



EUROPEAN COMMISSION

***CASE DMA.100033 – Amazon – cloud
computing services***

(Only the English text is authentic)

**Digital Markets Act
Regulation (EU) 2022/1925 of the European Parliament
and of the Council**

Articles 16(1) and 17(1) Regulation (EU) 2022/1925

Date: 18/11/2025



EUROPEAN COMMISSION

Brussels, 18.11.2025
C(2025) 7946 final

PUBLIC VERSION

Amazon.com, Inc.
410 Terry Avenue North,
Seattle, WA 98109
United States of America

**Subject: Case DMA.100033 – Amazon – cloud computing services
Commission decision opening a market investigation pursuant to Articles
16(1) and 17(1) of Regulation (EU) 2022/1925 of the European Parliament
and of the Council on contestable and fair markets in the digital sector
Only the English text is authentic**

Dear Sir or Madam,

- (1) In its notification of 3 July 2023, pursuant to Article 3(3), first subparagraph, of Regulation (EU) 2022/1925 ⁽¹⁾, Amazon.com, Inc. (hereinafter, together with all entities directly or indirectly controlled by it, referred to as “Amazon”) stated that its Amazon Web Services cloud platform (“AWS”) provides cloud computing services corresponding to a core platform service (“CPS”) within the meaning of Article 2, point (13), and Article 2, point (2) subpoint (i), of the same Regulation, but that these services did not meet the thresholds laid down in Articles 3(2)(b) and 3(2)(c) of that Regulation in relation to that CPS.
- (2) On 5 September 2023, the Commission adopted a decision designating Amazon as a gatekeeper pursuant to Article 3(4) of Regulation (EU) 2022/1925 in relation to the following CPSs that are provided by Amazon and which individually constitute an important gateway for business users to reach end users: (i) its online intermediation service Amazon marketplace and (ii) its online advertising service Amazon Advertising (“Amazon’s designation decision”). ⁽²⁾
- (3) Pursuant to Article 3(8) of Regulation (EU) 2022/1925, the Commission shall designate as a gatekeeper, in accordance with the procedure laid down in Article 17 of that Regulation, any undertaking providing CPSs that meets each of the

⁽¹⁾ OJ L 265, 12.10.2022, p. 1.

⁽²⁾ C(2023) 6104.

requirements of Article 3(1) of the Regulation but does not satisfy each of the thresholds in Article 3(2) of that Regulation. Consequently, an undertaking that does not fulfil the thresholds laid down in Article 3(2) of Regulation (EU) 2022/1925 shall be designated as a gatekeeper if: (i) it has a significant impact on the internal market; (ii) it provides a CPS which is an important gateway for business users to reach end users; and (iii) it enjoys an entrenched and durable position, in its operations, or it is foreseeable that it will enjoy such a position in the near future.

- (4) It follows from Article 17(1) of Regulation (EU) 2022/1925 that, in order to examine whether an undertaking providing CPSs should be designated as a gatekeeper pursuant to Article 3(8) of the Regulation or to identify the CPSs to be listed in the designation decision pursuant to Article 3(9) of that Regulation, the Commission shall conduct a market investigation. For the purpose of its examination, pursuant to Article 3(8), second subparagraph of Regulation (EU) 2022/1925, the Commission shall take into account some or all of the elements listed in that provision, insofar as they are relevant for the undertaking providing CPSs under consideration.
- (5) Recent market studies suggest that the characteristics of cloud computing services are favourable to the emergence of gatekeeper positions.⁽³⁾ For instance, the cloud computing services industry is subject to high barriers to entry due to their capital-intensive nature, requiring important upfront investment for market entrants. The industry is also subject to important economies of scope and scale, favouring players that have reached a critical size. There are also customer lock-in effects arising from barriers that make it difficult for cloud customers to use multiple cloud services or switch between cloud services providers.
- (6) The Commission takes the view, following an initial examination of the information available to it, that there are grounds to consider that Amazon may meet the criteria set out in Article 3(1) of Regulation (EU) 2022/1925 in relation to its AWS cloud computing services, and that this should be assessed in a market investigation pursuant to Article 17(1) of that Regulation, without prejudice to the outcome of that investigation. This finding is based, in particular, on the following reasons.
- (7) First, Amazon's average market capitalisation or its equivalent fair market value amounted to at least EUR 75 billion in the last financial year.⁽⁴⁾

⁽³⁾ See, among others, the OECD's 2025 Competition in the provision of cloud computing services, OECD Roundtables on Competition Policy Papers, No. 323 (https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/05/competition-in-the-provision-of-cloud-computing-services_f42582ad/595859c5-en.pdf); the French Autorité de la Concurrence's 2023 Opinion 23-A-08 on competition in the cloud sector (https://www.autoritedelaconcurrence.fr/sites/default/files/attachments/2023-09/23a08_EN.pdf); the Dutch ACM's 2022 market study on cloud services (<https://www.acm.nl/system/files/documents/public-market-study-cloud-services.pdf>); the UK CMA's 2025 Final decision report on cloud infrastructure services (https://assets.publishing.service.gov.uk/media/688b8891fdde2b8f73469544/final_decision_report.pdf); the UK Ofcom's 2023 Cloud services market study (<https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-3-4-weeks/244808-cloud-services-market-study/associated-documents/cloud-services-market-study-final-report.pdf>); or the Japanese JFTC's 2022 Report on trade practices in the cloud services sector (<https://www.jftc.go.jp/en/pressreleases/yearly-2022/June/221102EN.pdf>). All links last accessed on 16 October 2025.

