CHAMBER OF PROGRESS

Submission to Competition and Markets Authority (CMA) in Consultation on App Steering Conduct Requirement for Mobile Ecosystems
28 July 2026

On behalf of Chamber of Progress – a tech industry association supporting public policies to build a more inclusive society in which all people benefit from technological advancements – I write in response to the Consultation on the Proposed steering conduct requirement for Google's mobile platform and Apple's mobile platform respectively.[1]

We support the CMA's objective of ensuring that the UK's digital markets remain open to innovation and that consumers benefit from greater choice. The Digital Markets, Competition and Consumers Act (DMCCA), however, does not make intervention an end in itself. Its purpose is to address demonstrated competition problems in ways that improve outcomes for consumers, while preserving the investment, product differentiation and innovation on which those benefits ultimately depend. Any conduct requirement should therefore be targeted, evidence-based and proportionate to the harm identified, as we have noted in the past.[2]

That discipline is particularly important because the starting point for these consultations is not a dysfunctional or declining market. Apple's App Store ecosystem facilitated an estimated $61 billion, approximately £46.5 billion, in UK developer billings and sales in 2025.[3] Globally, Apple received no commission on more than 90 per cent of the billings and sales facilitated by the ecosystem.[4] Google similarly reports that Android generates more than £9.9 billion in revenue

[1] See CMA Press Release "CMA consults on new requirements for Apple and Google's mobile platforms" (30 June 2026), available here; Apple consultation page here; Google consultation page here.
[2] Chamber of Progress "Submission to UK Competition & Markets Authority: Consultation on Strategic Market Status Investigation into Apple's Mobile Platform" (20 August 2025), available here; Chamber of Progress "Submission to UK Competition & Markets Authority: Consultation on Strategic Market Status Investigation into Google's Mobile Platform" (20 August 2025), available here.
[3] Analysis Group, "Apple's Global App Store Ecosystem and Its Growth, 2025" (June 2026), available here.
[4] *Id.*

for UK developers and supports more than 457,000 UK jobs.[5] It also reports that more than two-thirds of UK Android devices come with a non-Play app store preloaded.[6]

These outcomes depend partly on business models that keep the costs of entry, development and distribution low for the great majority of developers, while recovering a greater share of platform costs from those developers that monetise successfully and derive the greatest commercial value from the ecosystem. The proposed requirements risk disrupting that balance. The developers best placed to steer users outside the platform are likely to be a relatively small number of sophisticated firms with established brands, substantial scale and pre-existing customer relationships. They may capture the immediate benefits of lower fees, while the resulting costs are spread across the wider ecosystem through higher charges, reduced platform services or weaker investment. The relevant question is therefore not simply whether steering would benefit some developers, but whether the intervention would improve outcomes for developers and consumers in the UK as a whole.

This concern is especially acute in relation to Google, which has already introduced new UK arrangements allowing developers to use alternative billing systems or direct users to their own websites for digital purchases, alongside lower service fees.[7] The CMA should allow those changes to operate and evaluate their effects before concluding that further prescriptive intervention is necessary.

Against that background, our response focuses on three areas in which the proposed requirements should be refined. **First**, the CMA should assess the ecosystem-wide and distributional consequences of intervention, including the risk that changes benefiting a handful of large developers impose costs on the much broader developer community. **Second**, any permitted steering fee must reflect the platform's full contribution to the value jointly created, including the costs of developing, maintaining, securing and continually improving the integrated ecosystem. **Third**, platforms should be able to provide proportionate, context-specific disclosures that reflect the risks and consumer protections associated with the particular app and transaction. These refinements would

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[5] Google, "The CMA's designation of Google's mobile ecosystem" (22 October 2025), available here.
[6] *Id.*
[7] Google, "Google Play updates let U.K. developers do more and pay less" (25 June 2026), available here.

preserve meaningful consumer choice without weakening the investment, trust and cross-subsidisation that have allowed the UK's mobile ecosystems to flourish.

