Constitution, Europe, External Affairs and Culture Committee Thursday 30 October 2025 27th Meeting, 2025 (Session 6)

Sporting events of national interest

- 1. The Committee will be taking evidence on the listed events regime designed to encourage certain sporting events of national interest to be on free-to-view television.
- 2. We will be hearing from—
 - Ian Maxwell, Chief Executive, Scottish Football Association (SFA)
- 3. There is a SPICe briefing at **Annexe A** and relevant correspondence from the SFA at **Annexe B**, Scottish Government at **Annexe C**, and UK Government at **Annexe D**.

Clerks, October 2025

Annexe A

Constitution, Europe, External Affairs and Culture Committee Thursday 30 October 2025

Listed events regime

Introduction

The Committee is exploring the place of international football qualifiers in the listed events regime which is designed to encourage certain sporting events to be on free-to-air television. Designating sporting events within the regime is a matter for the UK Government.

The Committee has written to the UK Government, the Scottish Government and the Scottish Football Association (SFA) on this matter and received response from all three organisations. This session the Committee will take evidence from the SFA.

What is the listed events regime?

The Broadcasting Act 1996 gives the Secretary of State for Culture, Media and Sport the power to draw up a list of sporting events of "national interest". This means the broadcast rights to these events must be offered to the main free-to-air terrestrial broadcasters on "fair and reasonable terms". The aim is to make sure the events are made available to all television viewers. The 1996 Act defines "national interest" as including "interest within England, Scotland, Wales or Northern Ireland." (s97(4)) and the Act allows flexibility for events to be shown only in the relevant part of the UK in which there is likely to be most viewer interest – see for example the Scottish FA Cup final.

The list consists of two groups:

- Group A events full live coverage must be offered. This group includes the FA Cup Final, the Scottish FA Cup Final (in Scotland), the Olympic and Paralympic Games, and the Men's and Women's Football World Cup and European Championships (ie the finals not the qualifying).
- Group B events these can have live coverage on subscription television provided that secondary coverage is offered to the free-to-air broadcasters. This group includes the Six Nations rugby union tournament (the games involving Home Countries), the Open Golf Championship, and cricket test matches played in England.

The 1996 Act is concerned with providing an opportunity for live coverage to be made available. Listing does not necessarily guarantee that an event will be broadcast live, or on a free to air channel. Rights holders are not required to sell live rights and broadcasters are not obliged to purchase them or to show the events. The broadcasting of Group A and B events is regulated by Ofcom who seek to ensure that broadcasters have a genuine opportunity to acquire the rights on fair and reasonable terms. Any broadcaster requires the consent of Ofcom to broadcast an

event on either list. Ofcom has published guidance (see from paragraph 1.13) which sets the criteria it would use in determining whether it would grant consent. These criteria include considerations of whether there was any interest from PSBs or other broadcasters and whether the price sought by rights holders is "fair reasonable and non-discriminatory between [PSBs and other broadcasters]". In practice, events in Group A have been broadcast live by free to air broadcasters. For events in Group B, Ofcom will normally give its consent to exclusive live coverage of an event by a broadcaster provided that there is "adequate provision has been made for secondary coverage", ie highlights.

The qualifying rounds for any of the home nations' football European Championships or World Cup are not in either group A nor group B. The broadcasting of events that are not listed is wholly a commercial decision between the rights holders and broadcasters.

What constitutes an event of "nation interest" is not defined in the Act. A <u>DCMS</u> <u>leaflet from the</u> early 2000's gave an explanation of the thinking at the time, it said—

"There are many different sports and sporting events which people feel passionately about. Unfortunately, we cannot list them all. A listed event is one which is generally felt to have special national resonance. It should contain an element which serves to unite the nation, a shared point on the national calendar, not solely of interest to those who follow the sport in question."

Reviews of the scheme

The Broadcasting Act 1981 first provided the power to Ministers to make regulations "with a view to preventing the making of exclusive arrangements for the broadcasting of sporting or other events of national interest". There have been a number of reviews, legislative changes, and changes to the listed regime since then.

