

12 March 2026

Comments of

ACT | The App Association

to the

**United Kingdom's Competition and Markets
Authority (CMA)**

regarding its

**Call for Evidence Regarding
Proposed Commitments from Apple and Google:
app certainty and interoperable access**

Introduction and statement of interest

ACT | The App Association is a trade association representing small business technology companies from across the United Kingdom (UK), European Union (EU), and the United States (U.S.). Our members are entrepreneurs, innovators, and independent developers within the global app ecosystem that engage with verticals across every industry. We work with and for our members to promote a policy environment that rewards and inspires innovation while providing resources that help them raise capital, create jobs, and continue to build incredible technology.

Small and medium-sized enterprises (SMEs) are a key engine of the UK technology economy

The UK has the third-largest tech sector in the world, valued at more than \$1.2 trillion. In 2021, 56 per cent of the digital sector's £182.1 billion gross value-add contribution to the UK economy came from SMEs. SMEs account for more than 50 per cent of all private sector jobs in the UK.¹

The small business-driven app economy is vital to UK prosperity

A huge amount of economic activity involves mobile apps, much of which we do every day without a second thought. A few examples include shopping, booking travel, gaming, banking, watching media, working, communicating, teaching kids in school, monitoring our health, and learning new languages. Apps are also used to control our homes, cars, factories, and medical devices, plus countless more activities, via the internet of things (IoT). These activities don't just generate money; they increase sustainability, boost productivity, and provide critical support to countless consumers and businesses.

The term we use for this broad ecosystem of economic benefit is 'the app economy', and it is a significant contributor to the UK's financial success. The direct revenues of the UK app economy in 2021 amounted to £38.4 billion. Including direct and indirect contributions, the app economy generated £74.8 billion in revenue throughout all sectors of the UK's economy in 2021, creating more than 400,000 jobs in the process.²

ACT appreciates this opportunity to provide input to the CMA on its call for input regarding proposed commitments from Apple and Google relating to app certainty and interoperability.

ACT comments

In its implementation of the 2024 Digital Markets, Competition and Consumers Act (DMCCA), the Competition and Markets Authority (CMA) is examining potential regulation of mobile ecosystems, specifically Apple's App Store and the Google Play store. Both are examples of curated online marketplaces (COMs) and have been designated as having Strategic Market Status. In July 2025, the CMA published roadmaps of proposed interventions and, just recently, secured commitments³ from Apple and Google to change the way their app stores and interoperability systems operate.

¹ Tech UK - [UK Tech SMEs: A Global Force to Be Reckoned With](#) - 2023

² Deloitte - [The App Economy in Europe](#) - 2022

³ CMA - <https://competitionandmarkets.blog.gov.uk/2026/02/10/improving-the-way-apple-and-google-deliver-app-store-services-and-enhancing-ios-interoperability-in-the-uk/> - 2025

ACT and our members urge policymakers, and the CMA in particular, to prioritise the needs of the small and medium-sized enterprises (SMEs) that drive the UK tech economy when considering any changes to regulation and to emphasise security, data privacy, and consumer confidence.

In general, ACT views the commitments secured by the CMA from Apple and Google relating to the App Store and Google Play in the UK as a positive development for the app ecosystem in the UK digital marketplace and a sensible solution to the CMA's concerns. ACT and our members have long called for⁴ many of these improvements, including greater transparency, predictability, and speed in app review; clear and objective rules for app ranking and notification when rules change; and protection for app developer data against use by platforms for their own apps. Apple and Google's commitments to the CMA represent significant progress toward these goals. ACT also appreciates that commitments are more dynamic than lengthy formal processes, thereby bringing positive improvements to developers faster.

