

## **A response from comparison shopping sites to Google's update on its (non) compliance with the DMA**

On 26 November, Google published an [update](#) on its compliance with the Digital Markets Act (“DMA”). In that update, Google makes a number of false accusations against comparison shopping sites, tries (again) to oppose various stakeholders, and presents itself as a model of compliance with the DMA. This cannot be further from the truth. Instead, Google's blog is yet another manifestation of its DMA playbook:

1. Misinform;
2. Divide stakeholders; and
3. Do not comply.

Google pretends having made several changes to Google Search to “*boost the prominence of comparison sites for free in categories like flights, hotels, and shopping, among others.*” It also argues that certain businesses, namely airlines, hotel operators, and small retailers, are losing traffic as a result of these changes. Google blames “*a few*” comparison sites for requesting yet further changes, as a result of which Google is announcing more adjustments to their European search results.

Yes, Google made changes to its search page, allegedly to comply with the DMA. However, the truth is:

- Comparison shopping sites have not asked Google to remove useful features or to include all these new boxes that popped up in the user interface: these boxes are confusing, keep consumers more on the Google Search page, and remove vital organic traffic for comparison shopping sites;
- These design changes also fail to address the fundamental problems the DMA is meant to solve:
  - Ending self-preferencing by Google of its own comparison service (Google Shopping), which still sits prominently, alone, at the top of the search page;
  - Fair treatment of all categories of users in organic search results
  - Offering transparency in its selection algorithms and auctioning process.

Contrary to what Google claims, the end goal of the DMA is obviously not to “*prevent search engines from innovating and competing.*” No one is asking Google for “*a complete ban on anything that's more sophisticated than a simple blue link to a website.*” That Google feels the need to misinform the public is yet another example of its obstructive behavior. Google is simply being asked to stop self-preferencing so that competition can take place freely, to the benefit of consumers. But **Google Shopping, one of Google's greatest profit drivers, is simply too lucrative for Google to do so.**

Google pretends to have organized more than 100 events to seek feedback on its compliance efforts with the DMA. Regardless of whether that figure is correct, it is clear that **Google has not listened**. Comparison shopping sites and other stakeholders have indeed provided feedback to the Commission and Google on its compliance solution, and even made positive proposals on what a DMA-compliant solution could look like. **Google has simply, repeatedly, ignored this feedback**, and instead continued to iterate on the same non-compliant solution for months. If Google has not taken feedback into account after more than 100 events, it can only mean one thing: **Google is willfully not complying with the DMA**, just like it never complied with the 2017 Commission decision, confirmed by the European Court of Justice. Instead, it continues to suck innovation power from European companies.

We are now at a crossroads. The Commission has opened proceedings against Google for non-compliance. It must proceed with such proceedings, issue preliminary findings, and impose fines on Google, including periodic penalty payments, to force Google to finally listen and comply.

We welcome Commissioners Ribera and Virkkunen in their new roles. Upon them now falls the great responsibility to make the DMA a success. They can count on the support of the signatories to this letter to help them do so.

 **argép.hu** **BIANO** **beslist.nl** **billiger.de**

 **COMPAREGROUP.EU**  **connexity**  
a **Taboola** company  **FAVI**  **Geizhals**  
Preisvergleich

**guentiger.de**  **HomeTiger™** **heureka!group** **idealo juuhu**

**kelkoo**group **KiESKEURIG.NL**  **KUANTOKUSTA** **leGuide.com**

**moebel.de**  **PANTHER** **Preis.de**  **PriceRunner**  **Prisjakt**

 **RESHIFT** **RUNNEA** **solute**  **Testberichte**  **trovaprezzi.it**