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Annex 1

Consumer detriment

Evidence that consumers do not value AI Overviews and should be able to opt out

1. Introduction

1.1. At paragraph 2.7 of its consultation, the CMA declines to expand the scope of the User Choice CR to give consumers control over whether Google's generative AI features, such as AI Overviews ("**AIOs**"), are displayed. The CMA states that it has "*not received sufficiently strong evidence of the specific issues such an expanded scope would seek to address, nor of the benefits of giving consumers these controls*", but that it will keep the case for further measures under review and is "*open to receiving further evidence on this point*".[1]

1.2. This Annex responds to the CMA's comment. This Annex draws together independent research, regulatory findings, professional market research and trade association evidence from the UK, the EU and the US on how consumers experience AIOs, which are increasingly becoming the default in response to user queries.[2] Taken together, the evidence shows that

- AIOs do not measurably improve consumers' search experience (Section 2);
- A large share of consumers distrust AIOs, and documented inaccuracy shows that distrust is justified (Section 3);
- AIOs crowd out the results consumers are looking for (especially on mobile) and add friction, even where the consumer simply wants to reach a known website (Section 4);
- AIOs reduce consumers' onward access to original sources on the open web (Section 5); and
- Consumers consistently say they want to be able to switch AIOs off, which Google does not allow (Section 6).

1.3. The evidence is from a range of sources, which should be considered and weighed by the CMA as they use different methods for the data. That being said, they all point to the conclusion that Google's tying of AIOs with search denies consumers from a choice, which has an impact on the primary discovery markets (search or rival AI services) and secondary market (online publishers[3]). Impact on the publishing industry leads to broader decline of diversity of publishers and plurality of the media. In addition, the tying is reshaping user behaviour and

[1] CMA, Consultation: User Choice Conduct Requirement (23 September 2026), paragraphs 2.5–2.7 and footnote 9, https://assets.publishing.service.gov.uk/media/6ab29c76fe72ed1e2b02eebe/consultation_user_choice_conduct_requirement.pdf

[2] https://techcrunch.com/2026/07/27/googles-ai-search-is-rapidly-becoming-the-default-new-data-shows/ and https://axis-intelligence.com/google-ai-overviews-statistics/.

[3] For example, see https://observer.com/2026/01/google-ai-overviews-search-digital-commerce/, which outlines the impact of the increase of AIOs on various publishing sectors (such as finance, healthcare and retail), which leads to rising acquisition costs, diminished message control and competitive displacement. See further at https://zapier.com/blog/google-ai-overview-industry-impacts/ and https://www.retailtouchpoints.com/executive-viewpoints/how-ai-overviews-are-reshaping-the-consumer-journey-in-2025/150088/ and https://techresearchonline.com/blog/google-ai-overview-impact-business-growth/.

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channelling traffic into Google's own properties, which maximises the returns by depriving users of alternatives.

2. AIOs do not measurably improve the consumer search experience

2.1. A pre-registered randomised field experiment by researchers at the Indian School of Business and Carnegie Mellon University randomly assigned 1,065 US desktop Chrome users over two weeks in January and February 2026, to standard Google Search, to Google Search with AIOs hidden, or to Google's AI Mode.[4]

2.2. Hiding AIOs made no measurable difference to users' reported satisfaction, information quality or ease of finding information. More than 95% of participants whose AIOs were hidden did not notice any change. The authors concluded that AIOs reduce traffic to publishers without a measurable improvement in user experience. Participants moved to AI Mode reported *lower* satisfaction than either of the other groups.

2.3. This is directly relevant to the second limb of paragraph 2.7. If consumers lose nothing measurable when AIOs are removed, giving them the option to remove AIOs carries no cost to consumers. By contrast, displaying AIOs by default does carry costs.

