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28 July 2026
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Response to the Consultations on the Proposed Steering Conduct Requirements for Apple's and Google's Mobile Platforms

Introduction

Japan Association of New Economy ("JANE") welcomes the Competition and Markets Authority's proposed Steering Conduct Requirements ("Steering CRs") for Apple's and Google's mobile platforms and supports the timely adoption of binding requirements for both designated undertakings.

JANE has previously submitted views to the CMA on competitive conditions in mobile ecosystems, Apple's designation with Strategic Market Status, and recent international developments concerning app-store steering. In particular, JANE's response of 22 April 2026 explained that steering must not merely be permitted in formal terms, but must be practically and economically usable, without being undermined by high or multi-layered fees, mandatory design conditions that may favour the designated undertaking's own payment system, technical friction, excessive disclosure obligations or broadly framed safety justifications. JANE does not repeat that general analysis here. This response focuses on the specific provisions of the proposed Steering CRs that should be clarified or amended in the CMA's final decision.

JANE particularly welcomes the proposed protections for free-text communications, End-user Redirection Mechanisms (including dynamic links and link parameters), equal treatment and non-discrimination. JANE also supports the CMA's decision to address pricing and non-pricing conditions together, rather than treating the formal removal of anti-steering rules as sufficient in itself.

JANE nevertheless considers that in particular, four aspects of the proposed Steering CRs require strengthening:

1. **Steering Fees:** Steering Fees should be zero in principle. If the CMA nevertheless permits a fee, it should be limited to demonstrable costs directly attributable to services objectively necessary for the relevant Steered Transaction. The value-based principle should not permit an upward adjustment to a cost-based outcome, and all steering-related charges should be assessed in aggregate.
2. **Mandatory side-by-side presentation:** Developers may choose to present the designated undertaking's in-app purchase system alongside an End-user Redirection Mechanism, but the designated undertaking should not be entitled to require them to do so as a condition of exercising the steering right.
3. **Interstitial screens and the full redirection path:** Any interstitial should be strictly neutral and ordinarily shown no more than once for a particular app after the end-user has confirmed the redirection. The Steering CR should expressly protect the entire redirection path, including the access path, transition process, session continuity and transition method.

4. **Circumvention, disclosure and monitoring:** The final Steering CR should expressly prohibit measures that, individually or cumulatively, materially undermine effective steering, including indirectly imposed or relabelled charges, excessive reporting requirements, technical degradation and indirect retaliation.

Unless otherwise indicated, these comments apply to both the Apple and Google consultations.

Question 6.2 (Apple) / Question 6.2 (Google)

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

JANE agrees with the CMA that effective steering can benefit developers and end-users by expanding choice, enabling more flexible commercial models and direct customer relationships, increasing competition in payment processing, and placing downward pressure on app-store commissions. JANE refers in this respect to its previous submissions to the CMA.

JANE's principal concern is that these benefits may not materialise unless steering is commercially viable and practically usable. Experience in other jurisdictions indicates that formal permission to steer may not generate meaningful uptake where surrounding commercial, technical or design conditions make steering unattractive in practice. The final Steering CR should therefore be assessed by reference to real-world outcomes, including developer uptake, the share of transactions completed through steering, abandonment at mandatory screens, and the total platform charges applied to steered transactions.

The remainder of this response identifies the amendments that JANE considers necessary to mitigate that risk of under-effectiveness.

Question 6.3 (Apple) / Question 6.3 (Google)

Do you have any views on the proposed scope of the Steering CR in particular: (a) allowing [Apple/Google] to require that any steering links must direct users to a developer's own website; and/or (b) allowing [Apple/Google] to require that any steering links be for the purposes of completing steered transactions?

(a) Developer-controlled destinations

JANE can accept, at this stage, the CMA's provisional approach of allowing Apple and Google to require a developer-controlled destination, provided that this does not prevent developers from using legitimate third-party payment and merchant-of-record infrastructure.

