

Ecosia response to the CMA consultation on Google search user choice

Ecosia welcomes the opportunity to respond to the CMA's consultation on the proposed user choice conduct requirement for Google's general search services. [Ecosia](#) is an independent search engine based in Berlin that uses its profits for climate action. We strongly support the CMA's aim of enabling UK users to choose their search provider freely and easily.

However, we would like to point out three aspects of the proposal, as currently drafted, that could tilt the Search Choice Screen towards the largest providers.

Selection of the 12 providers shown (paragraph 4.82)

Where more than 12 providers are eligible, the CMA proposes to show the five most popular Eligible Providers plus seven others selected at random. Google itself favours this "5+7" approach (paragraph 4.76). This gives guaranteed visibility to those who need it least, while the most relevant challengers to Google appear only when the draw selects them. By way of illustration, if 25 providers qualified, each one outside the top five would appear on only around a third of screens. The CMA's own research found that users are drawn to familiar brands (paragraph 4.78), so a fixed top tier would compound the advantage of the largest providers. We therefore ask the CMA to apply a single rule to all 12 places: select all 12 by UK market share, or all 12 at random.

One service per corporate group (paragraph 4.22)

Google (Google Search and Gemini) and Microsoft (Bing and Copilot) each operate distinct search and AI services that would readily pass this test. Combined with the 5+7 approach, these two groups alone could take up to four of the five guaranteed places. Independent providers would be left to compete for the randomly allocated places. We ask the CMA to allow one service per corporate group and not to mix search engines with AI assistants on the same screen. The two serve different use cases, and many users in the CMA's own research regard them as different (paragraph 4.12). AI assistants deserve their own choice screen and interoperability measures.

Users who have already switched away from Google (paragraph 4.59)

The Search Choice Screen exists to counter Google's default; where a user has already chosen another provider, there is nothing left to correct. Showing them the screen again, including a non-skippable screen in Chrome, would give Google a fresh chance to win back users it has already lost. This works against the CMA's goal of supporting the growth of rival search services (paragraph 2.3). We ask the CMA to require the Search Choice Screen only where Google is still the default search provider.

Deep links and in-app prompts (paragraphs 4.99 and 4.101)

We warmly welcome the proposal that Eligible Providers can take users directly to the default search setting, both from their website in Chrome and from their Android app (paragraph 4.99). We also welcome the removal of the provision that would have allowed Google to limit how often providers prompt users within their own apps (paragraph 4.101). Friction in switching is one of the biggest barriers to competition in search. Of every 100 people who set out to make Ecosia their

default search engine, we lose 80 because the process is so cumbersome. This is why Ecosia has long argued for a one-click switch. We therefore urge the CMA to retain both measures in the final conduct requirement.

Ecosia warmly welcomes this initiative, and remains available to provide further input and insights into the next steps of the CMA consultation.