting a Steering Fee

9. In using an End-user Redirection Mechanism, Google may require developers to pay a Steering Fee to it in respect of Steered Transactions:
 - (a) in relation to a Steering Fee so offered, payable or proposed, Google must secure, and must be able to demonstrate to the satisfaction of the CMA, that each Steering Fee is fair and reasonable by reference to the principles set out in paragraph 10; and
 - (b) as to the timing within which a Steering Fee may be offered, payable or proposed:

- (i) Google may only require a Developer to pay a Steering Fee provided the corresponding Steered Transaction occurs within a maximum of seven days of the End-user reaching an alternative purchasing mechanism as a result of an End-user Redirection Mechanism provided by the Developer;
- (ii) paragraph 9(b)(i) does not apply to payments made under a recurring subscription subject to one exception. The exception is that Google must not impose a Steering Fee where a subscription renews automatically and was entered into prior to the End-user reaching an alternative purchasing mechanism.

10. Subject to paragraphs 11 to 13 as applicable, in setting each Steering Fee Google must apply the following principles, securing that each Steering Fee offered, payable or proposed is no higher than a fee calculated in accordance with those principles:

(a) cost-based principle:

- (i) subject to paragraph 12, this principle requires Google to take account of the costs incurred by Google in providing services used by a Developer to a material and direct extent in facilitating or supporting a Steered Transaction, calculated on the basis of: (i) a forward looking long run incremental cost approach, (ii) an appropriate recovery of common costs, and (iii) a reasonable rate of return as appropriate.

(b) value-based principle:

- (i) subject to paragraph 13, this principle requires Google to take account of the value attributable to the services offered by Google to a Developer and consumed by an End-user, ensuring that both Google and Developers are fairly and reasonably treated given the value of their respective contributions in connection with Steered Transactions. This principle requires Google to take account of a material net value which is defined as: (i) including the value provided to Developers by the Native App Distribution services, (ii) adjusting for the effects of Google's substantial and entrenched market power in respect of its Mobile Platform, and (iii) including the value contributed by Developers (in aggregate) in respect of all elements of Google's Mobile Platform.

(c) administrative simplicity principle:

- (i) this principle requires Google to put in place, and maintain, adequate safeguards to ensure that the Steering Fee structure and all related terms associated with that Steering Fee structure do not impose technical,

administrative or other constraints that would limit the effectiveness of a Steered Transaction or otherwise prevent or undermine developers' ability to steer End-users in practice.

11. In applying each of the cost-based principle and the value-based principle under paragraphs 10(a) and 10(b), Google must not double count the same costs or investments (as applicable).

12. In applying the cost-based principle under paragraph 10(a) for the purposes of setting a Steering Fee:

(a) Google may include the following costs:

- (i) long run incremental costs directly incurred in providing app store services to developers in connection with Native App Distribution services, discovery, and platform access, to the extent that those services are used by Developers to a material and direct extent in facilitating or supporting Steered Transactions;
- (ii) incremental costs of enabling and operating steering links or similar link-out technology;
- (iii) an appropriate allocation of common costs incurred in providing Native App Distribution services discovery, and platform services to Developers, where such services are used by Developers in connection with both Steered and non-Steered Transactions. Such an allocation must be based on objective, causally relevant and proportionate cost drivers that reflect the extent to which such costs are incurred to support the provision of Native App Distribution services used to a material and direct extent by Developers who offer Steered Transactions to their End-users, such that only those common costs properly attributable on that basis are allocated; and
- (iv) a reasonable rate of return on the investments Google made in infrastructure and services supporting Native App Distribution, to the extent that those investments are, to a material and direct extent, causally attributable to providing Native App Distribution services used by Developers who offer Steered Transactions.

(b) Google must exclude the following costs:

- (i) costs relating to Google's provision of its own downstream digital content or services, or activities unrelated to the provision of the Native App Distribution services;

- (ii) costs relating to general app discovery, marketing, developer tooling, or other services not used by Developers who offer Steered Transactions to a material and direct extent;
 - (iii) costs relating to Google's provision of in-app payment security and privacy features that are not provided or not required for Steered Transactions; and
 - (iv) costs associated with services that do not provide value to Developers, unless those services are necessary for the operation, security, or legal compliance of the Mobile Platform.
- (c) Google must not double count costs already recovered through other Developer fees.
 - (d) Google must maintain cost accounting records (including inputs, allocations and assumptions) sufficient to be able to demonstrate compliance with the cost-based principle to the CMA's satisfaction.
13. In applying the value-based principle under paragraph 10(b) for the purposes of setting a Steering Fee, the assessment of the value-based principle and the resulting Steering Fee:
- (a) must not lead, or contribute, to an imbalance of rights and obligations between Google and Developers or categories of Developers whether imposed directly or indirectly by Google;
 - (b) must not confer an advantage on Google that is disproportionate to the service provided by Google to Developers or a category of Developers;
 - (c) must reflect the material value (in aggregate) provided to Developers by the Native App Distribution services;
 - (d) must adjust for the direct and indirect effects of Google's substantial and entrenched market power in respect of all elements of Google's Mobile Platform, in particular the End-user base that can access Google's Mobile Platform through the Native App Distribution services; and
 - (e) must take account of the value contributed by Developers (in aggregate) in respect of all elements of Google's Mobile Platform, including through the provision of applications, services, and user engagement through the Native App Distribution services.

Non-discrimination

14. Google must not discriminate against Developers that make use of an End-user Redirection Mechanism, including in respect of one or more of the following:

- (a) app review processes that apply to those Developers;
- (b) search ranking or discoverability of those Developers' apps within the Native App Distribution services;
- (c) the ability of those Developers to access APIs or platform functionality; and
- (d) the ability of those Developers to secure interoperability with Google's Mobile Platform.

Interpretative Notes

1. The CMA may publish interpretative notes to accompany a conduct requirement. Interpretative notes will provide greater clarity over the CMA's interpretation of a conduct requirement, including how it may apply in particular circumstances, for the benefit of both the SMS firm and other industry participants.⁴² It would be open to the SMS firm to take a different approach to the one outlined in the interpretative notes where it is able to demonstrate to the CMA that its approach complies with the terms of the conduct requirement.⁴³
2. We propose that this proposed conduct requirement be accompanied by the following set of interpretative notes.

Effective steering rights

3. Paragraph 3(b) of the conduct requirement indicates that Google may only restrict a Developer from including an End-user Redirection Mechanism if the restriction is strictly necessary for an objectively justifiable purpose of preventing malware, fraud, unlawful content or content harmful to children. Examples of such purposes may include preventing End-users from being steered to websites that enable downloading of apps or websites known to be malicious, or imposing additional constraints on redirection of younger End-users.
4. For the avoidance of doubt, the provision in paragraph 3 does not oblige Google to facilitate steering to other apps that may have been downloaded onto the device (except in order only to access the internet).

Equal treatment

5. Paragraph 6 of the conduct requirement ensures that the presentation of any End-user Redirection Mechanism for a Steered Transaction will not be unequal in

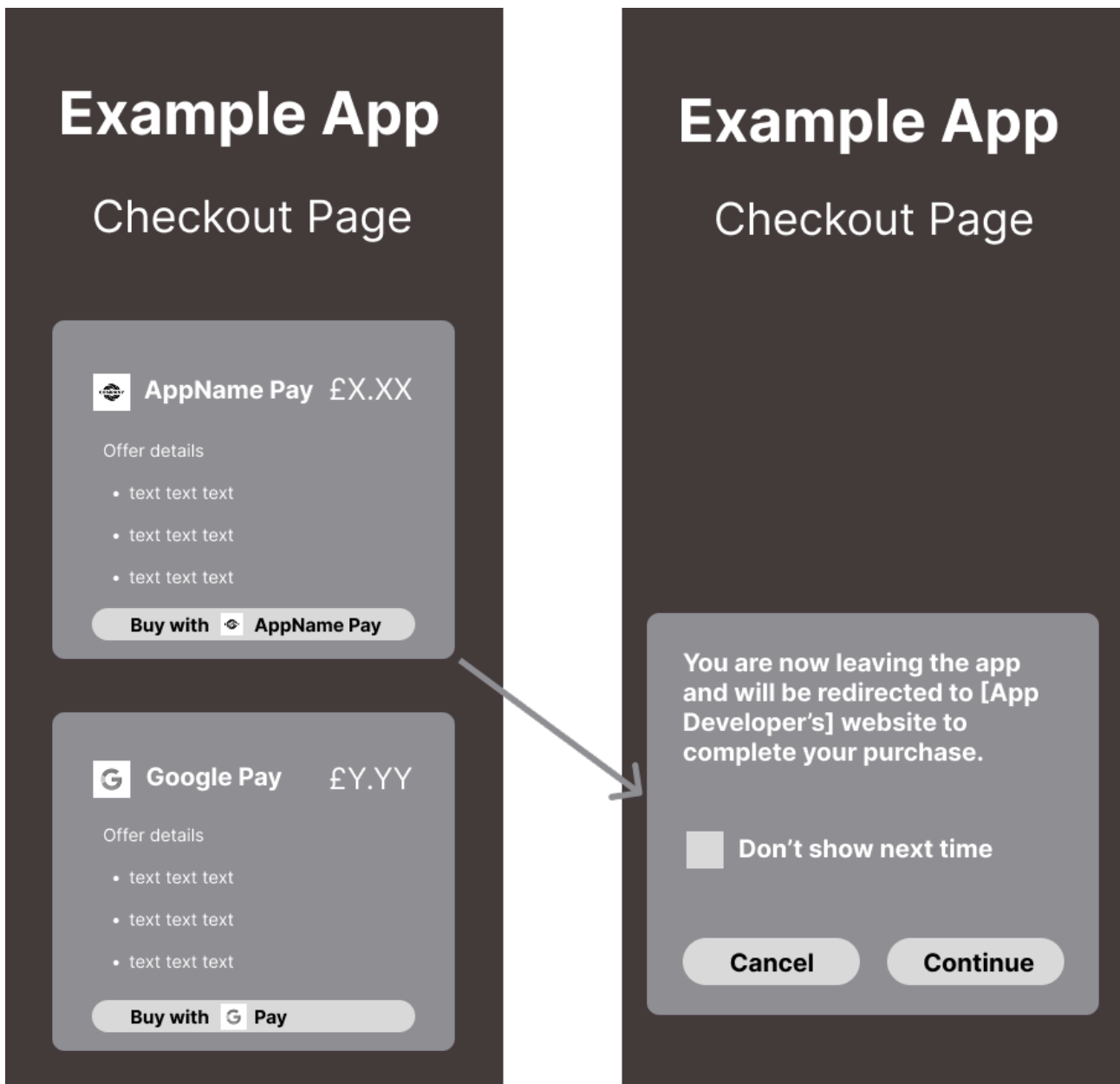
⁴² See [digital markets competition regime guidance](#) (CMA194), paragraphs 3.59 to 3.60.

⁴³ See [digital markets competition regime guidance](#) (CMA194), paragraph 3.61.

comparison to that of Google's in-app purchase system. Presenting both mechanisms side-by-side would be permitted under this provision.

Interstitial screens

6. Paragraph 7 of the conduct requirement sets out conditions with which any interstitial screen – informing End-users that they are moving outside of Google's in-app purchase system – must comply. These include using Neutral Language, and having the same visual design, prominence, and interaction as comparable steps within Google's in-app purchase system.
7. The following figure demonstrates how an interstitial screen may comply with these conditions:



Source: the CMA. For illustrative purposes only. AppName Pay is a fictional name.

Steering Fees

8. In setting each Steering Fee, Google must take account of the following three principles which are all relevant to the assessment: (i) the cost-based principle, (ii) the value-based principle, and (iii) the administrative simplicity principle. Each of those principles is defined and specified in the conduct requirement which sets out how the principles must be applied and the approach Google must follow in doing so.

9. It is appropriate to leave a degree of flexibility in relation to how Google applies these principles in practice, subject to being able to demonstrate to the CMA's satisfaction that its approach takes account of each of the principles (as defined and specified in the conduct requirement) in a suitable way. In relation to the application of the cost-based principle and the value-based principle as part of determining the level of the Steering Fee, Google may for example start by taking one of those principles into account and subsequently considering the second principle as a cross-check, adjusting the resultant Steering Fee downward or upward as applicable.

4. PROVISIONAL EFFECTIVENESS ASSESSMENT OF OUR PROPOSED STEERING CR

- 4.1 In this chapter, we assess whether the proposed Steering CR is likely to be effective in achieving the aim set out in Chapter 2. As part of this, we will consider both the content and form of potential CRs.⁴⁴
- 4.2 The evidence gathered in this investigation, as well as experience in other jurisdictions, clearly indicates that preventing prohibitions on steering alone would not be sufficient to deliver against our aim. This is because in our provisional assessment, Google would still have the ability and incentive to impose other potential measures such as restrictive conditions, complex design requirements, or commercially unattractive terms which would frustrate our aim of ensuring that developers can take advantage of effective steering rights. This would mean that developers would be very unlikely to adopt steering in practice and users would not be able to engage with it.
- 4.3 In light of this, in making our proposals for the Steering CR, we focus not only on preventing prohibitions on steering, but also assess obligations that Google should be subject to when setting new pricing and non-pricing terms applicable to steering. For the reasons set out below, we provisionally consider that our proposed Steering CR would effectively address the barriers that would likely prevent developers from using steering in practice.
- 4.4 We have identified a number of key design considerations for the effectiveness of any steering intervention:
- (a) **the scope of the intervention**, including:
 - (i) the relevant digital activities;
 - (ii) setting the proposed territorial scope; and
 - (iii) focusing on the use of links to complete a transaction.
 - (b) **ensuring that Google provides developers with effective and practical steering rights**, including:
 - (i) consideration of user trust, security and privacy factors;
 - (ii) communicating with end-users through free text;

⁴⁴ See [Digital markets competition regime guidance](#), December 2024 (CMA194), paragraph 3.20(b).

