

# PPA (Professional Publishers Association)

Evidence from the PPA on Google Search and Advertising Services  
SMS - Conduct requirements

For inquiries regarding this submission, please contact:

Eilidh Wilson, Head of Policy and Public Affairs,

Professional Publishers Association, Chancery House, Chancery Ln, London WC2A 1QS

[Eilidh.wilson@ppa.co.uk](mailto:Eilidh.wilson@ppa.co.uk)

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## Introduction and about the PPA

The Professional Publishers Association (PPA) is the professional body for special interest member companies, ranging from large consumer magazine publishers to business-to-business data and information providers, as well as smaller independent publishers.

The PPA's membership base operates in a digital marketplace dominated by Google, which holds approximately 93% of the UK search market and processes over 13 billion searches globally each day<sup>1</sup>. Google leverages its market power in several ways, including the algorithmic de-prioritisation of publisher content without warning, the restriction of publisher access to vitally important user-level data, and the development of offerings which directly compete with publishers, such as AI Overviews (AIOs) and the recently launched AI Mode.

Each of these offerings have become a significant concern for publishers, as they divert traffic away from original sources by providing summarised answers directly within (or in place of) search results. Publishers report rising impressions but falling click-through rates (also known as the “crocodile” phenomenon), disrupting the long-standing link between visibility and engagement.

The experiences of publishers are backed up by research which confirms that Google users are less likely to click on result links when visiting search pages with an AIO compared with those without one<sup>2</sup>. Google has attempted to spin reports by publishers of their own experiences and findings of recent studies (which found an almost 50% drop in traffic) with claims that the overall traffic remains stable, but acknowledges there is a shift in the type of sites that users are visiting<sup>3</sup>. Google has not published any data that would substantiate its assertions, and its position remains unconvincing compared to the mass of transparent studies that point to an existentially damaging decline in search traffic for publishers, caused by Google's use of its dominant position to exert and extend its power in the AI space.

Google is showing no signs of slowing down—in fact, quite the opposite. On the 28<sup>th</sup> July 2025, Google made “AI Mode” available to users in the UK, which turns search on its head and provides a chatbot-like experience. This makes it extremely unlikely that users would click on links to navigate to source material even if they wanted to. This move from Google comes on the heels of the AIO expansion into the Google Discover product<sup>4</sup>, which is a significant source of traffic for publishers. Instead of seeing

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<sup>1</sup> DemandSage (2025) How Many Google Searches Per Day [2025 Data] ([Source](#))

<sup>2</sup> Pew Research Center (2025) Google users are less likely to click on links when an AI summary appears in the results ([Source](#))

<sup>3</sup> Google (2025) AI in Search is driving more queries and higher quality clicks ([Source](#))

<sup>4</sup> TechCrunch (2025) Google Discover adds AI summaries, threatening publishers with further traffic declines ([Source](#))

headlines, users will find an AI summary with the publisher sources reduced to citations. These practices not only entrench Google’s position in both search and digital advertising markets but also stifle competition and undermine growth opportunities for UK publishing businesses.

Publishers have allowed Google to crawl their sites in return for inclusion in search results that drive traffic back to their websites. This exchange of content for clicks has underpinned the relationship between publishers and Google for many years. However, the levels of traffic returned to publishers have steadily eroded. Despite search traffic dwindling, Google’s dominant position in search means no publisher can realistically refuse to be crawled if they wish to remain visible. AIOs and AI Mode represent a radical departure from the original “content for clicks” exchange, as they do not deliver traffic in the same way – in some cases, at all. So-called “zero-click” searches on Google where users do not click on any link following a search have grown from 56% to 69% in the last year<sup>5</sup>. Publishers have not freely given consent for their content to be used in this new product, yet Google is treating inclusion in AIOs as part of the existing search arrangement despite the unfavourable economic consequences for publishers.

This brief response sets the PPA’s recommendations for conduct requirements for Google search services under its SMS designation and outlines evidence from the PPA, informed by anonymised publisher data and member SEO analysis. All commercially sensitive brand data has been anonymised, and this submission itself does not contain identifiable business information.