The final decision should clarify that a developer may:

- integrate third-party payment technology into a website or offer owned, operated or controlled by the developer;
- redirect an end-user from such a website or offer to a hosted payment page operated by a payment service provider or merchant of record; and

- engage a third-party provider to perform payment processing, tax, refund, chargeback, regulatory-compliance and related customer-support functions on the developer's behalf.

Access to third-party payment and merchant-of-record infrastructure is an established feature of online commerce and may be particularly important for developers that lack the scale to provide these functions internally. A developer-controlled-destination requirement should not, in practice, require the developer to act as its own payment processor or merchant of record. This would be consistent with the CMA's provisional view that any destination restriction should not impede the use of legitimate third-party payment providers.

Apple and Google should also not be permitted to prescribe or restrict the lawful commercial terms presented at a developer-controlled destination, including prices, discounts, promotions, bundles, refund arrangements or subscription terms, except to the extent strictly necessary for an objectively justifiable purpose listed in paragraph 3(b) of the proposed Steering CR.

(b) Links for the purpose of completing Steered Transactions

JANE can accept an initial limitation to links provided for the purpose of completing Steered Transactions, provided that this requirement is interpreted functionally rather than formalistically.

A link should qualify where it directs the end-user to a product, plan-selection, account or subscription-management page from which the relevant purchase, upgrade or subscription can be completed directly or through a reasonable and proportionate number of further steps. A destination should not be excluded merely because it also performs other functions or is not exclusively dedicated to checkout.

The relevant question should be whether the destination objectively facilitates completion of the relevant external transaction, rather than whether the first page reached by the end-user is the final payment page.

More generally, the protection afforded by the Steering CR should extend beyond the formal existence of an external link to the operation of the redirection path as a whole. JANE addresses the relevant technical and design restrictions in response to the questions on user experience and additional risks below.

Question 6.4 (Apple) / Question 6.5 (Google)

> *Do you consider our proposals would achieve both enabling effective steering in practice, and allowing [Apple/Google] to introduce necessary measures to protect and inform users?*

JANE supports the CMA's objective of enabling effective steering while permitting measures that are genuinely necessary to protect and inform end-users. However, JANE does not consider that this balance requires Apple or Google to be entitled to mandate side-by-side presentation of its own in-app purchase system whenever a developer offers an End-user Redirection Mechanism.

Mandatory side-by-side presentation

JANE does not object to a developer choosing to present the designated undertaking's in-app purchase system alongside an End-user Redirection Mechanism. JANE objects to the designated undertaking being entitled to require the developer to offer or maintain its in-app purchase system as a condition of exercising the steering right.

A mandatory side-by-side requirement may:

- require developers to maintain multiple payment, billing and customer-support arrangements;
- prevent a developer from choosing a business model based solely on a direct billing and customer relationship;
- risk preserving an advantage for the designated undertaking's familiar and established payment option;
- increase the complexity of the purchase interface, particularly where pricing structures are complex; and
- compound the friction created by any additional interstitial screen.

The CMA's evidence records that many developers prefer to retain the flexibility to decide whether to offer steering, the designated undertaking's in-app purchase system, or both. That preference is directly relevant to the CMA's stated aim of enabling developers to make meaningful choices over how they transact with end-users.

JANE therefore requests that paragraph 6 and Interpretative Note 5 be clarified so that:

- where a developer chooses to offer both mechanisms, the End-user Redirection Mechanism must receive the same or equivalent treatment as the designated undertaking's in-app purchase system; but
- the designated undertaking may not require the developer to offer or maintain its in-app purchase system as a condition of providing an End-user Redirection Mechanism.

If the CMA nevertheless permits Apple or Google to require side-by-side presentation, the final decision should at least provide that:

- neither option may be pre-selected, pre-activated or otherwise designated as the default;
- ordering, location, visual prominence, button size, labelling and interaction steps must not disadvantage the End-user Redirection Mechanism;
- the designated undertaking may not prescribe asymmetric, cautionary or negative labelling for the developer's option;
- the developer must remain free to display prices, discounts and non-price benefits at the point of choice; and
- compliance monitoring should assess the cumulative effect of side-by-side presentation and any interstitial screen on abandonment, transaction completion and the share of transactions completed through steering.

