

CMA's 5-Point Plan Signals Shift In Enforcement Priorities

By **Caroline Hobson, Anna Caro and Pia Pyrtek** (April 17, 2026)

The Competition and Markets Authority published its annual plan for 2026-2027 on March 23, setting out its strategic priorities for the coming year.[1]

This is the first detailed plan for implementation under its 2026-2029 strategy, which seeks to put into practice some of the regulator's longer-term objectives of protecting consumers and promoting competition in the wake of its mandate to help drive economic growth and improve household prosperity.

The plan was published against the backdrop of a government consultation on refining the U.K. competition regime, which seeks to speed up and streamline market investigations, provide clarity on merger control thresholds, and implement a new decision-making model for in-depth mergers.[2]

The plan further embeds the CMA's framework for acting with pace, predictability, proportionality and process — the 4Ps — in order to make the U.K. economy a more business-friendly environment and to put money back in people's pockets.

In terms of key initiatives, the plan is notable for a strong shift in the CMA prioritizing its enforcement of U.K. consumer protection laws, potentially to a greater extent than its competition law enforcement; a focus on encouraging innovation by supporting small and medium-sized enterprises, or SMEs, and startups; policing public procurement markets for signs of anticompetitive conduct; and aligning its interventions to support the U.K. government's eight industrial strategy sectors.

Key Objectives

The plan reiterates the CMA's key objectives from its 2026-2029 strategy, namely:

- Remaining a strong advocate for, and independent enforcer of, effective competition across the U.K. economy;
- Championing consumers;
- Helping the government deploy tailored procompetition interventions to support growth, innovation and investment-related policies;
- Contributing to a U.K. regulatory landscape that instills business confidence and acts as a magnet for investment; and
- Delivering tangible benefits for the U.K. economy, citizens and businesses.



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These key objectives contrast with those set out in previous annual plans, which had a stronger focus on competition in digital and fast-growing markets, complex — often digital — merger review and sustainability.

This shift has arisen not only from the strategic steer received from the government in 2025, but also from the coming into force of the Digital Markets, Competition and Consumers Act, or DMCCA, in May 2024, which bolstered the CMA's consumer protection enforcement powers.

Under this regime, the CMA can act more quickly and investigate and impose fines directly, without having to go through lengthy U.K. court procedures.

We set out the CMA's five key areas of focus for the year ahead, and what this means for businesses.

1. Consumer Protection

Under the DMCCA, the CMA received new enforcement powers to protect consumers against unfair commercial practices.^[3] The plan states that implementing the enhanced consumer protection regime under the DMCCA is a core priority, combining support for business compliance with enforcement action.

The CMA highlights that this approach is intended to put money back in people's pockets and strengthen consumer confidence.

The plan explains that the CMA will continue to prioritize areas of essential spend to help people struggling with pressure on household budgets, focusing in particular on the following behaviors:

- Providing objectively false information to consumers;
- Fake reviews;
- Hidden fees;
- Aggressive sales practices; and
- Imbalanced and unfair contract terms.

In addition, the plan also sets out that the CMA will drive at behavioral change in businesses and across sectors through the use of advisory letters, noting that this approach has already driven behavioral change without the CMA needing to deploy a full case team to an enforcement investigation.

The CMA is clearly prioritizing its enforcement of U.K. consumer protection laws. This is a continuation of the CMA's 2025 strategy, which saw the agency send more than 100 advisory letters to businesses that it considered to be out of compliance with their consumer law obligations. It also launched its first investigations under the regime. For the remainder of 2026, we expect to see further enforcement of consumer issues, with the CMA seeking decisive resolutions for consumers.

In addition to the enforcement priorities named, the DMCCA also sets out new obligations for businesses in relation to subscriptions, which we expect to come into force during the course of 2026. Businesses are advised to review their existing subscription offers to check if these fall within the remit of the DMCCA, and if so, put in place a compliance plan.

2. Competition Enforcement

The plan sets out the CMA's targeted focus for competition enforcement as follows:

- To tackle anticompetitive conduct in key growth sectors and areas that may help to improve household prosperity, and as part of this, the CMA will actively target anticompetitive activity that prevents startups and scale-ups from growing;
- To facilitate progrowth, legitimate business collaboration, particularly in the eight industrial strategy priority sectors, i.e., advanced manufacturing, clean energy industries, creative industries, defense, digital and technologies, financial services, life sciences and professional and business services — and in relation to sustainability agreements;
- To prioritize action against bid-rigging in the public sector and use artificial intelligence and data science tools to support evidence gathering; and
- To ensure that AI is not used to impede competition in the U.K., including through algorithmic collusion — in this context, the CMA is also making further investments into its detection tools, including AI, to scan public data and identify suspicious activity in all areas of focus. The CMA's recent guidance "Complying with Consumer Law When Using AI Agents" supports this as a key area of focus in the consumer space as well.[4]

The CMA's competition enforcement focus is clearly targeted to support the government's growth agenda. Notable is the emphasis on identifying how the CMA can support startups to scale up in the U.K., both in the plan and in the CMA's public statements.

These reflect a wider program of work commenced last autumn, in which the CMA looked at the role of competition policy to encourage startup growth and investment in the U.K., including tackling sector-specific barriers, such as public-sector procurement and regulation; the role of data and interoperability in scaling in the U.K. and from a merger control perspective; and the role of consolidation to achieve scale.

