

United Kingdom: CMA publishes Approach Document on commencement of the new Digital Markets, Competition and Consumers Act 2024

In brief

With the majority of the UK's Digital Markets, Competition and Consumers Act 2024 (DMCCA) provisions having entered into force on 6 April 2025, the Competition and Markets Authority (CMA) has published its [Approach Document](#) – setting out enforcement priorities for the next 12 months and what businesses can expect following the widespread reforms to the UK consumer law regime.

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First 12 Months

The CMA's strategic priorities for consumer protection over the next 12 months are centred around (i) areas of focus for investigation; (ii) the CMA's approach to new provisions on fake reviews and drip pricing; and (iii) penalties during the first 12 months.

(i) *Areas of focus for investigation*

The CMA aims to secure consumer redress more quickly through clear and transparent investigation timelines, with the focus being **on the most egregious practices with the most significant consumer impact, including:**

- aggressive sales practices (particularly impacting vulnerable consumers);
- providing false information to consumers;
- banned practices including fake reviews;
- hidden fees; and
- imbalanced/unfair contract terms, including unfair exit charges.

(ii) *CMA approach to new provisions on fake reviews and drip pricing*

Fake Reviews: The new provisions prohibit practices related to fake reviews, including incentivised reviews and publishing reviews in a misleading way. Publishers of reviews must take effective steps to prevent and remove fake or misleading reviews. The guidance provides a framework to help businesses comply with these obligations. For the first three months (until July 2025), the focus will be on supporting businesses with compliance rather than enforcement.

Drip Pricing: Extensive consultation has been conducted on guidance for the new consumer regime, particularly regarding drip pricing. The guidance provides a clear framework for complying with laws prohibiting unexpected mandatory charges added at the end of a purchasing journey. Businesses are expected to be familiar with these obligations, and enforcement action may be taken over the coming year. Drip pricing harms consumers and fair-dealing businesses by hindering effective price competition. The CMA will enforce clear violations such as unexpected mandatory charges added at the end of a purchasing journey. However, for aspects of drip pricing that are less clear, such as **fixed-term periodic contracts, further consultation will run on draft guidance in the summer, with final guidance published in the autumn.** No enforcement will occur on these issues until the guidance is finalised.

(iii) *Penalties during the first 12 months*

Penalties will reflect the severity of the conduct, in line with the published penalties policy, and the CMA will take into account proactive steps by businesses to correct issues. Whilst the DMCCA does not apply retrospectively, and **penalties can only be imposed on conduct after the commencement date, the CMA has indicated that it will consider any relevant prior conduct** – so far as is necessary or appropriate where relevant to any monetary penalty, such as aggravating factors (e.g. failure to comply with CMA

enforcement action) or mitigating factors (e.g. prior corrective actions). As a reminder, the CMA can now enforce consumer law directly and impose fines of up to 10% of a company's global turnover.

The 4Ps framework – Pace, Predictability, Proportionality and Process

The Approach Document also outlines how the 4Ps framework (Pace, Predictability, Proportionality and Process) will be embedded into the CMA's consumer protection work. The CMA aims to conduct investigations swiftly (**Pace**), provide clear guidance and engage constructively with businesses (**Predictability**), act fairly and proportionately in enforcement (**Proportionality**), and ensure transparent processes with opportunities for businesses to engage (**Process**). This approach is designed to enhance business and investor confidence in the UK's competition and consumer regimes, supporting a regulatory environment conducive to growth.

Pace: the CMA will streamline investigations with clear timelines, seeking early resolution of enforcement cases through settlement. The aim is to reduce costs and put an end to harmful conduct. In return, the CMA expects prompt and fulsome responses to information requests, with a joint aim of narrowing the focus of investigations by communicating issues businesses are willing to resolve early.

Predictability: as well as clearer guidance and more active engagement, the CMA promises to offer new opportunities for businesses in areas where there is no legal precedent or where possible regulatory uncertainty could potentially be holding back innovation – allowing businesses to seek advice for new initiatives prior to launch.

Proportionality: the CMA will target the most egregious conduct, prioritise consumer redress and take into account where businesses have taken proactive steps to correct infringing conduct. The most harmful conduct is considered to be:

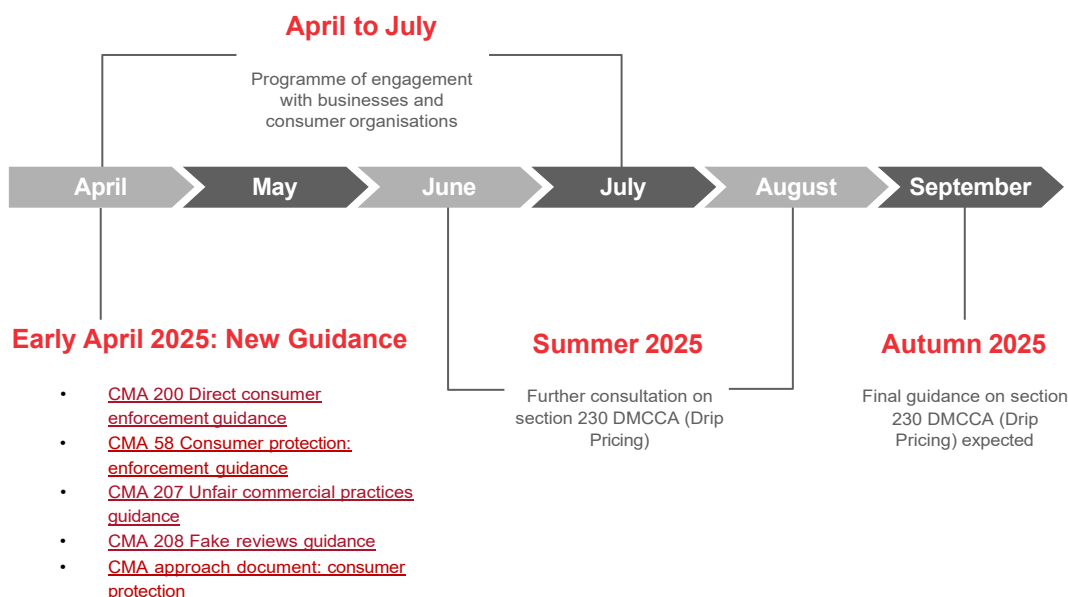
- misleading information about prices;
- misleading information about goods and services;
- unfair online choice architecture (or "dark patterns");
- unfair contractual barriers to switching and exercising legal rights; and
- banned practices.

Process: The CMA now offers direct engagement with businesses as part of the new regime, with opportunities to engage with CMA decision makers throughout a case in the form of written and oral representations prior to any final decision. The CMA has also published enforcement guidance, setting out what businesses can expect at each stage of an investigation.

Avoiding double enforcement – collaborating with national and international partners

Finally, the CMA has committed to collaboration with national and international partners, including other UK regulators and consumer organisations as it seeks to avoid duplicate enforcement action, minimise overlapping requests for information and reduce compliance burdens for cross-border businesses.

Timeline



Further Reading

For more information, also see:

- [DMCC - Consumer Protection - Spotlight on Online Reviews - Connect On Tech](#)
- [DMCC – Consumer Protection – Spotlight on Consumer Subscriptions - Connect On Tech](#)

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