App review, app ranking, and use of app data

Startups and SMEs leverage COMs to lower their overhead, gain access to global customers, and access a trusted marketplace. COMs create an environment where consumers feel more comfortable exploring new services and apps, especially from businesses they have never heard of, such as startups and SMEs. Without the brand recognition and established reputation of bigger competitors with large marketing budgets, SMEs rely on the trust and loyalty COMs build with consumers. Both consumers and SMEs benefit from having a bundle of services provided by COMs, including subscription management, data security, customer data collection, and marketing.

ACT and its members are encouraged to see commitments from Apple and Google that will improve the developer experience on and relationship with app stores without undermining the important functions those stores provide. We welcome commitments to ensure app review decisions are fair, objective, transparent, and without discrimination against apps that may compete with Apple or Google services. Clear guidelines and explanations for app rejections and a consistent appeals process will go a long way to addressing complaints that app approval decisions can be opaque or inconsistent.

We also approve of Apple and Google's commitments to transparency and objectivity in app store search ranking and to provide safeguards for developer data collected during the app review process. While we do not believe that the promotion of a store operator's own apps is inherently anti-competitive, increased fairness and transparency in the application of these rules and the ways in which developer data will be used is a benefit to the ecosystem.

Interoperability

Interoperability ensures that you can connect your Sony headphones to your Apple iPhone. The CMA is currently looking into issues of interoperability. While there is occasionally a role for the government to play, standards development led by the private sector is the most efficient way to

⁴ ACT - <https://actonline.org/wp-content/uploads/competition-policy-priorities.pdf>

promote interoperability between products and services provided by different companies in a competitive environment.

As SME tech developers, our members are broadly supportive of the premise of interoperability. However, ACT and our members are concerned that unrestricted interoperability can expose sensitive data, such as private messages, location, or access to cameras, and can be taken advantage of by unscrupulous third parties and malware.

In addition, ACT welcomes the CMA's decision to refrain from insisting on mandatory sideloading remedies that would reduce consumer trust in app distribution as part of this process. Mandates that require sideloading or materially weaken platform security controls erode consumer trust and disadvantage small tech companies. It is universally recognised that sideloading can reduce security and open significant new attack vectors for bad actors.

Trust and security are of paramount importance to SME developers. Alternative app stores may not implement review processes comparable to those of the main software distribution platforms, and sideloaded apps provide no protections at all. Therefore, the risk of downloading a pirated and potentially malicious app increases significantly.

When considering third-party app stores, SME developers with small teams and limited resources weigh the cost to adapt their apps and business processes against the potential customer expansion. If they decide against listing their app on a certain store, this creates an opportunity for copycat apps to be present on a multitude of third-party app stores. Customers who are looking for the original app after hearing of it through word-of-mouth or the original developer's marketing efforts receive a degraded experience, damaging the small business' reputation and trust.

We urge the CMA to approach this issue sensibly and ensure that security is front and centre of their thinking at all times. We also encourage them to listen to the voices of startups and SMEs who rely on trust in interoperability for their businesses to succeed.

What startups, scaleups, and SMEs need from policymakers

SMEs are the backbone of the UK's tech sector, and regulation should be aimed at ensuring they can grow, innovate, and flourish.

We urge policymakers to give full consideration to the impact on startups and SMEs of any market interventions on app stores and digital platforms, rather than designing policies that further benefit a handful of already large businesses. Any changes should be designed to ensure strong data and privacy protections and robust cybersecurity measures are maintained. Without this, consumers will lose trust in the app ecosystem, causing devastating harm to SMEs.

Conclusion

ACT welcomes the opportunity to contribute to the CMA's Strategic Market Status investigations. SMEs drive the UK's digital economy, and the UK has a chance to take a balanced approach, avoiding the harmful unintended consequences seen in other jurisdictions, where overregulation has burdened SMEs while reinforcing the dominance of large firms. Policymakers must ensure interventions enhance competition without disrupting the stability of digital ecosystems.

We look forward to working with the CMA to support a fair, secure, and innovative app economy.

Sincerely,

Mike Sax
Founder and Chairperson

Stephen Tulip
UK Country Manager