ACT | The App Association

Mobile Ecosystems Team
Competition and Markets Authority,
The Cabot,
25 Cabot Square,
London,
E14 4QZ

Monday, 22nd December 2025

Mobile Ecosystem SMS designations and roadmaps

We, the undersigned, write in response to the Competition and Markets Authority's (CMA) request for feedback on its Mobile Ecosystem SMS designations and roadmaps. As small technology companies and developers, we urge the CMA to ensure that any interventions preserve (1) consumer security and privacy, and (2) developers' ability to reach users through trusted distribution channels.

Before the rise of secure digital platforms, consumers were understandably cautious about installing or purchasing software from unfamiliar developers. Today, mobile platforms are how we reach customers, manage subscriptions, and build the trust consumers need to download and pay for our products. Unlike large, well-known companies, startups cannot rely on brand recognition to earn consumer confidence. The safeguards and built-in trust provided by online marketplaces are not incidental to our success; they are key in our ability to start, operate, and scale. Some of us develop for multiple platforms while others focus on just one, but all of us benefit from the core structure of the current mobile ecosystem.

We appreciate the past opportunities to share these perspectives directly with the CMA through roundtables and other engagements. We also recognise the CMA's serious attention to our security concerns in both its Apple and Google roadmaps.

We support the postponement of measures that would reduce consumer trust in app distribution, including mandates that facilitate sideloading or materially weaken platform security controls. In our view, the CMA should not pursue sideloading-related remedies unless and until the CMA can demonstrate that equivalent security and consumer-protection outcomes will be maintained in practice.

Consumer trust and security are the bedrock of the digital ecosystem, particularly as our most sensitive personal data is stored on mobile devices and apps have significant access to that data. At a time when scam prevention is [a priority for the UK government](#) and scamming and malware tactics are increasingly prevalent and sophisticated, expanding sideloading mandates will make it easier for consumers to download apps outside of trusted channels. Bad actors will exploit these pathways when they exist, sometimes in the form of links received in messages pretending to be a grandchild or colleague. [Android has already reported](#) that sideloaded apps contain up to 50 times more malware than those distributed by trusted marketplaces like the Google Play store. We are also concerned that third-party app stores may operate with untested levels of security, increasing the risk of intellectual property (IP) theft, malware, and scams[, harming trust in small businesses](#). Ultimately, these

changes could increase opportunities for data theft and financial fraud, damaging consumer perceptions of small developers and harming confidence in the broader regulatory architecture.

Separately, we encourage CMA to protect developers' control over where and how their apps are sold. We have seen proposals suggesting third-party app stores could gain automatic access to the existing app stores' back catalogues. This would risk developers losing control not only over distribution and commercial terms, but also over the context in which our apps appear, who sells them, and what they are sold alongside. This raises risks of impersonation, consumer confusion, increased support burdens, and reputational harm.

Finally, the CMA is well-positioned to assess early outcomes and implementation challenges emerging from other jurisdictions, including the European Union's (EU's) Digital Markets Act (DMA). A recent study of 5,000 European consumers shows that rather than seeing improvements, a majority would like to see a return to pre-DMA products and services and would even pay for this privilege. UK policymakers can avoid the EU's mistakes by grounding policy and enforcement in demonstrated systemic harms and by rejecting proposals pushed by a small number of large companies that use competition policy to boost their own profits at the expense of developers and consumers.

Several other areas of the roadmaps interest us, and we are already engaging with the CMA to assist your evidence gathering. As members of ACT | The App Association, we stand ready to provide the CMA with a small-developer perspective on these critical issues moving forward.

Yours sincerely:

Alter Sapiens	Nebula Labs
Augmented Solutions	Nomw Health
BadVR	Nuke from Orbit
Extasy	Qube Catalyst
Factoree	Skillora
HDK Solutions Ltd	TL Tech
Layers Studios	Undisclosed DNA
Lazy Moose Company	Vaicat International

Yours Sincerely,

Stephen Tulip
Country Manager – UK, The App Association.