2.4. In a Gartner survey, 41% of consumers said that generative AI overviews make searching more frustrating than traditional search, and the perceived usefulness of AI summaries fell as consumers moved from researching to comparing options and fell further when finalising a purchase.[5]

2.5. A YouGov survey of British adults found that only 52% found AIOs useful and 32% did not. Among those aged 55 and over, only 37% found them useful. More respondents wanted to see fewer AI summaries (38%) than wanted more (18%).[6] A feature that a third of UK users, and most older users, do not find useful is nevertheless shown to all of them by default, with no means of switching it off.

2.6. In January 2026, Gartner reported that, rather than shortening consumers' decisions, AI features are lengthening their research journeys, and that while 82% of consumers had noticed AIOs, most do not rely on them exclusively.[7] In May 2026 it reported that, among consumers who had used generative AI tools while shopping, 54% had to double-check all of the

[4] S. Agarwal and A. Sen (Indian School of Business and Carnegie Mellon University), working paper (SSRN, April 2026), "The Impact of Google AI Overviews on Publisher Traffic and User Experience: Evidence from a Field Experiment" available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=6513059.

[5] Gartner, "Gartner Survey Finds 53% of Consumers Distrust AI-Powered Search Results" (3 September 2025), survey of 377 US consumers conducted June–July 2025, https://www.gartner.com/en/newsroom/press-releases/2025-09-03-gartner-survey-finds-53-percent-of-consumers-distrust-ai-powered-search-results0.

[6] YouGov, "Do the British public trust search engine AI summaries?" (18 February 2025), survey of 2,001 British adults, 13–14 February 2025, https://yougov.com/en-gb/articles/51644-do-the-british-public-trust-search-engine-ai-summaries.

[7] Gartner, "Gartner Survey Finds Only One-Third of Consumers Say GenAI Rivals Search Engines" (20 January 2026), drawing on surveys of 377 US consumers (June–July 2025) and 365 US consumers (July–August 2025), https://www.gartner.com/en/newsroom/press-releases/gartner-survey-finds-only-one-third-of-consumers-say-genai-rivals-search-engines-marketers-must-optimize-for-both-ai-driven-and-traditional-search.

information those tools provided and 62% said the information ended up being a waste of their time.[8]

3. Consumers distrust AIOs, and the accuracy evidence shows why

3.1. Marie Curie and others compiled a report on Google AI Search results and the impact on the Health Sector (see our letter to the CMA dated 4 February 2026).

3.2. Gartner found that 53% of consumers distrust or lack confidence in the reliability and impartiality of AI search and summaries.[9] In a separate survey of US adults, 25.3% said they had noticed "major errors" in AIOs.[10]

3.3. Researchers at Washington University in St. Louis analysed 55,393 Google searches and checked 98,020 verifiable claims made in AIOs against the sources the AIOs cited. Around 11% of claims were not supported by those sources: 7% could not be found in the cited text and 4% contradicted it. Only 41.9% of AIOs were fully grounded, meaning every verifiable claim was supported. The lead researcher concluded that "*readers still need to check what they're told, even when the citations look trustworthy*".[11]

3.4. In the UK, Which? tested AI search tools on 40 common consumer questions in September 2025 to establish accuracy, relevance, clarity, usefulness and ethical responsibility. AIOs scored 70%. Among other errors, an AIO wrongly implied that any broadband contract can be left without penalty over poor speeds, when that right applies only to providers signed up to Ofcom's voluntary code, and an AIO relied on a three-year-old Reddit thread to advise on when to book flights. Which? also found that 51% of UK adults use AI to search the web and that 47% of those trust the information to a great or reasonable extent.[12]

3.5. The risk is greatest where the subject matter is sensitive. In January 2026, a Guardian investigation found AIOs giving misleading health information, including advice to people with pancreatic cancer to avoid high-fat foods, which Pancreatic Cancer UK described as "completely incorrect" and potentially "*really dangerous*". Google subsequently stopped showing AIOs for some of the queries identified.[13] Corrections of this kind are reactive and query-by-query. They do not give the consumer any control.