- (iii) end-user redirection mechanisms;
 - (iv) the destination of links; and
 - (v) measures that affect the form and functionality of links.
- (c) **ensuring a user experience that supports informed choice while minimising unnecessary friction**, including:
- (i) “side by side” presentation of in-app payment options and steering;
 - (ii) interstitial information screens;
 - (iii) restricting the use of WebViews; and
 - (iv) targeted measures to protect children.
- (d) **ensuring that any steering fee is set at a level which is commercially viable for developers to use steering whilst protecting Google’s cost recovery and investment incentives**, including:
- (i) why we have provisionally adopted a principles-based approach;
 - (ii) what is ‘fair and reasonable’ in the context of a steering fee;
 - (iii) what level and structure of fees might be fair and reasonable;
 - (iv) the role of cost-based principles;
 - (v) the role of value-based principles;
 - (vi) the administrative simplicity principle; and
 - (vii) the relationship between the pricing.
- (e) **ensuring Google does not discriminate against developers who use steering**

4.5 In considering these issues we have sought to balance the need to ensure developers can use steering effectively with the need to protect legitimate platform interests, as set out in paragraph 2.5(d) of our aim. In particular, the proposed Steering CR allows Google to take proportionate steps to safeguard user security and privacy and to obtain fair remuneration for the services provided. However, it places limits on the form and extent of such measures where they would otherwise risk undermining the overall effectiveness of the intervention.

4.6 The analysis that follows considers each of these issues in turn and explains how the design of the proposed Steering CR delivers against our aim, addressing the

identified barriers to ensure that steering is a practical and effective option for developers and users.

Key design issues we have considered

The scope of the intervention

Relevant digital activities

- 4.7 We have previously found Google to have SMS in respect of the provision of its Mobile Platform, as set out in our 2025 SMS Decision.⁴⁵ The Mobile Platform is the relevant digital activity for the purposes of the Act, and comprises, among other things,⁴⁶ Native App Distribution (the Play Store), defined as the provision of a service enabling the installation, distribution, and operation of native apps on Mobile Devices running the relevant Mobile Operating System.
- 4.8 The proposed Steering CR covers Google's conduct in relation to its Native App Distribution activities in the form of the Play Store (as included in the definition of relevant digital activity in the Final Decision). We provisionally consider that this scope would be effective in meeting our aim, as set out in Chapter 2, since it:
- (a) encompasses developers distributing their apps on the Play Store as well as end-users who engage directly with these apps; and
 - (b) enables developers to direct end-users to channels outside the Play Store ecosystems in order to access and complete transactions.

Setting the proposed territorial scope

- 4.9 Our aim seeks to ensure that developers can make meaningful choices regarding steering, and trade on fair and reasonable terms with Google, which ultimately benefits UK end-users of Google's Mobile Platform.
- 4.10 Having considered what territorial scope would be appropriate to address this aim, we have provisionally designed the proposed Steering CR so that its obligations would apply in relation to developers steering on all apps to the extent the apps are made available to, or accessed by, end-users in the UK via the UK Play Store (irrespective of the location of those developers). This focus on UK end-users

⁴⁵ [Strategic Market Status Investigation into Google's Mobile Platform: Final Decision \(SMS Decision\)](#), 22 October 2025.

⁴⁶ Google's Mobile Platform comprised its: Mobile Operating System (Android); Native App Distribution (the Play Store); and Mobile Browser and Browser Engine (Chrome and Blink) on Mobile Devices.

would ensure that we continue to have regard in particular to the benefits for end-users that would likely result from the CR.⁴⁷

Focusing on the use of links to complete a transaction

- 4.11 Our aim is to ensure that developers can communicate with end-users, including about the existence of alternative purchasing options, while enabling them to access and complete transactions outside the Play Store environment, free from restrictions that limit effective steering. As such, our proposed Steering CR would allow developers to direct users to alternative purchasing mechanisms (see paragraph 3 of the proposed Steering CR). In practice this means that these requirements to link-out to external websites only apply when those links are provided for the purposes of completing transactions.
- 4.12 In our discussions with developers, and in the submissions we have received relating to linking outside of the Play Store, there has been a particular focus on providing an alternative route to complete a transaction. We have not received evidence to suggest there is a significant interest in linking out for reasons other than completing transactions.
- 4.13 We have also heard that the purpose for which end-users are steered may affect their exposure to certain privacy and security risks. Google submitted that enabling developers to steer users for the purpose of downloading apps outside of the Play Store environment would present a significantly higher level of risk for Android users. Google stated that restricting this form of linking out is necessary to mitigate risks associated with the installation of potentially malicious or unreviewed applications.⁴⁸ Google submitted that installing harmful apps is far more dangerous than accessing web content, as apps on Android have broad capabilities to take control of a user's device, and provided examples of these functionalities being used to harm users. Google further submitted that sideloaded apps are 90 times more likely to have malware than apps on Play. We understand that to mitigate such risks, Google currently prohibits apps on the Play Store from installing other apps and restricts the steering of users for the purpose of distributing apps not reviewed by Google.⁴⁹
- 4.14 Given the limited benefits of allowing links for purposes other than completing transactions, and the potential concerns identified, we provisionally consider that Google should continue to have the ability to prevent, limit or restrict developers from providing links that steer users to external websites for purposes other than completing transactions.

⁴⁷ Section 19(10) of the Act.

⁴⁸ Google's response to section 69 notice [38].

⁴⁹ Google, '[Device and Network Abuse](#)'; Google, '[Policy coverage](#)'.

Ensuring that developers have effective and practical steering rights

- 4.15 In this section we discuss the different design parameters reflected in paragraphs 6–8 of the proposed Steering CR and assess whether those measures are effective in achieving our aim.
- 4.16 As discussed throughout the document, some stakeholders have raised concerns that Google’s rules and restrictions in relation to steering may constrain how developers can implement steering in practice and at scale. Stakeholders have also said that Google should not be able to condition, restrict, or otherwise control developers’ steering communications in ways that reduce their effectiveness in practice. Stakeholders indicated that such limitations may reduce the effectiveness of steering by preventing developers from offering targeted and commercially viable user journeys.
- 4.17 However, Google has argued that restrictions on steering, including the type or destination of links that developers can offer may be necessary to protect users’ security and privacy. In the following sections we therefore assess the extent to which such restrictions and safeguards are necessary for developers to implement steering effectively in practice.

How we have considered user trust, security and privacy factors

- 4.18 Our aim seeks to ensure that there are appropriate safeguards to protect legitimate platform interests, including to mitigate genuine risks to Google’s Mobile Platform such as in respect of security and privacy.
- 4.19 Google submitted that enabling steering for the purchase of digital goods and services means that users will no longer benefit, or benefit less, from protections that it introduced to ensure user security and privacy on its Mobile Platform.⁵⁰ This includes protections provided through its integrated payment system and app store review processes, which would result in:
- (a) risks related to handling of users’ payment information;
 - (b) a reduction in Google’s ability to review apps selling digital goods and services for fraud and other risks;
 - (c) users no longer benefiting from some parental control features; and
 - (d) an increase in risks from distribution of apps not subject to review by Google.

⁵⁰ We discuss these submissions in more detail in Chapter 5: Provisional Proportionality Assessment of the Steering CR.

- 4.20 We note that Google’s prohibition on the use of alternative in-app payment methods, including steering users through a link-out, did not apply to apps offering physical goods and services. We understand that Google has distinguished between the approach it takes to digital and physical goods and services for operational reasons.⁵¹ Google has also submitted that when a user completes a transaction for physical goods, they are more likely to understand that Play—as an online app store—cannot guarantee the safety of physical goods delivered in the real world.⁵²
- 4.21 Nevertheless, these are sensitive issues which require us to carefully balance all elements of our aim. We have sought to take a targeted and proportionate approach to how we restrict Google’s conduct in relation to the measures outlined above, and when designing the proposed Steering CR, we have sought to:
- (a) only limit measures that we consider would render the proposed Steering CR ineffective in achieving its aim, for example by making steering commercially unviable due to user drop-off; and
 - (b) enable Google to take targeted measures where potential harm may be particularly acute, such as regarding the protection of children.

Communicating with end-users through free text

- 4.22 This section discusses whether Google should be allowed to impose limits on developers’ ability to communicate with end-users using ‘free text’ (eg not using hyperlinks) and whether such communications should be subject to any conditions, including fees.
- 4.23 Google permits use of free text language that directs users outside the app inside ‘consumption-only’ apps, ie apps that do not provide in-app purchases of digital content.⁵³
- 4.24 We provisionally consider that free text communications do not give rise to the same level of potential privacy and security risks as actionable links to external websites, because they do not directly redirect users or transfer information externally. Accordingly, we provisionally consider that permitting developers to communicate with users through free text should require materially less intervention or oversight by Google.
- 4.25 Furthermore, in practice it would be very difficult for a developer to attribute the extent to which online sales are generated by free text providing information to

⁵¹ [Appendix H of the Mobile Ecosystem Market Study \(2022\)](#), paragraphs 29-32.

⁵² Google’s response to section 69 notice [redacted].

⁵³ Google’s response to section 69 notice [redacted].

users, relative to sales generated through other channels. We therefore provisionally consider that there would be significant practical and evidential difficulties associated with permitting Google to charge fees for transactions that may be connected to such communications.

- 4.26 On the basis of the above, our provisional view is that developers should be permitted to communicate through free text without restrictions imposed by Google beyond general Play Store rules relating to illegal or harmful content, and without fees being charged in relation to such communications. We provisionally consider that this approach is necessary to ensure that developers can communicate effectively with end-users and exercise meaningful steering rights for the purposes of paragraph 2.5(a) of the aim, without raising material platform concerns for the purposes of paragraph 2.5(d).

The use of end-user redirection mechanisms

- 4.27 We have considered the extent to which developers should be allowed to use end-user redirection mechanisms, having regard to all elements of our aim.⁵⁴
- 4.28 The ability of developers to provide end-user redirection mechanisms is important to ensure that developers have a genuine and commercially viable choice regarding how they transact with their end-users, and that users are able meaningfully to take advantage of alternative purchasing options through steering.
- 4.29 A number of third parties submitted that restrictions on use of actionable links would materially undermine the effectiveness of steering in practice.⁵⁵ By contrast, we have not received evidence suggesting that permitting free text communications alone would be sufficient to generate meaningful user uptake of steered transactions.
- 4.30 Accordingly, we provisionally consider that it is necessary to allow end-user redirection mechanisms as part of our proposed Steering CR. In the following sections we assess the potential for Google to limit the destination and functionality of end-user redirection mechanisms, including whether such measures are necessary having regard to the considerations of our aim in paragraph 2.5(d) relating to privacy, security and other legitimate platform interests.

⁵⁴ As explained above, this would be for the purposes of completing a transaction.

⁵⁵ 2 responses to voluntary requests for information [38]. 12 responses to voluntary requests for information [38].

Restricting the destination of links

- 4.31 We have considered whether the proposed Steering CR should allow Google to restrict end-user redirection mechanisms to only those that direct a user to a website or offer that is owned, operated or under the control of the relevant app developer.
- 4.32 Google submitted that limiting steering destinations to developer-controlled offers is necessary in order to mitigate privacy, security and fraud risks. Google argued that steering users to third-party offers may reduce transparency, weaken accountability for transactional environments, and increase the risk of fraud, scams or malicious content being presented to end-users.
- 4.33 In particular, Google submitted that permitting steering to third-party offers could enable malicious actors to exploit the reputation of trusted apps in order to expose users to scams, fraud or other harmful content. Google stated that a Play developer showing a link-out has no way of monitoring or controlling the third-party offer, and that the third-party content can be updated at any time to show harmful material without the developer's or Google's knowledge. Google also stated that there is no practical means by which it can conduct a security review of every third-party offer on the internet. Google referred to examples of malicious advertising and fraudulent links appearing within otherwise legitimate applications as evidence that third-party destinations may create elevated fraud and security risks for users.⁵⁶
- 4.34 We recognise that steering users to third party websites or content introduces an additional party to the user journey, which can introduce additional risks to end-users. However, we consider that any risks may be manageable.⁵⁷
- 4.35 We have also considered the extent to which such restrictions may impact the ability of developers to use third party payment providers, as any measure that significantly impedes this would risk undermining the ability for developers to steer in practice. We currently understand that measures proposed or introduced by Google and Apple would not prevent developers' from using third party payment processors on their websites, either through embedding functionality to complete transactions within their own websites ('self-hosted payment pages')⁵⁸ or by inviting users to click through to payment providers' websites ('hosted payment

⁵⁶ Google's response to section 69 notice [38].

⁵⁷ For example, Google's existing platform rules already impose diligence obligations on developers in relation to linked content; Google, '[Policy Coverage](#)', "Our policies apply to any content your app displays or links to, including any ads it shows to users and any user-generated content it hosts or links to."

⁵⁸ A 'self-hosted payment page' is a payment gateway that is directly integrated within a business's website. See [Self-Hosted Payment Gateways: A Comprehensive Guide](#), accessed 15 June 2026.

pages’).⁵⁹ There is some evidence that there is demand for the use of such third-party ‘hosted payment pages’ online.⁶⁰

- 4.36 While several developers emphasised the importance of preserving flexibility regarding steering implementation and user experience in general,⁶¹ we have received very little evidence that an effective steering remedy would need to include direct linking to destinations or offers controlled by third parties.
- 4.37 With the evidence available to us, our provisional view is that the proposed Steering CR should allow Google to require that links used for the purposes of facilitating steered transactions direct users to offers that are owned, operated or controlled by the relevant developer. However, this should not result in additional restrictions that limit the extent to which developers can engage with legitimate third party payment providers. We welcome further views on the extent of demand for steering directly to such destinations.

Measures that affect the form and functionality of links

- 4.38 We have considered the extent to which an effective proposed Steering CR should allow Google to restrict the form, functionality and operation of end-user redirection mechanisms. In particular, we have considered whether technical, operational or design restrictions that seek to protect legitimate platform interests (including in relation to privacy and security) might undermine developers’ ability to implement steering effectively in practice.
- 4.39 Examples of end-user redirection mechanisms functionalities that may be necessary for an effective proposed Steering CR include:
- (a) the ‘dynamic’ generation of links or alternative approaches which allow developers to display links tailored to a user’s transaction, context or selected product; and
 - (b) use of ‘link parameters’, whereby links used for steering pass user-authorised information to destination websites, including information necessary to support seamless login or transaction continuity.
- 4.40 Google submitted that these functionalities pose risks to users’ security and privacy.

⁵⁹ A ‘hosted payment page’ is a checkout page wholly provided and managed by a third party, such as a payment service provider. See Stripe, ‘[Hosted payment pages: What businesses need to know | Stripe](#)’, accessed 3 June 2026.

⁶⁰ For example, one major payment service provider submitted that the vast majority of their business customers use their hosted payment page offering. However, this was in the context of online transactions more generally, as opposed to in the specific context of steered transactions; [redacted] response to request for information [redacted].

