

Insights

CMA STEPS UP ENFORCEMENT ON FAKE AND MISLEADING REVIEWS: WHAT BUSINESSES NEED TO KNOW

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On 27 March 2026, the Competition and Markets Authority (**CMA**) [launched five new consumer law investigations](#) as part of a crackdown on fake and misleading reviews, opening cases against Autotrader, Feefo, Dignity, Just Eat, and Pasta Evangelists; this follows the CMA having signalled its focus on this area since summer 2025. Spanning funerals, food delivery, and car sales, the breadth of the investigations signals that no sector is immune from scrutiny. The CMA is targeting each key stage of the online reviews ecosystem – from how reviews are obtained, to how they are moderated and displayed, to the star ratings consumers rely on – tackling the multiple practices that can shape what people see when they search, shop or book online.

The concerns identified in this latest round of enforcement action are wide-ranging, although no findings of infringement have yet been made. Just Eat is being investigated in relation to whether its ratings system has inflated certain restaurants' and grocers' star ratings (giving consumers a potentially misleading picture of quality when choosing where to order). In the case of Autotrader and Feefo, the CMA is investigating whether 1-star reviews moderated by Feefo were excluded from Autotrader's platform and star ratings. In the case of Dignity, the question is whether the company asked staff to write positive reviews about its crematoria services. In relation to Pasta Evangelists, the CMA is investigating whether customers were offered undisclosed discounts in exchange for leaving 5-star reviews on delivery apps. If the CMA finds an infringement, it can require a business to change its practices, give commitments about future conduct and impose substantial fines.

These are the third set of investigations launched under the Digital Markets, Competition and Consumers Act 2024 (**DMCCA**), which came into force on 6 April 2025 and materially reshaped the UK consumer protection landscape. The CMA's other open investigations include a probe opened in November 2025 into eight businesses in relation to alleged misleading and unfair pricing practices and an investigation opened in March 2026 into a leading multinational software company in relation to early termination fees.

The DMCCA empowers the CMA to enforce consumer protections directly through administrative proceedings, without having to go to court, granting it the power for the first time to issue infringement notices, impose fines of up to 10% of annual global turnover, and order consumer redress. The CMA has already demonstrated its willingness to use these powers, having launched several investigations and having [issued a car park provider with a £473,000 fine](#) for failure to comply with a legal information notice – the first fine of its kind under the new regime.

The DMCCA also introduced provisions specifically targeting fake and misleading online reviews. Several practices became "banned practices" when the DMCCA came into force, meaning they are automatically deemed unfair and illegal – including obtaining and posting fake reviews, featuring paid-for reviews that are not clearly marked as incentivised, hiding negative reviews, and presenting misleading star ratings or aggregated customer feedback. Businesses are also subject to a positive obligation to take reasonable and proportionate steps to prevent fake reviews being posted on their platforms.

In April 2025, the [CMA published new fake reviews guidance](#) and allowed a three-month adjustment period for businesses to comply. In July 2025, following the end of that adjustment period, the [CMA completed a review of more than 100 businesses' websites](#) and found that over half could be failing to comply.

Businesses should expect enforcement to intensify in this area. In January 2026, Emma Cochrane, the CMA's Executive Director for Consumer Protection, stated that companies should "*expect further action*" in relation to fake reviews – the investigations launched on 27 March 2026 form part of that commitment.

HOW BCLP CAN HELP

BCLP's fully integrated global Consumer Practice comprises dedicated lawyers from diverse disciplines – including commercial law, consumer protection law, technology, government affairs, competition, and regulatory compliance – and regularly advises clients across a range of sectors on investigations and enforcement action by the CMA, the FTC, the EU Consumer Protection Cooperation Network, the ASA, Trading Standards, and other consumer bodies in the EU, US, and UK. With regulators signalling that consumer protection remains a key priority for 2026 to 2027, BCLP is well positioned to help clients get ahead of enforcement risk.

Across the UK, US and EU, it is now more important than ever for businesses to evaluate their approach to consumer reviews, including their associated internal and external policies and procedures. BCLP can assist at every stage of that process. This includes the delivery of compliance training to in-house legal and relevant business teams, and review of existing internal compliance processes. The team can also draft or amend consumer review policies and internal governance frameworks, and advise on, represent, and deal with claims and regulatory enforcement action in relation to consumer reviews.

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