Now, more than ever, the CMA is likely to be receptive to complaints by SMEs regarding market structures or the behaviors of competitors.

Also notable are how AI developments are now shaping the CMA's work plan — both regarding new tools that it is using to monitor market behavior, such as in public-sector markets and to detect cartels, but also the use of algorithms and AI, where these tools enable market collusion.

While, to date, the CMA has confined itself to issuing guidance on the use of AI and algorithms and decisions are awaited, companies that use pricing algorithms and other AI tools to gather information are strongly recommended to review the compliance position of these.

3. Markets

Regarding the CMA's markets work, while the agency has the ability to investigate entire markets, even in the absence of consumer or competition law breaches, the plan confirms a continued focus on consumer-facing markets.

The plan specifically calls out the progression of the CMA's market study into the private dentistry sector. It also highlights the implementation of remedies that result from its veterinary services market investigation, which concluded on March 24 and resulted in a price cap on prescriptions, among other things.

The plan further provides that the CMA will use its market function to support the government's industrial strategy to help reduce cross-economy barriers to growth, supporting interoperability and access to data.

The government's proposed reforms to the competition regime also include changes to the CMA's markets regime, which seek to replace the existing market study and market investigation model with a new single-phase market review tool, and ensure market remedies remain necessary and proportionate.[5]

In implementing these aims, the plan seeks to be mindful of not placing more burden on business than necessary, e.g., by focusing on light-touch and fast interventions, being guided by proportionality, and ensuring an effective monitoring of remedies, including removing those that are no longer needed.

The CMA continues to focus its market function on key areas of consumer need and spend, and we expect to see extensive use of this tool in the coming year. For example, on March 20, the CMA launched a market study into the supply of heating oil as an area of essential spend, following the sudden rise in oil prices caused by the current conflict in the Middle East.

On March 24, the chancellor set out a plan to help protect households from unfair price increases set for profiteering during the crisis. As part of this, the government may act to give time-limited, targeted powers to the CMA so it can clamp down on price gouging.

4. Digital Markets

In the digital realm, the plan sets out the CMA's priorities in implementing its digital market regulation powers, including its work on its first designations of strategic market status under the DMCCA in relation to search and mobile platforms. The CMA has recently indicated that it will open its next strategic market status investigation in May.

We expect the CMA to focus on delivering a pragmatic approach to the regulation of digital markets with a focus on ensuring a level playing field for startups and scale-ups across the U.K. tech sector, particularly in areas like fintech and digital wallets, and browsers and platforms, with a particular focus on choice architecture, data access and interoperability.

Commitments in the current designation process came into force on April 1, and we expect at least one further designation to land in 2026. We therefore do not expect the regulator to put its current focus on digital regulation on the back burner just yet, particularly in areas where technology intersects with essential consumer spend, such as banking and finance.

5. Merger Control

The CMA plans to apply its merger control powers in a targeted way, emphasizing that most mergers do not raise competition concerns, but it wants to be a strong advocate for effective competition across the U.K. economy. As part of this, the CMA will continue implementing its wait-and-see approach to global mergers.

On Jan. 20, the government opened a consultation on legislative changes to the U.K. merger control regime, aimed at enhancing predictability for businesses in support of economic growth.[6]

This came on the heels of a number of reforms and significant shifts in the CMA's enforcement and merger review priorities, emphasizing its alignment with the government's progrowth, probusiness agenda.

As part of this, we expect the following:

- Mergers involving global markets, but with only peripheral U.K.-specific overlaps, less likely to attract scrutiny, with more concentration on those transactions with a clear U.K. nexus;
- More deals to continue to be cleared through the briefing-paper route with less full Phase 1 reviews; and
- A more flexible approach to remedies following the removal of the presumption against behavioral remedies at Phase 1 review.

The government consultation proposes to refine this further, with more streamlined investigations, greater certainty on notification thresholds, and more time for businesses to agree remedies following a Phase 1 merger investigation.

What's Next

Overall, the draft annual plan highlights the CMA's ambition to be a consumer champion and enabler of economic growth in the U.K. It also reinforces the CMA's role in shaping markets — not just policing them, offering both risks and opportunities for businesses with U.K. operations.

In particular, while much of the commentary focuses on increased enforcement, the plan also presents strategic opportunities. The CMA is explicitly seeking to facilitate investment, sustainability initiatives and progrowth collaboration, including in the government's priority sectors.

Firms that understand how to operate within this framework can gain an advantage, particularly where regulatory clarity or market opening measures create new avenues for innovation.

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[1] https://assets.publishing.service.gov.uk/media/69bd1ce5ed813d0d8b690bf8/Annual_Plan_2026_to_2027.pdf.

[2] <https://www.cooley.com/news/insight/2026/2026-02-19-uk-merger-control-in-2026-what-to-expect>.

[3] <https://www.cooley.com/news/insight/2025/2025-04-14-new-uk-consumer-law-regime-comes-into-force>.

[4] <https://www.gov.uk/government/publications/complying-with-consumer-law-when-using-ai-agents/complying-with-consumer-law-when-using-ai-agents>; <https://www.cooley.com/news/insight/2026/2026-03-26-ai-agents-and-consumer-law-what-businesses-need-to-know>.

[5] <https://www.gov.uk/government/consultations/refining-our-competition-regime>.

[6] <https://www.cooley.com/news/insight/2026/2026-02-19-uk-merger-control-in-2026-what-to-expect>.