⁶¹ 2 responses to call for evidence dated 1 April 2026 [redacted]. 2 responses to voluntary requests for information; [redacted]; [redacted].

- 4.41 Google submitted that while any form of steering creates security risks as it takes users outside of Play’s secure environment, dynamic links are particularly dangerous as links are constantly changing and can link to destinations that are not secure or have not been vetted. Google submitted that there is currently [REDACTED]. Google submitted that it is reasonable and proportionate for developers to be required to submit links to external content for review to maintain a baseline level of security, and that it does not allow dynamic links for steering under the External Offers Program in the EU, or any of its other steering solutions. Google explained that under the EU External Offers Program, developers can submit an unlimited number of links, and that it also enables user targeting so that developers can choose which users they promote specific links to, without the significant security risks associated with dynamic links.⁶²
- 4.42 Google submitted that transferring user information across insecure networks through link parameters poses security and data protection risks for end-users, particularly in respect of financial data, which can potentially be intercepted and used by malicious actors to conduct fraud. As a result, developers should take proportionate steps to ensure that user data is protected. [REDACTED].⁶³
- 4.43 We assess these measures together below because restrictions on dynamic link generation, and on the use of link parameters, pursue broadly similar privacy, security and app review objectives, while potentially introducing similar forms of friction and operational limitations on developers’ ability to implement effective steering in practice.^{64, 65}
- 4.44 We provisionally consider that allowing restrictions on these measures would provide only limited incremental privacy and security benefits because:
- (a) the functionalities in question are already widely available across the Play Store ecosystem in analogous contexts. In particular, dynamic links and link parameters are already commonly used within apps, including where users are directed to purchase physical goods and services or are otherwise redirected to external websites; and
 - (b) the likely restrictions that could be imposed could be easily circumvented by developers, which would limit any potential benefits, eg:

⁶² Google’s response to section 69 notice [REDACTED].

⁶³ Google’s response to section 69 notice [REDACTED].

⁶⁴ For example, the ‘dynamic’ generation of links may be required to insert link parameters unique to the user, and a requirement to use a limited number of unique, pre-registered links would prevent both the dynamic generation of links and the use of link parameters that reflect the granular context of the user.

⁶⁵ 4 responses to voluntary requests for information; [REDACTED].

- (i) information may still be collected within both the app and destination websites, and such information could be shared with third parties without the use of link parameters in the steering link;
- (ii) developers could still transfer information collected through the app to a first-party destination website and link user app and web contexts without using parameters in the steering link (eg through logging the user in at both ends); and
- (iii) website review mechanisms can be circumvented because content may change after review has taken place.⁶⁶

4.45 We also note that Google would in any event still be able to implement mitigating actions that would be less likely to reduce the effectiveness of the proposed Steering CR. For example, Google could require developers to integrate APIs capable of identifying where users are being steered in practice.

4.46 We understand that Google [REDACTED].⁶⁷

4.47 We are also concerned about the risks that restrictions on these measures would have for the use of steering. Authorities in other jurisdictions have expressed similar views around the potential negative impact on effectiveness of restricting the use of dynamic links and link parameters,⁶⁸ and the latest measures implemented or proposed by both Google and Apple in other jurisdictions and in the UK allow the use of link parameters and ways to tailor links shown to users to their specific context.⁶⁹

4.48 However, Google submitted that its approach under the External Offers programme effectively enables steering while restricting the use of dynamic links. Google explained that because its approach allows developers to register an unlimited number of links, target specific links to specific users, and use parameters, such as transaction IDs, to enable users to be directed to a logged-in web session to complete a transaction, it does not impede users from being steered off-Play and also does not incur the specific risks of enabling dynamic

⁶⁶ Google's response to section 69 notice [REDACTED].

⁶⁷ Google workshop with the CMA [REDACTED].

⁶⁸ Both the US Epic v Apple judgment (30 April 2025) and the European Commission's steering decision questioned the necessity and proportionality of restrictions on dynamic links, link parameters and related mitigations (see [Epic v. Apple 30 April 2025 ruling by the United States District Court, Northern District of California](#), pages 39-41, paragraphs 75-76). In particular, the European Commission rejected Apple's argument that preventing the inclusion of additional URL data was necessary to protect user privacy and security (see [Commission decision for Case DMA.100109](#) dated 23 April 2025, paragraphs 128-134).

⁶⁹ Recent compliance approaches adopted or proposed by Apple and Google in Japan, the UK and other jurisdictions have not prohibited the use of link parameters (see Apple, '[Payment options on the App Store in Japan](#)' (accessed 6 May 2026), Google's response to follow-up questions [REDACTED]. We understand that Apple allows the use of dynamic links in Japan, and stated more widely that it does not currently review steering destinations in jurisdictions where steering is permitted (see Apple's response to section 69 notice [REDACTED].) [REDACTED] (see Google workshop with the CMA [REDACTED]); Google's response to follow-up questions [REDACTED].

links.⁷⁰ We consider that this solution could be effective and may result in equivalent outcomes to dynamic links in terms of tailoring links to the user context. We welcome further views as to the impact of this approach.

- 4.49 On the basis of the analysis outlined above, we have provisionally concluded that an effective Steering CR should ensure that Google does not restrict the use of dynamic links (or equivalent alternatives) or link parameters by developers when generating steering links.

Ensuring a user experience that supports informed choice while minimising unnecessary friction

- 4.50 In this section we discuss the different design parameters reflected in paragraphs 6–8 of the proposed Steering CR and assess whether those measures are effective in delivering the aim set out in Chapter 2.

“Side-by-side” presentation of in-app payment options and steering

- 4.51 We have considered whether to allow Google to require that its own in-app payments option (ie GPB) is presented alongside any external links provided for the purposes of completing transactions.
- 4.52 Google submitted that requiring developers to offer its own integrated payment system alongside any steered option would mitigate some of the privacy and security risks arising from enabling steering.
- 4.53 Google submitted that while it cannot fully eliminate the risk posed by steering, requiring developers to give end-users the choice of completing a transaction via GPB alongside any alternative would reduce the risk. Such a requirement would put end-users in control and mean that they can continue to benefit from GPB’s protections if they wish. This mitigation forms part of Google’s recently announced measures on steering and Google states that it improves its overall security, as end-users can choose to complete transactions with GPB in scenarios where they may not trust a developers’ third-party billing system.⁷¹
- 4.54 We received a range of views from developers on the need for, and implications of, being required to present in-app payment and alternative payment options side-by-side:

⁷⁰ Google’s response to follow-up questions [38].

⁷¹ Google’s response to section 69 notice [38]. Google, [Enrolling in the billing choice program](#). Accessed by the CMA on 25 June 2026.

- (a) several developers acknowledged that side-by-side presentation supports end-user choice;⁷²
- (b) however, some developers submitted that it increases complexity. Specifically, maintaining multiple payment infrastructures may be burdensome for some developers, reduce the space on the purchase flow and reduce the benefits of a single, cross-platform account management and customer support network;⁷³
- (c) some developers also raised concerns that offering steering alongside an in-app payment option would be confusing for end-users and introduce additional friction.⁷⁴ Concern around increased complexity of information was emphasised by developers with more complex pricing structures.⁷⁵ These concerns could ultimately result in some end-users defaulting to in-app payment as a more familiar option or lead to a reduction in overall conversion rates;
- (d) however, one developer noted that end-users are already accustomed to choosing between payment methods in other online contexts,⁷⁶ and several others suggested confusion risk could be mitigated by clear labelling;⁷⁷
- (e) overall, many developers expressed a preference to have the flexibility to decide whether to offer steering, in-app payment or both.⁷⁸

4.55 We recognise that presenting GPB alongside alternative payment options may increase cognitive effort for end-users and place additional demands on developers. However, enabling end-users to compare payment options by price and other characteristics allows for meaningful user choice. Side-by-side presentation does not, in itself, appear to cause confusion and is common in online environments, while any risk of confusion can likely be mitigated through clear design and labelling.

4.56 Importantly, end-users should be able to meaningfully compare purchasing options at the point of choice. Developers should therefore be able to communicate clearly and transparently, at the point where end-users make their decision, the differences between the available options, including price information, and any non-price promotional benefits or bonuses. This matters because information presented at different points in the end-user journey (eg on a prior page) may not

⁷² 7 responses to voluntary requests for information; [redacted]. 2 responses to call for evidence dated 1 April 2026 [redacted].

⁷³ 6 responses to voluntary requests for information [redacted].

⁷⁴ 8 responses to voluntary requests for information [redacted].

⁷⁵ [redacted] response voluntary request for information [redacted].

⁷⁶ [redacted] response to voluntary request for information [redacted].

⁷⁷ 4 responses to voluntary request for information; [redacted].

⁷⁸ 10 responses to voluntary request for information; [redacted].

be recalled at the point of choice, making users more susceptible to biases, such as defaulting to familiar options.⁷⁹

- 4.57 We also note that requiring developers to offer the first-party integrated payment systems alongside any steered payment options would enable end-users to continue to use the same systems and guarantees offered by Google they currently have access to, while also allowing them to benefit from the availability of an alternative. For end-users that choose to only use Google's integrated payment systems, there would be no change in their current circumstances (including any potential concerns around security and/or privacy) arising from the availability of alternative purchasing mechanisms.
- 4.58 In light of the above, we provisionally consider that allowing Google to require presentation of GPB alongside any steering links is justified in achieving our aim. However, developers should be given full flexibility to communicate the price and non-price differences between these options at the point of the user's decision. This approach ensures informed and genuine end-user choice.

Interstitial information screens

- 4.59 We have also considered whether to allow Google to require the display of interstitial information screens to end-users who are completing steered transactions, and whether the proposed Steering CR should impose any limitations regarding the content of any such screens.
- 4.60 Google submitted that end-user confusion regarding with whom they are transacting and whether they remain protected by Play's secure environment, combined with pre-existing expectations of transaction security and privacy within apps on the Play Store, could amplify harms that may arise from enabling steering. Google submitted that this additional harm may arise from end-users choosing to transact with parties they would not otherwise consider trustworthy or not taking other measures to protect themselves they would ordinarily take when transacting online.⁸⁰
- 4.61 Third party stakeholder views on the benefits of interstitial screens are mixed:
- (a) many stakeholders did not express strong views on the presence of a screen as such, but argued that if a screen is needed, it should focus on informing end-users in a neutral way that they are leaving the app environment and transacting directly with the developer.⁸¹ Key concerns included:

⁷⁹ Enke, Benjamin. (2024), '[The cognitive turn in behavioral economics](#)', Working paper, Harvard University.

⁸⁰ Google's response to section 69 notice [redacted].

⁸¹ 6 responses to call for evidence; [redacted]. 4 responses to voluntary requests for information [redacted].

- (i) **language and design:** certain language or designs risk deterring users from following links to external payment options. Respondents gave various examples of how screens should not be shown repeatedly, not include warnings about risks, loss of protection or functionality, or other forms of alarmist or asymmetric language, as these may deter legitimate transactions;⁸² and
 - (ii) **level of information:** many developers also suggested that detailed information (on refunds, customer support or payment processing arrangement) should be provided in other places, and gave examples, such as before the payment journey, in post-purchase confirmations, or via accessible links to further information.⁸³ This should ensure a balance between providing information in line with user expectations and industry practice without disrupting the end-user journey.
- (b) some respondents submitted that interstitial screens are important for informing end-users;⁸⁴
 - (c) however, a number of developers questioned the need for any interstitial screens, including highlighting the recent Epic v Apple judgment in the US which resulted in steering being introduced without such a screen, and noted that they did not observe an increase in end-user confusion. While acknowledging that it is important for users to understand who they are transacting with, they suggested clarifying this through less intrusive means.⁸⁵

4.62 Developers also expressed mixed views on the potential negative impact an additional neutral screen would have on conversion rates:

- (a) some developers expect that a neutral screen with short text informing end-users that they are transacting with the developer would have limited impact or that impact could be mitigated if developers can improve end-user experience of the screens;⁸⁶
- (b) however, several other developers expect that the extra friction from a single neutral screen is likely to materially increase drop offs.⁸⁷ Some of these

⁸² 7 responses to voluntary requests for information [redacted]. 8 responses to call for evidence dated 1 April 2026 [redacted].

⁸³ 9 responses to voluntary requests for information [redacted].

⁸⁴ 5 responses to call for evidence dated 1 April 2026 [redacted].

⁸⁵ 2 responses to call for evidence dated 1 April 2026 [redacted]. 6 responses to voluntary requests for information [redacted].

⁸⁶ 2 responses to voluntary requests for information; [redacted].

⁸⁷ Response to call for evidence dated 1 April 2026 from [redacted]. 9 responses to voluntary requests for information [redacted].

provided estimates of drop off rates ranging from 5% to over 60% leading to a corresponding reduction in conversion due to the extra step.⁸⁸

- 4.63 More generally, we recognise that developers are unlikely to have tested the exact scenario of a neutral interstitial screen for steering, so the estimates are based on their expectations or testing and observations in other contexts. The range may also in part be due to different payment models, with those reliant on high volume, low value transactions ('microtransactions') appearing more sensitive to frictions than those operating other models.
- 4.64 Overall, while developers support factual, clear and neutral information to be given to end-users to support informed choice, there are concerns with respect to screens being designed in a way that actively discourages end-users from steering ('scare screens'), and the increased levels of friction associated with the inclusion of additional screens resulting in reduced conversion rates (eg vs GPB).
- 4.65 Further to the above, we note again that Google's respective app stores do not make their in-app payment systems available to apps offering physical goods and services, instead directing such apps to use alternative payment methods, including steering, without the use of any interstitial screens. Accordingly, we provisionally consider it likely that a relatively large proportion of apps use alternative in-app payment mechanisms, meaning that end-users already have substantial experience with these types of transactions.
- 4.66 We recognise the need to balance informed end-user choice with minimising friction and ensuring that the proposed Steering CR remains effective in achieving its aim. Based on the above, we provisionally consider that allowing a single interstitial screen, appropriately designed with neutral language, can support informed end-user choice at the point of redirection while still preserving a sufficiently smooth journey to enable developers to use steering in practice.
- 4.67 We note that there may be ways to further optimise this balance, for example by time-bounding,⁸⁹ frequency-bounding,⁹⁰ changing defaults,⁹¹ or restricting the screens to riskier transactions.⁹² We will continue to consider these potential refinements, including by reviewing any responses to this consultation.