1. Proportionality requires an ecosystem-wide and distributional assessment

Section 19(5) of the DMCCA permits the CMA to impose a conduct requirement only where it considers the requirement proportionate to its statutory objectives, having regard to what the intervention is intended to achieve. The CMA's guidance explains that a proportionate requirement must be effective, no more onerous than necessary, the least onerous among equally effective options, and must not produce disadvantages disproportionate to its aim. Importantly, that assessment must consider positive and negative effects on the SMS firm, third parties, consumers and business users, as well as wider market distortions, unintended consequences and the possible loss of benefits generated by the conduct being restricted.[8]

The CMA's provisional analysis underlying the proposed conduct requirements does not yet satisfy that standard. It concentrates principally on the incremental operational costs of permitting steering and the potential savings available to developers that choose to use it. It concludes that the incremental costs to Apple and Google are likely to be low, treats the resulting reduction in platform revenues as a consequence rather than a cost of intervention, and reasons that developers and consumers who do not wish to use steering can simply avoid it.[9]

That approach risks overlooking the economics of the ecosystem as a whole. App stores are not standalone payment-processing services whose costs arise only when a particular transaction takes place. They are integrated platforms requiring continuing investment in operating systems, developer tools, APIs, review processes, discovery, security, fraud prevention, distribution infrastructure and consumer support. The commercial model determines not only how much a particular developer pays, but how these common costs are distributed across the entire ecosystem.

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[8] CMA, "Digital markets competition regime guidance" (December 2024), paras 3.30–3.33, available here.

[9] CMA, "Consultation: Steering Conduct Requirement, Apple's Mobile Platform" (30 June 2026), paras 5.13–5.18 and 5.32–5.34, available here; CMA, "Consultation: Steering Conduct Requirement, Google's Mobile Platform" (30 June 2026), paras 5.13–5.16 and 5.32–5.34, available here.

Under the existing model, entry and distribution remain free or inexpensive for the great majority of developers, while more of the platform's costs are recovered from developers that successfully monetise digital goods and services. Apple does not charge a commission on free apps, advertising revenue, physical goods and services, or many purchases made outside the App Store. Globally, Apple received no commission on more than 90 per cent of the billings and sales facilitated by the App Store ecosystem in 2025.[10] Google similarly reports that 97 per cent of developers distribute through Google Play without paying a service fee and that, among developers subject to a fee, 99 per cent are eligible for a rate of 15 per cent or less.[11]

This structure has helped individual developers and small businesses reach large audiences without bearing the full upfront cost of building distribution, payment, security and discovery infrastructure. It also means that substantially reducing the contribution made by the most commercially successful developers may have consequences for developers that do not steer. Platforms may need to rebalance their business models through higher fixed or distribution charges, reduced developer services, less investment, or the recovery of costs from a broader group of developers and users. Those outcomes are not avoided merely because an individual developer chooses not to use a steering link.

The distribution of the intervention's benefits therefore matters. The developers best placed to steer users to proprietary payment channels are likely to be those with established brands, substantial scale, existing direct customer relationships and the resources to operate their own payment, customer-support and fraud-prevention systems. Smaller developers may derive greater value from the platform's discovery, payment and trust infrastructure, and may be less able to persuade users to leave a trusted purchasing environment. The immediate financial gains may consequently accrue to a relatively small cohort of sophisticated developers, while any resulting increase in ecosystem costs or reduction in investment is shared much more widely.

The CMA and Ofcom have previously recognised, in the different context of platforms and news publishers, that a regulatory pricing framework can favour larger and more powerful firms at the expense of smaller participants unless its distributional consequences are expressly considered. They accordingly

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[10] Analysis Group, "Apple's Global App Store Ecosystem and Its Growth, 2025" (June 2026), pp. 12–14, available [here](#).
[11] Google, "Service fees" (accessed 28 July 2026), available [here](#).

identified non-discrimination against smaller providers as an important feature of a fair compensation framework.[12] The same regulatory discipline is relevant here. A measure should not be treated as pro-developer merely because it benefits some developers, particularly where its costs may fall on a much broader and less visible group.

This consultation document does not yet provide sufficient evidence on this question. The CMA identifies the large number of developers formally capable of using steering and assumes that increased revenues could be passed on through lower prices or greater investment. But eligibility is not the same as likely use, and increased margins do not necessarily translate into lower consumer prices. A robust proportionality assessment should examine which developers are realistically likely to steer, their size and share of app-store revenues, the likely rate of consumer take-up, the extent of price pass-through, and the effect of lower platform revenues on fees, services and investment elsewhere in the ecosystem. It should also compare these outcomes with those generated by the existing model, including the value of maintaining low-cost access for the great majority of developers.

