

DMA.100209 - Consultation on the proposed measures for Google Search data sharing under Article 6(11) of the DMA

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Introduction

The Commission is consulting third parties on the proposed measures that Alphabet must implement to ensure effective sharing of Google Search data with third party undertakings providing online search engines, as required by Article 6(11) of the Digital Markets Act (“DMA”).

Target Group

All citizens, companies and organisations are welcome to contribute to this consultation. The Commission especially welcomes contributions from companies that are directly affected by the scope of these proceedings, namely those providing online search engine services including AI chatbots with search functionality.

Objective of the consultation

The DMA is a European legislation that aims to make digital markets fairer and more open. The DMA applies to gatekeepers, which are companies operating large digital platforms that play an important role in the digital economy and act as gateways for other companies to access end users. Alphabet is one of such gatekeepers.

Amongst others, the DMA requires gatekeepers that operate online search engine services to share anonymised ranking, query, click and view data with other search engines against fair, reasonable and non-discriminatory (FRAND) terms. To assist Alphabet in sharing such data in an effective way, the Commission opened proceedings on 27 January 2026 to specify measures that Alphabet must implement to comply with its data sharing obligation under the DMA. The Commission’s case reference is DMA.100209.

On 16 April 2026, the Commission addressed its preliminary findings to Alphabet, including the draft measures that Alphabet must take to ensure effective sharing of Google Search data with other search engines. A case summary and the proposed measures are available in the Reference documents section below.

The Commission is now seeking feedback from interested third parties on the proposed measures. The Commission's measures cover five areas:

1. **Eligibility:** Which third parties are eligible to receive data under Article 6(11) of the DMA?
2. **Data scope:** Which data must Alphabet share?
3. **Anonymisation:** How must Alphabet anonymise the data based on technical measures complemented by contractual measures, without unnecessarily degrading the quality and usefulness of the data?
4. **Pricing terms:** What pricing terms for the search data can be considered FRAND?
5. **Sharing process:** How must Alphabet share the data with third parties?

In particular, the Commission seeks views on the technical aspects of the measures:

- The effectiveness of the measures in practice: if implemented, will the proposed measures offer search data that is useful for third parties providing search engines to optimise their services while meeting the requirement that the shared data is anonymised?
- The completeness of the measures: is anything else needed to ensure effective sharing of search data?
- Timelines: is the proposed timeline for Alphabet to implement the measures achievable?

The Commission will carefully assess the feedback provided by interested parties and Alphabet. The input received may result in adjustments to the proposed measures and will feed in the Commission's decision making the measures legally binding on Alphabet. The Commission will adopt a final decision by 27 July 2026 (within six months of opening the proceedings).

How to provide feedback

You can submit feedback in response to this consultation through this form. Each question has a character limit of 5,000. If your answer exceeds the character limit, you can upload your contribution as a pdf file through the field provided below.

The deadline to respond to this consultation is **Friday 1 May 2026**.

Your submission must be fully non-confidential. All contributions will be made available to Alphabet. Contributions will not be published. The Commission may contact you with follow-up questions on your feedback.

Reference documents

[DMA.100209 - Case summary.pdf](#)

[DMA.100209 - Preliminary measures.pdf](#)

Your details

* Company / Organisation

ACT | The App Association

* Briefly describe your company / organisation

ACT is a policy trade association for the small business technology developer community. 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.

* Country

Belgium

* Contact person

Maria Goikoetxea

* Role within company / organisation

Senior Policy Manager

* Email

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Your contribution

What is your view on the proposed **eligibility** measures?

ACT's view on eligibility centres on two related concerns. The DMA as currently scoped focuses on 'online search engine services' in the traditional sense. ACT cautions against an overly expansive interpretation that extends data sharing obligations to general-purpose AI systems simply because they surface web-based information. An AI assistant that retrieves information from a corpus is substantively different from a search engine that operates on live ranked web indices. Extending eligibility to such systems without careful legal grounding risks creating obligations beyond the DMA's mandate and could raise questions about the legal robustness of the Commission's decision.

Additionally, ACT is concerned that eligibility criteria may be designed around the profile of large, well-capitalised search competitors. The Commission should ensure that the eligibility process itself is accessible. Application requirements should be clear, non-burdensome and not require dedicated legal or compliance teams to navigate. The Commission should consider a tiered eligibility model that allows smaller players to access data at scales and on terms appropriate to their operational reality, rather than requiring them to meet the same benchmarks as large-scale competitors.

