UK Finance

Consultation Response: CMA proposed conduct requirements for steering

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UK FINANCE RESPONSE TO THE CMA'S PROPOSED STEERING CONDUCT REQUIREMENTS

Introduction

UK Finance welcomes the opportunity to respond to the CMA's consultation on the proposed steering conduct requirement for Apple (and to a limited extent Google). UK Finance represents firms across the banking, payments and finance sector, with a strong interest in competitive, secure and innovative digital payment markets.

This response is limited to the proposed steering requirement and is issued from the perspective of the UK payments industry.

Overall position

UK Finance supports the CMA's objective of enabling effective steering. The proposals appear largely proportionate, enabling greater developer and merchant choice while recognising Apple's legitimate interest in maintaining the security, quality and integrity of its ecosystem. However, without appropriate standards, there is a risk that avoidable disputes in the card system could rise significantly and become difficult to manage.

Steering and financial services. Financial services firms may not typically sell standalone digital content in the manner contemplated by the consultation. However, many banking and payments providers now offer paid plans or subscription packages that combine financial services with non-financial benefits. Where such packages include a clear mix of financial and non-financial services, they should not be reclassified by Apple (or Google) as digital goods or services for the purpose of applying steering fees or restrictions.

UK Finance therefore considers that the CMA should make clear that displaying benefits included within a paid banking plan inside an app does not, of itself, constitute a steered transaction. Any conduct requirement should include a narrow and clearly defined concept of steering so that platform providers cannot extend the regime beyond its intended scope without operational precedent or objective justification.

Competition and innovation

The proposed steering requirement could create new opportunities for UK developers, merchants and payment firms. By allowing developers to inform customers about alternative purchasing and payment routes, the CMA's approach may support competition between payment providers, including card payments, Open Banking-enabled payments, account-to-account payments and other emerging payment models. UK Finance therefore supports the CMA's objective of ensuring that Apple does not impose unnecessary restrictions that prevent effective steering.

Safeguards

UK Finance agrees that proportionate safeguards are necessary. Apple has a legitimate interest in ensuring that steering does not weaken ecosystem quality, consumer protection, security, fraud prevention or user trust. At the same time, those safeguards should be clearly specified and should not be designed or applied in a way that prevents legitimate steering from operating effectively.

The proposed conduct requirement would benefit from greater specificity on the standards that will apply in practice, rather than relying principally on existing law, developer controls or Apple's discretion. In particular, the CMA should not assume that consumer outcomes will improve simply because users are steered to a developer-controlled payment journey or a third-party payment service provider.

Requirements should include:

- steering should be limited to the developer's own website, rather than unrelated or unverified third-party sites;
- consumers should receive clear information when they leave the App Store environment, including clarity on whether pricing must be shown in-app before the user is taken to an off-app environment;
- controls should reduce phishing, impersonation and deceptive redirection risks;
- minimum standards should address misleading or incomplete pricing, subscription traps, poor cancellation journeys and merchant fraud; and
- the customer journey should be traceable where needed for fraud prevention, dispute investigation and chargeback handling.

These safeguards should be capable of preventing avoidable consumer harm before it arises. In particular, Apple should be able to police compliance with standards on pricing, cancellation and merchant conduct, so that avoidable disputes are reduced and issuers have clearer evidence where chargebacks are raised. The standards should be set out in the conduct remedies or, if set by Apple, should be publicly available.

Cancellation journeys are a particular example. It should not be assumed that cancellation or refund handling will improve simply because the consumer has a direct relationship with the developer. The conduct requirement should set a clear standard to ensure that users are not left with a poorer experience once they are outside Apple's centralised mechanisms.

Traceability. For issuers, the most important practical safeguard is transaction-level traceability. Steered transactions may sit outside Apple's integrated payment environment and users may no longer have access to Apple's centralised refund or subscription-management mechanisms. Without a reliable data point, issuers may be unable to distinguish steered transactions from other card-not-present payments or determine whether a transaction relates to digital or physical goods.

One large member considers that the CMA should explore requiring a standardised transaction-level identifier for steered transactions in the authorisation message, applied consistently across wallet and platform providers. This would support fraud monitoring, customer investigations, dispute handling and chargeback processes. UK Finance has not had the opportunity, within the time available for this response, to discuss this proposal with its broader membership, but would welcome further engagement with the CMA on how such a requirement could operate in practice.

Steering fees and compliance monitoring

UK Finance notes that the CMA's draft conduct requirement gives Apple significant discretion in how it justifies any steering fee, including by reference to cost-based or value-based principles. The CMA should scrutinise any proposed fee carefully to ensure that it is objectively justified, proportionate and does not undermine the effectiveness of steering in practice.

The CMA should also monitor compliance closely, including whether platform rules, warning screens, technical requirements or fees have the practical effect of discouraging consumers or developers from using alternative payment routes. Ongoing international litigation concerning anti-steering restrictions illustrates the importance of ensuring that remedies are not only well designed, but enforceable and actively supervised.

UK Finance does not offer a view on how steering pricing should be set and leaves the developer community to address those questions. This should not be viewed as being inconsistent with UK Finance's position in relation to NFC access, where it noted in its NFC Call for Evidence response that certainty of pricing is important for payment firms, and transaction value should not be treated as an appropriate benchmark for calculating Apple's remuneration, if any.

Conclusion

In summary, UK Finance supports the CMA's objective of enabling effective steering and greater choice between payment providers. To make the conduct requirement effective in practice, however, the CMA should clarify its scope in relation to paid banking plans, specify practical consumer-protection and fraud-prevention standards, consider transaction-level traceability for issuers, and ensure that any steering fee is objectively justified, proportionate and closely monitored.