

Rt Hon Peter Kyle MP
Secretary of State for Business and Trade
House of Commons
London
SW1A 0AA

17th December 2025

RE: IMPLEMENTATION OF THE NEW SUBSCRIPTION CONTRACTS REGIME UNDER THE DIGITAL MARKETS, COMPETITION AND CONSUMERS ACT (DMCCA):

The Online Dating and Discovery Association (ODDA) is the recognised trade body for the sector with a mission to create safe, responsible and enjoyable experiences for everyone. Representing nearly 500 brands worldwide, our sector contributes over £400 million to the UK economy each year with the vast majority of revenue generated through subscription contracts.

In February, the ODDA was delighted to respond on behalf of its members to the consultation on the implementation of the new subscription contracts regime. In our response, we broadly welcomed the proposals but raised a number of concerns that would have a significant impact on firms in our sector. In particular, we felt that the proposals for processing refunds during cooling-off periods were largely unworkable, creating additional complexity, risk and cost for our members without directly benefitting consumers.

We also raised concerns about the short implementation period with the new regime scheduled to come into effect from Spring 2026. We were therefore pleased to see the recent announcement by the Department for Business and Trade (DBT) to delay the implementation date until the Autumn of 2026.

However, the lack of detail on the proposed changes and the absence of the Department's response to the consultation creates uncertainty, which damages business confidence, investment and growth.

We hope there is an opportunity to revisit the proposals and welcome engagement with DBT officials to discuss further. We also think a workshop with firms in our sector and the digital services industry more widely would help address some of the concerns we have raised above before final advice is sent to Ministers.

While we recognise the difficulty in developing a way forward that works for everyone, we also fear that the six-month delay in implementation risks *'kicking the can down the road'* leaving us in the same place in six months' time as we are now.

Our goal is to ensure that consumers are properly protected from 'subscription traps' while recognising that the overwhelming majority of traders in our sector already adhere to tried and www.theodda.org Email: info@theodda.org

tested subscription models that reflect best practice. The proposals in their current format leave too many questions unanswered, particularly around existing definitions and how they are applied.

We look forward to hearing from you.

Yours sincerely,



Simon Newman
Chief Executive Officer

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