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Open letter from the European Encyclopedia Network

Dear Executive Vice-President Vestager,

In a time of misinformation and disinformation, it is crucial that people have access to reliable knowledge. Where people previously had options other than the internet when they needed to search for reliable information, today there are no other real options than to search the internet – and thus the dominant search engine Google.

Google's search engine has now achieved such a dominant market share that Google holds a *de facto* monopoly on the access to searching for knowledge on the internet. It is therefore essential which search results people are displayed on Google when they look for information.

*For years, Google has prioritised Wikipedia in search results.* And last summer, the collaboration was confirmed in a commercial agreement between Google and Wikimedia Enterprise. The agreement means that content from Wikipedia will get an even higher priority in Google's search results. The new agreement deepens the cooperation, and ensures that all alternatives to Wikipedia will get less traffic and usage.

On top of this Google search pages are increasingly being designed so that the user gets the answer to queries on the search results page itself. This means that European citizens encounter less diverse knowledge when they search the internet. The citizens of Europe will find it more difficult to access reliable, research-based knowledge in their own language. In many cases, Google even chooses to present machine translations from English Wikipedia or unnamed sources, instead of displaying - and linking to - the original sources in the search result.

The national encyclopaedias of Europe are an important alternative to Wikipedia. While Wikipedia relies on volunteer contributors, the national encyclopaedias are written by academics and national experts and are important sources of verified knowledge.

The agreement between Google and Wikimedia Enterprise means that Wikipedia has a priority position. The result is that national encyclopaedias and other sources of trusted information have great difficulty in remaining visible and receiving traffic: When people search on Google, national encyclopaedias will often rank so low on search result pages that they are *de facto* invisible.

As national encyclopaedias, we believe that the new agreement between Google and Wikimedia Enterprise means that the market for information search is exposed to competitive distortion, which is similar to the case of Google's favouring of Google Shopping. The European Commission fined Google for abusing its market dominance as a search engine by giving an illegal advantage to another Google product, its comparison shopping service.

Google's favouring of Wikipedia and Google's accumulation of content from other sources has a significant negative impact on our possibilities to position trustworthy information in the market and – even worse – people's ability to search for – and find – reliable knowledge and information. In summary:

- Google's favouring of Wikipedia has a negative impact on the possibility of finding reliable knowledge and on the innovation within reference works.
- Google's search result pages are dominated by the display of Google's reuse of content from other websites and results from Wikipedia.
- Google does not apply its system of penalties (a predefined set of parameters to lower the placement of search results) to Wikipedia results as it does to other competitors, regardless of the merits of how well the Wikipedia results meet the results of the search query.
- Google and Wikipedia have worked together on a number of projects and initiatives to enhance Wikipedia's content distribution to the world. Content from Wikimedia Enterprise helps power some of Google's features, including being the most frequent data source that shows up in its knowledge panels. This gives Wikipedia an unfair competitive advantage.
- Where citizens think that Google is a way to find content on the internet, analysis shows that a steadily growing number of Google searches (more than 60% according to [published research by SimilarWeb](#)) do not result in a direct, follow-up click to another website. This is most likely because the users are given their answers on the search page itself. This information is presented by Google either as instant answers, featured snippets, a section of "Other users asked" or knowledge panels from primarily Wikipedia.

Overall, this is a deeply worrying situation in which the citizens of Europe are hindered in their search for reliable information. Furthermore, Google holds the national encyclopaedias in a competitively unfair situation which now and in the future constitutes a threat not only to the existence of fact-checked encyclopaedias, but also to the efforts of member states and the research community to make reliable knowledge available for the benefit of an informed public dialogue and equal access to reliable knowledge.

On behalf of the European Encyclopedia Network, we would like to ask for the opportunity to discuss the situation and present our analysis at a meeting with you.

We look forward to hearing from you, and we can be contacted at [nek@lex.dk](mailto:nek@lex.dk).

Yours faithfully

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