In 2008, the UK Government asked David Davies, the former BBC journalist and senior official at the FA, to lead a review of the listed events regime. The review reported in November 2009¹. This review "supported the principle of protecting some major sporting events for the widest possible television audience" and suggested significant changes to the regime. The review concluded that guaranteeing only the highlights of a major event could no longer be seen as a sufficient substitute for live coverage and that there should be a single list of live events protected for free-to-air television; ie that there should not be a Group B.

The Davies Review suggested criteria for ministers to determine what should be on the list:

"In order to be eligible to be listed, an event must have a special national resonance and not simply a significance to those who ordinarily follow the

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sport concerned. Such an event is likely to fall into one or both of the following categories:

- it is a pre-eminent national or international event in sport;
- it involves the national team or national representatives in the sport concerned.

It should also be likely to command a large television audience."

The Davies Review suggested what should be on an amended list and this included:

"Home and away qualification matches in the FIFA World Cup and UEFA European Football Championships (listed in the Home Nation to which they relate)."

Following the Davies Review, the then <u>UK Government undertook a further</u> consultation in 2010 and decided to defer further consideration.

The Paralympic Games were added to Group A in January 2020. This followed a consultation in 2019. The FIFA Women's World Cup Finals and the Women's European Football Championship Finals were added to Group A in April 2022. This also followed consultation in 2019.²

The UK Government last reviewed the listed events in 2022. No details on the outcome of the review were published, but this did feed into to the Media Act 2024 which included changed to the listed regime. The 2024 Act provided that qualifying services can only be provided by a PSB and updated the range of services which fall within scope, e.g. including internet programme services. Ofcom explained these changes:

"The Media Act makes significant changes to the listed events regime. Instead of being restricted to traditional broadcast channels, the updated regime will include any services which can be used to show live coverage of listed events to UK audiences – including Public Service Broadcasters' (PSBs) on-demand players, global media platforms and other internet-based streaming services."

The 2024 Act made no changes to the two lists.

Other jurisdictions

Other European states have listed events regimes. The <u>EU publishes details</u> of nine (out of the 27) member-states' approaches to listing major events. This indicates that some countries list all international men's competitive football matches (e.g. <u>Hungary</u>, <u>Germany</u>, <u>Italy</u>, <u>Belgium</u> – both in Flemish and French, <u>Denmark</u>, <u>Ireland</u>, <u>France</u>); others listed only the championship matches, and sometimes only certain of those games (e.g. <u>Austria</u>, <u>Finland</u>).

² https://www.gov.uk/government/news/government-adds-womens-international-football-tournaments-to-listed-events-regime

Major events are not limited to sporting events; both Austria and Italy list, for example, music events. Guidelines for member states from the Commission include four indicators for the assessment of an event of major importance for society, two of which have to be fulfilled for the inclusion of an event in a national list:

- the event and its outcome have a special general resonance and are not simply of significance to those who ordinarily follow the sport or are actively concerned about it;
- the event has a generally recognised, distinct cultural importance for the population, in particular as a catalyst of its cultural identity;
- the event is of major international importance and features the national team in the sport concerned;
- the event has traditionally been broadcast free-to-air and has commanded large TV audiences.

<u>The Irish Government has recently</u> been consulting on changing its listed events regime to include, among other things, a range of women's events as well as including Ireland's men's and women's teams' participation in the Nations Cup.

Outside of Europe, Australia has legislation to ensure that a range of sports and sporting events are accessible on free-to-air TV. Its 'anti-siphoning' list <u>covers a wide range of domestic and international sport</u>. India also has anti-siphoning legislation whereby broadcasters are required to share the rights to sporting events of 'national importance' with a national public broadcaster.

Debates around listing major events or anti-siphoning schemes

Many of the regimes to protect access to sporting and other major events arose after the growth of subscription television market in the 1990s and 2000s. The key argument for making such regimes is "that the wider public interest in the form of cultural citizenship is served by the availability of particular sporting events on free-to-air television."

The terms of reference to the 2022 review set out the <u>UK Government's policy objectives</u>. These were to

"Ensure that key sporting events of national interest are widely available and free-to-air for all audiences, particularly those who cannot afford to watch sport behind a paywall, insofar as is practicable and reasonable. Sports rights holders use commercial broadcast income to the benefit of the wider sporting sector, so it is important that the regime continues to strike the right balance between accessibility, particularly when timezones affect the screening of

³ Evens, T., Iosifidis, P., Smith, P. (2013). The Regulation of Access to Major Sporting Events. In: The Political Economy of Television Sports Rights. Palgrave Global Media Policy and Business. Palgrave Macmillan, London. https://doi.org/10.1057/9781137360342_7

events domestically, and the ability of sporting organisations to generate revenues to invest in their sports at all levels."