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[8] Gartner, "Gartner Survey Finds Consumers Want AI Shopping Help, But Not AI Purchase Decisions" (27 May 2026), reporting a survey of 846 US consumers conducted November–December 2025, https://www.gartner.com/en/newsroom/press-releases/2026-05-27-gartner-survey-finds-consumers-want-ai-shopping-help-but-not-ai-purchase-decisions.

[9] Gartner, "Gartner Survey Finds 53% of Consumers Distrust AI-Powered Search Results" (3 September 2025), survey of 377 US consumers conducted June–July 2025, https://www.gartner.com/en/newsroom/press-releases/2025-09-03-gartner-survey-finds-53-percent-of-consumers-distrust-ai-powered-search-results0.

[10] Press Gazette (27 August 2025), reporting a Pollfish survey of 1,000 US adults for NP Digital (May 2025), https://pressgazette.co.uk/media-audience-and-business-data/google-ai-overview-click-trust-survey-us-adults/.

[11] Washington University in St. Louis, "WashU research finds gaps in Google AI Overview citations, claims" (29 September 2026), describing research by J. Montgomery, U. Iqbal and H. Xu forthcoming at the ACM Internet Measurement Conference (October 2026), https://source.washu.edu/?p=732908.

[12] Which?, press release on AI search tools giving risky consumer advice (18 November 2025), https://www.which.co.uk/policy-and-insight/article/chatgpt-and-gemini-among-ai-tools-giving-risky-consumer-advice-which-finds-aBnBP0l2CE0T. The consumer survey was conducted by Yonder among 4,189 UK adults, 10–14 September 2025.

[13] The investigation was published by The Guardian in January 2026. See Tom's Guide, "'We work to make broad improvements': Google responds to claims its AI Overviews mislead users over health queries" (January 2026), https://www.tomsguide.com/ai/google-pulls-ai-overviews-on-some-health-queries-after-claims-they-mislead-users.

3.6. Also, another research study found that 46.5% of the URLs included in AI Overviews rank outside the top 50 organic results[14] so the AIO summary sources appear to not be the most relevant to a user's query.

3.7. The combination is what causes harm: AIOs are placed at the top of the results page, presented with the authority of Google's brand, and trusted by a large share of users, yet a material proportion of their content is unsupported by the sources they cite. Consumers who do not want to rely on an unverified synthesis have no way to switch it off.

4. AIOs crowd out relevant results and add friction to navigation

4.1. Many searches are navigational: the consumer knows the website they want and uses Google to get there. AIOs are triggered less often for short queries of this kind,[15] but where an AIO does appear, it slows the consumer down.

4.2. An analysis of around 846,000 US Google Search sessions in February and March 2026 found that, for navigational searches, 45.8% of users were still on the results page after 21 seconds when an AIO was present, compared with 12.0% when it was not. Cursor movement across the page rose from 8% to 27.5%, and the share of users scrolling back up the page rose from 23% to 44%.[16] Consumers trying to reach a known destination take longer to get there and search the page more widely to find it. This is friction imposed by Google's design, not a benefit to the consumer.

4.3. AIOs also crowd out the results consumers are looking for. An analysis by DemandSphere and Botify of around 120,000 keywords found that, where they appear, AIOs take up nearly half of the screen on both desktop and mobile, occupying 48% of the mobile screen on average and as much as 76% in some cases.[17] The organic results that consumers would otherwise see first, which for many queries are the relevant results the consumer wants, are pushed out of view, most acutely on mobile. A consumer who wants relevant links must first scroll past content they did not ask for.