The need for further assessment is particularly clear for Google. Its new UK terms already allow developers to use their own billing systems or direct users to external websites, alongside revised service fees. [13] The CMA acknowledges that these changes came into effect on 30 June 2026 and that their likely effects have not yet been assessed.[14] As the DMCCA imposes no statutory deadline for adopting a conduct requirement, the least onerous approach would be to allow the new arrangements to operate and evaluate whether they already achieve the CMA's intended outcomes before imposing an additional prescriptive requirement.

Before proceeding, the CMA should therefore complete and publish an ecosystem-wide assessment that identifies both the beneficiaries and the bearers of the proposed intervention's costs, taking into account the likely business model changes that Google and Apple would introduce, based on their input. Without that analysis, the conclusion that the proposed requirements

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[12] CMA and Ofcom, "Platforms and Content Providers, including News Publishers: Advice to Government" (November 2021), paras 5.38–5.40, available here.
[13] Google, "Google Play updates let U.K. developers do more and pay less" (25 June 2026), available here.
[14] CMA, "Consultation: Steering Conduct Requirement, Google's Mobile Platform" (30 June 2026), paras 1.14–1.15, available here.

would produce substantial benefits at only limited cost remains incomplete. Proportionality requires more than demonstrating that steering can benefit particular developers. It requires confidence that the intervention will improve outcomes for the wider developer ecosystem and consumers as a whole.

2. Fair remuneration must reflect the full value and cost of maintaining the platform

The CMA is right to recognise that effective steering should not require Apple or Google to provide their platform services without remuneration. The proposed requirements accordingly permit a steering fee and acknowledge that it should reflect cost, value and administrative simplicity. The consultation documents also rightfully recognise that the fee must preserve legitimate platform interests, including cost recovery, investment, innovation, security and privacy.[15]

The proposed methodology does not yet translate that recognition into a fair or economically coherent framework. Under paragraphs 10 to 13, the cost-based principle permits recovery only for services used by a developer to a "material and direct extent" in facilitating or supporting a steered transaction. General app discovery, marketing, developer tooling and other services are excluded unless they satisfy that threshold. Common costs and returns on investment would similarly be recoverable only where they are materially, directly and causally attributable to the distribution services used by developers offering steered transactions.[16]

That test draws an artificial boundary around the final transaction. A steered purchase does not arise independently of the mobile ecosystem simply because payment is completed on a website. The developer has reached the consumer through an app built using the platform's operating system, intellectual property, APIs and developer tools; reviewed and distributed through its infrastructure; kept functional through updates mediated through its infrastructure; and made commercially viable by access to a large user base and a trusted environment.

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[15] CMA, "Consultation: Steering Conduct Requirement, Apple's Mobile Platform" (30 June 2026), paras 4.102–4.105, available here; CMA, "Consultation: Steering Conduct Requirement, Google's Mobile Platform" (30 June 2026), paras 4.104–4.107, available here.
[16] CMA, "Consultation: Steering Conduct Requirement, Apple's Mobile Platform" (30 June 2026), proposed Steering CR, paras 10–13, available here; CMA, "Consultation: Steering Conduct Requirement, Google's Mobile Platform" (30 June 2026), proposed Steering CR, paras 10–13, available here.

Discovery, security, fraud prevention, account management and the platform's reputation may all contribute to the acquisition and confidence of the customer who ultimately completes the transaction elsewhere. The location of the checkout is not the boundary of the platform's economic contribution.

Many of these contributions are necessarily common and indirect. An operating system, developer toolchain, app-review process or system of malware protection cannot realistically be allocated to an individual steered transaction in the same way as the cost of processing a payment. Yet these investments make that transaction possible. A methodology that recognises only costs susceptible to "material and direct" transactional attribution risks excluding precisely those shared investments that create the greatest value.

The proposed value-based principle does not fully correct this problem. It requires the value provided by Apple or Google to be assessed by reference to Native App Distribution services connected with steered transactions. By contrast, the value contributed by developers is to be assessed in aggregate across "all elements" of the relevant mobile platform and netted against the platform's contribution. This creates an asymmetrical comparison between a relatively narrow account of platform value and a much broader account of developer value. It ignores that the existing rates are already based on an assessment of the value that developers contribute to the ecosystem. It also risks conflating the collective contribution that third-party apps make to the attractiveness of a mobile ecosystem with the distinct value that a particular developer receives from access to the customers, infrastructure and trust that the platform has created.