What is your view on the proposed **data scope** measures?

The DMA's data sharing obligation, if poorly calibrated, could reduce Alphabet's incentives to invest in improving Google Search. A degraded product ultimately harms users and the ecosystem of businesses, including our startup members, that depend on high-quality search infrastructure. The Commission should ensure that the data sharing obligations are forward looking and are reviewed periodically to ensure ongoing calibration between the pro-competitive benefits of sharing and the dynamic incentives of continued investment.

What is your view on the proposed **anonymisation** measures?

ACT acknowledges the Commission's intention to require anonymisation as a safeguard for end-user privacy. However, ACT has significant concerns about the current approach, which appears to rely primarily on contractual obligations and technical safeguards to ensure that data cannot be re-identified. This is insufficient and likely to lead to significant harm to the privacy of EU citizens.

Contractual obligations to refrain from re-identification are a deterrent, not a technical barrier. Modern data science techniques can re-identify individuals from supposedly anonymised datasets, particularly when combined with auxiliary data that recipients may already hold. Relying on a contractual 'don't re-identify' clause does nothing to prevent technical re-identification and creates an uneven enforcement landscape where well-resourced recipients with legal teams may exploit ambiguity. The General Data Protection Regulation (GDPR) acknowledges this dynamic, treating pseudonymised data capable of being re-identified as subject to GDPR's privacy protection and data security provisions, while only fully anonymised data for which re-identification is not remotely feasible falls outside its scope. Moreover, although requirements for contractual clauses prohibiting re-identification are a common feature of privacy laws and proposals globally, they are an appropriate safeguard as part of a privacy framework that does not include requirements to share sensitive data but are less effective against a backdrop of mandated data sharing.

Technical barriers are becoming increasingly fragile. Advances in data processing and AI make it increasingly possible to link seemingly unrelated data points, breaking anonymisation and exposing highly sensitive information. This would not only compromise the safety and privacy of EU citizens but also severely erode public trust.

ACT strongly recommends that the Commission implement a thorough and continuously reviewed process to manage technical anonymisation standards. This includes the establishment of a multi-stakeholder technical committee with responsibility for overseeing anonymisation standards and their evolution over time. This committee should include independent technical experts, academics, representatives from civil society, and consumer organisations as well as SME operators.

We urge the Commission to consider such concerns as misuse of data can negatively affect the ecosystem and, as a consequence, startups which are trying to grow and scale in the ecosystem.

What is your view on the proposed **pricing terms** measures?

Pricing is the area where the proposed measures are most at risk of failing SMEs entirely. If pricing terms are set at a level and structure that are only workable for large companies, SMEs will effectively be excluded from participation.

The predictable market outcome is the emergence of data intermediaries: analytics firms, data brokers, and platform aggregators that purchase data at scale and re-sell derived insights or access to smaller parties at a premium. This would add an additional cost layer for SME operations, concentrate market power in a new set of intermediaries that become de facto gatekeepers in their own right, and allow large competitors to monetise or leverage the data in ways that further widen the gap between them and smaller operators.

What is your view on the proposed **sharing process** measures?

ACT's principal concern is that a sharing process designed around the technical capabilities and resources of large organisations will systematically fail SME recipients, even if all other aspects of the regime are well designed. If this occurs, the Article 6(11) regime will not have democratised access to search data, it will have created new barriers to data access.

ACT remains available to engage further with the Commission on these issues and to create a fair, competitive environment with SMEs and startups at its core.

Upload your contribution

Please upload your file(s)

I confirm that my contribution does not contain confidential information and understand that my contribution will be shared with Alphabet.

Contact

EC-DMA@ec.europa.eu

Protection of your personal data

The Commission will share your response with Alphabet to allow it to exercise its right to be heard under Article 34 of the Digital Markets Act, including your name/contact person, company/organisation, country and role within company/organisation. However, the Commission will not share your email address with Alphabet. The Commission has updated this page and the privacy notice on 23 April 2026.

Privacy notice

[DMA specifications consultations privacy notice 6-11 DMA.pdf](#)

I confirm that I have read and agree with the privacy notice.

Useful links

[DMA website \(https://digital-markets-act.ec.europa.eu/index_en\)](https://digital-markets-act.ec.europa.eu/index_en)

Contact

[Contact Form](#)