DIGITAL ECONOMY

Ex Ante Platform Regulation in the European Union, the United Kingdom and Japan

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ABSTRACT

Between 2022 and 2025 three major jurisdictions moved digital platform oversight from ex post competition enforcement to ex ante regulation of designated firms. The European Union's Digital Markets Act, the United Kingdom's Digital Markets, Competition and Consumers Act 2024 and Japan's Mobile Software Competition Act share the premise that case-by-case antitrust enforcement is too slow to discipline entrenched gatekeepers, but they differ systematically in how obligations are set, how compliance is determined and how enforcement is escalated. This article develops a four-dimensional institutional framework – designation, obligation-setting, compliance-determination and escalation – and applies it to the three regimes on the public record to January 2025: the designation of seven gatekeepers under the Digital Markets Act, the first year of applicable obligations and the proceedings it produced, the commencement of the United Kingdom's regime and its first investigations, and the phased entry into force of the Japanese statute. Three findings emerge. First, the regimes converge on substantive obligations – anti-steering, self-preferencing, interoperability, data separation – while diverging sharply on procedure. Second, those procedural differences generate a trade-off between speed and legitimacy that each jurisdiction resolves differently. Third, the first compliance cycle suggests that where an obligation is behaviourally simple and verifiable, as in application distribution, it produces observable change quickly; where it is not, as in search and social layers, it produces contestation instead. The article argues that for smaller and middle-income jurisdictions the effective choice lies between building domestic designation capacity and free-riding on compliance changes induced elsewhere.

KEYWORDS digital platforms; ex ante regulation; Digital Markets Act; gatekeepers; competition policy; Strategic Market Status; interoperability

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1. Introduction

For two decades, the regulation of digital platforms was a branch of competition law. Dominance was established case by case, abuse was proven on the facts, remedies were imposed after years of litigation, and by the time a decision became final the market it addressed had usually changed. The European Commission's Google Shopping investigation took seven years from complaint to decision and a further seven to final judgment; by then the comparison-shopping market it concerned had been reshaped by developments the case did not address. This experience produced a broad, cross-jurisdictional conclusion: the problem with antitrust in digital markets is not doctrinal but temporal.

The response was ex ante regulation. Rather than proving dominance and abuse, the regulator designates a small number of firms meeting quantitative or qualitative thresholds and imposes prospective obligations on them directly. Regulation (EU) 2022/1925 – the Digital Markets Act – became fully applicable to designated gatekeepers in March 2024. The United Kingdom's Digital Markets, Competition and Consumers Act 2024 established a Strategic Market Status (SMS) regime operated by the Competition and Markets Authority (CMA) from January 2025. Japan's Act on Promotion of Competition for Specified Smartphone Software – the Mobile Software Competition Act – was enacted in June 2024 and takes full effect in December 2025. Comparable instruments are in force or in preparation in South Korea, India, Brazil, Turkey and Australia.

Three years of DMA operation, one year of the UK regime and the first months of the Japanese statute now permit something that was not possible when these instruments were debated: comparison on the basis of an enforcement record rather than on projected effects. This article undertakes that comparison. Its central claim is that the three regimes have converged substantively while diverging procedurally, and that the procedural divergence – not the content of the obligations – explains most of the observed variation in outcomes.

The article contributes to three literatures. To the competition-policy literature it offers a structured comparison of ex ante designs on the basis of realised enforcement rather than of statutory text. To the regulatory-governance literature it supplies evidence on how negotiated compliance operates when the regulated population consists of a handful of firms with resources exceeding those of the regulator. And to the development-policy literature it offers an assessment of what smaller jurisdictions can and cannot achieve by adopting ex ante platform rules.

Section 2 sets out the theoretical case for ex ante intervention. Section 3 reviews the literature. Section 4 explains the comparative method and the four institutional dimensions used. Section 5 presents the comparison. Section 6 examines observable effects. Section 7 discusses the speed–legitimacy trade-off and derives propositions. Section 8 sets out policy implications. Sections 9 and 10 address limitations and conclude.

2. Why Ex Ante? The Theoretical Case and Its Limits

The economic case for ex ante platform regulation rests on four features of digital markets that together make ex post enforcement systematically under-deterrent.