Privacy, security, fraud prevention and protection of children

JANE recognises that preventing malware, fraud, unlawful content and content harmful to children are legitimate objectives. However, these objectives should be addressed through targeted and proportionate measures and should not serve as a general basis for retaining restrictions on effective steering.

The final Steering CR or Interpretative Notes should clarify that the designated undertaking bears the burden of demonstrating to the CMA, on the basis of concrete and verifiable evidence, that any restriction imposed under paragraph 3(b):

- responds to a specific and material risk falling within one of the purposes listed in paragraph 3(b);
- is strictly necessary to address that risk;
- cannot be replaced by a less restrictive effective measure; and
- is no broader than necessary and does not materially undermine the effectiveness of the Steering CR as a whole.

User familiarity, consistency of UI or UX, or generalised convenience may be relevant to design, but should not independently justify a restriction under paragraph 3(b). This is consistent with JANE's previous submissions in Japan and to the CMA.

Question 6.5 (Apple) / Question 6.6 (Google)

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

JANE welcomes the broad protections in paragraphs 3, 4, 8, 10(c) and 14. The principal remaining risk is that measures which appear limited or permissible individually may cumulatively make steering economically or practically unattractive.

The final CR or Interpretative Notes should therefore clarify that compliance will be assessed by reference to the individual and cumulative effects of all relevant commercial, technical, design and administrative measures. Relevant examples include stacked or indirectly imposed charges, disproportionate reporting requirements, app-review delay, degradation of APIs or platform functionality, withdrawal of programme benefits solely because a developer steers, and technical disruption of the redirection path.

Paragraph 14 should be interpreted as covering not only outright denial of access, but also unjustified delay, degradation in quality or functionality and selectively more onerous requirements. The CMA should use compliance reports and behavioural audits to examine the combined effect of these measures.

Question 6.6 (Apple) / Question 6.7 (Google)

> *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)?*

JANE does not consider that the evidence presently establishes that an interstitial screen is necessary for every Steered Transaction on a permanent basis. The CMA records developer evidence that even a single additional screen may materially increase drop-off, although the estimates are uncertain and vary significantly across business models. The absence of equivalent mandatory screens for transactions involving physical goods and services also weighs against treating an interstitial as a permanently necessary feature of all steered digital transactions.

If the CMA permits an interstitial during an initial implementation period, JANE supports the proposal to limit it to a single screen and strongly supports the requirements in paragraph 7 that it contain only strictly necessary information and use Neutral Language. Paragraph 7 should, however, be strengthened to provide that the screen:

- informs the end-user only that they are leaving the designated undertaking's in-app purchase system to transact with the developer;
- does not include references to loss of protection or generalised security, privacy or fraud risks;
- does not characterise the destination, developer or transaction as unsafe, unverified, less trustworthy or otherwise inferior;
- consists of a single screen and requires no more than one affirmative action to continue, without a separate acknowledgement, checkbox or secondary confirmation; and
- is ordinarily shown no more than once to the same end-user for the same app, with an accessible option for the end-user to reset that preference.

Any response to a specific and substantiated risk should be addressed separately under paragraph 3(b), rather than through a general interstitial applied to all transactions.

A once-per-user, per-app rule would implement the CMA's proposed frequency-bounding approach in a clear and administrable manner. It would also be consistent with JANE's June 2025 submission in Japan, which stated that, once an end-user had approved redirection from a particular app, the same warning should not ordinarily be shown again.

The continued use of interstitial screens should be reviewed after a defined initial period. Unless abandonment-rate data from compliance reports and, where appropriate, user-comprehension evidence from behavioural testing or audits demonstrate a material informational benefit that cannot be achieved through a less restrictive measure, the CMA should require the screen to be withdrawn or further frequency-limited.