4.4. The visibility of navigational results is now being reduced directly. The finding that AIOs are triggered less often for short, navigational queries (see paragraph 4.1 above) is being overtaken by events. DemandSphere's daily tracking found that the share of branded searches, where the consumer names the company or website they want, that returned an AIO rose from 26% on 1 September 2026 to a peak of over 90% on 27 September, before settling at around 82%.[18] Where a consumer searches for a known destination, that destination is increasingly placed

[14] https://www.advancedwebranking.com/blog/ai-overview-study.
[15] The Washington University research (footnote 9) found that AIOs appeared for around 65% of question-form queries but only 9.5% of other searches.
[16] E. Van Buskirk, Search Engine Journal (26 May 2026), analysing Surfer SEO clickstream data for c. 846,000 US Google Search sessions in February–March 2026, https://www.searchenginejournal.com/google-search-sessions-show-how-users-pause-scroll-reconsider-before-clicking/575243/.
[17] DemandSphere and Botify, analysis of c. 120,000 keywords across 22 websites (August–September 2024); see Search Engine Journal, "Study: Google AI Overviews Appear In 47% Of Search Results", https://www.searchenginejournal.com/study-google-ai-overviews-appear-in-47-of-search-results/535096/; and Digital Information World (December 2024), https://www.digitalinformationworld.com/2024/12/ai-overviews-dominate-search-taking-48.html . See also https://seranking.com/blog/ai-overviews-2024-recap-research/, which states that "*since mid-2024, the average text length of AI Overviews has almost doubled, from 2,633 characters in July to 5,337 characters in November.*"
[18] DemandSphere daily tracking data (September 2026), as reported by Scalevise, "Google AI Overviews Reached More Branded Queries in September, DemandSphere Data Shows" (October 2026), https://scalevise.com/resources/google-ai-overviews-branded-queries-september-2026 and https://www.demandsphere.com/blog/branded-ai-overviews-september-2026/. DemandSphere measured whether an AIO appeared on the results page, not whether the brand searched for was cited in it.

below an AI summary, and the session data in paragraph 4.2 show the consequence: consumers take longer, scroll more and search the page more widely to find it. The detriment is direct. It falls on the large share of searches whose only purpose is to reach a website, and it exposes those consumers to being diverted to Google's own summary, or to other sources cited in it, rather than to the destination they chose.

5. AIOs reduce consumers' onward access to the open web

5.1. Pew Research Center tracked the actual browsing behaviour of 900 US adults. Where an AI summary appeared, users clicked on a traditional search result in 8% of visits, compared with 15% where it did not. Users clicked a link inside the AI summary in only 1% of visits. Users were also more likely to end their browsing session altogether after seeing an AI summary (26% of visits, against 16%).[19]

5.2. The Indian School of Business and Carnegie Mellon experiment found that in the counterfactual, the presence of AIOs reduced publisher clicks by 39.8% on the queries where they appeared, and increased zero-click searches by 34.5%. The effect was concentrated where the AIO appeared at the top of the page.[20] Seer Interactive found that organic click-through rates on queries with AIOs fell by 65% between June 2024 and September 2025.[21]

5.3. Authoritas measured the effect of AIOs on UK publishers and found that, where an AIO appeared, click-through rates fell by 47.5% on desktop and 37.7% on mobile. A continuation of the Authoritas study was included as part of the complaint to the CMA dated 30 June 2025.[22]

5.4. DMG Media, the Publishers Association and the Affiliate and Partner Marketing Association have each given the CMA evidence of falling click-through rates and referral traffic, the Publishers Association citing a 19% decline in click-through to academic reference services.[23] Ofcom has reported early evidence that users who see AI summaries are less likely to click through to original content.[24]

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[19] Pew Research Center, A. Chapekis and A. Lieb, "Google users are less likely to click on links when an AI summary appears in the results" (22 July 2025), based on the browsing activity of 900 US adults (68,879 Google searches) in March 2025, https://www.pewresearch.org/short-reads/2025/07/22/google-users-are-less-likely-to-click-on-links-when-an-ai-summary-appears-in-the-results/

[20] S. Agarwal and A. Sen (Indian School of Business and Carnegie Mellon University), working paper (SSRN, April 2026), "The Impact of Google AI Overviews on Publisher Traffic and User Experience: Evidence from a Field Experiment" available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=6513059.