Tipping and entrenchment. Where direct and indirect network effects are strong and multi-homing is costly, markets tip to a single provider and the winner's position becomes durable. Because the competitive harm is the loss of the counterfactual market, and because that counterfactual cannot be reconstructed once tipping has occurred, a remedy imposed after the fact cannot restore what was lost (Crémer, de Montjoye & Schweitzer, 2019).

Error-cost asymmetry. In conventional markets, the standard error-cost framework counsels caution about false positives, because wrongly condemning pro-competitive conduct chills exactly the behaviour antitrust exists to protect. In tipped digital markets the asymmetry reverses: a false negative is close to irreversible, whereas a false positive imposes a bounded compliance cost on a firm with extraordinary margins. This inversion is the strongest analytical justification for shifting the burden ex ante.

Ecosystem leverage. Platform firms operate portfolios of complementary services – operating system, app store, browser, identity, payments, advertising, search, cloud – in which control of one layer can be leveraged into adjacent layers through defaults, self-preferencing, technical interoperability decisions and data flows. Conventional market definition struggles here, because each leveraging step may be individually defensible while the aggregate effect is exclusionary.

Regulatory tempo. Even where doctrine is adequate, procedure is not. Investigation, decision, appeal and remedy design consume years in which conduct continues.

The case is not unqualified. Four objections recur. Ex ante rules are typologically rigid: an obligation drafted for the app-store conflicts of 2021 may fit poorly the assistant-mediated and model-mediated distribution now emerging. They are self-preferencing-blind at the margin: distinguishing prohibited self-preferencing from ordinary product integration requires a counterfactual that the rule itself does not supply. They invite compliance theatre, in which the designated firm implements the letter of the obligation through a design that satisfies the text while preserving the economics – the recurring pattern in app-store fee restructuring. And they carry dynamic costs that are hard to observe: reduced integration, degraded security, or withheld product launches in the regulated jurisdiction.

These objections do not defeat the case for ex ante regulation, but they identify where its design work has to be done: not in choosing which conduct to prohibit, on which there is now broad international agreement, but in specifying how obligations are operationalised, verified and escalated. That is the focus of the comparison below.

3. Literature Review

The intellectual foundation of the current wave was laid by three expert reports published in 2019: the Crémer, de Montjoye and Schweitzer report for the European Commission, the Furman review for the UK government, and the Stigler Center committee report in the United States. All three reached broadly the same conclusion – that competition law's substantive standards were adequate but its procedures were not – and all three recommended some form of asymmetric, forward-looking obligation on firms with entrenched positions. The Furman review's proposal of a digital markets unit with a code of conduct is the direct ancestor of the DMCCA regime.

The critical literature preceding these reports developed the diagnosis. Khan (2017) argued that a consumer-welfare standard focused on price could not capture the strategic logic of platforms pursuing scale and vertical integration. Rahman (2018) recast dominant platforms as infrastructure and drew on public-utility regulation for remedies. Wu (2018) and Cohen (2019) situated platform power in a broader political-economy account. Zingales and Lancieri contributed the market-structure evidence on entrenchment.

The design literature is more divided. Larouche and de Streel (2021) warn that ex ante regimes risk decoupling from the economic theories of harm that justify them, producing rules enforced for their own sake. Cabral et al. (2021), in an expert assessment of the DMA proposal, endorsed the instrument while cautioning that per se obligations require careful specification and that effects-based defences should not be wholly excluded. Caffarra and Scott Morton have argued the opposite – that admitting effects-based justification reintroduces the delay the regime exists to avoid. Bostoen (2023) provides the most detailed doctrinal treatment of the DMA's enforcement architecture and anticipates the compliance-determination problem examined in Section 5.

Empirical assessment remains thin, for the obvious reason that the regimes are new. Early work has focused on app-store economics, on choice-screen effects in search and browser markets, and on the measurable consequences of anti-steering prohibitions. The present article contributes to this emerging literature by organising the first three years of enforcement evidence into a comparative institutional frame.

4. Method

The study compares three regimes using structured, focused comparison. Cases were selected on the basis that each represents a distinct institutional solution to the same regulatory problem, and that each had reached at least the point of designation or of first investigation by the end of January 2025. Jurisdictions whose ex ante statutes had not been enacted by that date were excluded.