## Proposed conduct requirements for Google Search and Ad Services

To support more competitive conditions in Google Search and Ad Services, the CMA should introduce the following conduct requirements:

- Transparency reporting on crawling which distinguishes between crawling conducted for search indexing and crawling conducted for the creation of AIOs, AI Mode and any successor AI products which aggregate and summarise content.
- Transparency reporting in Search Console to show where and when publisher content appears in AI-powered Search Engine Results Page (SERP) features like AIOs, AI Mode and AIO in Google Discover.
- Transparency for acquisition sources in Google Analytics.
- Requiring clear attribution and functional linking when publisher content is used in AIOs, AI Mode and Google Discover.

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<sup>5</sup> Similarweb (2025) The Impact of Generative AI on Publishers ([Source](#))

## **Transparency in Crawling**

Google should clearly distinguish between crawling conducted for search indexing and crawling conducted for the creation of AIOs. For years, Google has exploited the weakened position of publishers—who cannot afford to decline being indexed for search—by combining indexing with scraping for AI offerings, using the same bot for both.

To ensure transparency and enable real choice, Google should be required to use separate bots for indexing and for scraping content for its AI products. Using separate bots is an effective and proportionate way to ensure that Google cannot force publishers into an all-or-nothing decision. In this way, consent for traditional search would not be assumed to extend to AIO use.

This separation allows website owners to choose whether to allow one, the other, or both. Google’s merging of these activities obscures the extent to which publisher content is being used for AIO generation, meaning publishers are being used as a data source for a new Google product without explicit agreement.

## **Transparency in Search Console**

Google has added AIOs to search results and offered AI Mode as an alternative to search but has not provided any separate reporting on their performance or impact, instead bundling the data into Search Console alongside traditional search.

Publishers need to see traditional search and AIOs, AI Mode and related Google Discover uses of AIO reported as distinct products.

Currently, publishers are left to conduct manual comparisons using incomplete data. For example, one major B2C publisher has been conducting daily scraping of almost 15,000 keywords to gain some measurement of the impact of AIOs, this is costly for the publisher and is only necessary because of Google’s opaque reporting. Transparency reporting for the search console would mean publishers have access to accurate data without having to make huge investments to make estimations of the impact of AIOs.

Separation in reporting is paramount, as it would also clear consent controls, allowing publishers to decide whether their content can be used in new Google products and services, including AIOs and AI Mode. Consent for traditional search should not be assumed to extend to other uses

## **Transparency for acquisition sources in Google Analytics**

In addition to Search Console, the CMA must require Google to mark acquisition sources transparently in Google Analytics.

Google should be required to parse referrer data so that traffic from Google Search and Google Discover can be separately identified in Google Analytics and in publishers’ first-

party data tracking systems. This level of source transparency is essential for accurate audience segmentation, performance analysis, and the development of differentiated engagement and monetisation strategies.

Such visibility would enable publishers to understand on-site user behaviour and identify which traffic sources generate longer dwell times, more page views, or a higher propensity to convert.

Google has repeatedly claimed that publishers benefit from AIOs because AI search users are “high quality and more valuable”, yet it has provided no evidence to substantiate this assertion. If the CMA were to introduce a conduct requirement on transparency for acquisition in Google Analytics, publishers would be able to assess the impact not only on the scale of traffic but also on the quality of visits originating from Google.

### Clear attribution

Where publisher content is used in AIOs, there must be visible attribution to the publisher and clear and functional links to the original source.

Publishers have reported significant declines in click-through rates despite holding or improving search rankings. In some cases, CTR has dropped by 10–25% year-on-year, with many editorial brands including automotive and lifestyle publishers recording double-digit declines. These figures align with independent research showing similar trends across the market (see Press Gazette<sup>6</sup>, Search Engine Land<sup>7</sup>, WARC<sup>8</sup>).

While attribution and linking are essential to maintain visibility and recognition, they cannot replace lost traffic. Many publishers have not freely given consent for their content to be repurposed in AIOs and AI Mode and are concerned that requesting attribution could risk legitimising a product they do not agree to. Any attribution measures must therefore sit alongside stronger consent controls over how content is used in AIOs and AI Mode.