[21] Seer Interactive, AI Overviews impact on Google CTR, September 2025 update (4 November 2025), covering 3,119 search terms across 42 organisations, June 2024 to September 2025, https://www.seerinteractive.com/insights/aio-impact-on-google-ctr-september-2025-update and https://www.omnibound.ai/blog/google-ai-overviews-statistics and https://www.dataslayer.ai/blog/google-ai-overviews-the-end-of-traditional-ctr-and-how-to-adapt-in-2025.

[22] Authoritas, study of the effect of AIOs on UK publishers' click-through rates (data 18 June–27 July 2025), submitted to the CMA in support of the complaint dated 30 June 2025; see Press Gazette (August 2025), https://pressgazette.co.uk/media-audience-and-business-data/google-ai-overviews-publishers-report-clickthroughs-authoritas-report/.

[23] Responses published by the CMA in its SMS investigation and conduct requirements consultations: DMG Media, https://assets.publishing.service.gov.uk/media/68a5aa50a6acbbc7fb96a3b2/DMG_Media.pdf; Publishers Association, https://assets.publishing.service.gov.uk/media/69b970dc6736ec37c8a46658/Publishers_Association.pdf (citing Times Higher Education, March 2025); Affiliate and Partner Marketing Association, https://assets.publishing.service.gov.uk/media/69b970d8635612b767a4665f/Affiliate_and_Partner_Marketing_Association.pdf.

[24] Ofcom, Online Nation 2025 (10 December 2025), https://www.ofcom.org.uk/media-use-and-attitudes/online-habits/from-apps-to-ai-search-how-the-uk-goes-online-in-2025 and page 30 onwards of https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/online-nation/2025/online-nations-report-2025.pdf?v=409837.

5.5. Across 27 markets, the Reuters Institute found that only 4% of respondents always or often click through to underlying news sources from AI, compared with 19% from search;[25] and in its survey of news executives it reported that publishers' search traffic had fallen by around a third, with a further fall of more than 40% expected over the next three years.[26]

5.6. There is also large reference to the "crocodile effect" where impressions are rising but clicks are declining.[27] According to an Ahrefs and AIO study, CTR for the #1 organic result dropped from circa 7.3% to 2.6% within a year, which is 34.5% relative decrease in clicks. Other studies show even steeper declines.[28]

6. Consumers want the ability to switch AIOs off

6.1. Consumers consistently say that they want control:

- 61% of consumers surveyed by Gartner want an option to turn AI summaries on or off;[29]
- in a Verasight survey of US adults, only 24.6% would keep AI summaries on for all searches if Google allowed a choice; 21.6% would turn them off for all searches and 28.4% for some;[30] and
- in the NP Digital survey, 17.7% would turn AIOs off for all queries and a further 38% for some, a combined 55.7%.[31]

6.2. Rival search services already compete on this dimension. DuckDuckGo offers a dedicated no-AI version of its search service, and in a public poll around 90% of respondents chose search without AI.[32] Google, by contrast, provides no setting that switches AIOs off.[33] The only practical routes are workarounds, such as selecting the "Web" results filter after each search, that most consumers will not know about.

6.3. Ofcom found that around 30% of keyword searches in the UK now return an AI overview and that 53% of UK adults say they often see them, which it described as largely passive adoption by people using their existing search service.[34]

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[25] Reuters Institute for the Study of Journalism (University of Oxford), Digital News Report 2026 (June 2026), chapter on emerging uses of AI chatbots for news, covering 27 markets including the UK, https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2026/emerging-uses-ai-chatbots-news-and-what-it-means-journalism.

[26] Reuters Institute for the Study of Journalism, Journalism, Media and Technology Trends and Predictions 2026 (12 January 2026), based on a survey of 280 senior news executives in 51 countries; the report is supported by the Google News Initiative available at https://reutersinstitute.politics.ox.ac.uk/journalism-media-and-technology-trends-and-predictions-2026.

[27] https://digitalmarketinginstitute.com/blog/google-ai-overviews-what-do-they-mean-for-search and see our letter to the CMA dated 13 February 2026.

[28] https://www.sevenatoms.com/blog/google-ai-overviews.