⁸⁸ 5 responses to voluntary requests for information [36].

⁸⁹ For example, disallowing screens after a period of time as users become accustomed to steering and the need for explicit information may reduce.

⁹⁰ For example, putting a limit on how many times a screen can be shown per month/week for the same app.

⁹¹ For example, having a default 'do not show this screen again' setting.

⁹² For example, establishing a form of 'trusted partner programme' or similar.

Restricting the use of WebViews

- 4.68 We have also considered whether Google should be allowed to prohibit the use of WebViews for steering.⁹³ In doing so, we have focused on the extent to which WebViews can lead to end-user confusion about whether they are continuing to benefit from protections offered by the Play Store, as well as any evidence on the impact that restricting WebViews may have on uptake of steering.
- 4.69 Google submitted that the use of WebViews can introduce additional user confusion, as WebViews often look like an integrated part of the app.⁹⁴ As outlined in the above section on interstitial screens, Google submitted that avoiding end-user confusion is important because confused end-users may be more likely to transact with a potentially malicious website, and may not take measures they may otherwise take to protect themselves.⁹⁵ Google submitted that Play users are accustomed to high levels of security and might assume that such links have been reviewed by Google (and that they are therefore protected), so are particularly vulnerable to exploitation.⁹⁶
- 4.70 A number of developers submitted that WebView use is unlikely to cause end-user confusion; some report using WebViews in their native apps without end-user comprehension issues, while others warned that prohibiting WebViews could itself create confusion by forcing end-users unexpectedly out of the app.⁹⁷
- 4.71 Many developers reported that they would consider using WebViews for steering, in particular stating that it can provide a smoother end-user experience over launching external payment flows in a dedicated web browser.⁹⁸ They stated that browser-based payment journeys can be clunky and slow, whereas WebViews can load faster, involve fewer steps, and reduce friction by keeping end-users within the app, resulting in a more streamlined experience and better conversion rates.
- 4.72 There may be some merit to Google's argument that WebViews introduces additional user confusion, although the evidence is weak and the use of an interstitial information screen (and side-by-side) would likely mitigate this issue in any case. While we recognise a stated support for WebViews from some developers (at least to the extent that they would consider using them), we have

⁹³ A 'WebView' is a functionality that enables developers to render web content within an app, and which forms the basis of many in-app browsers on Android. This is described in more detail in the [Mobile Browsing and Cloud Gaming Market Investigation Final Decision Report](#), paragraphs 2.64-2.68.

⁹⁴ Google's response to section 69 notice [redacted].

⁹⁵ Google's response to section 69 notice [redacted].

⁹⁶ Google's response to the CMA's S69 notice [redacted].

⁹⁷ 7 responses to voluntary requests for information [redacted].

⁹⁸ [redacted] response voluntary request for information [redacted]. Response to call for evidence dated 1 April 2026 [redacted]. 14 responses to voluntary requests for information [redacted].

not currently seen evidence that their absence would have a material impact on the uptake of steering (eg through a lower conversion rate). In the absence of such evidence, our provisional view is that it is not necessary at this stage to require Google to allow the use of WebViews for steering.⁹⁹ However, this may need to be reviewed over time, as in-app browsing appears to be an increasingly significant proportion of all browsing on Mobile Devices.¹⁰⁰

Targeted measures to protect children

- 4.73 Google has stated that any Steering CR should allow the introduction of additional protections for children. For example, this could include preventing steering being offered to children, or preventing the use of steering on devices with parental controls enabled.¹⁰¹
- 4.74 Google submitted that as part of its latest measures on steering in the UK, [redacted].
- 4.75 We recognise that it is reasonable to apply stronger protections for children when using apps and transacting online. We have also not seen any evidence to suggest that preventing children from being steered would have a material impact on developers' interest in taking up steering. We have therefore provisionally concluded that it would be appropriate to allow Google the ability to introduce additional, appropriate, protections for children.

Ensuring that any steering fee is set at a level which is commercially viable for developers to use steering whilst protecting Google's cost recovery and investment incentives

- 4.76 This section covers the measures included in the proposed Steering CR which regulate the setting of any fees charged for the purposes of steering end-users to complete transactions on external websites.

Why we have decided to adopt a principles-based approach

- 4.77 In determining the content, form and level of detail of a CR, the CMA will follow the approach set out in the digital markets competition regime guidance which includes an assessment of which CR(s) would likely be effective in achieving its aim. The guidance explains that, when setting action-focused CRs, the CMA will typically impose higher-level requirements where that is likely to be effective, since such requirements allow greater flexibility in the specific steps the firm must take

⁹⁹ See Proportionality below.

¹⁰⁰ [Mobile Browsers and Cloud Gaming Market Investigation, summary of final decision](#), 12 March 2025, page 3.

¹⁰¹ Google's response to section 69 notice [redacted].

to comply, which may support innovation and involve less risk of unintended consequences.¹⁰²

4.78 We provisionally consider that it is not necessary or appropriate at this stage for the CMA to specify an exact steering fee in the proposed Steering CR itself. Instead, we provisionally consider that the more appropriate approach is to impose higher-level principle-based obligations on Google. The proposed obligations require Google to set any steering fee by reference to the cost-based, value-based, and administrative simplicity principles. This is because:

- (a) the relevant concern we are aiming to address with the fee provisions is that the setting and structure of fees, and related terms, may prevent or undermine developers' ability to make effective use of steering. That concern is not limited to the absolute level of any fee, or to a single price point. For example, a fixed fee may weaken steering by being set too high, but also by being structured or applied in a way that creates uncertainty, complexity, or other deterrents to its use by developers;
- (b) a principle-based approach also has certain benefits over a fixed fee because it constrains not only the amount of each fee offered, payable or proposed, but also its structure and operation. It therefore sets a framework which allows for greater flexibility, including across a range of commercial circumstances and over time. By contrast, a fixed fee would typically require an ex-ante assessment based on modelling assumptions that may become outdated, creating a greater risk of distortion and a heavier ongoing administrative burden; and
- (c) in particular, any fair and reasonable price point, or such a fee range, would need to be set on a forward-looking basis and remain effective and appropriate throughout the designation period. The principle-based approach which stipulates the relevant factors that Google must take into account in setting a fee would allow for the flexibility to adjust the pricing as appropriate given changes in circumstances during the designation period.

4.79 At the same time, adopting a principle-based approach at this stage does not mean that more specific requirements could never be justified in future. For example, if in practice Google failed to comply effectively with this higher-level CR, or if we identified issues requiring correction through specific measures, the CMA has the legal powers to impose more detailed requirements.

4.80 We therefore provisionally consider that a principle-based approach is the appropriate form of CR at this stage, while noting the potential for more detailed

¹⁰² See [Digital markets competition regime guidance](#), December 2024 (CMA194), paragraphs 3.27–3.32.

requirements if that proves necessary and appropriate to ensure the effectiveness of the proposed Steering CR.

- 4.81 Under this principles-based approach, the proposed Steering CR would not itself specify the level of any steering fee. Instead, compliance with the proposed Steering CR would require Google to set any such fee consistently with the relevant principles, and to be able to demonstrate to the CMA's satisfaction that the fee's level, structure and operation comply with those principles.

What is 'fair and reasonable' in the context of setting a steering fee

Fair and reasonable in the context of the Act

- 4.82 The concept of fair and reasonable pricing is a flexible standard used across different legal frameworks, including on an ex ante basis. It is not confined to the application of any single regime-specific methodology; what methodology is appropriate depends on the legal framework in question and the specific regulatory objectives which the authority is pursuing based on its assessment of the relevant competition concerns.
- 4.83 We have carefully considered the legislative scheme under the Act, specifically in context of setting fair and reasonable pricing CRs. It is clear that there is no explicit or implicit indication that Parliament intended for the CMA to be bound by the legal tests and principles applicable under different legal regimes,¹⁰³ including ex post competition law. Specifically:
- (a) as a matter of statutory interpretation, there is no provision in the Act or the Explanatory Notes linking section 20(2)(a), 20(3)(a), 20(3)(f) and 20(3)(h) to the ex post competition law test or another legal framework. Instead, the Explanatory Notes emphasise the distinct purpose of the Act and the insufficiency of existing competition and consumer laws to address digital market issues;¹⁰⁴ and
 - (b) as a matter of legislative design, the Act is an ex ante, forward-looking regime, which differs materially from other regimes and from ex post competition law.¹⁰⁵ The Act does not require a finding of wrongdoing and instead enables the CMA to impose bespoke, flexible interventions to advance a broad set of statutory objectives, including fair dealing, open

¹⁰³ This is based on the statutory construction and consideration of accompanying Parliamentary materials, including the Act Explanatory Notes.

¹⁰⁴ Paragraph 3 of the Act Explanatory Notes states that 'It is the Government's view that the unprecedented market power, in relation to certain digital activities, of a small number of businesses, is holding back innovation and growth. Existing competition and consumer laws are not designed to address the unique barriers to competition in digital markets. In response, this Act establishes a new regime that is designed to boost competition in digital markets.'

¹⁰⁵ Paragraph 30 of the Act Explanatory Notes.

choices and trust and transparency. The concept of trading on ‘fair and reasonable terms’ is deliberately left undefined and broad,¹⁰⁶ indicating that Parliament intended to confer discretion on the CMA rather than constrain it by fixed tests.

- 4.84 Instead, fair and reasonable pricing must be interpreted in light of the statutory framework set by the legislation for imposing conduct requirements:
- (a) what amounts to fair and reasonable pricing depends on the nature of the competition concerns being addressed and the regulatory objectives pursued to address them;
 - (b) fair and reasonable pricing is a mechanism enabling the CMA to assess and stipulate appropriate pricing terms, for example through reflecting costs and/or the value of the goods or service provided, while taking account of the wider purpose of the UK’s digital markets competition regime and the need to preserve appropriate incentives to invest and innovate; and
 - (c) fair and reasonable pricing should ensure that an SMS firm does not use its substantial and entrenched market power to impose prices that are unfair and unreasonable.
- 4.85 Nevertheless, we recognise that there are certain similarities between the Act legal framework and the other regimes. In setting our proposed Steering CR, we have therefore considered approaches used in other circumstances, where appropriate, to inform our own thinking under the Act.

What level and structure of fees might be Fair and Reasonable for steering?

- 4.86 In the context of steering, the application of fair and reasonable pricing must be informed by the competition concerns the proposed Steering CR is designed to address and the regulatory and statutory objectives pursued through this intervention. In particular:
- (a) fair and reasonable pricing must be applied in a way that ensures that the proposed Steering CR’s fair dealing and open choices statutory objectives are met in relation to steering fees. That requires pricing terms which ensure that developers and users are treated fairly, are able to interact directly or indirectly with Google on reasonable terms, and are able to choose freely and easily between the services or digital content provided by Google and those provided by other undertakings; and

¹⁰⁶ Paragraph 183 of the Act Explanatory Notes.

(b) fair and reasonable pricing should also be applied so as to support the regulatory aim of the proposed Steering CR to ensure the ability of developers to use steering effectively with the need to protect legitimate platform interests. Given the competition concern that restrictive steering terms can frustrate the remedy and insulate Google's own fees from competitive pressure, fair and reasonable fee terms must ensure that steering is commercially viable for developers.

4.87 This means that fair and reasonable pricing is relevant to the proposed Steering CR where Google set fees for link-outs or similar steering mechanisms.

4.88 The level and structure of fees are directly relevant to ensuring developers can make meaningful choices regarding steering and trade on fair and reasonable terms with Google. Fees that significantly reduce the incentive of developers to offer steered transactions, or that introduce complexity, uncertainty or deterrence, may limit developers' ability to communicate with and direct end-users and weaken the effectiveness of steering in practice.

4.89 In assessing what level of fee would meet the Fair and Reasonable standard, we have considered Google's submissions, evidence from developers, and international experience.

Google's submissions

4.90 Google has submitted that it is entitled to fair remuneration for the services it provides to developers who would offer steered transactions. It adds that its fees reflect the genuine value it provides to developers and do not include a monopoly premium that arises solely on account of alleged market power.¹⁰⁷

4.91 Google submitted that it provides a differentiated service and competes with other app stores on quality, security, innovation, and price, and that the key, valuable, services it provides are characterised by trust, discovery, delivery, and ongoing support.¹⁰⁸ It noted that across these areas it is differentiated, or superior to, other Android app stores and Apple's App Store in a number of ways. For example, it highlighted that [REDACTED].¹⁰⁹ It also noted some ways in which the Play Store was differentiated to Apple's App Store, although these were less numerous. For example, it stated that [REDACTED].¹¹⁰ Google said that the challenges the App Store faces are different to that of the Play Store due to Google using an open-ecosystem

¹⁰⁷ Google's submission [REDACTED].

¹⁰⁸ Google's submission [REDACTED].

¹⁰⁹ Google's submission [REDACTED].

¹¹⁰ Google's submission [REDACTED].

model, meaning the trust and safety features are far more valuable on Android than on iOS.¹¹¹

- 4.92 Google has submitted that cost-based pricing would prevent an app store from being rewarded for investment, encourage app stores to become less efficient as it would penalise app stores with lower costs, and would reduce the incentive for risk-taking and innovation. This is in addition to its submissions that cost-based pricing would be inconsistent with the legal framework for determining fair pricing.¹¹²
- 4.93 Google also provided a list of innovations made by Play in 2025 which includes investments in AI and real-time defences to stop threats, the prevention of apps getting excessive amounts of sensitive user data, anti-spam protections, new layers of protection for kids and families and new features to enable developers to build safer apps.¹¹³ Google stated that it was unable to provide the estimated cost of these developments as [redacted].¹¹⁴ Google did however provide Play's global P&L for FY2025 which showed that Play's FY25 global 'Research & Development' totalled \$[0-1 billion][redacted].¹¹⁵

Developer feedback

- 4.94 We have received evidence from developers that for steering to be viable, any fees for steering need to be sufficiently low.¹¹⁶
- 4.95 We have received evidence that to adopt steering developers will need to incur both fixed and variable costs, including those associated with updating their apps and self-provide a number of services, such as organising their own payment processing, merchant of record services, customer support services (eg refunds), and operating their own website. Evidence from larger and smaller developers differed to some degree as to the extent of these costs.

¹¹¹ Google's submission [redacted].

¹¹² Google's submission [redacted].

¹¹³ [redacted].

¹¹⁴ Google letter to the CMA [redacted].

¹¹⁵ Google's response to section 69 notice [redacted].

