Competition & Markets Authority

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To whom it may concern,

OPEN LETTER TO ONLINE RETAILERS SELLING GOODS TO UK CONSUMERS

Why the CMA is writing

As we approach the Christmas shopping period, we are reminding traders of the importance of ensuring that they make prices – including delivery fees – clear to customers up front. We encourage any businesses who have not already done so to review their website, mobile app and online advertising to ensure that their pricing is clear and complies with the law.

Clear pricing that includes all the fees that people can't avoid helps people compare offers confidently and choose the option that works best for them. Unexpected charges make it more difficult for consumers to understand and compare the true cost of products, including between different retailers. The first price consumers see should be the price they pay.

What does this mean for delivery fees?

Where a customer must pay a delivery charge to buy a product, the total price including the minimum mandatory delivery charge must be shown to the customer throughout the sales process.

We recognise that many businesses across the UK have taken steps since the Digital Markets, Competition and Consumers Act 2024 (DMCC Act) came into force to ensure that they comply with the DMCC Act's price transparency requirements. We welcome those changes. Increasing price transparency benefits consumers across the UK.

We are concerned, however, that some businesses remain non-compliant in how they present delivery charges to consumers. This letter highlights some issues the CMA has identified regarding the presentation of delivery charges by those businesses and sets out steps online retailers should take now to help ensure compliance with consumer protection law and reduce the risk of enforcement action.

We always seek to use our enforcement powers in a fair and proportionate manner. We published detailed guidance for business on price transparency requirements in November 2025. Where we see ongoing non-compliance, we may use our enforcement powers to ensure that customers benefit from the price transparency that is required by law.

What does the law require?

The DMCC Act requires that if the price of a product is being provided to a consumer (an 'invitation to purchase') that price must be the total price, including mandatory delivery or collection fees.[1]

The total price must be provided at every stage of the purchase process where a price is given, including advertising, product pages, carts and baskets, checkout and payment pages.

The CMA has published guidance for business on compliance with the DMCC Act's **Price transparency (CMA209)**. If businesses have not already done so, they should read that document now to ensure they understand their legal obligations. In particular, Chapter 4 of the guidance explains the core requirements of the DMCC Act, and paragraphs 5.2 to 5.21 provide additional guidance on the presentation of delivery fees.

The guidance addresses a wide range of situations and provides examples of approaches different types of businesses, and businesses with different types of delivery fees, can take to ensure they are compliant with the law. The guidance includes illustrations of various possible approaches.

Review your pricing practices against the DMCC Act's requirements and the CMA's Price transparency (CMA209) guidance

Make any changes necessary to ensure that consumers receive clear, prominent and timely information about the total price they are likely to pay up front.

What information must be provided when there is a flat delivery charge that applies to a customer's shopping basket?

Where an e-commerce website or app allows customers to purchase multiple products together (for example an online clothing retailer), it is often the case that a single delivery charge applies to the order regardless of how many items are purchased.

In those situations, the retailer must still provide the customer with the total price of the products, including any mandatory delivery or collection fees, throughout the shopping

[1] The total price must also include any other unavoidable fees, taxes and charges.

process. The requirement to provide the total price does not preclude the presentation of other information such as a breakdown of how the price is calculated or the cost of the delivery fee that is included within it. Retailers could, for example, automatically display the price for a product both including and excluding delivery.

In our published guidance, CMA 209, we provide further details and examples of approaches retailers could take to ensure compliance.

What information must be provided when delivery charges are optional?

Where a retailer has optional delivery charges, the retailer must tell customers clearly throughout the process that these charges apply. If the amount cannot reasonably be calculated in advance, retailers must explain that an additional charge may be payable.

Customers should not have to search through separate pages, hidden menus or expandable sections to find this information. Additional information is provided in our guidance on pricing transparency.

What information do online marketplaces, comparison sites and search engines need to provide when they are showing prices from multiple different retailers?

The requirement to make complete pricing information available to customers applies not just to shops, but also to online marketplace operators, comparison sites and search engines.

When, for example, an online marketplace displays a list of items sold by different traders, each of which can be purchased individually and has its own delivery charge, the price of delivery should be included in the total price of each product. As for other types of retail sites, traders can also present other pricing information to the consumer, such as the base cost (exclusive of delivery), provided that the total price is presented in a clear and timely manner and in a way that the consumer is likely to see it.

Again, additional details and examples are provided in our guidance on pricing transparency.

What is the CMA looking at?

Examples of non-compliant practices that the CMA is looking out for include:

- displaying a product price without including a mandatory delivery charge in the total price;
- failing to include applicable mandatory delivery charges within basket totals or order summaries;

- failing to provide information about optional delivery fees or placing that information behind links, separate pages, pop-out pages, expandable sections or drop-down menus;
- failing to provide information about delivery charges until late in the checkout stage.

Online retailers, marketplaces, comparison sites and search engines should review their pricing practices against the DMCC Act's requirements and the CMA's Price transparency (CMA209) guidance.

The CMA will continue to monitor pricing practices across the online retail sector and is committed to taking enforcement action if it appears non-compliance is continuing.

If the CMA finds that the law has been broken, the DMCC Act gives the CMA the power to impose substantial penalties and it may also require redress to be paid to affected consumers.

The CMA has already enforced the rules on drip pricing against four businesses, imposing fines totalling more than £5.1 million and securing more than £1.35 million in refunds for affected consumers.