Four dimensions are coded:

1. Designation – who is brought within the regime, on what criteria, with what procedural protection, and how easily designation can be varied or withdrawn.
2. Obligation-setting – whether duties are specified in primary legislation, in delegated instruments, or through case-by-case administrative determination.
3. Compliance-determination – how the regulator establishes whether a designated firm's chosen implementation satisfies the obligation, and who bears the burden.
4. Escalation – the sanctions available, their severity, and the availability of structural remedies.

Sources are the primary legislation, published designation and non-compliance decisions, the European Commission's DMA implementation reporting, CMA case pages and consultation documents, and Japan Fair Trade Commission guidance. The analysis reflects the public record to

31 January 2025; several proceedings discussed are open and their outcome is not settled.

5. Comparative Institutional Analysis

5.1 Designation

The DMA designates on the basis of quantitative presumptions: size thresholds relating to Union turnover or market capitalisation, user thresholds of 45 million monthly active end users and 10,000 yearly active business users in the Union, and an entrenchment criterion satisfied by meeting the user thresholds in each of the last three financial years. Designation attaches to core platform services within a firm, not to the firm as a whole, and a firm may rebut the presumptions. By January 2025 seven gatekeepers had been designated across a set of core platform services. The Commission had also concluded, following market investigations, that several services notified as meeting the thresholds should not be designated – evidence that the mechanism is capable of contraction as well as expansion, which matters for the proportionality of the regime over time.

The DMCCA takes the opposite approach. SMS designation follows an investigation in which the CMA must find substantial and entrenched market power in a digital activity linked to the UK, together with a position of strategic significance. There are no automatic thresholds; each designation is an evidenced administrative decision subject to consultation and to judicial review on ordinary public-law grounds. The CMA opened its first Strategic Market Status investigations in January 2025, into general search and search advertising, and into mobile ecosystems.

The MSCA designates by function and scale: a provider is designated where its operating system, application store, browser or search engine exceeds a statutory user threshold in Japan – set at 40 million monthly users during the relevant fiscal year. Apple, its Japanese subsidiary and Google were designated on this basis.

The dimension reveals a clear trade-off. Threshold-based designation (DMA, MSCA) is fast, predictable and cheap to administer, but crude: it captures services on the basis of scale irrespective of whether the specific competitive concern is present. Evidence-based designation (DMCCA) is precise and more defensible on review, but slow – the CMA's first designations came almost a year after the regime commenced – and it consumes exactly the investigative resource the regime was intended to economise.

5.2 Obligation-Setting

Here the divergence is greatest. The DMA specifies obligations directly in Articles 5, 6 and 7, applicable to all designated gatekeepers by operation of law, without any administrative act tailoring them to the firm. Article 5 duties are self-executing; Article 6 duties are "susceptible of being further specified" through a regulatory dialogue in which the Commission may adopt specification decisions. This design maximises speed and legal certainty about what is required, while displacing all the difficulty onto the question of whether a given implementation satisfies it.

The DMCCA does the reverse. Designation creates no obligations by itself; the CMA must impose conduct requirements drawn from a statutory menu, each of which must be specified for the designated firm and consulted upon.
Pro-competitive interventions – the more structural remedies, capable in principle of extending to divestiture – require a separate investigation. In practice the CMA has proceeded incrementally, opening with a limited set of conduct requirements addressed to Google's search activity and pursuing commitments from Apple and Google in relation to mobile platforms rather than imposing requirements directly, while indicating that it would not pursue the most intrusive interventions. The approach maximises procedural legitimacy and minimises the risk of successful challenge; it also transfers substantial agenda-setting power to the designated firms, since a commitment is by definition an offer the firm has chosen to make.

The MSCA occupies an intermediate position: core prohibitions on anti-steering, self-preferencing in search results, and the use of platform-acquired data to compete with third parties are set in the statute, with detailed operational content supplied through JFTC guidelines developed and expanded in consultation with designated providers.

5.3 Compliance-Determination

This dimension has proved the most consequential in practice, and it is where the DMA's design has been most severely tested.