There has been opposition to these schemes, or to the extent of these schemes, from sporting bodies or subscription services. For example, in 2007 FIFA and UEFA challenged elements of the UK and Belgium's schemes at the European Court. This challenge was around the inclusion of the whole of the World Cup and European Championships on those states' lists – rather than protecting just those matches including the representative countries along the semi-finals and finals. The court upheld the lists noting that other matches attracted large audiences that went beyond the usual fans of the sport. (Evens et al 2013).

The 2009 Davies Review provides a useful source for some of the debates around the listing of events.

In relation to Scotland and Wales the review noted the marked difference between "the views of the elected administrations in Scotland and Wales and, on the other, of the governing bodies of football and rugby union." It continued:

"The Scottish Government, quoting research contained in 'Public Attitudes to Broadcasting in Scotland' (2008) concluded that 96% of those interested in football, and even 70% of those who were not interested, wanted Scotland's qualification games in both the FIFA World Cup and UEFA European Football Championships listed. 'The importance of these qualifying games as events of national significance has been well established' said the Scottish Government in its written evidence. In their response to the Panel though, the Scottish Football Association could hardly have taken a more different view. 'Should our ability to go to an open market be restricted' they believed 'the shortfall to Scottish football could be up to £12million per year. To put it simply, Scottish football cannot afford to lose this amount of money and be expected to exist in the future.'" (Para 103)

The Davies Review noted that the principle of listing events had strong public support. It said for those that supported the listing regime, "the issue was one of universality regardless of ability to pay, of social cohesion, of creating tomorrow's role models for the young people of today". The Review said that those opposed to listing believed that decisions about broadcasting rights were best left to sports' governing bodies, who could balance exposure and development needs, and expressed concern about potential financial losses and reduced competition in the bidding process if events were reserved for free-to-air broadcasters.

In terms of listing international football qualifiers, the Davies Review noted that research it had commissioned suggested that this "could constrain each domestic FA, and potentially reduce income streams from broadcasting and thus their ability to invest at grassroots level [but] such home nations games on free-to-air television do attract significantly larger audiences and thus potentially attract more sponsorship."

The Davies review also discussed the issue of who 'owns' important sporting events or representative teams. It reported that the Six Nations Committee said that that competition was competed by national representative teams "but it is NOT a public asset". The Davies Review expressed its view:

"It is surely though the sense that the national team, someone representing the nation (Great Britain or whichever home nation), and to some extent the major event in which they are taking part as well, are all 'owned' beyond the confines of any organisation that lies at the heart of the case in favour of protecting key events for the widest possible audience."

Committee Correspondence

The Committee has received responses from the UK Government, the Scottish Government and the SFA. These are included in Members' paper and therefore only very briefly summarised here.

UK Government Response

The key points of the UK Government's letter to the Committee on <u>18 September</u> were:

- Sports policy is devolved, it would be appropriate for the Devolved Governments to consider in the first instance whether there is currently the right balance between rights holders' ability to generate sufficient income and access for Scottish audiences to those sporting events.
- UK Government believes the current list of events works well to deliver the best outcome and that it strikes an appropriate balance, but that it is open to further review of the scheme.

Scottish Government response

The key points of the <u>Scottish Government's letter to the Committee on 18 August</u> 2025 were:

- Women and men's international football matches should be part of the listed events regime of free-to-air sporting events.
- The listed events regime is the responsibility of the UK Government and the Scottish Government engages with both Ofcom and the broadcasters to urge them to consider how they can ensure that audiences in Scotland receive the best possible level of service.
- In considering this issue one should consider the balance between the ability
 of rights holders to generate income to support their sport and the
 accessibility of sporting events for television viewing.

SFA response

The key points of the SFA's letter to the Committee on 28 August 2025 were:

 Supports the principle of making our national teams as accessible as possible to supporters across the country. Welcomes the agreement between BBC

Scotland and UEFA for men's international matches broadcast in the lead-up to the next World Cup.

