PPA (Professional Publishers Association)

CMA Consultation, Google's general search services: proposed user choice conduct requirement

For enquiries regarding this submission, please contact:

[redacted] Head of Policy and Public Affairs,

Professional Publishers Association, Chancery House, Chancery Ln, London WC2A 1QS

[redacted]

About the PPA

The Professional Publishers Association (PPA) is the professional body for special interest member companies, ranging from large consumer magazine publishers to business-to-business data and information providers, as well as smaller independent publishers. Our members generate the high-quality information that users of Google Search and AI services such as ChatGPT and Perplexity are seeking.

Introduction

As highlighted in our recent submission to the government's Media Green Paper, Ofcom's own research has shown that users turn to platforms for a range of purposes including personal finances, leisure time, personal interests, work and academia[1]. Notably, this research has also demonstrated that use of social media for wellbeing purposes and to seek health related information is on the rise[2]. These are among the areas in which PPA members specialise.

Search services have long been one of the main ways people find this content. People rely on search to answer "how to"[3] questions in everyday life and to research purchasing decisions[4], and these are among the queries where publishers' content has traditionally yielded clicks.

These same uses are now among the fastest growing on AI assistants. OpenAI's own research shows that seeking information, practical guidance such as "how to" advice, and product research are some of the most common uses of ChatGPT[5]. As a result, users are increasingly getting answers to these queries directly from AI assistants rather than clicking through to publishers' sites, putting at risk the referral traffic on which our members rely.

We understand that the CMA's revised eligibility criteria for the User Choice Conduct Requirement (CR) reflect its view that the line between general search services and AI assistants is becoming increasingly blurred. The CMA has therefore made the criteria technology-neutral, so that AI assistants can appear on the Search Choice Screen if they meet them. We acknowledge that there are growing similarities in how users interact with these services.

However, similarities in user behaviour mask a fundamental difference in how these services treat publishers. General search services initially developed around a three-

[1] Ofcom (2025) Adults' Media Use and Attitudes Report Link.
[2] Ibid.
[3] Google News Lab (2017) "How to fix" visual essay, reporting a 140% increase in "how to" searches since 2004. Link.
[4] Think with Google (2022) Retail Marketing Guide: Customers turn to Google every day to browse, research, and buy. Link.
[5] Chatterji, A. et al. (2025) "How People Use ChatGPT". Link.

way value exchange: the user seeks content, the publisher creates it, and the search engine provides access to it by directing the user to the publisher's site. This exchange has sustained investment in trusted, high-quality journalism and specialist content. Assistants based on large language models (LLMs) have largely disintermediated publishers. They draw on publishers' content to answer users' queries directly, often without referral traffic, permission or remuneration. Publishers can continue to rank well and still lose traffic where the interface answers the query or completes the task itself.

The CMA has already recognised the harm this causes in the context of Google's own generative AI features. That recognition is why the Publisher CR now requires Google to provide publishers with effective controls, transparency and attribution. If an AI assistant wants to be treated as a substitute for general search and benefit from distribution through the Search Choice Screen, it should meet minimum standards appropriate to that role. There is a risk of a non-level playing field and regulatory inconsistency if AI assistants are treated as substitutes for general search for the purposes of the User Choice CR, but the eligibility framework does not address the same publisher-facing concerns that the CMA has identified in relation to generative AI within Google Search.

The PPA supports the aim of the User Choice CR of giving UK users greater awareness of, and an easy choice between, general search services. We also recognise the importance of stronger competition in a market where Google holds entrenched and substantial power. However, if the CMA is to treat AI assistants as Eligible Providers, the eligibility requirements must reflect this difference. They should support the re-intermediation of publishers by ensuring that Eligible Providers attribute, link to and drive users to original content. They should equally require that those AI assistants provide control to publishers over whether their content is used and transparency over click-through rates and impressions. At the very least, they should hold Eligible Providers to standards equivalent to those required of Google Search.

Without this, the User Choice CR risks steering users towards services that offer publishers fewer protections than Google, which would undermine the Publisher CR and the wider aims of the digital markets regulatory regime.

Throughout this submission, the PPA makes the following recommendations:

1. **Equivalent standards for Eligible Providers.** Any provider whose service relies materially on third-party web content in generative AI responses should, as a condition of eligibility, meet publisher safeguards at least equivalent to those required of Google under the Publisher CR.

2. **Meaningful attribution.** The interpretative notes should make clear that attribution and links to original sources must be prominent enough for users to readily identify and act on. This means attribution that is inline, clearly branded, deep-linked and individual rather than clustered, and visible by default, with summaries that tease rather than substitute for the original content.

3. **Outcome-based assessment.** Evidence of actual referral traffic, not just interface design, should inform assessments of whether a provider meets the attribution and access requirements.

4. **Granular publisher controls.** Eligible Providers should offer publishers effective controls over how their content is used, distinguishing between indexing, AI-generated answers, grounding, model training and agentic uses.

5. **Transparency and reporting.** Eligible Providers should tell publishers when their content is used and cited in AI-generated responses, how prominently it is displayed, and the impressions, clicks and click-through rates it generates.

6. **Publisher recognition under Criterion 3.** An Eligible Provider should also be considered a general search service by a significant proportion of the publishers whose content it directs users to.

7. **A role for publishers in assessing eligibility.** The procedural safeguards should require Google to consult publishers when assessing providers' eligibility.

Q1. A) Do you agree with the proposed changes to the User Choice CR, including:

i. Eligibility criteria, and associated interpretative notes, to appear on the Search Choice Screen

Criterion 1

The PPA understands that Criterion 1 requires an Eligible Provider to adequately address the CMA's use cases which include online navigational queries, transactional queries, simple informational queries and more complex informational queries.

