

# Competition and Markets Authority Annual Plan 2025/2026 Consultation

## Summary of responses

27 March 2025

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1. This document provides a summary of stakeholder feedback on the Competition and Markets Authority's (CMA) draft Annual Plan for 2025/26.
2. The draft Plan was published on 13 January 2025. It set out the CMA's intention, consistent with the work we have undertaken over the last year, to harness the power of competition and consumer protection to drive economic growth, opportunity and prosperity for UK businesses and consumers.
3. In the draft Annual Plan, we proposed to:
  - Continue our ongoing programme of consumer-facing markets work that helps to put money back in people's pockets, delivering benefits across products and services they rely on every day;
  - Apply a focus on cross-economy enablers which have a multiplier effect on growth;
  - Resolutely deter restrictive, exclusionary and exploitative anti-competitive practices, applying a particular focus on public procurement, as government pursues essential programmes to improve public services and invest in economic infrastructure;
  - Make meaningful changes to the way the CMA works consistent with our '4Ps framework' of pace, predictability, proportionality and process – starting with merger control, and reflecting clear feedback from businesses and investors (both domestic and international);
  - Apply our consumer enforcement powers to help grow the economy through promoting consumer trust and confidence, while deterring poor corporate practices;
  - Use the new digital markets competition regime flexibly, proportionately and collaboratively to unlock opportunities for growth across the UK digital economy and the wider economy;
  - Support the UK government's Industrial Strategy by focussing efforts and resources on priority sectors, and by leveraging our advocacy and micro-economic capabilities to advise government;
  - Exercise our specialist subsidy advice (SAU) and UK internal market (OIM) functions, which provide reporting, monitoring and advice to all levels of government.
4. We asked stakeholders a set of consultation questions relevant to these proposals. We received feedback from more than 40 organisations during the consultation period in total (listed in the Annex). The 18 responses that we received in writing were supplemented by feedback from an extensive programme of stakeholder engagement across the UK.

5. Reflecting the fundamental importance of consumer protection as a core part of the CMA's statutory mandate, we hosted a roundtable event with our consumer protection partners and other consumer advocates.
6. Aligned with our commitment to a regulatory environment that encourages the greatest possible level of business investment, we sought extensive feedback from the business and investor community. This included business-focussed roundtable events in Belfast, Cardiff and Edinburgh, as well as valuable input received at the [inaugural meeting](#) of the CMA Growth and Investment Council.
7. Since publishing the draft Annual Plan in January, there have been several developments in the CMA's operating environment. The most significant of these has been the publication of the UK government's draft Strategic Steer to the CMA on 13 February.
8. We consider there to be broad alignment between the CMA's draft Annual Plan, the draft Strategic Steer, and the feedback we received from stakeholders during the consultation period.
9. The following themes came through particularly clearly in stakeholder feedback, all of which are reflected in the draft Strategic Steer:
  - **The importance of an effective, independent competition and consumer protection regime which supports growth by driving greater productivity, innovation and investment.** The significant impact that well-targeted work by the CMA can have for the UK economy and UK businesses was evident in the feedback from stakeholders. Many of our consumer protection partners highlighted the importance of robust consumer protection in supporting consumer confidence, spend, and engagement with markets, and in deterring the unfair behaviour of a minority of businesses. These speak to the fundamentals of the CMA's role, which are also clear in the draft Strategic Steer.
  - **How the CMA goes about our work is particularly important to investment and the attractiveness of the UK as a destination for investment.** This is explicit in the draft Steer and aligns closely to the CMA's plan to implement the 4Ps across our work. Members of the CMA Growth and Investment Council, in particular, endorsed our intention to implement this framework at pace; and to work to strengthen business and investor confidence in the competition regime. Several business and investor stakeholders provided detailed feedback on how we could improve our processes in line with the 4Ps, with a particular focus on merger control.

- **Prioritisation of pro-growth and pro-investment interventions, including support for the Industrial Strategy’s key sectors and the targeting of our work in ‘enabling’ sectors.** Many stakeholders endorsed the CMA’s proposal to help to drive broad-based economic growth. Some provided specific suggestions about particular areas of the economy we should act in. Members of the Growth and Investment Council agreed that the CMA should prioritise sectors captured within the Industrial Strategy, in particular advanced manufacturing, life sciences, clean energy industries, digital and technology, and financial services. Some stakeholders also felt that work on cross-cutting themes or enablers affecting these sectors would be particularly valuable. Public procurement, interoperability and technology adoption were consistently put forward as important areas.
- **A focus on the international dimension of our work, including on markets and harms that particularly impact UK-based consumers and businesses.** The CMA’s proposal to sharpen our focus on UK impact received widespread support. This is also aligned with the draft Steer. Relatedly, a theme of the inaugural meeting of the CMA Growth and Investment Council related to international comparisons and learnings as one route to how the CMA can support the UK’s relative attractiveness to investment.
- **The importance of engagement and feedback.** Many stakeholders commended the CMA’s recent efforts to engage more closely with the business and investor community, including through the establishment of the Growth and Investment Council and meaningful actions that are being taken forward to break down barriers to more direct engagement in relation to the merger regime. Some stakeholders felt that more could be done to ensure regular, reported feedback, and this is aligned with the draft Strategic Steer.

