To: The Competition and Markets Authority (via email)

23rd July 2026

RE: CONSULTATION ON STEERING CONDUCT REQUIREMENTS ON APPLE AND GOOGLE'S MOBILE PLATFORMS:

The Online Dating and Discovery Association (ODDA) is the recognised trade body for the sector with a mission to create safe, responsible and enjoyable experiences for everyone. Representing over 500 brands worldwide, 5 million adults in the UK have used a dating or social discovery service in the past 12 months, the majority of whom accessing them using Apple and Google's mobile platform ecosystems.

As we have stated in previous correspondence with the Competition and Markets Authority (CMA), the restrictive practices and fees charged by these two tech giants continues to have a significant impact on firms in our sector. Our own research shows that app developers and consumers are forking out £90 million a year thanks to this 'app tax' – money that instead could be reinvested in product development, hiring new staff or reducing costs to consumers. That's why the proposed Conduct Requirements (CR) under the Digital Marketing, Competition and Consumers Act (DMCCA) as opposed to non-legally binding voluntary commitments are broadly welcomed by our members.

Our response covers both consultations as the draft CRs are near-identical.

Fee Framework and Transparency:

The ODDA and its members are particularly pleased to see the draft CR impose a binding obligation on Apple and Google to maintain cost accounting records. For too long, both firms [redacted] pointing towards an absence of detailed cost data. While we remain of the view that Apple and Google should not be allowed to charge any fees for steering, we recognise that if fee charging is permitted, then they should be cost-based only with no value-based component.

We encourage the CMA to require a redacted or aggregated summary of the cost/value methodology to be published through the CRs, so that developers have a basis on which to assess whether a fee offered to them is genuinely compliant. We also believe that the fee should be flat, rather than a commission on a percentage of the developer's revenue, which reflects the one-time service being provided to the developer that has no connection to the price being charged by the developer to the user.

Furthermore, we would like the CMA to go further in relation to compliance by specifying a defined process and timeline for developers to challenge a steering fee they consider non-

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compliant rather than leaving this to be inferred from the general compliance and enforcement provisions of the DMCCA.

We note the changes that Google announced on 30th June, which includes revised fee tiers. As far as we are aware, Apple has not yet committed to any published fee structure for steering, relying instead on submissions about joint value creation. We recommend the CMA hold both platforms to an equivalent standard of published fee disclosure before treating either as provisionally compliant with the fair and reasonable principle under the DMCCA.

However, the consultation documents recognise that smaller developers should be subject to lower fees because they are less likely to already provide the services (payment processing, customer support and refunds etc) that steering requires them to take on themselves and are therefore less able to cross-subsidise from other parts of their business. In practice, this could mean the savings from a lower steering fee may be outweighed by the new operational burden of handling chargebacks, refunds and subscription cancellation that was previously absorbed by the platform's payment system. We think this needs further thought to avoid smaller app developers being negatively impacted by the CRs.

We also note that the underlying fee structures in the CRs distinguish between new and existing installs, meaning small developers with an established user base will see limited benefit from lower fees until their base substantially changes. We recommend the CMA assess, as part of its post-implementation review, the length of time it takes smaller developers to realise the intended fee benefit in practice.

Furthermore, given that Google's fee and steering changes are already live in the UK as of 30th June 2026 and that the CMA has stated it will assess their impact as part of this consultation process, we recommend the CMA commit to a defined post-implementation review point. With this in mind, we think 12 months after any final CR takes effect is a reasonable basis to work from. The review should assess whether fee savings were passed to consumers and the actual uptake of steering among smaller developers, including within subscription-heavy sectors.

Interstitial Screens:

We welcome the inclusion of interstitial screens within the CR and the definition of 'Neutral Language' that means Apple and Google must not include warning or risk-based wording, must not highlight potential harms, and must not increase perceived risk through steering. We note that both CRs carve out a limited exception at paragraph 3(b) allowing restriction of redirection mechanisms where strictly necessary to prevent fraud, alongside malware and content harmful to children. Our concern is in the potential for these exceptions [redacted] to render the CRs on these points as ineffective.

In conclusion, the ODDA and its members broadly support the proposed CRs. Regular reviews and transparent reporting will boost confidence in measuring whether the CRs will actually make a difference in creating a level playing field for the UKs innovative app developer community. We look forward to the draft CRs being confirmed.

Yours sincerely,

[redacted]

Simon Newman
Chief Executive Officer