We do not propose any changes to the use cases at this stage. However, as set out in our response to the January 2026 consultation, LLMs such as ChatGPT and Perplexity differ fundamentally from search engines in how they handle navigational queries. They are not designed primarily to direct users to external websites. Instead, they present information directly, often synthesised from third-party content, and usually in a manner which is specifically designed to keep users within their interface. In our view,

they therefore do not currently meet the navigational use case of "finding a specific website, webpage or app" in the way that a general search service such as Google Search does.

The PPA welcomes the requirement for clear and accurate attribution and for AI-generated responses to give users a "clear means to access" the underlying web content. However, the current drafting leaves providers considerable flexibility over how they do this, and clarity alone does not make attribution meaningful.

Attribution can be technically accurate yet so small, clustered or hidden that users rarely notice or act on it. This is the experience of PPA members with Google's AI Overviews and AI Mode today. We therefore recommend that **the interpretative notes make clear that attribution and links to original sources must be prominent enough for users to readily identify and act on them**. In particular, the notes should set out that attribution must be:

a. **Inline and contextual.** Attribution should appear directly next to the claim or fact it supports. It should not be relegated to endnotes, footers or collapsible panels, and should be accompanied by clear cues that the information comes from that source.

b. **Clearly branded.** Attribution should show the publisher's name and logo, and ideally the author or brand, a clickable headline and an image. A small favicon with a site name is not sufficient.

c. **Directly linked.** Each attribution should deep-link to the specific source URL, not to a homepage or a further results page.

d. **Individual, not clustered.** Each source should be attributed separately, with its brand and headline next to the text it supports. Undifferentiated rows of favicons, and labels such as "+1" that hide additional sources, should not count as attribution.

e. **Visible by default.** Key sources should not be hidden behind "Show more" or similar expansion controls, particularly on mobile, where much of an AI-generated answer is collapsed by default. Source cards showing brand, headline, description and image should appear prominently at the top of the answer, with a clear signal that these are the sources it draws on.

f. **Paired with summaries that tease rather than substitute.** Where AI-generated summaries accompany links, they should be short enough to work as a teaser and should not give away the key facts that make the click worthwhile. Exclusives and original reporting should be credited explicitly to the originating publisher.

These principles should **apply consistently across all AI-generated search surfaces, including Google Discover's generative AI features**. There, grouped publishers are often shown as a cluster of logos or a "+10" label, which leaves individual sites effectively

invisible. Each publisher should instead appear individually with its brand name and headline, especially where its angle differs from the stated topic or the content is original reporting.

Finally, the measure of meaningful attribution is whether it delivers real visibility and referral traffic. Effective attribution should recover a meaningful share of click-through rate and protect brand visibility for cited publishers, and compliance should be monitored against these outcomes. A provider could meet every presentational requirement and still send users to publishers only rarely. **Evidence of actual referral traffic should therefore inform assessments of whether a provider meets this criterion**, not just the design of its interface.

However, attribution cannot on its own resolve the underlying problem. Products designed to answer the query on the page work against click-through even when attribution is perfect. **Attribution must therefore sit alongside effective publisher controls and incentives for licensing** and should not be treated as a substitute for them.

We also recommend that Eligible Providers be **required to give publishers transparency over the crawling, processing and use of their content**. As a minimum, this should show when content is used in AI-generated responses, when it is cited, how prominently those citations are displayed, and the impressions, clicks and click-through rates they generate. Without this information, neither publishers nor the CMA will be able to judge whether the attribution and access requirements are working in practice. This would also align the User Choice CR with the Publisher CR.

Criterion 3

Criterion 3 requires an Eligible Provider to be considered a general search service by a significant proportion of its UK users, but takes no account of how the service is viewed by publishers. We recommend that Criterion 3 be amended to also **require that an Eligible Provider is considered a general search service by a significant proportion of the publishers whose content it directs users to**.

Need for an additional criterion

In addition to the three substantive eligibility criteria, the CMA should require any provider whose service relies materially on third-party web content in generative AI responses to meet minimum publisher safeguards as a condition of eligibility.

In particular, Eligible Providers should be required to offer publishers effective, granular controls over how their content is used. Traditional indexing, AI-generated answers, grounding (where content is retrieved to answer a query in real time), model training and agentic uses are distinct, and a single choice between allowing and blocking a crawler is unlikely to be sufficient. These controls, together with the transparency

metrics set out above, should be at least comparable to those the CMA requires of Google under the Publisher CR.

ii. Procedural safeguards for the process of applying the eligibility criteria

The PPA welcomes the CMA's oversight of how Google runs the eligibility process. However, the proposed safeguards give publishers no role in assessing applicants. Under the proposed process, Google would effectively judge whether competing services meet attribution and referral standards. Publishers are often best placed to provide evidence of how their content is actually used and whether it generates traffic, and that evidence should inform eligibility decisions alongside Google's own assessment. We therefore recommend that the **procedural safeguards include a requirement for Google to consult publishers when assessing the eligibility of providers**.

Conclusion

Technology neutrality should not mean that publishers lose protections simply because user behaviour is shifting from search results towards AI interfaces. If AI assistants are to receive the same status and distribution advantages as general search services, they should meet comparable standards on transparency, attribution, referral and publisher control. In the longer term, **the CMA should also consider whether fair treatment of publishers needs to extend beyond traditional search results to other significant discovery surfaces, such as Google Discover.**