¹¹⁶ 8 responses to voluntary requests for information [redacted].

- 4.96 Evidence from large developers suggests that the fixed costs of adopting steering are likely to be low or zero,¹¹⁷ with some variation.¹¹⁸ This is largely because they are already providing many or all of the required services.¹¹⁹
- 4.97 Most large developers' respondents noted there would be a cost to steering as they expected that steered transactions would result in lower customer conversion rates (eg due to increased frictions and inputs required).¹²⁰ There is some suggestion that the extent of the impact on conversion rates may improve over time.¹²¹ The evidence also suggests that conversion rates may vary among developers, and in some cases result in positive conversion rates as a result of the developer being able to make a better, more personalised offer to its customers.¹²²
- 4.98 Smaller developers may need particularly low fees because:
- (a) they are less likely to be providing the required services outside of the Play Store already, and may be less willing or able to absorb additional operational complexity; and
 - (b) they may be more sensitive to higher costs or tighter margins as they do not sell large volumes and are less able (or unable) to cross-subsidise their digital goods from other areas of their business. For example, a small UK developer that earns over the \$1m threshold told us that, '(t)he 30% loss of revenue is very significant for [us] as a small business, particularly when trying to make hiring, investment, and expansion decisions';¹²³ another smaller developer noted that 'every pound lost to the 'App Tax' is a pound not spent hiring a developers, improving a product, or lowering prices for end-users';¹²⁴ and a representative body for UK developers said that issues are

¹¹⁷ 12 responses to voluntary requests for information [redacted].

¹¹⁸ There was some variation as to the size of the expected potential fixed costs that likely reflect their different business models, capabilities, and expectations of what a steering remedy may include. For example, [redacted] said that it would incur fixed costs of just £10k to £20k to adopt steering in the UK, whereas [redacted] estimated it would incur a one-off cost of £50k to £300k to build the steered transaction journey. See [redacted] response to voluntary request for information [redacted]. [redacted] response to voluntary request for information [redacted].

¹¹⁹ 12 responses to voluntary requests for information [redacted].

¹²⁰ 6 responses to voluntary requests for information [redacted]. [redacted] found monthly active users fell by 4% when implementing a web payment option in the US despite it being lower priced, and [redacted] estimated the conversion rate of steered transactions was 30-60% whereas in-app purchases were consistently above 60%. See [redacted] response to voluntary request for information [redacted], and [redacted] response to voluntary request for information [redacted]. This is consistent with a study by RevenueCat (an in-app purchase management platform) found that using web-based payments for in-app subscriptions reduced developers' revenue by 6%. See [Web vs. in-app subscriptions: Web subscriptions result in 6% drop in takehome revenue](#), accessed by the CMA on 21 May 2026.

¹²¹ For example, one developer said that conversion rates may be managed over time by testing and optimizing the user journey. See [redacted] response to voluntary request for information [redacted].

¹²² For example, one developer said that transacting directly with the customer allows it to gather information to improve the tailoring of their offers to user preferences. See [redacted] response to voluntary request for information [redacted]. Another found that steering did not significantly impact its conversion rates in the US. See [redacted] response to voluntary request for information [redacted].

¹²³ Note of meeting with [redacted].

¹²⁴ xigxag, '[The App Tax shows who really holds power in Britain's digital economy](#),' accessed 1 June 2026.

particularly significant for smaller developers and that the more revenue that they can retain the more they can invest into growth and scaling.¹²⁵

- 4.99 Steering fees may also need to be low enough to reduce the distorting effect they have on competition between Google's own apps and competing apps. For example, [redacted] told us that an app store commission impacts its ability to compete, including against Google [redacted].¹²⁶

International experience

- 4.100 We provisionally consider that international developments indicate that steering fees must be significantly lower than current headline commission rates to ensure an effective intervention:

- (a) In the US, Apple has permitted restriction-free steering since 30 April 2025.¹²⁷ Although a number of large developers implemented steering in response to the new rules, by August 2025 some developers had still not decided whether to implement steering despite facing zero fees or restrictions. We have received evidence that several developers were still conducting analysis as to whether steering would benefit them.¹²⁸ Reasons cited for this include considering how it would impact the customer experience,¹²⁹ and the lack of consistent global rules, which prevented scaling the capability effectively.¹³⁰ While this observation relates to the removal of Apple's steering prohibitions, we consider it is also informative for what might happen if steering restrictions on Android were reduced.
- (b) Responses to our call for evidence in April 2026 noted that there is currently low adoption of steering in the EU. Respondents stated that this is in part because of high fees.¹³¹ Google has recently issued updated fees in the EU, but it is too soon to see the effect of these.¹³²

- 4.101 We note that the uptake discussed above is focused on link-out methods as these are easier to measure than other steering approaches (eg free text), so could underestimate the total effect of allowing steering.

¹²⁵ Note of meeting with [redacted].

¹²⁶ [redacted] response to section 69 notice [redacted].

¹²⁷ This is in response to a court injunction which mandated changes to its approach to steering in the US.

¹²⁸ 5 responses to voluntary requests for information; [redacted].

¹²⁹ [redacted] response to voluntary request for information [redacted].

¹³⁰ [redacted] response to voluntary information request [redacted].

¹³¹ 4 responses to Call for evidence [redacted].

¹³² Google updated its Play service fees for when a developer completes a transaction or app install following an external content link on 4 June 2026. See: [Enroll your app in the external offers program](#), accessed 10 June 2026.

CMA analysis

- 4.102 In developing the proposed steering fee provisions, we have considered a range of possible approaches to both their content and form. In particular, we have considered different ways of framing the level and structure of any fee payable in connection with steered transactions.
- 4.103 Steering fees should be set at a level that makes steering a genuinely viable alternative to the in-app payment system and encourages meaningful uptake among developers, while allowing Google to recover the costs associated with operating a trusted app store and to maintain incentives to invest in these systems over time:
- (a) If the fee is set too high, steering is likely to be commercially unattractive to developers, particularly once they factor in the risk that any additional frictions involved in taking users outside the in-app environment could reduce conversion rates;
 - (b) At the same time, where a fee is imposed, its level should be calibrated to maintain Google's incentives to invest and innovate, in order to support and improve the infrastructure, security, and other relevant end-user protection systems.
- 4.104 We provisionally consider that the right approach should therefore balance these objectives: steering fees should be set at a level that does not undermine the effectiveness of the proposed Steering CR and keeps steering a viable option in practice, while recognising legitimate platform interests, including cost recovery, investment, innovation, security and privacy. The steering fee provisions we propose in paragraphs 9–13 of the proposed Steering CR are intended to ensure that both these goals are achieved.

The role of the cost-based principle in our proposed approach to setting steering fees

- 4.105 This section provides: (i) an overview of different cost-based approaches, (ii) our proposed definition of this concept in the Steering CR, (iii) an assessment of the likely impact on steering fees of adopting the cost-based principle, and (iv) an overview of the practical considerations of using the cost-based principle.

Cost-based approaches

- 4.106 Cost-based approaches are common and well-established under a variety of ex ante and ex post frameworks, with different approaches being used to support

relevant firms to recover a broader or narrower range of costs.¹³³ While these approaches are often used in other contexts, including for more utility-like services, they could offer relevant parallels for assessing the appropriateness of using a cost-based approach in relation to steering.

4.107 We have considered the range of costs that can be recovered which could be appropriate for the proposed Steering CR:

- (a) under a narrow cost-based approach, cost recovery could be exclusively linked to the long run incremental cost (LRIC) which allows a regulated firm to recover all costs which would not be incurred if the product or service was not offered. We provisionally consider that the LRIC for the provision of steered transactions could be very low. It is unlikely that costs incurred in the operation of an app store (including investments) would be specific to apps that offer their end-users steered transactions and would be incurred in any event for apps that do not offer steered transactions. The incremental costs for allowing steered transactions may be limited to the provision of technology that allows a developer to offer external links;¹³⁴
- (b) cost-based approaches can be wider than a LRIC approach and can be expanded to include the recovery of an appropriate allocation of common costs. These could include costs which are not directly linked to the provision of the service, but which are real and unavoidable costs for the firm supporting (among other things) the provision of the relevant product or service. The level of any such allocation would usually reflect the extent to which the relevant service is fairly attributable to, or benefits from, those shared costs, taking into account principles of cost causation, proportionality, and avoiding undue cross-subsidisation; and
- (c) a cost-based approach can also allow for an appropriate return on investment (and could therefore maintain Google's incentives to invest, as described in the 'Google's submissions' section above). There are different possible approaches to assessing the appropriate level of return, which would need to reflect the specific circumstances of the case at hand, for example the ex ante risks and innovation incentives present in the operation of app stores.

¹³³ Examples include: The CAA's [price control for Heathrow Airport](#); Ofcom's [Wholesale Fixed Telecoms Market Review](#); Ofgem's [RIIO](#) (Revenue = Incentives + Innovation + Outputs) framework in energy; the Office of Road and Rail's [control over Network Rail's access charges](#); and the ex post approach under competition law when assessing excessive and unfair pricing.

¹³⁴ We note that a similar measure of cost has been recommended as to what Apple is permitted to recover by the United States Court of Appeals for the Ninth Circuit, in the Epic v Apple litigation. See United States Court of Appeals for the Ninth Circuit, [Epic Games, Inc v. Apple Inc.](#), 11 December 2025, pages 41-42.

- 4.108 Given the common and well-established nature of such approaches, and the ability to maintain incentives to invest and innovate, we provisionally consider that a cost-plus approach is an appropriate principle which Google should take account of when setting each steering fee. We consider that the cost-plus approach (incorporating LRIC, the appropriate allocation of common costs and the reasonable rate of return) meets the aim of the proposed Steering CR by:
- (a) protecting Google’s legitimate platform interests and maintaining its incentives to invest by allowing Google to fully recover its costs incurred in providing the relevant services through the Play Store, including a portion of common costs (given that the majority of the Play Store services provided to a steered transaction will also be provided to a non-steered transaction as well), as well as earning a return on its investments (maintaining its incentives to invest); and
 - (b) keeping prices at a fair and reasonable level which we would expect to maintain the effectiveness of steering in practice.

Likely impact on steering fees

- 4.109 We attempted to gather information from Google as to the costs of operating the Play Store. Google stated that it is not able to provide information regarding the cost of providing the Play Store in the UK given the global nature of Play’s business.¹³⁵ In the absence of relevant cost information, we have considered the available profitability analysis.
- 4.110 We provisionally consider that the evidence shows that Google and the Play Store are likely to be highly profitable. Over the last ten years, the Alphabet Group has been able to generate an average estimated ROCE of 38%, significantly higher than the estimated benchmark weighted average cost of capital (WACC) of [10-15] [%].¹³⁶ Excluding advertising revenues, the Play Store generated average gross margins and operating margins for the period 2022-2024 of [%] and [%] respectively, higher than the gross margins and operating margins for Google Services and Google overall.¹³⁷
- 4.111 Given the above, we provisionally consider that the cost-based principle is likely to result in significantly lower steering fees relative to Google’s Play Store fees given the likely low cost model of operating an app store (which is a high-volume,

¹³⁵ Google’s response to section 69 notice [%].

¹³⁶ CMA, [Strategic Market Status Investigation into Google’s Mobile Platform: Final Decision \(SMS Mobile\), Appendix B](#), 22 October 2025, paragraphs B.99–B.100.

¹³⁷ CMA, [Strategic Market Status Investigation into Google’s Mobile Platform Final Decision, Appendix B](#), 22 October 2025, paragraph B.78.

platform-based model), and which is consistent with the high observed profitability of Google.

Practical considerations

- 4.112 A cost-based fee is a well-established approach in regulation with recognised methodologies.¹³⁸ This could help deliver an effective Steering CR, as well as one which is predictable and understandable.
- 4.113 We recognise that the details of a cost-based fee would involve complexities, for example, determining a suitable proportion of common costs that can be recovered, and the reasonable rate of return on investments. We would expect Google to provide the necessary evidence to justify its compliance approach.
- 4.114 We note the submissions from Google that it is currently unable to provide data on the annual costs involved with operating the Play Store in the UK. Nevertheless, we consider that Google cannot use a current stated inability to identify costs as a reason not to impose the cost-based principle as relevant to setting a steering fee.¹³⁹ Furthermore, the proposed Steering CR makes provision that Google should record this data.

Summary

- 4.115 We provisionally consider that the cost-based principle should be a relevant measure for the fees that Google is able to charge for steered transactions, given that a cost-based fee as specified in the proposed Steering CR is likely to be set at a viable level for developers to steer, whilst maintaining Google's incentive to invest and innovate.

The role of the value-based principle in our proposed approach to setting steering fees

- 4.116 This section sets out: (i) an overview of value-based approaches, (ii) our proposed definition of this concept in the Steering CR, (iii) an assessment of the likely impact

¹³⁸ See the 'cost-based approaches' section above.

¹³⁹ We note that this is also consistent with the CAT's conclusions in the *Kent v Apple* judgment (which is subject to an ongoing appeal). While this is a case relating to Apple's App Store fee structure, we consider that the similarities to Google's Play Store still make this informative. Apple argued that it was difficult to separate and allocate costs across different elements of its ecosystem. The CAT rejected the proposition that that complexity alone should prevent an excessive pricing evaluation from taking place. [Dr. Rachael Kent v Apple Inc. and Apple Distribution International Ltd](#), [2025] CAT 67, paragraph 599: 'Apple's objections are in reality concerns about the accuracy of the exercise, given the complex relationships between the product lines and the OPEX that supports them. However, we provisionally consider those concerns to be overstated'. See also paragraph 602: 'We would in any event be very reluctant to accept an argument that a degree of complication in allocating OPEX should prevent a Limb 1 evaluation taking place. The complexity largely arises from Apple's, perfectly reasonable, choice of business model and its decisions about how to organise its management accounts. As a matter of policy, to accept Apple's arguments would allow those decisions to provide an unjustifiable shield against scrutiny by courts and regulators'.

on steering fees of adopting the value-based principle, and (iv) an overview of the practical considerations of using the value-based principle.