[29] Gartner, "Gartner Survey Finds 53% of Consumers Distrust AI-Powered Search Results" (3 September 2025), survey of 377 US consumers conducted June–July 2025, https://www.gartner.com/en/newsroom/press-releases/2025-09-03-gartner-survey-finds-53-percent-of-consumers-distrust-ai-powered-search-results0.

[30] Verasight (12 May 2026), survey of 1,509 US adults conducted 30 July–4 August 2025, https://data.verasight.io/ai/what-people-want-from-ai-search-summaries.

[31] Press Gazette (27 August 2025), reporting a Pollfish survey of 1,000 US adults for NP Digital (May 2025), https://pressgazette.co.uk/media-audience-and-business-data/google-ai-overview-click-trust-survey-us-adults/.

[32] PCWorld (27 January 2026), https://www.pcworld.com/article/3044488/90-of-duckduckgo-users-dont-want-ai.html.

[33] WIRED, "How Google's AI Overviews Work, and How to Turn Them Off (You Can't)", https://www.wired.com/story/google-ai-overviews-how-to-use-how-to-turn-off/.

[34] Ofcom, Online Nation 2025 (10 December 2025), https://www.ofcom.org.uk/media-use-and-attitudes/online-habits/from-apps-to-ai-search-how-the-uk-goes-online-in-2025 and page 30 onwards of https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/online-nation/2025/online-nations-report-2025.pdf?v=409837.

6.4. In May 2026, Gartner reported that consumers said generative AI appears in their internet and app use whether they asked for it or not and 62% said information from GenAI tools ended up being a waste of their time.[35]

6.5. Pew Research Center's 2026 survey found that 30% (three in ten) of US adults do not read AI search summaries at all, rising to 47% of those aged 65 and over;[36] Google nonetheless shows AIOs to all of them. Gartner's own advice to businesses is that generative AI should be made optional rather than mandatory, and placed in the customer's control, if it is to earn consumers' trust.[37]

6.6. In September 2026, The Guardian asked readers how AI had changed their use of Google search.[38] Although some welcomed AIOs, many did not, and their responses illustrate the absence of choice. Readers described having to scroll past the AIO to reach a real website or to check that the summary was not wrong, adding "-ai" to their queries, and installing a browser extension to hide AIOs. A Manchester reader complained that consumers can no longer switch AI summaries off, and said: "I want to be able to decide for myself". Others had stopped using Google altogether and moved to rival search engines without AIOs. Tellingly, several of those who switched described the rivals they had moved to as weaker than Google, with lower-quality results. Consumers who want a links-based search service are therefore left with a choice between Google with AIOs imposed and rivals that, lacking Google's scale, cannot offer the same quality. That is not a free choice; it is the consequence of the competitive problem the User Choice CR is designed to address.

7. Conclusions – primary and secondary market harms

7.1. The evidence above shows that AIOs in fact lead to consumer detriment across numerous sectors:

7.1.1. Competition between search services is reduced because Google controls the default point of access to search, has amended the SERP to show AIOs at the top of the page and does not make this a positive choice for the user but rather sets it as a default.

7.1.2. Competition between and among AI services. Consumers do not choose the AI service by selecting the AI service and/or downloading a separate app. Google's LLM model therefore gains usage, visibility and interaction data not by competing on the merits against other AI models, but by being bundled with a service consumers already use. Rival models, including open-weight models that can increasingly run on consumers' own devices, are denied that visibility and usage. More evidence is being published

[35] https://www.gartner.com/en/newsroom/press-releases/2026-05-27-gartner-survey-finds-consumers-want-ai-shopping-help-but-not-ai-purchase-decisions.

[36] Pew Research Center, "Americans and AI 2026: Chatbots, Smart Devices and Views on Impact" (17 June 2026), survey of 5,119 US adults on its probability-based American Trends Panel, 17–23 February 2026, https://www.pewresearch.org/internet/2026/06/17/americans-and-ai-2026-chatbots-smart-devices-and-views-on-impact/; age breakdown at https://www.pewresearch.org/chart/a-majority-of-americans-overall-say-they-read-ai-search-summaries-but-adults-65-and-up-are-least-likely/.

