

Wednesday, 6 March 2024

Mrs. Margrethe Vestager
Executive Vice-President – A Europe Fit for the Digital Age
European Commission

Mr. Thierry Breton
Commissioner for Internal Market
European Commission

Subject: Google Search is not Compliant with the DMA. We Urge the European Commission to Take Action

Dear Executive Vice President Vestager and Commissioner Breton,

Today marks an important milestone for Europe's digital landscape as the designated gatekeepers are now required to comply with the obligations imposed by the Digital Markets Act (DMA). This legislation is poised to reshape the digital economy, fostering fairness and competition in our markets. It's a significant step towards creating a level playing field for all players, and towards ensuring a more diverse ecosystem for users. In the travel tech space, fair competition can unlock tremendous value in terms of innovation, economic growth, sustainability and consumer welfare.

The ban on self-preferencing in Article 6.5 of the DMA is a crucial step towards realizing that vision. It will be an especially important tool to ensure that services can compete fairly on Google Search. With 300-400 million active monthly users and 90% of market share, Google Search has become the main way people find information online. Most businesses – including eu travel tech members – rely on Google Search to acquire customers and share their brand. Ensuring the effective application and enforcement of this obligation is not only essential from a DMA perspective but also crucial for fostering a fairer internet ecosystem.

It is alarming for Europe's digital markets that, despite extensive consultations with business users, Google's proposed solutions for Article 6.5 DMA fall significantly short of compliance, potentially rendering the new rules ineffective.

Google continues to self-preference its own intermediation services on the Search Engine Results Page (SERP). In travel search, this includes the display of Google's comparison products for Hotels, Flights, Things to do, Trains, and Vacation rentals with units that are more prominent, interactive and rich than any other search result. Organic search results are moving further away from view, while the page is filled with Google-owned content. This leads to a poorer experience and less choice for users.

The ambitious aim of the DMA can only be achieved with the effective implementation of the obligations and swift consequences for non-compliance. Google should immediately propose new travel solutions for Search that respect the DMA requirements. We urge the European Commission to do everything in its power to

ensure Article 6.5 is enforced, including opening an investigation without undue delay if Google continues to fail to comply.

We look forward to the effective implementation of the DMA and stand ready to offer our support and contributions throughout this process.

Yours sincerely,

Emmanuel Mounier
Secretary General
eu travel tech