Value-based approaches

- 4.117 Value-based approaches have been used in a range of regulatory contexts to balance the need to constrain the exploitation of market power while maintaining incentives to invest and innovate, particularly where cost-based benchmarks alone may not always fully capture the contribution of the underlying asset or service.¹⁴⁰ For example, a value-based approach could be appropriate in the context of providing remuneration for the creation of a platform that did not exist previously, allowing new businesses to enter and create value of their own.
- 4.118 In the context of the proposed Steering CR, a value-based approach would allow Google to capture a share of the surplus created where its offer to developers in relation to steered transactions is particularly differentiated, valued, or the result of ongoing innovation. As noted above, a value-based approach is the preferred approach of Google, given its submissions as to the importance of the value that the creation of, and innovations in, the Play Store provides to developers.
- 4.119 A value-based approach could in principle be the sole way of determining how much Google should be able to charge for steered transactions, or it could be used alongside a cost-based approach. As we explained above, we provisionally consider that a cost-based approach should be a relevant measure in setting a steering fee, and so our proposal is for a value-based approach to be used alongside the cost-based approach and the administrative simplicity principle (discussed in the next section).

Defining an appropriate value-based approach

- 4.120 As with the cost-based approaches, it is important to clearly define the form of a value-based approach and how this would be effective in meeting the aim of the proposed Steering CR. In doing this, we set out two considerations in particular:
- (a) First, when assessing an appropriate level of fees, any value-based approach should reflect the value attributable to the services offered by the Play Store. We provisionally consider that it is necessary and appropriate to adjust any estimate of value for the effects of Google's substantial and entrenched market power (SEMP). This is because in the presence of

¹⁴⁰ For example, in a Standard Essential Patents context, FRAND royalties are typically tied to the economic value of the underlying technology absent the additional bargaining power created by standardisation, with courts relying on comparable licences and hypothetical negotiation frameworks rather than pure cost-based analysis. Similarly, the EU Digital Markets Act contemplates benchmark-based assessments of whether access terms confer a disproportionate advantage relative to the value of the service provided.

effective competition some of the potential returns, for example for providing platform access and a means to acquire customers, would likely be competed away.¹⁴¹

- (b) Second, in addition to the value attributable to the services offered by Google to app developers and consumed by end-users, these developers also provide value to Google. Without the offer of third-party apps on Google's platform, it is unlikely that end-users would value the platform to the same extent that they do, impacting, for example, the attractiveness of the platform to OEMs and advertisers.^{142, 143} We provisionally consider that this two-way exchange should be included in any assessment of value (for example, by netting this off the value that Google provides to developers).

Likely impact on steering fees

- 4.121 A value-based approach could result in a justifiable fee above a cost-based measure where Google's offer to developers that steer is particularly differentiated, valued, or improved as the result of ongoing innovation.
- 4.122 Some developers acknowledged that they benefit from Play Store services such as automatic updates,¹⁴⁴ app review,¹⁴⁵ privacy and security standards or other measures that generate user trust,¹⁴⁶ standardised interfaces,¹⁴⁷ and an easy download process.¹⁴⁸ Some trade associations also acknowledged that Google provides a trusted environment for downloading apps,¹⁴⁹ with one noting that this particularly benefits small developers with less established brands.¹⁵⁰ Therefore, where the Play Store's services (such as search, security, insights, etc) provide

¹⁴¹ For example, we note that the Standard Essential Patenting framework guidance discusses a similar concept where FRAND commitments prevent SEP holders from exploiting their strong bargaining power. See [Standard Essential Patent licensing - GOV.UK](#) section 1.2.

¹⁴² For example, Huawei and Microsoft made significant investments to incentivise developers to develop apps for their operating systems, with Huawei investing roughly \$1.5 billion in 2019, and Microsoft paying developers up to \$600,000 per app listed on its store in 2012. [Huawei to invest \\$1.5 billion in developer program, outlines computing plan](#); [Microsoft shelling out as much as \\$600,000 for Windows Phone apps | Network World](#); and [Microsoft Reveals New Windows Phone Marketplace Policies | CRN](#).

¹⁴³ In 2022, Spotify negotiated a deal with Google allowing it to pay no commission and offer its own payment processor, or pay 4% commission when using Google's payment processor. Google explained that *'Listening to music is one of [the phone's] core purposes... if we don't have Spotify working properly across play services and core services, people will not buy Android phones: "If a user chooses to use Spotify for its payment method, there is no fee paid to Google."* | [The Verge](#); [A secret Google deal let Spotify completely bypass Android's app store fees | The Verge](#); and ["If we don't have Spotify working properly... people will not buy Android phones."](#) | [The Verge](#).

¹⁴⁴ 1 response to section 69 [redacted]. 3 responses to voluntary request for information [redacted].

¹⁴⁵ 1 response to section 69 notice [redacted]. 1 response to section 69 [redacted]. 1 response to voluntary request for information [redacted].

¹⁴⁶ 4 responses to section 69 notice [redacted]. 1 response to voluntary information request [redacted].

¹⁴⁷ 1 response to section 69 notice [redacted].

¹⁴⁸ 1 response to section 69 notice [redacted].

¹⁴⁹ 3 responses to Invitation to Comment [redacted]. 3 responses to Invitation to Comment [redacted].

¹⁵⁰ [redacted] response to CMA's Invitation to Comment [redacted].

value on these points, which is not captured by a cost-based measure, this should be reflected in any relevant fees.

Practical considerations

- 4.123 There would be a number of practical considerations in using a value-based approach.
- 4.124 First, as noted above, a value-based approach would aim to allow Google to capture a share of the value created by the Play Store. Assessing the defined value measures (ie adjusting for the effects of SEMP and taking into account the two-way value exchange) could be both complex by its nature and open to a degree of subjectivity. The challenges in doing this are illustrated by the benchmarks Google has suggested could be used.¹⁵¹
- 4.125 Google argues that the appropriate way to disentangle value from monopoly value is through the use of benchmarks. Google argues that benchmarks allow an assessment of what a price would be if set under competitive conditions.¹⁵² Google further submitted that its proposed fee structure reflects the value that apps bring to the Play Store. It submits that [REDACTED].¹⁵³
- 4.126 Given the above submissions from Google, we have considered the benchmarks against which Google has compared the fees it charges for the Play Store. [REDACTED].
- 4.127 We do not consider that any of Google's proposed benchmarks are appropriate comparators. We provisionally consider that an appropriate comparator must: (i) provide similar services to those being regulated,¹⁵⁴ (ii) be exposed to effective competition, and (iii) reflect the two-way value exchange between the participants and the platform, and that none of the benchmarks proposed by Google satisfy all of these conditions.
- 4.128 This is consistent with the Competition Appeal Tribunal's (**CAT**) judgment (subject to an ongoing appeal) in relation to the App Store fees set by Apple,¹⁵⁵ noting that Apple and Google have similar fee structures. The CAT found that the fee set by Apple appeared to be an arbitrary one,¹⁵⁶ and was not satisfied that whilst Apple 'clearly provides value to developers through the App Store... the level of those

¹⁵¹ While it is not strictly necessary for us to assess submissions on the specific level of fees at this stage, as it would primarily be a compliance consideration, the submissions are relevant in assessing the practicalities of applying a value-based approach in these circumstances.

¹⁵² Google's submission [REDACTED].

¹⁵³ Google's submission [REDACTED].

¹⁵⁴ We note that Google has provided benchmarks that it compares with the Play Store, although this would more properly be focused on steering comparators rather than app store ones. However, we have not relied on this distinction when forming our provision view on the validity, or otherwise, of these benchmarks.

¹⁵⁵ [Dr. Rachael Kent v Apple Inc. and Apple Distribution International Ltd](#), [2025] CAT 67.

¹⁵⁶ [Dr. Rachael Kent v Apple Inc. and Apple Distribution International Ltd](#), [2025] CAT 67, paragraph 631(11).

benefits can in itself reasonably be taken to explain the very high profitability of the App Store.’¹⁵⁷

- 4.129 Second, value-based approaches tend to be used in industries with a particularly high degree of risk around returns on investment (ie where high investments are made with a limited chance of success), and so it is particularly important to maintain incentives to invest and innovate. Value-based approaches also tend to be used in time limited circumstances (for example in relation to time limited Intellectual Property or licensing rights). It is unclear that an established app store such as the Play Store (first introduced nearly 20 years ago) would face similar circumstances.
- 4.130 We also note that so far Google has been unable to provide evidence as to the scale and cost of the investments that it has been making in the Play Store. Therefore, whilst it does invest in the Play Store, it would be important for Google to explain the extent to which the nature and scale of such investments would feed into the application of the value-based approach. Further, we also note that the evidence on the extent to which the Play Store is differentiated is mixed, and it would therefore be important for Google to include an explanation of how to incorporate any identified level of differentiation into a value-based assessment, in practice.

Summary

- 4.131 While there may be some practical challenges in its application, we provisionally consider that the value-based principle should be a relevant measure for the fees that Google is able to charge for steered transactions, to be taken into account alongside the other principles.

The administrative simplicity principle

- 4.132 This principle is intended to ensure that the ability to steer under the proposed Steering CR can be exercised effectively in practice. It requires Google to ensure that its steering fee structure and related terms are straightforward to understand and implement, and do not introduce unnecessary technical or administrative burdens for developers.
- 4.133 This reflects the aim of the proposed Steering CR to remove restrictions that undermine effective steering and ensure that developers can meaningfully exercise choice, including by communicating with end-users, directing them to

¹⁵⁷ [Dr. Rachael Kent v Apple Inc. and Apple Distribution International Ltd](#), [2025] CAT 67, paragraph 673.

alternative purchasing options, and managing those interactions without undue friction or complexity.

- 4.134 Google's Play Store fee structures in the UK are relatively simple, consisting of three main price points in its recent change.¹⁵⁸ Stakeholders have stated that fee structures in other jurisdictions have been overly complex.¹⁵⁹
- 4.135 Google has to be able to track steered transactions in order to charge the appropriate fee (where a steering fee applies). To this end, it may require developers to integrate with reporting and monitoring APIs. A number of developers have raised concerns about how Google implements any monitoring APIs, namely that it might allow the platform to gain confidential information, raise technical barriers to adoption, and may affect developers' willingness to adopt steering.¹⁶⁰ We provisionally consider that any reporting and monitoring APIs should have fair and transparent terms, to address developers' concerns.

Summary

- 4.136 We provisionally consider that the administrative simplicity principle should be a relevant measure for the fees that Google is able to charge for steered transactions, to be taken into account alongside the other principles.

The relationship between the pricing principles

- 4.137 This section describes how the pricing principles are intended to interact, in particular how the value-based approach is proposed to work alongside the cost-based approach when setting the level of the steering fee.
- 4.138 As described above, we provisionally consider that the steering fee should be no higher than the level determined in accordance with the cost-based, value-based and administrative simplicity principles. We note that, properly defined, the cost-based and value-based principles might be expected to result in similar outcomes.
- 4.139 As set out in the proposed interpretative notes, we consider that it is appropriate to leave a degree of flexibility to Google as to how the principles should be applied in practice, subject to being able to demonstrate to our satisfaction that its approach takes proper account of each of those principles. One way in which Google could apply the cost- and value-based principles as part of determining the steering fee level is by using them as a cross-check on each other and adjusting the level of

¹⁵⁸ A store services fee for new installs of 10% on the first \$1m of annual earnings, and thereafter a standard fee of 20%, a fee of 15% when the developer participates in the new Apps and Games programmes.

¹⁵⁹ [redacted] response to voluntary information requests [redacted]. Note of meeting with [redacted].

¹⁶⁰ 11 responses to voluntary requests for information [redacted].

the fee as applicable. This would ensure that any resulting steering fees reflect the relevant underlying evidence.

- 4.140 We also note that combining the cost-based principle (which includes consideration for investment and innovation above a pure cost-base) with the value-based principle might lead to a degree of double-counting of innovation benefits. Accordingly, we have included a provision in paragraph 11 of our proposed Steering CR which prohibits this.

Ensuring Google does not discriminate against developers who use steering

- 4.141 Some third parties have highlighted the importance of protecting them from discrimination if they choose to steer, in particular because developers would be less likely to use steering in practice if Google can penalise them by withholding, degrading, or making conditional access to critical services on its Mobile Platform.¹⁶¹
- 4.142 The proposed Steering CR sets out that Google must not disadvantage or retaliate against developers for using alternative purchasing mechanisms, including through less favourable treatment in app review, app distribution, discoverability, access to platform functionalities, or interoperability conditions. We have proposed including these requirements in order to give developers confidence that they will not be unfairly or unreasonably disadvantaged in the general operation of their apps, purely because they have opted to make use of steering.
- 4.143 Developers who steer should be able to set lower prices or provide different terms to those made under Google's billing systems. Google should not be able to require that the offer using its own billing systems is the best (or equivalent). This would undermine the ability of developers to provide a differentiated offer for steered transactions and undermine the uptake of steering.
- 4.144 Furthermore, Google may not make the use of its in-app payment options contingent on developers foregoing offering a steering payment option to users. This equates to a form of punishment for developers that take up steering which is not permitted under the proposed Steering CR.

Provisional conclusion on effectiveness

- 4.145 We provisionally consider that the design of the proposed Steering CR would be effective in achieving the aims set out in Chapter 2, because it would remove the existing restrictions on steering, and address the wider set of conditions that could otherwise undermine steering in practice. As discussed above, absent safeguards

¹⁶¹ 2 responses to voluntary requests for information; [redacted] 1 response to CMA call for evidence dated 1 April 2026 [redacted].

that go beyond the removal of the ban on steering, Google would continue to have the ability and incentive to impose contractual, technical, design or commercial restrictions that would materially reduce the viability and attractiveness of steering.

- 4.146 The design of the proposed Steering CR therefore seeks to ensure that developers are not only permitted to steer, but are able to do so effectively in practice, without undue friction, deterrence, discrimination or commercially unworkable terms. In our provisional assessment, the proposed approach is effective at meeting all elements of our aim. This is because it would promote greater choice and make steering a practical and effective competitive constraint, while continuing to allow reasonable measures to protect legitimate platform interests, including in relation to security, privacy and fair remuneration.

Implementation, monitoring and compliance

- 4.147 CRs come into force at a time determined by the CMA.¹⁶² Once in force, Google would be required to provide the CMA with compliance reports in relation to the CR¹⁶³ and the CMA would be required to keep under review the extent to which Google is complying with the CR.¹⁶⁴ This section sets out our proposed approach to ensure any final Steering CR is implemented effectively, and our approach to monitoring compliance.

