











Brussels, 6 March 2024

JOINT INDUSTRY STATEMENT ON GOOGLE SEARCH AND ARTICLE 6.5 OF THE DIGITAL MARKETS ACT

Associations representing the airline, hospitality and retail sectors are closely following Alphabet's recent changes to Google Search that aim to comply with Article 6.5 of the Digital Markets Act (DMA). The changes on Google's verticals (retail, airlines, hotels/restaurants) should not redirect traffic to online search services (OSSs) and lead to a reduced visibility of organic results of direct suppliers/merchants websites.

The DMA represents an important legislative tool to tackle practices of gatekeeper platforms. We strongly believe it should benefit businesses using online platforms and lead to fairer and more open digital markets.

The changes proposed by Alphabet to Google Search should ensure a level playing field among all market participants and offer the best options to consumers. Concretely, it should not lead to situations where the economic power of large online intermediaries is further entrenched and where consumers are not presented with a variety of choices.

The process through which stakeholders are consulted and informed of changes by Google should also be improved in the future. The business users and merchant community were only involved very late in the process. At the end of 2023, Google was not able to communicate which features of the test search product would be kept and which would be replaced. Most businesses around Europe are therefore unaware of the changes and have planned their business and marketing activities without taking the scheduled changes by Google into consideration.

Therefore, the below-signed associations expect that visibility of organic results of direct suppliers and merchants on Google Search will not be reduced. Furthermore, we expect expeditious communication on the changes from Google. We encourage the European Commission to ensure compliance, closely monitor the implementation and set up an independent system which will measure the impact on business users from 6 March 2024, with the view to identify and correct any harmful unintended effect on business users.

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About Airlines for Europe

<u>Airlines for Europe (A4E)</u> is Europe's largest airline association. Based in Brussels, A4E works with policymakers to ensure aviation policy continues to connect Europeans with the world in a safe, competitive and sustainable manner. As a key initiator of aviation's <u>Destination 2050</u> roadmap, A4E and its members committed to achieve Net Zero carbon emissions for their own operations by 2050. With a modern fleet of over 3,300 aircraft, A4E airlines carried over 610 million passengers in 2022 and served nearly 2,000 destinations. Each year, A4E members transport more than 4 million tonnes of vital goods and equipment to more than 360 destinations either by freighters or passenger aircraft.

About Ecommerce Europe

<u>Ecommerce Europe</u> is the united voice of the European Digital Commerce sector, representing the interests of companies selling goods and services online to consumers in Europe. Our mission is to act at EU level by engaging with policymakers to create a better regulatory framework for all e-merchants. Ecommerce Europe is a platform where our members can stay informed, exchange best practices, and define common positions on EU legislation impacting the sector. Follow our work on <u>LinkedIn</u> and <u>Twitter</u>.

About European Hotel Forum

The European Hotel Forum is a pan-European association bringing together the diversity of the hotel industry in Europe, both in terms of geographical locations and in the variety of professionals involved, including independent hotel groups, hotel chains, hotel owners and managers. The organisation represents a cross-section of the European hospitality industry, encompassing over six thousand European hoteliers and 750,000 European hotel rooms.

About EuroCommerce

<u>EuroCommerce</u> is the principal European organisation representing the retail and wholesale sector. It embraces national associations in 27 countries and 5 million companies, including leading global players and many small businesses. Over a billion times a day, retailers and wholesalers distribute goods and provide an essential service to millions of business and individual customers. The sector generates 1 in 7 jobs, offering a varied career to 26 million Europeans, many of them young people. It also supports millions of further jobs throughout the supply chain, from small local suppliers to international businesses. EuroCommerce is the recognised European social partner for the retail and wholesale sector. Find more information on our <u>website</u>, on <u>X</u>, and on <u>LinkedIn</u>.

About HOTREC

HOTREC is the umbrella association of Hotels, Restaurants, Bars and Cafés and similar establishments in Europe. It brings together 46 national associations in 36 European countries and serves as the voice of European hospitality. The industry counts 2 million businesses, 99% of them being Small and Medium-sized Enterprises (SMEs), provides 10 million jobs and contributes to 3% of the EU GDP. HOTREC's mission is to represent and champion the industry's interests towards the EU and international institutions, foster knowledge sharing and best practices among its members to promote innovation and serve as an expert platform for the hospitality sector.

About Independent Retail Europe

Independent Retail Europe is the European association that acts as an umbrella organisation for groups of independent retailers in the food and non-food sectors. Our members are groups of independent retailers, associations representing them as well as wider service organizations built to support independent retailers. Independent Retail Europe represents 23 groups and their 462.000 independent retailers, who manage more than 737.000 sales outlets, with a combined retail turnover of more than 1,385 billion euros and generating a combined wholesale turnover of 604 billion euros. This represents a total employment of around 6,4 million persons. Find more information on our website, on X, and on LinkedIn.