Question 6.7 (Apple) / Question 6.8 (Google)

> *What do you consider to be the benefits and drawbacks of allowing [Apple/Google] to prohibit steering to WebViews?*

JANE does not consider that Apple or Google should be permitted to impose a blanket prohibition on the use of WebViews for steering. WebViews can reduce context switching, support session continuity and provide a faster and more integrated transaction journey. Requiring every steered transaction to open in a standalone external browser may itself create confusion and additional friction.

JANE recognises that some WebView implementations may make it less clear that the end-user is transacting outside the designated undertaking's in-app purchase system. However, the CMA describes the evidence supporting this concern as weak and recognises that a neutral interstitial and side-by-side presentation could mitigate it. Any remaining concern should therefore be addressed through less restrictive safeguards, including identification of the transaction counterparty, visibility of the destination, an option to open the destination in the default browser and an easy return to the originating app.

Any restriction should be technology-neutral, risk-based and comply with paragraphs 3–5 of the Steering CR. A general prohibition should not be justified solely by abstract concerns about user confusion or consistency of user experience.

The CMA should review the treatment of WebViews within a defined period after implementation, using evidence on uptake, conversion, abandonment, user comprehension and material security outcomes. This approach would be consistent with JANE's previous submissions that developers should be able to use WebViews and other commercially reasonable redirection mechanisms.

Question 6.8 (Apple) / Question 6.9 (Google)

> *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 [Apple/Google] must apply when setting steering fees?*

JANE's primary position is that a Steering Fee should be zero or limited to the strictly incremental and objectively verifiable cost of enabling the relevant steering functionality. It should not recreate the commission applied where Apple or Google provides its integrated payment and merchant-of-record services.

If the CMA permits a Steering Fee, the cost-based principle should determine its maximum level. Common costs should be included only where they are causally attributable to services used by the developer to a material and direct extent in facilitating the relevant Steered Transaction. Costs incurred irrespective of steering, costs already recovered through other fees and costs unrelated to app distribution must be excluded.

JANE does not support using the value-based principle to increase a fee above the cost-based level. App-store access value is difficult to separate from the effects of substantial and entrenched market power, and the proposed value-based principle does not identify an external competitive benchmark. If retained, value should operate only as a downward cross-check, or the fee should be capped at the lower of the cost-based and value-based amounts. Developer-contributed value must be deducted.

The seven-day attribution period should be an absolute maximum and should apply only where a direct and verifiable relationship exists between the redirection and transaction. Recurring fees should not continue indefinitely following one redirection.

JANE supports the administrative simplicity principle. Reporting should be proportionate, data-minimised and limited to fee verification. Wherever possible, aggregate reporting or independent audit should replace routine disclosure of transaction-level data to Apple or Google. Any fee methodology should be notified to the CMA in advance and disclosed to developers in sufficient non-confidential detail.

Ultimately, a fee should not be regarded as fair and reasonable if, when combined with payment-processing costs, reporting requirements and design-related friction, it prevents steering from operating as a meaningful and commercially viable alternative.

Question 6.4 (Google consultation only)

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

JANE remains concerned that Google’s measures may permit steering in form while limiting its effectiveness in practice. In particular, for certain transactions, steering removes only the additional billing fee, while developers must bear their own payment-processing, implementation and conversion costs.

The CMA should therefore assess whether Google’s continuing service fee corresponds to specific services actually provided in relation to steered transactions. It should also examine the cumulative effect of the fees, mandatory presentation of Google Play Billing, technical-integration requirements and reporting obligations.

Consistent with JANE’s previous submissions, any fee should be zero or strictly cost-based, and developers should not be required to disclose commercially sensitive external-transaction data beyond what is strictly necessary.

Google’s measures should not be treated as a substitute for the Steering CR or as a benchmark for what is fair and reasonable. Rather, they should be assessed under the final Steering CR based on their actual effects on developer uptake, user completion and the commercial viability of steering.