Approach to implementation, monitoring and compliance

- 4.148 We propose that the CR would come into force three months following our decision on any final Steering CR and its imposition. During this three month implementation period, Google should, within one month of imposition, submit an implementation plan and engage constructively with the CMA and third parties to develop and implement changes to comply with the requirements.
- 4.149 The CMA would use a variety of tools to ensure compliance with the conduct requirements, including compliance reports from Google every three months. As part of these reports, the CMA proposes to monitor both compliance with the Steering CR, and its effectiveness.
- 4.150 To assess implementation plans, compliance and effectiveness, the CMA would require Google to provide key information and data, including, but not limited to, developer and user uptake of steering, data on user-journey frictions, the operation of steering mechanisms and total platform charges applied to purchases

¹⁶² Section 19(11)(a) of the Act.

¹⁶³ Section 84(1) of the Act.

¹⁶⁴ Section 25(b) of the Act.

completed, as supported by an explanation of the approach to applying the pricing principles, including appropriate cost and value information.

- 4.151 The CMA would also consider the use of behavioural audits, which could be used to explore the user journey and identify any choice architecture issues that have arisen, if necessary.
- 4.152 We propose to require Google to supply the following metrics in each compliance report, each in relation to UK-based usage of the Steering solution during the reporting period, broken down by month:
- (a) percentage of developers using Steering or alternative in-app payment methods, and the associated commissions paid on steered transactions, disaggregated by developer size;
 - (b) percentage of developers who have paid a steering fee to Google;
 - (c) percentage share of digital goods/services transactions via GPB vs steering;
 - (d) total platform charges applied to purchases completed (and how calculated) via steering / GPB; and
 - (e) percentage rate of abandonment at any mandatory information screens

Consistency with existing and expected laws and regulations

- 4.153 We have considered the proposed Steering CR in the context of a range of relevant international and domestic laws, regulations and judicial decisions, in particular:
- (a) the DMA in the EU requires gatekeepers to permit developers to promote and direct users to external offers and payment options, and complete transactions outside the gatekeeper's ecosystem;
 - (b) the Japanese Mobile Software Competition Act prohibits platform operators from preventing links or communications directing users to external purchasing options, and from imposing unnecessary additional restrictions on developers who use such links or communications;
 - (c) in the ongoing litigation in the US between Epic Games and Google, Google was required in 2024 to stop restricting developers from communicating to users about alternative payment methods;¹⁶⁵ and

¹⁶⁵ Permanent Injunction in Case No. 20-cv-05671-JD [Epic Games, Inc. v. Google LLC et al.](#) paragraph 9.

(d) the Coll v Alphabet¹⁶⁶ collective proceedings, currently in the pre-trial phase, concern Google's alleged abuse of a dominant position in operating systems, app distribution, and app payment services, including by restricting developers' options for taking payments, and charging developers excessive commission fees.

4.154 Some stakeholders noted that market-by-market divergence in steering rules increases implementation and compliance costs and reduces incentives to build steering capabilities, and argued that therefore requirements should, as far as practicable, avoid unnecessary jurisdiction-specific complexity.¹⁶⁷

4.155 The above decisions (many of which are ongoing) take a range of different approaches to the design parameters associated with a steering remedy, including the extent to which they are addressing wider app distribution considerations. In designing the proposed Steering CR, we have sought to minimise the risk of potential conflicts with actions in other jurisdictions given the impact of international consistency on the effectiveness and proportionality of the proposed Steering CR, while at the same time ensuring that we achieve effective and proportionate outcomes in the UK.

¹⁶⁶ 1408/7/7/21.

¹⁶⁷ 1 response to voluntary request for information; [redacted] 2 responses to call for evidence dated 1 April 2026 [redacted].

5. PROVISIONAL PROPORTIONALITY ASSESSMENT OF OUR PROPOSED STEERING CR

- 5.1 The CMA may only impose a CR if it considers that it would be proportionate to do so for the purposes of one or more of the statutory objectives, having regard to what the CR is intended to achieve (as set out in Chapter 2 above).¹⁶⁸
- 5.2 This chapter sets out our provisional proportionality analysis for the proposed Steering CR. A proportionate CR is one that:
- (a) is effective in achieving its intended aim;
 - (b) is no more onerous than it needs to be to achieve its intended aim;
 - (c) is the least onerous CR, where the CMA has identified multiple equally effective options that would achieve the intended aim; and
 - (d) does not produce disadvantages that are disproportionate to its aim.¹⁶⁹
- 5.3 We have provisionally considered each of these four criteria below.

The CR is effective at achieving its intended aim

- 5.4 The analysis set out in the effectiveness chapter shows how the proposed Steering CR is designed to be effective in meeting its intended aim.
- 5.5 In the sections below, we set out evidence on the significance of the benefits and costs which would flow from achieving this aim, given the proposed Steering CR design set out above.

The CR is no more onerous than necessary

- 5.6 The proposed Steering CR removes the restriction on steering and prevents Google from making steering ineffective. As described in the effectiveness chapter, the proposed Steering CR seeks to be effective in meeting our aim while minimising the burdens for affected parties, including Google. This includes making design decisions which are strictly necessary to maintain effectiveness, whilst reducing the burdens for affected parties meaning the CR is no more onerous than necessary. These measures include:
- (a) allowing Google to take reasonable steps to protect end-user security and privacy, such as measures that limit the destination of links and measures to

¹⁶⁸ Section 19(5) of the Act.

¹⁶⁹ See [Digital markets competition regime guidance](#), December 2024, (CMA194), paragraph 3.33.

protect children, while restricting their conduct in areas more likely to have a material impact on the effectiveness of the proposed Steering CR such as in relation to the form and type of links that are allowed;

- (b) allowing Google to require side-by-side presentation of in-app payments and steered options, while prohibiting restrictions on showing price and other information that allow users to make an informed choice. This should promote user choice and understanding of the options while enabling end-users who prefer to continue using in-app payment systems to do so;
- (c) allowing Google to require a single, neutrally worded interstitial screen for linked transactions. This should support user understanding of the transaction context while limiting any additional friction;
- (d) restricting additional design elements that may introduce friction or distort user decision-making when compared with the user journey for GPB;
- (e) allowing Google to charge developers that use a steering link a fair and reasonable fee, including to protect Google's investment and innovation incentives; and
- (f) keep the administrative burden relating to compliance and monitoring focused on what is necessary for us to monitor Google's compliance with the proposed Steering CR, and its ongoing effectiveness.

5.7 We therefore provisionally consider that, given our analysis of the key design choices set out above, the proposed Steering CR is no more onerous than necessary.

The CR is the least onerous of equally effective measures

5.8 Given the substantial and entrenched market power that Google enjoys with the Play Store, and its decision to restrict the large majority of forms of steering, we provisionally consider that any effective conduct measure would require the removal of these restrictions. Therefore, the relevant provisions of the proposed Steering CR represent the only effective measure, which is therefore the least onerous.

5.9 Further, as explained above, we have proposed not only to remove the existing restrictions but also to impose obligations on Google specifying a set of minimum requirements that it must follow when setting new pricing and non-pricing terms applicable to steering. In designing all the different aspects of the intervention, we have sought to promote greater choice and make steering a practical and effective competitive constraint, while continuing to allow reasonable measures to protect legitimate platform interests (including in relation to security, privacy and fair

remuneration). In following this approach, we have not identified any other equally effective conduct requirement designs which would take a different form than proposed obligations on setting new pricing and non-pricing terms applicable to steering.

- 5.10 We therefore provisionally consider that the proposed Steering CR is the least onerous of equally effective measures.

The CR does not produce disadvantages which are disproportionate to the aim

- 5.11 In the assessment below, we set out the main potential costs and benefits of the proposed Steering CR for Google and other parties, and our assessment of their relative magnitudes.

Potential costs of the CR

- 5.12 In this section we assess the potential costs that (i) Google, (ii) developers, and (iii) end-users may experience from our proposed Steering CR.

Costs to Google

- 5.13 We expect that the incremental costs to Google to allow steering would be very low. At its heart the main action that Google would need to take in order to permit steering is to reduce its restrictive terms and conditions, and allow sellers of digital goods and services freedoms closer to what it already allows sellers of physical goods and services.¹⁷⁰ As such, we would expect the incremental costs of permitting steering to be very low (see also Chapter 4 on costs).
- 5.14 Google would incur certain additional costs, through the need to comply with this CR, including the need to gather cost accounting data as a basis for setting fees. Google would also face some costs in terms of monitoring and compliance activities. We provisionally consider these costs to be necessary features of the proposed Steering CR in order to meet the aim described in Chapter 2, and unlikely to be substantial.
- 5.15 We acknowledge that, if Google's steering fees are lower than its current fee levels as a result of this proposed Steering CR, as we would expect, it is likely to earn lower revenues. However, we do not consider that this is a cost of our intervention as a whole. This is because the current level of Google's fees reflects its position of SEMP and the restrictions it places on the ability of app developers to steer customers, including to alternative payment methods. As we have described, the aim of the proposed Steering CR is to remove these restrictions

¹⁷⁰ 3 responses to voluntary requests for information [§<].

and to ensure the setting of a fair and reasonable price for steering, which is sufficient to reflect its costs and/or value (including remunerating investment and innovation) while also better reflecting the price Google would be able to charge when faced with more effective competition. Lower revenues to Google would be a consequence of lower steering fees relative to the current situation and, for the reasons described in Chapter 4, lower fees are a necessary feature for this CR to be effective and to give rise to the benefits described in Chapter 2.

Costs to developers

- 5.16 Developers who choose to steer will have to manage their own payments and customer relationships. Many developers will already do this for web-based transactions, and as such may face limited costs (see ‘Developer Feedback’ section in Chapter 4). We note that to the extent that these costs are material for developers, they can choose not to steer, and developers that do steer would do so because the benefits to them of steering would outweigh the costs.

Costs to end-users

Google’s views

- 5.17 Google submitted that enabling steering to complete transactions would expose users to additional risks because when users are steered to complete a purchase, responsibility for protecting them falls to developers and their chosen payment service providers, and Google has no way to monitor or verify the security of steered transactions.¹⁷¹ Specifically, enabling steering would mean:
- (a) that Google has no way to verify that user payment information is handled securely and privately. Google submitted that while many third-party billing systems can, and do, offer safe alternatives to GPB, there remain a number of risks to users when exposed to unsafe billing systems, including the possibility of data theft;¹⁷²
 - (b) that Google is less able to review apps selling digital goods and services, and purchases within those apps, for fraud and other risks. Google cannot effectively review websites users are steered to as the content of websites may change at any time, and it is not feasible to maintain ongoing review of all potential destinations users may be steered to;¹⁷³ and

¹⁷¹ Google’s response section 69 notice [⌘]; Google’s response to section 69 notice [⌘].

¹⁷² Google’s response to section 69 notice [⌘]; Google’s response to section 69 notice [⌘].

¹⁷³ Google’s response to section 69 notice [⌘], Google’s response to section 69 notice [⌘].

(c) enabling steering could enable distribution of apps that are not reviewed by Google, leading to potential security and privacy risks.¹⁷⁴

- 5.18 Google submitted that Play has no oversight of what happens to a user once they leave Play's secure environment, which creates fundamental challenges to quantifying precisely the level of harm resulting from link-outs. Play's steering programs in other jurisdictions are also in their early stages, creating further challenges to quantifying increased levels of user harm.¹⁷⁵
- 5.19 Google submitted that the extent of risks posed by insecure or fraudulent online transactions is evidenced by statistics on general fraud related to online shopping. Google cited the latest fraud report by UKFinance, statements by third parties and several statements on fraud by the Home Office as evidence that the risk of fraud from online transactions is substantial.¹⁷⁶ Additionally, Google referred to [redacted] and third-party analyses of threats on the Android platform that highlight the use of link-outs as elements of how fraud is conducted.¹⁷⁷

Third party views and other evidence

- 5.20 Some developers stated that steering may come with increased risks to privacy, security and fraud that broadly mirrored concerns raised by Google, including increased responsibility of developers for transaction security.¹⁷⁸ However, a larger number of developers stated that the alleged risks to security, privacy and fraud are not material, including because developers already safely transact for physical content on the Play Store without restriction by applying their own protections.¹⁷⁹
- 5.21 We have received no robust evidence in response to our Call for Information published 1 April 2026 to indicate that enabling steering for digital content in other jurisdictions has resulted in observed privacy or security harm to users or received any estimates of the extent of such harm. A number of responses, primarily by industry groups, asserted that enabling steering would lead to potential privacy and security risks for reasons similar to those outlined by Google,¹⁸⁰ whilst a similar number of responses, primarily by developers and industry groups, asserted that the risks to user security and privacy are overstated by Google.¹⁸¹
- 5.22 Some developers stated that there may be costs to the end-user experience if there are significant frictions when redirecting users to an alternative payment

¹⁷⁴ Google's response to section 69 notice [redacted].

¹⁷⁵ Google's response to section 69 notice [redacted].

¹⁷⁶ Google's response to section 69 notice [redacted].

¹⁷⁷ Google's response to section 69 notice [redacted].

¹⁷⁸ 2 responses to voluntary requests for information [redacted]. Note of meeting with [redacted].

¹⁷⁹ 10 responses to voluntary requests for information [redacted].

¹⁸⁰ 10 responses to call for evidence dated 1 April 2026 from [redacted].

¹⁸¹ 9 responses to call for evidence dated 1 April 2026 [redacted].

platform¹⁸² (although one of these developers considered that the risk is minor),¹⁸³ while others considered that there are no costs to users.¹⁸⁴

- 5.23 Some third parties submitted that a CR allowing steering would damage the trust that has been built between app stores and end-users.¹⁸⁵

CMA analysis

- 5.24 We explained our approach to user trust, security and privacy factors in the section entitled “How we have considered user trust, security and privacy factors” in Chapter 4, and have taken explicit steps in the design of the proposed Steering CR to mitigate or eliminate potential risks. In particular, we have retained the option of ‘side-by-side’ such that end-users can continue to use GPB if they prefer, limited additional frictions in the user journey, and allowed for the introduction of additional, appropriate, protections for children, as well as only requiring Google to allow external link-outs for completing transactions, as opposed to other usages such as downloading apps.
- 5.25 Overall, we consider that informed user choice allows end-users to choose the approach which is most suited to them, weighing up the benefits and costs, including any privacy risks, security risks, and frictions. Accordingly, and particularly in the context of side-by-side presentation of GPB and steered links, we would expect the overall benefits of steering to outweigh the costs for those end-users that choose the steered approach, while those that choose GPB would incur no costs as a result of the proposed Steering CR. We also note that increased competitive pressure could result in improvements to aspects of privacy and security over time.
- 5.26 However, we recognise that end-users may not always be in a position to accurately judge the privacy and/or security risks associated with particular decisions, and that other participants may therefore have a role to play in supporting this.
- 5.27 We provisionally consider that, in the context of our proposed Steering CR design any residual privacy and security risks identified by some parties, including Google, are likely to be very small because:
- (a) Google does not directly track the harms arising from steering, instead relying on more general reports around online risks. General reports around online risks do not reflect the fact that apps that steer would still be subject to

¹⁸² 8 responses to voluntary requests for information [redacted].