### Key Sectoral Concerns

Publishers report that AIOs (and now, AI Mode) are reshaping search behaviour, with a growing share of searches ending without a click to the original source. Evidence detailed in the case studies below shows that this is happening even where impressions

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<sup>6</sup> Press Gazette (2025) AI Overviews cutting publisher clickthrough rates by 50%, new report finds. ([Source](#))

<sup>7</sup> Search Engine Land (2025) New data: Google AI Overviews are hurting click-through rates. ([Source](#))

<sup>8</sup> WARC (2025) AI overviews hit publisher traffic hard, study finds. ([Source](#))

have held steady and rankings remain on page one, and is reflected across both consumer and B2B publishers.

This shift reduces visits from most, which has a direct impact on advertising revenues and audience growth. In a digital advertising environment where both publishers and platforms rely on high volumes to generate revenue, the effect of AIOs on user behaviour creates further pressure on publisher business models.

The lack of visibility over AIO and AI Mode performance has direct business impacts. Publishers are having to make strategic decisions on resource allocation, investment, and product development without knowing whether their content is driving traffic, being consumed entirely within AIOs, or being used to power competing information services. Google’s dominance in search means that continuing to allow crawling for traditional search cannot be taken as valid and acceptable consent for use in AIOs and AI mode. It is a choice made under conditions where refusal would mean near-total loss of visibility in search results.

This section outlines the practical issues experienced by publishers. Including changes in user behaviour, falling click-through rates, and the impact of AIOs that have informed our recommendations. All examples have been anonymised.

### A decline in traffic despite ranking improvements

Publishers have reported a “decoupling” between search ranking and click-through rates, indicating the increase in zero-click searches.

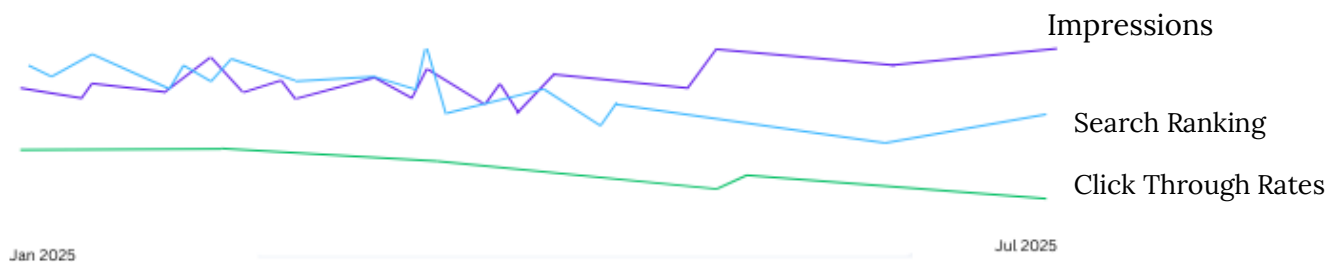


Figure 1 - Divergence between impressions and click-through rates on a UK publisher site following AIO rollout. (This graph is demonstrative of the “crocodile” trend publishers are seeing).

Despite rising impressions<sup>9</sup> (purple) and relatively stable rankings (blue), click-through rates (green) have steadily declined since early 2025. This correlates to the widespread rollout of AIOs on Google search.

<sup>9</sup> Impressions refer to the number of times a webpage URL appears in a user’s search results, regardless of whether it is clicked. This metric reflects visibility, not engagement.

## **Lack of transparency**

Publishers currently cannot distinguish between impressions generated by AIOs, AI Mode and those from standard search results. This is due to limitations in Google Search Console and a lack of transparency in Google Analytics, which do not provide the detail needed to isolate the performance of individual SERP features or assess the quality of the traffic generated.

The absence of this data is not just a technical issue. It masks the fact that AIOs, and AI Mode reduce traffic to publisher websites by surfacing their content directly in the search results. Users receive answers without needing to click through, meaning the publisher gains no traffic and no commercial return.

At the same time, Google continues to claim that publishers benefit from inclusion in AIOs, and AI Mode, while withholding the information that would allow this to be tested. Without access to this data, publishers cannot assess the true impact of AIOs or pursue any form of redress.

