C/2025/5000

18.7.2025

Summary of Commission Decision

of 19 March 2025

relating to a decision pursuant to Article 8(2) of Regulation (EU) 2022/1925

(Case DMA.100204 – Article 6(7) – Apple iOS and iPadOS – SP – Process)

(notified under document number C(2025) 3001)

(Only the English text is authentic)

(C/2025/5000)

On 19 March 2025, the Commission adopted a decision pursuant to Article 8(2) of Regulation (EU) 2022/1925 ([1]). *In accordance with the provisions of Article 44 of Regulation (EU) 2022/1925, the Commission herewith publishes the names of the parties and the main content of the decision, having regard to the legitimate interest of undertakings in the protection of their business secrets.*

1. **INTRODUCTION**

(1) The Implementing Decision ('the Decision') concludes the specification proceedings pursuant to Article 8(2) of Regulation (EU) 2022/1925 ('DMA') opened on 19 September 2024. Pursuant to that Article, the Decision specifies measures that Apple Inc. (hereinafter referred to as 'Apple') must implement in relation to its operating systems iOS and iPadOS in order to effectively comply with the obligations under Article 6(7) DMA in relation to the process for requesting interoperability concerning existing features, including their functionalities, within the deadlines specified in the Annex to the Decision.

(2) This Decision pursuant to Article 8(2) DMA clarifies how an obligation – here the interoperability obligation under Article 6(7) DMA – should be implemented to ensure compliance. Under the DMA, specification proceedings and non-compliance investigations are two distinct tools at the disposal of the Commission, which have different purposes. Unlike non-compliance cases, specification proceedings define how obligations should be met rather than sanctioning breaches of the DMA. Therefore, this Decision does not assess Apple's compliance and does not provide for the imposition of fines.

(3) This Decision follows a structured six-month process, which includes extensive discussions with Apple and a public consultation to gather input from relevant stakeholders. This decision imposes measures Apple has to implement under Article 6(7) DMA to improve the transparency and effectiveness of the process of reviewing requests submitted by developers to obtain interoperability with iOS and iPadOS features. The second specification decision that was adopted in parallel under case DMA.100203 clarifies Apple's obligations under Article 6(7) DMA for a specific and important set of iOS features for connected physical devices such as smartwatches, headphones and TVs.

2. **PROCEDURE**

(4) On 5 September 2023, the Commission adopted a decision designating Apple as a gatekeeper under the DMA for a number of its services, including its operating system iOS. On 29 April 2024, the Commission adopted a decision amending the designation decision to include Apple's operating system iPadOS as a core platform service. As a result, Apple must comply with the obligations set out in the DMA. Under Article 6(7) DMA, Apple must, free of charge, provide third parties with effective interoperability with, and access for the purposes of interoperability to, hardware and software features accessed or controlled via its operating system iOS and iPadOS.

(5) On 19 September 2024, the Commission opened proceedings pursuant to Article 20(1) DMA in view of specifying the measures that Apple must put in place to effectively comply with its interoperability obligations in relation to the implemented request-based process.

([1]) 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 and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act) (OJ L 265, 12.10.2022, p. 1, ELI: http://data.europa.eu/eli/reg/2022/1925/oj).

(6) On 18 December 2024, the Commission communicated to Apple its preliminary findings in line with Articles 8(5) and 34(1) DMA ('Preliminary Findings'), providing Apple with the opportunity to comment on the findings and the proposed measures.

(7) In parallel, on 18 December 2024, in line with Article 8(6) DMA, the Commission published a non-confidential summary of the case and the Commission's proposed measures to enable interested third parties to provide comments. During the public consultation, the Commission received 51 contributions from business users, end users and other interested third parties. All submissions were shared with Apple. Prior to the public consultation the Commission also engaged with third parties through meetings and requests for information.

(8) On 20 January 2025, Apple provided its response to the Preliminary Findings after exercising its procedural rights pursuant to Articles 8(1), 8(2) and 8(3) of the Commission Implementing Regulation (EU) 2023/814 ([2]).

(9) In the context of these proceedings, the Commission has actively engaged with Apple and third parties to ensure the effectiveness of the measures imposed in relation to Apple's request-based interoperability process.

(10) The Commission, having assessed the overall body of evidence, including Apple's and third parties' input, and taking into account the engagement with Apple, takes the present Decision pursuant to Article 8(2) DMA.

(11) In accordance with Articles 17 and 50(2) DMA, the Digital Markets Advisory Committee was consulted and issued its positive opinion on 18 March 2025.

3. **LEGAL FRAMEWORK**

(12) Pursuant to Article 8(2) DMA, the Commission may, on its own initiative or at the request of a gatekeeper, issue an implementing act to specify measures that the gatekeeper should implement to effectively comply with certain obligations.

(13) Pursuant to Article 8(5) and 8(6) DMA, before adopting such an implementing act, the Commission is required to communicate to the gatekeeper its preliminary findings within three months, and to publish a non-confidential summary of the case and the measures that it is considering taking or that it considers the gatekeeper concerned should take. The implementing act should be adopted within six months from the opening of the proceedings pursuant to Article 20 DMA.