¹⁸³ [redacted] response to voluntary request for information [redacted].

¹⁸⁴ 3 responses to voluntary request for information [redacted].

¹⁸⁵ 5 responses to call for evidence dated 1 April 2026 from [redacted].

existing Play Store protections such as app review and additional mitigations that may be implemented by Google under this CR, both of which would mitigate potential harm;¹⁸⁶

- (b) many of the statistics and reports referenced by Google include harms that exist regardless of this CR, eg harms that occur as a result of fraudsters directly reaching out to users through messaging and social media apps,¹⁸⁷ harms that are not online-enabled,¹⁸⁸ and harms that occur as a result of users initiating transactions outside the Play Store;
- (c) where alternative payment providers are involved in a transaction, industry standards and regulatory oversight provide a level of protection.¹⁸⁹ Furthermore, while instances of fraud and other security/privacy issues can clearly arise online, we have seen little evidence that Google are uniquely capable of providing secure payment systems compared with other reputable payment service providers, and we have heard that other payment service providers also take measures to prevent fraud on their platforms.^{190,191} Finally, we note that Google's payment systems themselves use external payment service providers for the purpose of processing transactions, demonstrating that payment service providers can be used just as safely, with appropriate safeguards;¹⁹²
- (d) while requiring the use of Google's integrated payment system may reduce information handling risks by decreasing the number of parties with access to user payment information, other risk mitigation measures are available. For example, we understand that purchases made through digital wallets (ie through Google Pay, Samsung Wallet, Apple Pay, or other third-party

¹⁸⁶ While we note Google submissions on the difficulty of reviewing web content, outlined in the 'Google's views' section above, we provisionally consider that protections currently maintained by Google for all apps are still likely to help prevent fraud for users that are ultimately steered, at least to the same extent as such protections help prevent fraud within applications offering physical goods and services or that otherwise direct users to web content. For example, Google would still be able to delist apps that have been reported to them as malicious due to steering users to unsafe destinations, limiting harm.

¹⁸⁷ For example, see Zimperum, '[Global Mobile Threat Report 2025](#)', section on 'mishing', pages 7-10; Zimperum, '[Global Mobile Threat Report 2024](#)', section on 'mishing', pages 11-12; European Payments Council, '[2025 Payment Threats and Fraud Trends Report](#)', section 3.1.1 on social engineering, pages 21-22;

¹⁸⁸ The UK government's 2026-2029 fraud strategy indicates that around half of current fraud counted in broader reports is not online-enabled, and therefore must be unrelated to online transactions; Home Office, '[Fraud Strategy 2026-2029](#)', paragraph 22.

¹⁸⁹ [The Payment Services Regulations 2017](#), part 9, section 106 and 106A.

¹⁹⁰ 2 responses to voluntary requests for information [redacted].

¹⁹¹ We note that courts in the UK and other jurisdictions have considered the issue of fraud prevention effectiveness as a benefit of requiring the use of integrated payment systems and have concluded that such benefits are unlikely to be material – see in particular the [Kent v Apple judgement](#), paragraph 795 and the [Australian Epic v Apple judgement](#), paragraph 5520. Furthermore, we note that a major UK bank [redacted] submitted that the average e-commerce fraud-to-sales ratio is very low [redacted] (see [redacted] response to section 69 notice [redacted]). We provisionally consider this indicates that protections against fraud across the payments ecosystem are generally robust.

¹⁹² Google's response to section 69 notice [redacted].

wallets) or hosted payment pages can similarly reduce the number of parties with access to users' full payment information; and

- (e) where steering has been made available, including for the sale of physical goods and services on the Play Store, and more broadly in certain other jurisdictions, we have not seen evidence of a material increase in the prevalence of privacy or security issues.

5.28 We note that users of steered transactions will not be covered by Google's refund protections or centralised subscription management services (and rather will be covered by protections afforded by developers and their chosen payment service providers). Should users prefer to use Google's GPB and the protections that Google submits that it affords, then they will continue to be able to do so.

Overall view on costs

5.29 Overall, we provisionally consider that the incremental costs to Google to allow steering could be very low, and other costs of supporting steered transactions (such as store services) are already incurred by Google in supporting transactions that are not permitted to be steered (and in any event are likely to be low). We recognise there will be new, ongoing costs, that Google will incur as a regulated firm.

5.30 We provisionally consider that the cost to developers of adopting steering is also likely to be low, and given developers can choose not to steer, those who do steer will do so when the benefits are greater than the costs.

5.31 We provisionally consider that any potential risks from frictions when redirecting users will be mitigated by the design of the proposed Steering CR, and that the risks to user privacy and security will not be material.

Potential benefits of the CR

5.32 We provisionally consider that the proposed Steering CR is likely to provide benefits to developers, end-users, payment processors, and other third parties in the event that it is successful in meeting our aim of ensuring that developers can make meaningful choices regarding steering to end-users and trade on fair and reasonable terms with Google.

5.33 Developers would be able to innovate more, and have stated that the cost reduction from lower commissions would lead to increased investment in quality, new features, and/or new apps.¹⁹³ The option to steer could be attractive to developers who have not currently launched an app on the Play Store, or

¹⁹³ See footnote 23.

developers who have held off launching new products and services.¹⁹⁴ Developers could also innovate to offer their users a more seamless user experience when using services across multiple platforms,¹⁹⁵ and through offering combinations of digital and physical goods and services.¹⁹⁶ Overall, increased innovation would lead to more choice and more competition, resulting in lower prices and/or higher quality.

5.34 Further, developers have also stated that the cost reduction from lower commissions would result in benefits for:

- (a) end-users in the form of lower prices;¹⁹⁷ and,
- (b) other businesses, where developers offer a platform for content creators or other smaller developers. In these cases, developers may be able to pass through lower costs to these other businesses, and/or increase the investment/payout from the platform to these businesses.¹⁹⁸

5.35 Enabling effective steering is a key mechanism through which developers would be able to establish and manage direct relationships with their end-users (including billing, refunds, and support). This would allow developers to better understand their customers and enable them to offer tailored experiences to users. It would also provide for freer communication with users, allowing for improved customer support on issues such as refunds, as well as giving end-users greater choice over how they make their purchases and how they use digital goods and services.¹⁹⁹

5.36 Other potential benefits include:

- (a) downward pressure being placed on wider Play Store commission fees as a result of the introduction of an alternative, lower cost distribution channels via steering; and
- (b) developers that do not currently monetise their apps, or that limit their offerings due to high commission rates or a restricted ability to communicate,

¹⁹⁴ For example, following a change in the rules around steering for Apple in the US, Y Combinator has stated that “*For the first time in nearly two decades, Y Combinator can seriously consider investing in innovative businesses that would have been impossible in the past because of the ‘Apple Tax’*”; as reported. TechCrunch, [‘Y Combinator says Apple’s App Store has hindered startup growth’](#), accessed 26 June 2026.

¹⁹⁵ 2 responses to section 69 notice [REDACTED]. 5 responses to voluntary requests for information [REDACTED].

¹⁹⁶ 2 responses to voluntary requests for information [REDACTED].

¹⁹⁷ See footnote 22.

¹⁹⁸ [REDACTED] told us that as a result of the US Epic injunction, more than EUR [500,000-1 million] [REDACTED] additional revenue was paid to [downstream parties based in the UK] [REDACTED] ([REDACTED] response to follow up questions [REDACTED] to voluntary request for information [REDACTED]. See also call note with [REDACTED].

¹⁹⁹ 6 responses to section 69 notices; [REDACTED] responses to call for evidence dated 1 April 2026, [REDACTED]. 8 responses to voluntary requests for information; [REDACTED].

might start to offer an alternative business model better suited to their customers' needs or expand their offer.²⁰⁰

Overall view on benefits

5.37 Overall, we provisionally consider that our proposed Steering CR would lead to substantial benefits, through opening up opportunities for innovation (in terms of investment in new products, new entry, new opportunities to offer more seamless services, as well as new opportunities to offer bundles of digital and physical goods); improving developers' ability to communicate with and manage relationships with their customers; and increased revenue for developers that choose to steer, which could be passed onto end-users and other third parties in the form of reduced prices or increased investment in quality and innovation.

Comparing the costs and benefits

5.38 In this section we bring together the evidence on the costs and benefits and consider their relative magnitude.

5.39 We have explained above that there are likely to be substantial benefits of the proposed Steering CR. In particular:

- (a) given the scale of the Play Store in the UK, with millions of apps,²⁰¹ even small changes would result in material overall benefits:
 - (i) UK end-users who spend money on the Play Store stand to benefit significantly, given that they spend £[0 – 5] billion in apps on digital products and services on the Play Store every year.²⁰² Even with a relatively low take-up of steering and modest price decreases as a result of lower steering fees could result in millions of pounds saved for UK consumers;
 - (ii) the many UK developers²⁰³ that rely on the Play Store and currently offer digital goods and services, will benefit from the additional freedom offered by the opportunity to steer. And the many UK developers that do not currently offer digital goods and services,²⁰⁴ many of which may be

²⁰⁰ [redacted] response to section 69 notice [redacted]. 4 responses to voluntary requests for information; [redacted].

²⁰¹ In 2024 in the UK, there were on average [2-3] million apps available each month on Mobile Devices on the Play Store and [600,000-700,000] developers with a native app on Mobile Devices on the Play Store. See [Appendix A to Strategic Market Investigation into Google's Mobile Platform: Final Decision \(SMS Decision\)](#), 22 October 2025, tables A.3 and A.4

²⁰² In 2024 the value of customer billings on the Play Store was £[redacted][0-5] billion. [Appendix A to Strategic Market Investigation into Google's Mobile Platform: Final Decision \(SMS Decision\)](#), 22 October 2025, paragraph A.72.

²⁰³ In 2025 [redacted] UK-based developers paid a commission. Response from Google to section 69 notice [redacted].

²⁰⁴ In 2025 there were [redacted] UK-based developers on the Play Store. Of these [redacted] paid a commission. Response from Google to section 69 notice [redacted].

held back by current restrictions, will also be afforded greater freedoms; and

(iii) any benefits are likely to be wider than any gains made by current UK developers and UK end-users, given the new opportunities for innovation (in terms of investment in new products, new entry, new opportunities to offer more seamless services, as well as new opportunities to offer bundles of digital and physical goods) that steering will unlock. Overall, increased innovation can lead to more choice and more competition, resulting in lower prices and/or higher quality.

(b) the issues arising from restrictions on steering are very difficult for developers to address on their own, meaning that regulatory action is the only likely route for resolution.

5.40 Meanwhile, the associated costs are likely to be small, including to Google (for the reasons explained in paragraphs 5.13 to 5.15) and to developers and end-users (for the reasons explained in paragraphs 5.16 to 5.31, and notably since both groups have the option to avoid steering, incurring no associated costs if they choose to do so).

5.41 Accordingly, we expect the total benefits to outweigh the total costs. As explained above, even with a relatively low take-up of steering at a lower commission rate for steered transactions, tens of millions of pounds per year could be either retained by developers for further investments or passed on to UK end-users in the form of lower prices. We have not seen evidence that suggests that the costs of our proposed Steering CR comes close to this. Therefore, we provisionally consider that the CR does not produce disadvantages which are disproportionate to the aim.

Provisional conclusion on proportionality

5.42 Our overall provisional assessment is that the proposed Steering CR is effective and proportionate. We will continue to refine our understanding of the costs and benefits of the measure as part of the final proportionality assessment, to inform our decision about whether to impose the proposed Steering CR.

6. QUESTIONS FOR CONSULTATION

6.1 We welcome views on any aspect of the proposed Steering CR design or analysis set out above, but are particularly interested in stakeholder feedback on the following questions:

General

6.2 Do you have any views or evidence on the benefits or costs of the proposed Steering CR?

6.3 Do you have any views on the proposed scope of the Steering CR in particular:

- (a) allowing Google to require that any steering links must direct users to a developer's own website; and/or
- (b) allowing Google to require that any steering links be for the purposes of completing steered transactions?

6.4 Please share any general or specific views you have on the measures that Google rolled-out in the UK on 30 June 2026.

User experience and design options

6.5 Do you consider our proposals would achieve both enabling effective steering in practice, and allowing Google to introduce necessary measures to protect and inform users?

6.6 Are there additional risks and mitigations that you consider could be addressed through a steering CR?

6.7 Do you have any views on allowing a single neutral interstitial screen that informs an end-user that they are moving outside of in-app purchase system? In particular:

- (a) do you consider that this is appropriate?
- (b) do you have views or evidence on how to further reduce the friction from these interstitial screens (eg by time-bounding, frequency-bounding, default settings or reserving the screens for specific transactions)?

6.8 What do you consider to be the benefits and drawbacks of allowing Google to prohibit steering to WebViews?

Steering fees

- 6.9 Do you have any views on the approach to steering fees in the proposed Steering CR, in particular:
- (a) Do you consider the principles the CMA has proposed are appropriate, including the use of cost-plus and value, how each are defined, and the relationship between these two principles?
 - (b) Do you have any views on the practical benefits and risks of the principles the CMA has proposed?
 - (c) Do you have any other views or evidence on the principles that Google must apply when setting steering fees?

Responding to this consultation

- 6.10 Stakeholders are invited to comment on the proposed measures set out in this consultation document. We particularly welcome comments on the specific questions we have set out above. We will carefully consider responses to this consultation, in addition to our ongoing stakeholder engagement and wider analysis, before proceeding with any proposed measures.
- 6.11 Responses should be submitted to mobiliums@cma.gov.uk or made via the consultation portal no later than **5pm on 28 July 2026**, making clear which consultation or consultations they are responding to (in particular whether the response, or subsections of it, relates to Google, Apple, or both. We would expect to publish responses to the consultation, subject to any representations made in relation to confidentiality of the information provided.
- 6.12 Where responses include confidential information, this should be clearly marked. A non-confidential version should also be provided that can be published on the CMA's website.