Response to CMA Consultation: Proposed Steering Conduct Requirement — Google's Mobile Platform

Consultation: Proposed Steering Conduct Requirement for Google's mobile platform **Deadline:** 28 July 2026 **Confidentiality:** Non-confidential. This response may be published or disclosed.

Summary position

We welcome the CMA's proposal to require Google to permit steering on the Play Store. We are disappointed, however, that the draft Steering CR proposes a "fair and reasonable" fee test rather than a 0% commission requirement on steered transactions. We are also concerned that Google's own newly-announced Play Store terms, published on 24 June 2026 ahead of this consultation closing, which permit steering "subject to certain restrictions" alongside a revised fee structure, may be intended to satisfy a "lower than current charges" test without reaching zero. We ask the CMA to amend the proposed CR so that:

1. Google may charge **0% commission** on any transaction completed outside the app, whether via an external link, a developer's own website, or any other steered payment route.
2. Any disclosure screen is **neutral in language and a single step**, with no co-presentation of Google Play billing and no security- or trust-framed warnings.
3. **No steering-specific reporting or compliance obligation** is imposed on developers.
4. **Google's own recently-announced Play Store terms are independently assessed** against the CMA's final standard, rather than treated as pre-empting the outcome of this consultation.

Why "fair and reasonable" is the wrong test

Google provides no service in a steered transaction. Once a user is directed to a developer's own website to complete a purchase, Google supplies no payment processing, no fraud protection, no billing management, and no support. Developers already pay an annual developer fee for platform access. A further percentage taken from a transaction Google did not touch is not remuneration for a service rendered — it is rent extracted from a customer relationship Google did not create.

International precedent shows fee-based steering does not change behaviour. In the EU, DMA-mandated steering has produced alternative distribution adoption of under 3% after more than a year, precisely because platform fee structures made the alternative economically unattractive. In Japan, a 15% steering commission (10% for smaller developers) has produced similarly low adoption. Only the US, where commission on steered transactions is zero and disclosure is neutral, has produced measurable behavioural change, with major developers now routing customers to their own checkout to avoid the standard commission. We ask the CMA to adopt the US model as the UK standard, rather than a "lower than current charges" compromise.

A unilateral platform announcement is not a substitute for regulatory scrutiny. Ahead of this consultation's close, Google announced new global Play Store terms permitting steering subject to restrictions, alongside a revised fee schedule. We ask the CMA not to treat this as resolving the issue the consultation was designed to address. A platform's own choice of fee level, set unilaterally in the same window as a regulatory consultation into that fee level, warrants independent testing against the CMA's evidence-based standard, not deference.

The browser analogy is instructive. When a user completes a purchase on a developer's website via Chrome, Google takes no cut. A steered transaction from within an app is functionally identical: the app is simply the conduit that brought the user to the point of sale, exactly as the browser would. Google's ability to charge anything in this scenario rests purely on its control of Android app distribution, not on any service rendered in the transaction itself.

On disclosure screens and co-presentation

We ask the CMA to treat mandatory co-presentation of Google Play billing alongside an external steering link, and any disclosure screen using security- or trust-related language, as equivalent in effect to a direct fee. Choice-architecture research is clear that presenting a familiar, platform-endorsed billing option alongside an external one materially suppresses take-up of the external route, regardless of the headline commission rate.

Our ask

We ask the CMA to amend the proposed Steering CR for Google to require 0% Google commission on steered transactions, subject only to a single neutral-language disclosure screen, with no separate steering-specific reporting obligation, and to independently assess Google's own recently-announced Play Store terms against that standard. This is the standard that will actually deliver the CMA's stated aim of increasing competition in app distribution and supporting UK developers.