- The revenue received from sale of television rights for men's international qualifying matches is single biggest revenue stream and form a significant element the SFA's total income. Listing international qualifiers would significantly reduce commercial competition and value of the rights.
- This money supports a range of activity, including:
 - Grassroots football
 - o Girls' and Women's participation and performance pathways.
 - Developing facilities across the country
 - Support the national teams
- A reduction in revenue from broadcasting rights for international football would reduce participation and development investment across Scotland

Scottish Affairs Committee

In 2023 the Scottish Affairs Committee published a <u>report on Public broadcasting in Scotland</u>.

The Committee observed that the rights to men's international football matches are highly sought after. It quoted STV who told that Committee that, for Scottish international football and other sporting events where the likely TV audience is Scotland only, although the rights are usually sold on a UK-wide basis, "there is very little prospect of a larger commercial return UK-wide, which in turn determines the level of bid that we would be able to support".

The SAC noted that Sky had come to an agreement with STV to show the men's international football team's qualification semi-final for the 2022 FIFA World Cup in June 2022, despite Sky holding the exclusive rights to broadcast the qualifiers at the time.

The SAC concluded:

"We are firmly of the view that the current lack of opportunities to watch Scottish international football on free-to-air broadcast is letting down fans in Scotland, who are at a disadvantage compared to fans in England and (for now) Wales. The UK Government must be more proactive in acknowledging and responding to the frustration this situation is causing in Scotland. We also wish to see more examples of public service broadcasters and subscription services making deals to share rights to international football and other major sporting events."

The SAC recommended that the UK Government "communicate a clear expectation" to PSBs that they should "regularly and proactively" explore options to share

broadcasting rights. The SAC continued and recommended that the UK Government "communicate to subscription services and the national sporting bodies that act as rights holders that it expects them to carefully consider the public interest benefits of public service broadcasters having a share in these rights in this way."

SAC also recommended that the UK Government "establish a review to consider options to improve free-to-air access to Scottish international football" and engage a range of broadcasters and the SFA in this process. SAC continued:

"If the review is unable to come up with effective solutions within the existing commercial rights framework, it should recommend interventions the UK Government should make to ensure more Scottish international football is available to watch free-to-air, potentially including expanding the specific Scottish events covered under the listed events regime to include not just the Scottish FA Cup final but also Scotland's World Cup and European Championship qualifiers."

The <u>UK Government's response</u> said that it would not be appropriate to take a prescriptive approach to the rights PSBs seek, given the operational and editorial independence of those broadcasters. In relation to the listing regime, the response said:

"As sports policy is devolved, it would be for the Scottish Government to consider in the first instance whether there is currently the right balance between Scottish rights holders' ability to generate sufficient income and access for Scottish audiences to those sporting events. The UK Government would then take those considerations into account.

"For sporting events not within the listed events regime, the competition organisers have, as rights holders, the discretion to consider this balance in the context of their sport. Broadcasting rights provide essential income, which enables sports national governing bodies to invest in better facilities for spectators, improve elite performance, hire the best coaches, and keep-up with mounting competition from rival sports and tournaments."

Voluntary Code of Conduct for Rights Owners

There is a voluntary code of conduct for rights holders in the UK which is supported by the <u>Sport and Recreation Alliance</u>. The code has two 'principles'—

- Accessibility: To use all reasonable endeavours to ensure that broadcast coverage of all major sporting events is available in the UK through free-to-air television broadcasts in live, recorded or highlights form and/or through digital and social media and;
- Reinvestment: To reinvest a minimum of thirty percent of the net revenue generated from the sale of UK broadcasting rights into the long-term development of their sport.

None of the football associations of Scotland, Wales or Northern Ireland are signatories of this code of conduct. Nor are the Welsh or Scotlish rugby unions.

How qualifying rights are negotiated

UEFA sells the rights to qualifying matches on a collective basis. This includes the rights for all the home nations in the UK market.

In 2022 Viaplay acquired the rights home nations' internationals for Scotland, Wales and Northern Ireland from 2024 to 2028. This included FIFA World Cup 2026 qualifiers, EURO 2028 qualifiers, Nations League matches, and international friendlies.