10. Our commitment to the fundamentals of the CMA’s mandate to promote competition and protect consumers remains unchanged in the final Annual Plan – indeed, it is reinforced by both our Chief Executive Officer and incoming Interim Chair in their Forewords to the Plan. The core workplan laid out in our draft Annual Plan also remains substantively the same.

11. We have made several changes to the final Annual Plan to make it a clearer and more streamlined articulation of how the CMA will focus our work in 2025/26. We have also updated the Plan to reflect feedback and the new draft Strategic Steer, as above. Accordingly, section 3 of the Plan sets out how we will use our statutory functions to drive growth, opportunity, and prosperity for UK businesses and consumers, underpinned by the draft Strategic Steer.

12. Given the strength of positive feedback around the 4Ps, and the clear alignment with the draft Steer, we have built out further detail on these in the final Plan, including updating on considerable progress since the draft Plan was published in January. We are confident that these actions help to address, to a very significant extent, the feedback that stakeholders have shared with the CMA about how we can improve the way in which the CMA carries out our work.
13. This Annual Plan is the last in a three-year cycle and we will be reviewing the CMA's longer-term strategy over the course of 2025 (in advance of our 2026/27 Annual Plan). Reflecting this, we have opted to remove the Medium-Term Priorities from the Plan. This does not impair the ability of stakeholders to hold us to account on the positive impact of nearer-term activities, and we expect to provide clarity over our next multi-year strategy before the end of the year.
14. We thank all stakeholders who took the time to engage with this consultation. As set out in the Annual Plan, we are committed to maintaining and deepening relationships with a truly diverse range of stakeholders. This includes through the new CMA Growth and Investment Council; our efforts to embed a truly participative approach to the new digital markets competition regime; and our critical dialogue with consumer advocacy groups, civil society, academia, and the third sector. We will continue to seek feedback from a wide range of stakeholders in the year ahead, particularly in relation to the 4Ps framework and how we work, and identify opportunities to play back in a consistent, transparent way what we have heard and how we have acted on it.

## **Annex: Organisations that engaged with the consultation**

### **Organisations that submitted written responses in writing:**

- British Retail Consortium (BRC)
- British Private Equity & Venture Capital Association (BVCA)
- Candor Partners
- ChurchMapped Limited
- Citizens Advice
- Consumer Council of Northern Ireland (CCNI)
- Consumer Scotland
- Federation of Small Businesses (FSB)
- Institute of the Motor Industry
- Liberty Global
- Lloyd's Market Association
- Reed Smith LLP
- techUK
- Trust Alliance Group
- UK Finance
- Vodafone
- Which?

We also received one response from an individual member of the public.

## **Organisations represented at the CMA's Annual Plan events included:**

### **Growth and Investment Council**

- British Chambers of Commerce
- British Private Equity & Venture Capital Association
- British Retail Consortium
- Confederation of British Industry (CBI)
- Federation of Small Businesses (FSB)
- Founders Forum Group
- London Stock Exchange
- ScaleUp Institute
- Startup Coalition
- techUK
- UK Finance

### **Belfast business roundtable**

- Catalyst
- CBI
- Centre for Secure Information Technology
- FSB Northern Ireland
- Manufacturing Northern Ireland
- Northern Ireland Food & Drink
- Quarry Products Northern Ireland

### **Cardiff business roundtable**

- Ambition North Wales
- Association of Chartered Certified Accountants Wales
- Business Wales
- CBI
- Chambers Wales
- Development Bank of Wales
- FSB Cymru
- Food and Drink Federation Cymru
- Institute of Directors Wales
- Institute of Welsh Affairs

### **Edinburgh business roundtable**

- Business In the Community
- Fintech Scotland
- FSB Scotland
- Fraser of Allander Institute
- Institute of Directors Scotland
- Prosper Scotland
- Scottish Financial Enterprise
- Scottish Wholesale Association
- Scottish Whiskey Association

### **Consumer representatives roundtable**

- Citizens Advice

- Citizens Advice Scotland
- CCNI
- Consumer Scotland
- Joseph Rowntree Foundation
- Money Saving Expert
- Which?