⁽⁴⁾ Amazon's market capitalization is of USD 2.72 trillion as of 5 November 2025. See <https://markets.ft.com/data/equities/tearsheet/summary?s=AMZN:NSQ>, last accessed on 5 November 2025.

- (8) Second, by 2025, Amazon had become the world’s leading cloud infrastructure provider, accounting for approximately 29% of the worldwide cloud sector. In Europe, Amazon has a similarly strong presence.⁽⁵⁾ In addition, several official studies have consistently underlined Amazon’s strong position in cloud computing services with respect to different jurisdictions. For instance, in 2020, Amazon’s share in cloud computing services amounted to 46% in France, and to 45% in the Netherlands.⁽⁶⁾ Such strength is reflected by the latest information about revenue generated by Amazon in cloud services, which increased by 19% between 2023 and 2024 to reach USD 108 billion (approximately EUR 100 billion).⁽⁷⁾
- (9) Third, the cloud computing services provided by Amazon appear to benefit from strong indirect network effects derived from Amazon’s business model, which is built on a global network of data centres and an ecosystem of its wide, interrelated cloud computing services, which range from compute services (e.g., Amazon Elastic Compute Cloud), networking and content delivery services (e.g., AWS Cloud WAN), storage (e.g., Amazon Simple Storage Service), to data management services (e.g., AWS Data Exchange) stores (e.g., AWS Marketplace), among many others. The different categories of cloud computing services on AWS are interconnected and integrated, creating a comprehensive ecosystem aiming to keep customers on the platform with the perspective to meet all the end users’ needs for cloud computing services. Amazon’s large pool and portfolio of independent software vendors and third-party services included in the AWS cloud computing ecosystem further attracts more end users to AWS cloud computing services. This, in turn, attracts business users who provide their services to end users that rely on the different categories of AWS cloud computing services.
- (10) Fourth, Amazon also seems to benefit from scale and scope effects. The cost of developing and maintaining AWS cloud computing services appears to be dependent only to a limited extent on the number of specific end users and business users who use it and can be spread over the large number of interrelated cloud computing services, such as those mentioned above that are provided by Amazon.
- (11) Fifth, Amazon’s ecosystem displays lock-in features, since end users and business users of AWS cloud computing services wishing to switch to another provider of cloud computing services of a similar or the same nature may face numerous obstacles and high switching costs, also in light of the benefits of Amazon’s ecosystem referred to in paragraph (9) above.

⁽⁵⁾ See Statista, “Cloud Infrastructure Market, AWS Stays Ahead as Cloud Market Accelerates”, 4 November 2025 available at <https://www.statista.com/chart/18819/worldwide-market-share-of-leading-cloud-infrastructure-service-providers/>, last accessed on 12 November 2025 and also briefing by European Union Institute for Security Studies (EUISS), The UK CMA’s 2025 Final decision report on cloud infrastructure services, page 98, cited in footnote 4, and “Technical is political: When a cloud certification scheme divides Europe”, 3 November 2025, available at <https://www.iss.europa.eu/publications/briefs/technical-political-when-cloud-certification-scheme-divides-europe>, last accessed on 12 November 2025

⁽⁶⁾ See the OECD’s 2025 Competition in the provision of cloud computing services, OECD Roundtables on Competition Policy Papers, No. 323, page 22.

⁽⁷⁾ See Amazon latest annual report: “AWS revenue increased 19% YoY, from \$91B to \$108B. For perspective, just 10 years ago, AWS revenue was \$4.6B” page 1. Available at https://s2.q4cdn.com/299287126/files/doc_financials/2025/ar/Amazon-2024-Annual-Report.pdf, last accessed 12 November 2025.

- (12) Sixth, due to its conglomerate structure and high degree of vertical integration, Amazon can also benefit from cross-subsidisation opportunities and has opportunities to leverage its position to adjacent services. ⁽⁸⁾ Amazon has activities across a number of diverse, yet often complementary cloud computing services and other related services across the layers of the cloud computing stack. By using its significant cloud computing capabilities for its other services, Amazon is able to reduce its own costs, for example by benefiting from economies of scale. ⁽⁹⁾ In this context, it should be noted that Amazon is able to offer some parts of its cloud computing services such as AWS Storage Gateway and Amazon SimpleDB free of charge. Amazon can also optimise the cloud computing usage allocated to these other services when needed to compete with other service providers.
- (13) In light of the above, the Commission has decided to open a market investigation today, pursuant to Articles 16(1) and 17(1) of Regulation (EU) 2022/1925, for the purpose of determining whether Amazon should be designated as a gatekeeper in relation to the cloud computing services provided through the AWS platform.

For the Commission

(Signed)

Teresa RIBERA

Executive Vice-President

⁽⁸⁾ The scale and magnitude of AWS outage confirms the indispensability of its cloud computing services for their customers to consequently reach its own customers.

⁽⁹⁾ Amazon offers other services, including Amazon Store (through which Amazon provides the designated online intermediation service CPS Amazon marketplace), and advertising services (constituting a designated online advertising service CPS Amazon Advertising), Amazon Prime or Amazon Music, and which are among the leading services in their respective sector in the EU.