(14) Pursuant to Article 8(7) DMA, in specifying the measures that the gatekeeper concerned is to implement in order to effectively comply with its obligations, the Commission shall ensure that the measures are effective in achieving the objectives of that Regulation and the relevant obligation and that they are proportionate in the specific circumstances of the gatekeeper and the relevant service.

(15) Article 6(7) DMA requires gatekeepers to allow effective interoperability and access for the purposes of interoperability with the same features as are available or used by the gatekeeper's services or hardware. All features controlled by, or accessed via, operating systems of gatekeepers are within the scope of the interoperability obligation. Gatekeepers may take strictly necessary and proportionate measures to ensure that interoperability does not compromise the integrity of the operating system, hardware or software features provided by the gatekeeper, provided that such measures are duly justified by the gatekeeper.

(16) Article 6(7) DMA is an obligation that is susceptible of being further specified under Article 8(2) DMA.

([2]) Commission Implementing Regulation (EU) 2023/814 of 14 April 2023 on detailed arrangements for the conduct of certain proceedings by the Commission pursuant to Regulation (EU) 2022/1925 of the European Parliament and of the Council (OJ L 102, 17.4.2023, p. 6, ELI: http://data.europa.eu/eli/reg_impl/2023/814/oj).

4. **THE COMMISSION'S ASSESSMENT**

(17) The purpose of the present proceedings is to assist Apple in its compliance efforts under the DMA by detailing the measures that Apple must implement to achieve effective compliance with the interoperability obligation, as prescribed by Article 6(7) DMA. In this regard, Apple has put in place a system whereby interoperability with the existing features of its operating systems iOS and iPadOS, for which no interoperability exist yet, would only be provided following a formal request by a developer to that effect. A request-based approach can help the gatekeeper to identify where interoperability needs from developers may be the most pressing, in a context where it might be challenging to immediately ensure effective interoperability with all existing features and functionalities. However, such a request-based approach, which is not required by Article 6(7) DMA, presents important limitation and difficulties for third parties (delays, transaction costs, control by the gatekeeper) which can undermine the effectiveness of Article 6(7) DMA. The Commission therefore considers it appropriate to define certain principles and safeguards to ensure that the request process is predictable, transparent, timely and fair and able to deliver effective interoperability as required under Article 6(7) DMA.

(18) In summary, the specified measures include:

(19) Transparency of iOS and iPadOS features reserved to Apple

— At the stage where developers consider submitting an interoperability request, they should be provided, at their request, with clear and accurate information to reach a sufficient level of understanding of which features can be subject to interoperability. In reply to a reference query by a developer, Apple should provide a technical reference including a description of features (including their functionalities) that iOS and iPadOS make available only to Apple's services and hardware.

(20) Effectiveness and transparency of the process vis-à-vis requesting developers

— Throughout the process, swift two-way communication with the gatekeeper is essential, and the developer should be given the opportunity to provide feedback. To this end, Apple should provide support to developers interested in interoperability. Apple should also provide to developers adequate feedback concerning their requests and the opportunity to provide feedback themselves via an adequately staffed contact point. Developers should be able to provide feedback throughout the treatment of their requests, including in the preparation of the development plan.

(21) Handling of rejections

— In cases where interoperability requests are rejected, or where the interoperability solution Apple would design would not fully respond to the request, developers should be adequately informed of the reasoning for such decision. They should also be able in relevant cases to obtain a review of that decision through a fair and impartial mechanism. Therefore, Apple should set up an internal review mechanism with the purpose to review questions that arises of technical nature. Further, Apple's process should include also the possibility for developers to have recourse to a conciliator for the resolution of disputes of a technical nature. To increase transparency vis-a-vis the broader developer community, a non-confidential summary of the conciliator's opinion should be made public.

(22) Future-proof effective interoperability

— Whenever an interoperability solution is implemented in response to a request by a developer to obtain access to an existing feature available to Apple's hardware and software, Apple should ensure that this solution is made available to all developers, not restricted to specific use cases, adequately documented, maintained for a reasonable period of time and future-proof.

(23) Predictability and accountability

— Apple deals with the requests for interoperability in three different phases, and each stage of the process should be subject to a clear and transparent timeline. The specified measures include deadlines and guidance to Apple for each phase.

— Moreover, an adequate level of transparency vis-à-vis the broader developer community, or in some cases vis-à-vis the general public, is important to foster accountability. Developers should have available information about other developers' requests for interoperability, save for developers' confidential information. Further, Apple should publish to the broader public key performance indicators on the request-based-process.

(24) Apple has, in addition, the possibility to request the Commission to adapt the measures to exceptional situations.

(25) The measures will be reviewed in two years' time.

(26) The concrete measures are further specified in the Annex to the Decision.

5. **CONCLUSION**

(27) The Decision specifies measures pursuant to Article 8(2) DMA that Apple must implement in relation to its operating systems iOS and iPadOS in order to effectively comply with the obligations under Article 6(7) DMA in relation to the process for requesting interoperability concerning existing features and functionalities, within the deadlines specified in the Annex to the Decision.