Because DMA obligations apply automatically, the gatekeeper implements first and the Commission assesses afterwards. Where implementation is contested, the Commission must open non-compliance proceedings – which reintroduces, in attenuated form, precisely the adjudicative delay that ex ante regulation was intended to eliminate. Within three weeks of the obligations becoming applicable the Commission opened non-compliance proceedings against three gatekeepers: against Apple over steering in the App Store and over its choice-screen and default-setting design, against Alphabet over steering in Google Play and over self-preferencing in search results, and against Meta over its "pay-or-consent" model. In mid-2024 it issued preliminary findings that Apple's steering rules and Meta's binary consent model did not comply, and opened a separate investigation into Apple's new fee structure for alternative distribution. By the end of January 2025 none of these proceedings had produced a final decision. The first compliance cycle therefore took the form of implementation, contestation and investigation rather than of obligation and adherence – the outcome the design was meant to avoid.

The compliance-determination problem is analytically distinct from non-compliance in the ordinary sense. A gatekeeper that restructures a fee schedule, alters a linking permission, or introduces a new tier of terms is not refusing to comply; it is asserting that its chosen implementation satisfies an obligation whose operational content is indeterminate. Under the DMA, the burden of demonstrating otherwise sits with the Commission, and the evidentiary work required is substantial. Under the DMCCA, by contrast, the conduct requirement or commitment specifies the implementation in advance, so the comparable dispute occurs before the obligation binds rather than after. Under the MSCA, guidelines perform a similar anticipatory function.

There is no costless option. Specifying implementations in advance is slow and risks obsolescence; leaving implementation to the firm is fast but generates precisely the enforcement contests observed since 2024.

5.4 Escalation

The DMA provides fines of up to 10% of worldwide turnover, rising to 20% for repeated infringement, periodic penalty payments, and – after systematic non-compliance – behavioural or structural remedies including divestiture. None of these had been imposed by the end of January 2025, so the ceiling remains an untested signal rather than a demonstrated risk. The calculus for a designated firm is nonetheless straightforward: where the conduct at issue generates revenue substantially exceeding the expected penalty, litigation and incremental adjustment dominate full compliance – and that calculus improves for the firm with every month that passes without a decision.

The DMCCA provides fines of up to 10% of global turnover, and, distinctively, personal liability for senior managers, alongside the pro-competitive intervention power. With the regime only weeks old, none of this has been exercised, and its escalation potential is wholly untested.

The MSCA relies on JFTC investigation, cease-and-desist orders and surcharges, with the enforcement authority's existing antitrust experience supplying institutional capacity that a newly created regulator would lack.

6. Observable Effects

Attributing market outcomes to regulation is difficult where the regulated firms operate globally and adjust products across jurisdictions simultaneously. Three observations can nonetheless be made with reasonable confidence.

Mobile application distribution has changed materially in the European Union. Anti-steering prohibitions and the obligation to permit alternative distribution have loosened the coupling between application distribution and in-app payment: alternative marketplaces, third-party payment links and sideloading became available on iOS in the Union during 2024. The economic significance lies less in the immediate fee saving, which platform operators have partly recovered through restructured commission schedules, than in the establishment of a direct commercial relationship between developer and user that did not previously exist. Whether the same follows in Japan is not yet observable, since the Japanese obligations are phased in during 2025.

Choice architecture has changed; market shares have not. Choice screens for browsers and search engines, default-setting obligations and consent-flow modifications are now widely implemented. The observable effect on default-service market shares has been modest. This is consistent with the behavioural literature on defaults: a one-off choice presented at device setup is a weak instrument against habituation and ecosystem integration.

Data-related obligations remain the least implemented. Data portability in continuous real time, business-user access to performance data generated by their own activity, and restrictions on combining data across services are the obligations on which regulatory dialogue has been most protracted and public evidence of compliance is thinnest. This is unsurprising: unlike a link permission, whose compliance can be verified by inspecting an interface, data obligations require verification of internal systems that the regulator cannot observe directly.

The pattern, so far visible mainly in the European Union, is consistent and supports a general proposition: ex ante obligations produce observable change in proportion to their verifiability. Obligations that can be checked from the outside – a permitted link, a displayed screen, an available alternative store – are implemented. Obligations that require inspection of internal data flows are not, or are implemented in ways whose adequacy cannot be assessed.

7. Discussion: The Speed–Legitimacy Trade-off

The comparison yields a trade-off that the three regimes resolve at different points.

The DMA maximises speed: obligations bind by operation of law shortly after designation, without individualised administrative process. It pays for this in contested compliance, since every implementation dispute must be resolved through non-compliance proceedings that resemble the enforcement actions the regime was meant to replace, and in appeal risk, since firms subject to obligations they never had an opportunity to shape have both incentive and standing to litigate.