[37] Gartner, "Gartner Marketing Survey Finds 50% of Consumers Prefer Brands That Avoid Using GenAI in Consumer-Facing Content" (16 March 2026), survey of 1,539 US consumers, https://www.gartner.com/en/newsroom/press-releases/2026-03-16-gartner-marketing-survey-finds-50-percent-of-consumers-prefer-brands-that-avoid-using-genai-in-consumer-facing-content0.

[38] B. Montgomery, "'I miss old Google': readers tell us how they search the internet in the age of AI", The Guardian (23 September 2026), https://www.theguardian.com/technology/2026/sep/23/google-readers-respond-ai-overview-internet-searches.

regarding frontier type models (such as Google's Gemini) being less efficient and less useful for consumer takes than open-weight alternatives.[39]

7.1.3. In other words, consumers are being force-fed the wrong product, and in the process the visibility and uptake of next-generation technology that consumers could usefully use is restricted. That is consumer detriment arising from the absence of competition on the merits among and between AI models.

7.1.4. Harm to publishers and to consumers' ability to reach the destinations they are looking for. Publishers and other content creators lose the traffic, and therefore the revenue, that funds the content on which consumers and AIOs themselves depend (Section 5). Consumers find it harder to navigate to the websites and sources they want: AIOs add friction to navigational searches (Section 4), reduce onward clicks to original sources (Section 5), and leave consumers relying on an unverified synthesis (Section 3). If consumers could choose a links-based service, those who prefer to go directly to sources could do so, and much of this secondary harm would not arise.

7.1.5. Publisher traffic loss means the viability of a diverse range of publishers is reduced. News executives surveyed by the Reuters Institute already expect a further fall of more than 40% in search traffic over the next three years.[40] Smaller and independent publishers, which depend most on search referrals and have least bargaining power, are the most exposed. This can have a significant impact on media plurality.

7.1.6. By placing AIOs at the top of every results page, Google is reshaping consumers' search behaviour in a way that keeps them on Google's own properties.[41] As The Guardian reports, people are spending more time on Google.com and navigating less to sites beyond it.[42] Traffic that previously flowed to rival services and to the open web is channelled into Google's own pages, maximising Google's returns by depriving users of alternatives. For consumers, the effect is fewer alternatives: they lose the choice of a links-based search service and, increasingly, the direct route to the destinations they are looking for. For competition, the effect is felt at both levels: at the primary level, rival search services are denied the users and scale they need to compete; at the secondary level, publishers and other destinations are denied the traffic they need to fund and sustain their services. Both should be brought out in the CMA's assessment.

7.2. Both levels of harm are now recognised by competition authorities. The CMA's own proposals for publisher controls recognise the fall in traffic to publishers since AIOs were introduced,[43] and the European Commission has opened an investigation under Article 102 TFEU into Google's use of publishers' content for AIOs and AI Mode.[44] Publisher-side remedies address

[39] https://www.ft.com/content/48588acb-8026-4c8e-aac7-8b5588294dbf?segmentId=2c1df321-36a4-1206-2c08-112c059dd69d, which refers to OpenRouter as an example. OpenRouter works as an AI chatbot that chooses the most efficient model to answer your query. A chart in the article shows that in February 2026, 60% of the time the most efficient model was on the frontier, but by September 2026, this figure was down to only 25%, and the rest are open weight models (double check the exact percentages).

[40] Reuters Institute for the Study of Journalism, Journalism, Media and Technology Trends and Predictions 2026 (12 January 2026), based on a survey of 280 senior news executives in 51 countries; the report is supported by the Google News Initiative available at https://reutersinstitute.politics.ox.ac.uk/journalism-media-and-technology-trends-and-predictions-2026.

[41] https://fortune.com/2025/07/24/googles-ai-overviews-eating-internet-search-traffic/.