The CMA has already recognised that certain App Store services, including automatic updates, review, privacy and security standards, standardised interfaces, discovery and an easy download process, provide value to developers. It also notes evidence that the trusted environment created by these services is particularly valuable to smaller developers with less established brands.[17] These benefits should be reflected in the remuneration framework even where their contribution to an individual transaction cannot be measured directly.

[17] CMA, "Consultation: Steering Conduct Requirement, Apple's Mobile Platform" (30 June 2026), paras 4.123–4.124, available here.

The CMA and Ofcom adopted a broader approach in their joint advice on compensation between platforms and content providers. Although that advice arose in a different market context, its underlying economic principles are instructive. They concluded that an assessment of joint value should consider the benefits and costs accruing to both parties, take a broad view of the value created, and recognise that the joint value would not exist without the contributions of both sides. They also recognised that fair compensation could flow in either direction depending on the distribution of benefits and costs.[18]

The same principle should apply here. Developers provide apps that enhance the attractiveness of mobile devices, but platforms provide the technology, distribution, user base and trusted commercial environment through which those developers reach and monetise customers. Neither contribution should be artificially narrowed. Fair remuneration should reflect the value jointly created, with the contributions of both sides assessed consistently and at the same level of aggregation.

The earlier CMA and Ofcom advice also cautioned against prescribing a detailed pricing methodology that could limit commercial flexibility, become rapidly outdated and generate costly regulatory disputes. It instead favoured a principles-based framework under which different methods could produce fair and reasonable outcomes, depending on the circumstances.[19] That caution is particularly relevant to mobile ecosystems, where platform services are deeply integrated and technologies, security threats and developer business models continue to evolve.

The CMA should also avoid treating today's scale or maturity as evidence that investment incentives no longer require meaningful protection. The fact that an app store has existed successfully for many years does not turn it into a static utility. Apple reports that it reviewed more than 9.1 million app submissions in 2025, rejected more than two million problematic submissions, processed over 1.3 billion ratings and reviews, and prevented more than $2.2 billion in potentially fraudulent transactions.[20] These activities require continuing investment as the

[18] CMA and Ofcom, "Platforms and Content Providers, including News Publishers: Advice to Government" (November 2021), paras 5.19–5.28 and 5.31–5.38, available here.
[19] CMA and Ofcom, "Platforms and Content Providers, including News Publishers: Advice to Government" (November 2021), paras 5.16–5.19, available here.
[20] Apple, "The App Store stopped over $2.2 billion in potentially fraudulent transactions in 2025" (20 May 2026), available here.

volume of apps and sophistication of threats increase. Google similarly explains that its service-fee model supports continued investment in Android and Google Play while allowing Android to be provided to device manufacturers without an operating-system licensing fee.[21]

A narrow cost-based approach could weaken these incentives even if it permits recovery of the immediate costs associated with steering. Investments in new APIs, security systems, developer tools and platform capabilities are made prospectively, under uncertainty, and often benefit the ecosystem as a whole. They cannot always be tied in advance to a particular service or transaction. A framework that recognises successful investments only to the extent that their costs can later be attributed directly to steered transactions will systematically understate their ex ante risk and economic contribution. The relevant question is not simply whether the platform can continue operating after the fee is reduced, but whether it retains appropriate incentives to undertake the next generation of investment. This is particularly important with respect to security systems that address emerging challenges in the age of AI.

The concerns about the pricing element of the proposed Conduct Requirements also relate to the principle of the protection of property. A requirement compelling access to platform infrastructure and intellectual property while tightly constraining remuneration must be supported by a rigorous proportionality assessment and must not impose an excessive burden on the platform owner. Revenue losses cannot simply be dismissed as a consequence of intervention without considering whether the permitted remuneration fairly reflects the assets and services being used.