ITV secured the rights for the England men's national team over the same period. S4C came to an arrangement with Viaplay to provide Welsh Language coverage of the Wales men's national team.

Viaplay decided to withdraw from the UK market and this left the company holding the rights to broadcast international football but without a broadcasting platform to do so. The BBC stepped in to take on the broadcasting rights up to the 2026 World Cup. In a letter to this Committee in March, the BBC said:

"We know how important live international football is to our audience. The deal, agreed with UEFA, will include all 14 live Scotland matches, across all the European Qualifiers for the FIFA Men's World Cup 2026. Matches will be shown on BBC One Scotland and BBC iPlayer – with key fixtures also being broadcast across the UK – and will add to existing live international coverage on BBC Scotland and the BBC Sport app. The BBC's broadcast agreement also includes Wales and Northern Ireland men's international matches, the first time the broadcaster has secured live rights for all three of the UK's devolved nations."

Scotland will be a co-host for the 2028 Men's European Championships. <u>It will nevertheless be required to qualify for the tournament along with the other hosts</u> (albeit two slots are being held open for host nations that fail to qualify). How these qualifying matches will be broadcast is not yet clear.

SFA strategy and funding

Strategies

The SFA has a number of strategic documents:

- The Power of Football, an overall Strategic Plan covering 2021-2025;
- a Grassroots Strategy Football For All 2022-2025; and
- Accelerate Our Game 2021–2025, a strategy for Women's and girl's Football.

The 'Vision' and 'Mission' in The Power of Football are:

Vision: Harness the power of football to inspire the nation, transform lives and build a united and successful game.

Mission: Protect, develop and promote football for all, so current and future generations can enjoy and love our national game

There are a number of 'Gamechangers' or 'strategic pillars' underneath these aims. There are three which relate to participation:

- Accelerate the growth of girls' and women's football
- Inspire the nation through lifelong participation
- Connect Scottish football's diverse communities

Football for All also has a 'Vision' and a 'Mission'. These are:

Vision: Harness the power of football to improve the wellbeing of Scotland's communities through lifelong participation.

Mission: Lead on the collective action to remove participation barriers by influencing policy, increasing investment and improving systems so football can be accessed and enjoyed by all.

This grassroots strategy has a focus on participation in organised or club-based football, although it also contains actions on wider community assets that would support more informal involvement in the sport.

Accelerate Our Game again sets out a 'Vision' and 'Mission' for the women's game. These are:

Vision: Harness the power of women's football by changing perceptions and empowering people to inspire the nation, transform lives and build an inclusive, respected and successful game.

Mission: Protect, develop and promote women's football for all, by investing in the people, product and pathways, so current and future generations can enjoy and love our national game equally.

These strategic aims interact with the question of how international rights are sold in two potential ways. The first is that the income from the sale of international rights supports the SFA's work in pursuit of these aims; the second is whether encouraging more live international football to be on free-to-access television or streaming would support these aims.

Participation

The Scottish Government aims to increase participation in sport and physical activity. It published Physical activity for health: framework and the First Minister's foreword to the framework said:

"Recognising the many benefits of an active nation, the Scottish Government has always been committed to supporting and enabling people to be more active. ... Every part of the Scottish Government has some role to play and

both I and my Ministers are committed to working collectively across portfolios at a national level to deliver our vision.

The academic literature identifies structural barriers to participation in sport and physical activity. This includes socio-economic factors, although there is evidence that socio-economic factors affect team sports and individual activities in different ways⁴. SPICe published a briefing on <u>Getting the inactive active: Barriers to physical activity and their potential policy solutions</u>; this noted that, "the current financial climate means that significant increases to funding are unlikely, and existing real term reductions in local authority funding for sport and physical activity (PA) are expected to continue to have a negative impact upon participation" and therefore achieving the aspirations to increase participation is likely to be challenging. The briefing observed, "universal access to sport and PA [physical activity] in Scotland remains challenging with issues of social class, poverty, gender, and geography as significant barriers to sport and PA participation".

This briefing did not address whether elite sport would drive participation. A report of the Committee of Public Accounts at the House of Commons concluded in 2023 that the long-term impact of the London 2012 Olympics had "fallen short of the increase in grassroots sports and physical activity participation promised as part of the long-term legacy of the Games."