[42] B. Montgomery, "'I miss old Google': readers tell us how they search the internet in the age of AI", The Guardian (23 September 2026), https://www.theguardian.com/technology/2026/sep/23/google-readers-respond-ai-overview-internet-searches.

[43] CMA, conduct requirements for Google general search, including the Publisher CR (28 January 2026); see Reuters, "UK pushes Google to allow sites to opt out of AI Overviews" (28 January 2026), https://finance.yahoo.com/news/uk-regulator-proposes-changes-google-102256846.html.

[44] European Commission, Case AT.40983, formal investigation opened on 9 December 2025 into Google's use of web publishers' and YouTube creators' content for AI Overviews and AI Mode, following a complaint by the Movement for an Open Web, Foxglove and the Independent Publishers Alliance; see Press Gazette, https://pressgazette.co.uk/?p=246507.

the secondary harm to publishers. They do not address the primary harm to consumers' choice between search services, which only a consumer-facing control can remedy.

8. Control of consumer interfaces and interaction data

8.1. Google and Apple between them control the interfaces through which UK consumers access search and the web, and the data generated by consumers' interactions through those interfaces. Under the Information Services Agreement ("ISA"), Google pays Apple a substantial share of its search revenue in return for being the default search engine in Safari. The CMA's own mobile browsers market investigation found that this revenue-sharing arrangement significantly reduces both companies' financial incentives to compete.[45]

8.2. The consequence for consumers is that their interests, as revealed by their searches and interactions, are known only to Apple and Google. This reinforces each of the harms in Section 7: the interaction data generated by consumers' use of Google Search on Apple devices allows Google to improve its own services, including AIOs, while its rivals cannot.

8.3. Recent events illustrate the point. Apple's iOS 27 update, released on 14 September 2026, activated a mechanism in WebKit, the browser engine that every browser on iPhone and iPad must use, that unconditionally blocks requests to a list of domains chosen by Apple. We are writing to the CMA on this topic separately.

8.4. Please also see our letter to the CMA dated 10 July 2026, which highlights the feedback loops that are needed for a foundation model.

9. Implications for the User Choice CR

9.1. The evidence above addresses both limbs of paragraph 2.7. It identifies the specific issues an expanded scope would address (no measurable benefit to consumers, unreliable content presented with authority, added friction, and reduced access to original sources). It also shows the benefits of giving consumers control: consumers want it, and the only randomised evidence available indicates that they lose nothing when AIOs are removed.

9.2. At footnote 9 of its consultation, the CMA suggests that such controls would give users more control over specific aspects of Google's services rather than increase awareness of, and choice between, search services. We disagree. A generative AI answer and a page of ranked organic links are, in substance, two different search services. The CMA has itself amended "search engine" to "search service" in the User Choice CR. A consumer who wants a links-based search service from Google currently has no means of obtaining one. Allowing that consumer to choose is a choice between search services, and sits squarely within the aim of the User Choice CR.

9.3. We therefore ask the CMA to require Google to offer consumers an opt-out from AIOs (and from AI Mode as a default) that is:

- offered on the Search Choice Screen and at each redisplay;

[45] CMA, Mobile browsers and cloud gaming market investigation, final decision report (12 March 2025).

- persistent across devices, Relevant Access Points and software updates, with no silent reversion;
- available through a single setting, with no more friction than opting in;
- subject to the fairness duty in CR 18, so that Google cannot use warnings, framing or prompts to discourage its use; and
- reported on to the CMA, including uptake and reversion rates, as part of the monitoring framework proposed in Section 2 of our letter.

9.4. As Section 8 explains, the evidence is consistent across independent sources, methods and jurisdictions. The most complete evidence on how UK consumers respond to AIOs, including their satisfaction and their use of workarounds, is held by Google. If the CMA considers further evidence necessary, it should require Google to provide that data, or commission its own UK consumer research, rather than treat the absence of evidence it does not hold as a reason not to act.