The CMA should therefore revise paragraphs 10 to 13 so that the value-based principle operates as a genuinely co-equal basis for determining a fair steering fee, rather than as a limited adjustment to a narrowly defined cost calculation. The assessment should consider the full, ecosystem-wide contributions of both the platform and developers on a symmetrical basis. It should permit an economically appropriate allocation of common costs, historic and prospective investment, intellectual property, developer tools, distribution, discovery, security, customer acquisition and the trust associated with the platform, without requiring each contribution to be directly traceable to an individual transaction.

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[21] Google, "Evolving our business model to address developer needs" (21 October 2021), available here.

Apple and Google should be permitted to propose transparent methodologies and relevant commercial benchmarks, subject to CMA scrutiny, safeguards against double recovery and a requirement that the resulting terms remain administratively workable. That approach would preserve the CMA's ability to ensure that steering is commercially meaningful, while respecting property rights and maintaining the incentives that created the platform, and the opportunities available to developers, in the first place.

3. Consumer disclosures should reflect the actual transaction and risk

We support the CMA's objective of ensuring that disclosure screens do not frustrate steering through repetitive or alarmist warnings. The proposed requirements, however, go too far in the opposite direction. "Neutral Language" is defined to exclude wording that highlights potential harms or the loss of protections, while paragraph 7 permits only information strictly necessary to state that the user is leaving the platform's in-app purchasing system. This risks reducing neutrality to silence about information that may be material to an informed decision.[22]

Purchasing outside the platform may change who processes and secures payment information, provides refunds and customer support, manages subscriptions and protects purchases by children. Apple explains that features such as Report a Problem, Family Sharing, subscription management and Ask to Buy are not available for external purchases.[23] Google similarly explains that alternative billing can affect who secures the transaction, stores payment information and provides support, and that Google Play purchase approvals do not apply where a child uses a developer's billing system.[24]

The appropriate disclosure will therefore depend on context. A familiar user making a low-value purchase from an established developer may require little more than confirmation of the merchant and payment method. More detailed

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[22] CMA, "Consultation: Steering Conduct Requirement, Apple's Mobile Platform" (30 June 2026), proposed Steering CR, paras 7–8, available here; CMA, "Consultation: Steering Conduct Requirement, Google's Mobile Platform" (30 June 2026), proposed Steering CR, paras 7–8, available here.
[23] Apple, "About purchases not billed through the App Store or Apple In-App Purchase" (24 June 2026), available here.
[24] Google, "Learn about Google Play and alternative billing systems" (accessed 28 July 2026), available here.

information may be appropriate for recurring or high-value transactions, apps used by children, unfamiliar merchants, or apps and transactions involving particularly sensitive personal or financial information. The CMA itself recognises that screens could be reserved for riskier transactions or adjusted through a trusted-partner programme.[25]

The CMA should therefore revise paragraphs 7 and 8 to permit factual, proportionate and context-specific disclosures. Such screens should not be designed to deter steering, but platforms should be able to identify material differences in responsibility, privacy, security, refunds, subscription management and parental controls. Frequency limits and lighter disclosures may be appropriate where users are familiar with a trusted developer, while more prominent information should remain permissible where the transaction presents greater risks. This would protect effective steering while ensuring that consumer choice is genuinely informed.

Concluding Remarks

The proposed conduct requirements pursue a legitimate objective, but their success must be judged by their effects across the mobile ecosystem, not solely by the benefits they offer to developers most capable of steering users elsewhere. Before proceeding, the CMA should assess who will benefit, where the resulting costs will fall, and whether less onerous measures can achieve the same consumer benefits.

A proportionate framework should preserve meaningful steering while allowing fair remuneration for the platforms' full contribution, continued investment and factual disclosures reflecting the risks of particular transactions. These refinements would protect consumer choice without weakening the security, trust and low-cost distribution that have allowed developers and consumers across the UK to benefit from successful mobile ecosystems.

Chamber of Progress remains supportive of the CMA, its open regulatory dialogue and continued stakeholder engagement. We stand ready to assist as it pursues its ongoing mission of making markets work better for consumers.

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[25] CMA, "Consultation: Steering Conduct Requirement, Apple's Mobile Platform" (30 June 2026), paras 4.65–4.68, available here; CMA, "Consultation: Steering Conduct Requirement, Google's Mobile Platform" (30 June 2026), paras 4.66–4.69, available here.

Sincerely,

[redacted]

Kayvan Hazemi-Jebelli
Vice President for Europe