The DMCCA maximises legitimacy: each obligation is individually evidenced, consulted upon and proportionate on its face, which makes successful challenge less likely. It pays for this in tempo – the regime commenced in January 2025, its first investigations opened in the same month, and the statutory timetable places designation months away and conduct requirements later still – and in remedial ambition, since the negotiated route through commitments delivers what the firm is willing to offer rather than what the analysis indicates is required.

The MSCA occupies a middle position, combining statutory prohibitions with guideline-based specification and enforcement by an established competition authority. Its narrow scope – the smartphone software layer only – is a deliberate limitation that keeps the regime tractable.

Three propositions follow.

Proposition 1: Ex ante regulation does not eliminate adjudication; it relocates it. Under the DMA, adjudication moves from the question of whether conduct is abusive to the question of whether an implementation complies. Under the DMCCA, it moves upstream into the design of conduct requirements. The total quantum of contested decision-making appears roughly invariant; what changes is its position in the sequence and, critically, the allocation of the burden of proof. This is not a criticism – relocating adjudication downstream of a binding obligation is a genuine improvement over relocating it downstream of nothing – but it counsels against expectations that ex ante regimes will be self-executing.

Proposition 2: Convergence in obligations coexists with divergence in institutions, and the institutions determine outcomes. All three regimes prohibit anti-steering, self-preferencing and the exploitation of business-user data, and all three mandate some form of interoperability or portability. The variance in observed effect is therefore not attributable to the content of the rules. It is attributable to how quickly designation occurs, how precisely obligations are specified before they bind, and how credibly non-compliance is sanctioned.

Proposition 3: Verifiability is the operative constraint on effectiveness. Section 6's pattern – implementation tracking external observability – implies that the marginal return to drafting new obligations is low relative to the marginal return to building verification capacity: technical audit, access to internal telemetry, data-access mandates for researchers, and the specialist staff to use them.

8. Policy Implications for Smaller and Middle-Income Jurisdictions

Roughly two dozen jurisdictions are considering ex ante platform regimes. Most have domestic markets too small to meet the DMA's user thresholds by any proportionate adaptation, competition authorities with fewer specialist staff than a single gatekeeper's compliance team, and no realistic prospect of a global platform altering its architecture in response to a national designation.

Three implications follow.

First, designation capacity, not statutory text, is the binding constraint. A jurisdiction that adopts

DMA-style obligations without the investigative and technical resource to designate, monitor and sanction acquires the appearance of regulation without its substance – and, worse, forecloses the alternative strategies below by appearing to have addressed the problem.

Second, regulatory free-riding is a legitimate and often optimal strategy. Because platform architectures are costly to fragment, compliance changes induced by large regimes frequently propagate beyond their jurisdictional scope, and where they do not, they establish a technical capability that can be extended at low marginal cost. A smaller jurisdiction can capture much of the benefit by imposing a narrow, low-cost obligation: that any capability made available to users or developers in a designated jurisdiction be made available domestically on non-discriminatory terms. Such a "most-favoured-jurisdiction" rule requires no market investigation, no designation infrastructure and no technical audit – only the ability to observe what the firm offers elsewhere.

Third, domestic enforcement effort is better directed at layers where local firms operate. Application distribution, digital payments, ride-hailing, food delivery, classifieds and e-commerce marketplaces frequently have domestic or regional leaders whose conduct is within the practical reach of a national authority and where the relevant theories of harm – self-preferencing, exploitative terms for small business users, data leverage – are identical to those addressed in the DMA. Regulating the reachable layer well is a better use of scarce capacity than regulating the unreachable layer symbolically.

For jurisdictions in Central Asia, the South Caucasus and South-East Europe specifically, a further consideration applies: regional coordination raises the aggregate market above the threshold at which a global platform will alter behaviour. A harmonised designation standard and mutual recognition of compliance findings across a group of neighbouring states converts several individually negligible markets into one that is not.

9. Limitations

Three limitations should be noted. First, the enforcement record is short and partly sub judice; the Apple and Meta decisions are under appeal and their reasoning may not survive review, which would materially affect the compliance-determination analysis in Section 5.3. Second, effects attribution in Section 6 rests on public reporting and firm disclosures rather than on transaction-level data, and cannot separate regulatory causes from concurrent commercial and litigation-driven changes. Third, the three-case design cannot exclude confounding by market size, by the domestic presence of the regulated firms, or by the pre-existing capacity of the enforcing authority.