Requiring Google to publish this information would help clarify the commercial effects of AIOs and support fairer outcomes for those producing original content.

## **Business Decision Making**

Publishers operate in an advertising environment where revenue is driven primarily by audience volume, not just engagement. While Google has claimed that AIOs deliver “higher quality” clicks, this definition is based on its own internal, non-public data and is shaped to support its commercial narrative. For most publishers, fewer clicks (regardless of engagement levels) mean reduced revenue potential.

A lack of transparent reporting on AIO performance makes it impossible for publishers to assess whether their content is driving traffic, being consumed entirely within AIOs, or powering competing information services without any return. This uncertainty affects decisions on where to direct limited resources and investment, with consequences for core revenue streams.

Publishers believe that Google is using its market dominance in Search to launch new products that directly compete with and harm their performance, while withholding the information that would allow them to make informed commercial choices. Continuing to allow crawling for traditional search cannot be taken as implied consent for use in AIOs and AI Mode. Rather, it reflects the reality that refusing consent would mean near-total loss of visibility in search results, leaving publishers with no genuine choice.

## **Barriers to opt-out mechanisms**

Publishers have expressed that limited data from Search Console makes it difficult to know when or if they should use the NOSNIPPET tag.



“NOSNIPPET” tags are used by websites or publishers when they want to prevent Google from displaying any preview text or rich content – such as those featured in AIOs.

Even when they do identify AIOs and AI Mode impact, the only available opt-out is this bundled tool that removes all preview features, not just inclusion in AIOs and AI Mode. This lack of flexibility prevents publishers from responding proportionately or selectively protecting content.

## Specialist publisher evidence and case examples

The following anonymised examples have been shared by publishers to illustrate how AIOs and AI Mode are affecting traffic, user behaviour, and commercial performance across different publishing sectors.

### Lifestyle Magazine- Immediate Traffic Loss to AI Answers

A lifestyle publisher shared data on a popular search query, “how to get rid of [insect].” Despite the article still ranking on page one and impressions remaining relatively steady, the click-through rate fell sharply from 5.1% to 0.6% over the past year.

This decline is not in line with the small change in ranking or visibility and points to a significant change in how users interact with search results. The query now triggers an AIO that provides a full answer directly on the results page. It includes highlighted steps, removing the need for users to click through.

This example shows how AIOs can undercut revenue for high-performing content by replacing the user journey to trusted sources with an on-page summary. This is particularly problematic for publishers who rely on search-driven discovery for articles on travel tips, home décor, and wellness, as it results in reduced ad impressions, diminished newsletter sign-ups, and lower overall brand visibility.

### Automotive Content Publisher- Devaluing Evergreen, High-Investment Articles

One automotive publisher investing in detailed car benchmarking content reported a 25% drop in traffic to articles ranking first in organic search, despite a 7% increase in search visibility. Over the same period, their click-through rate declined from 2.76% to 1.71%.

This type of “evergreen” content requires significant editorial investment. It includes expert vehicle testing, specification comparisons, and guidance designed to support high value purchasing decisions. The publisher's commercial model relies on attracting large volumes of traffic to generate advertising and affiliate revenue.

The observed gap between visibility and engagement highlights the harm posed by AIOs. Although the content remains visible in search results, users are increasingly consuming the summary provided by Google without visiting the original source.

### E-Commerce & Affiliate Magazine- Eroding Partnership Revenue

A publisher who specialises in product reviews and purchasing advice through articles such as “best” lists has reported that AIOs appear between 30 and 37% of the time and that the click through rate from search is typically 25-50% lower when an AIO appears.

For one of the publisher’s websites, the session’s impact is in the range of -2.9 to -7.7% compared to a version of the SERP in which AIOs do not exist. The site’s evergreen search, which includes high-intent keywords landing on reviews and best lists, has been reduced by -7.5% to -18.7%. The publisher also estimates the total revenue impact on this one site to be between 2.4% and 6.5% purely due to the rollout of AI in the SERP.

The revenue for this publisher is derived not only from advertising but also from affiliate marketing, which depends on website users clicking through to partner sites after reading comparison articles. The reduction in traffic from AIOs has undermined these income sources.