Conclusion

JANE supports the adoption of the proposed Steering CRs for both Apple's and Google's mobile platforms. The lesson of recent international experience – in the EU, Japan and the United States – is that the effectiveness of steering depends on the totality of fees, design and conditions applied to it, not on formal permission alone. The proposed Steering CRs give the UK the opportunity to adopt a regime that is simpler, more effective and more resilient against circumvention than existing implementations elsewhere. That approach would also serve the interest in international coherence recorded at (Apple, paragraph 4.155 / Google, paragraph 4.154): coherence is best achieved through common principles rigorously applied, rather than through the replication of design features that have weakened steering in other jurisdictions.

As set out in this response, JANE's position of principle remains that fees imposed on steered transactions should be zero – with any fee that cannot be avoided limited to a strictly cost-based level – and that the effectiveness of a steering intervention depends on the fee level and structure, the user-journey design, the reporting and integration requirements, and the treatment of circumvention risks being addressed together.

To that end, JANE's key requests are:

- an express provision that all fees, charges and commissions connected with steered transactions – however labelled, whenever levied, and whether or not applied to the steered transaction itself – are assessed in aggregate against the fee principles in paragraph 10;
- confirmation that each of the cost-based and value-based principles operates as an independent ceiling (so that the Steering Fee may not exceed the lower of the two), that the administrative simplicity principle operates as an independent requirement of practical workability, and that the value-based principle cannot be used to adjust a cost-based fee upward;
- confirmation, in the operative Steering CR or in paragraph 5 of the interpretative notes, that the designated undertaking may not require developers to present the end-user redirection mechanism side-by-side (side-by-side presentation being permitted only at the developer's option), and that the design decision described at paragraph 5.6(b) of the consultation document permitting such a requirement should not be carried into the final decision; strict enforcement of the equal treatment obligation, including in respect of labelling, warnings and other visual elements, in any side-by-side implementation that is nevertheless permitted; and frequency- and time-bounding of the single interstitial screen;
- protection of the full redirection path (access path, transition process and transition method), of developers' ability to communicate commercial content – including prices, discounts, promotions, bundles, refund conditions and subscription terms – as part of ordinary competitive commercial activity, and of developers' engagement with legitimate third-party payment providers;
- data minimisation in any fee-related reporting or monitoring integrations, and in any integration required for choice-screen implementation;
- an express anti-circumvention provision, confirmation that the prohibition of discriminatory or retaliatory treatment in paragraph 14 extends to indirect measures, and monitoring of the aggregate effect of fees, design conditions and reporting requirements on steering uptake;
- periodic publication of the compliance metrics in aggregate form, and a mechanism for the CMA to move promptly to more prescriptive fee measures where those metrics indicate that the intervention is not delivering effective steering in practice; and
- a defined review mechanism for the position on WebViews, together with clarification that any prohibition may not be used to degrade the quality of the hand-off to an external browser.

JANE urges the CMA to reach a final decision within 2026 and to bring the Steering CRs into force promptly, and stands ready to provide further evidence, including on the practical operation of steering under Japan's Mobile Software Competition Act.

About Japan Association of New Economy

Japan's newest business association dedicated to creating an environment in which individuals and private companies can maximize their potential for economic and social reform centered on digital. With the basic principle of "Give more authority to private sector", JANE publishes numerous policy proposals and statements of both regulatory reform and market creation type every year.

It has a diverse membership that transcends the boundaries of size and industry, ranging from start-ups to large corporations, and from IT companies to construction and manufacturing companies. In addition, more than half of the approximately 50 board members and executives are founders of the company, which distinguishes JANE as an "economic organization where entrepreneurs gather".

In 2022, the year of its 10th anniversary, JANE is further revitalizing its activities under the new slogan "Japan Transformation" as a guideline that encompasses the origin of its activities: the promotion of "innovation, entrepreneurship, and globalization".