Future research should prioritise transaction-level analysis of developer revenue and pricing following anti-steering obligations, controlled comparison of choice-screen effects across jurisdictions with staggered implementation, and systematic measurement of compliance-dialogue duration as an indicator of regulatory capacity.

10. Conclusion

Three years of ex ante platform regulation permit a preliminary assessment. The instrument works: obligations bind, conduct changes, and fines have been imposed at a scale no ex post case would have reached in the same period. But it works unevenly, and the unevenness is systematic. Obligations that can be verified from outside the firm are implemented; obligations that require inspection of internal systems are not. Regimes that specify implementation in advance move slowly but face fewer compliance disputes; regimes that let the firm implement first move quickly and then litigate.

The most useful conclusion for legislators is therefore not about which conduct to prohibit – on that there is now broad international agreement – but about what must accompany prohibition. Designation capacity, technical audit capability, specification of implementation before obligations bind, and penalties calibrated to the revenue at stake rather than to the appearance of severity are the variables that determine whether an ex ante regime changes market structure or merely changes documentation. For smaller jurisdictions the further conclusion is that the choice is not between regulating and not regulating, but between building a designation apparatus that a global platform will notice and adopting narrow, low-cost rules that capture the benefit of other jurisdictions' enforcement. The second is frequently the better use of scarce institutional capacity.

REFERENCES

Bostoen, F. (2023). Understanding the Digital Markets Act. Antitrust Bulletin, 68(2), 263-306.

Cabral, L., Haucap, J., Parker, G., Petropoulos, G., Valletti, T., & Van Alstyne, M. (2021). The EU Digital Markets Act: A report from a panel of economic experts. Publications Office of the European Union.

Caffarra, C., & Scott Morton, F. (2021, January 5). The European Commission Digital Markets Act: A translation. VoxEU/CEPR.

Cohen, J. E. (2019). Between truth and power: The legal constructions of informational capitalism. Oxford University Press.

Crémer, J., de Montjoye, Y.-A., & Schweitzer, H. (2019). Competition policy for the digital era. Publications Office of the European Union.

European Commission. (2024). Digital Markets Act: designation decisions, compliance reports and market investigations. European Commission.

Furman, J., Coyle, D., Fletcher, A., Marsden, P., & McAuley, D. (2019). Unlocking digital competition: Report of the Digital Competition Expert Panel. HM Treasury.

Khan, L. M. (2017). Amazon's antitrust paradox. Yale Law Journal, 126(3), 710-805.

Larouche, P., & de Streel, A. (2021). The European Digital Markets Act: A revolution grounded on traditions. Journal of European Competition Law & Practice, 12(7), 542-560.

Rahman, K. S. (2018). The new utilities: Private power, social infrastructure, and the revival of the public utility concept. Cardozo Law Review, 39(5), 1621-1692.

Scott Morton, F., Bouvier, P., Ezrachi, A., Jullien, B., Katz, R., Kimmelman, G., Melamed, A. D., & Morgenstern, J. (2019). Committee for the study of digital platforms: Market structure and antitrust subcommittee report. Stigler Center.

Wu, T. (2018). The curse of bigness: Antitrust in the new gilded age. Columbia Global Reports.

LEGAL INSTRUMENTS AND CASES

Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector (Digital Markets Act), OJ L 265, 12.10.2022, pp. 1-66.

Digital Markets, Competition and Consumers Act 2024, c. 13 (United Kingdom).

Act on Promotion of Competition for Specified Smartphone Software (Mobile Software Competition Act) (Japan), enacted June 2024, taking full effect in December 2025.

European Commission, Designation decisions of 5 September 2023 and 13 May 2024 under Regulation (EU) 2022/1925, Brussels.

European Commission, Decisions of 25 March 2024 opening non-compliance proceedings against Alphabet, Apple and Meta under Regulation (EU) 2022/1925, Brussels.

Competition and Markets Authority, Notices of investigation under the Digital Markets, Competition and Consumers Act 2024 in respect of general search and search advertising, and mobile ecosystems, London, January 2025.

Japan Fair Trade Commission, Guidelines on the Act on Promotion of Competition for Specified Smartphone Software (consultation draft), Tokyo, 2024.