The Scottish Household Survey provides data on the population's participation in football. Football is more likely to be played by younger people and the Chart below shows the data from the Scottish Household Survey for 16-34 year olds and all adults.



⁴ Richard, V., Piumatti, G., Pullen, N. et al. Socioeconomic inequalities in sport participation: pattern per sport and time trends – a repeated cross-sectional study. BMC Public Health 23, 785 (2023). https://doi.org/10.1186/s12889-023-15650-7

SHS data indicates that there has been a trend of reducing participation in football between 2013 and 2023; this was particularly pronounced in the 16-34 age group: participation roughly halved in the period.

At the same time, the SFA reported that registered players in grassroots football in 2023 was at a record high. It said that there were 161,412 grassroots participants registered by the end of 2023 and this included 22,977 women and girls, also a record.

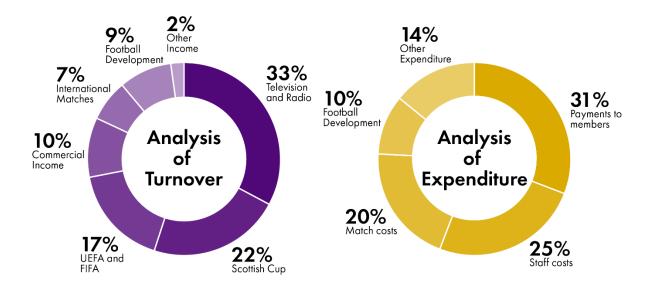
The SHS and the SFA are measuring different things. The SHS asks if a respondent to a survey has played football in the past 4 weeks. It is up to the respondent to interpret this, but it seems likely that this would include informal games as well games or training as a registered player at a club. The SHS also does not provide data for children under 16. The SFA reported data on all those registered at clubs in 2023, of whom over 60% were under 18.

Funding/Accounts

The latest <u>annual accounts posted by the SFA cover the 2024 calendar year</u>. This reported that the turnover of the SFA in that year was £78.7m, up from £57.1m in 2023 and the profit of the association after tax was £5.5m, up from £1.5m in 2023. The reported reserves of the SFA at the end of 2024 was £16.2m (2023: £11.1m). The SFA reported that the total distribution to member clubs and affiliated national associations for the year was £15.5m (2023: £15.4m). The SFA described this as the "best ever financial performance" for the association.

The SFA does not report specifically on the income it receives from broadcasting deals for international football or the Scottish FA Cup. Previously the <u>SFA would also publish annual reviews</u> which would provide more detailed information on this. The most recent annual review covers 2019 an provided an analysis of the source of income and purpose of expenditure for the period 2014-2018.

SFA: Turnover and Expenditure 2014-2018



This shows that around 33% of the SFA's income for that period came from "television and radio" in 2014-2018. The total reported revenue for those years was £181.7m. This would suggest that the total income in that five-year period was in the region of £60m or around £12m a year. As members will recall from earlier in this paper, the SFA suggested to the Davies Review in 2009 that if international qualifiers were listed, "the shortfall to Scottish football could be up to £12million per year".

The SFA received funding from the Scottish Government through a number of schemes. The SFA receives funding through the Cashback for Communities scheme. Over the period of 2023-26, the total grant to the SFA was £1.6m.

The SFA delivers the Extra Time initiative which provides free after school and holiday clubs for families on low incomes. The Scottish Government in June announced in June that it was increasing the annual funding of this programme this year to £5.5, up from £4m last year.

The SFA has also receives grants from the UK Government. In March 2025, the Department of Culture, Media and Sport awarded £8.6m in the current financial year to the SFA to support its Pitching In campaign. The SFA indicated that this year it was also providing £5m and overall the programme aims to invest £50m into facilities improvements by 2028.

Sportscotland reports on the funding it provides to national bodies annually. In 2024-25 it granted £1.35m to the SFA along with £0.46m of 'Additional Investment' into the sport. Additional investment can include Direct Club Investment, Awards for All and the Sports Facility Fund. The SFA and SPFL wrote to the Health, Social Care and Sport Committee last week. The letter said:

"We remain committed to working with all partners to make Scotland a true sporting nation. Both the Scottish FA and the SPFL maintain regular engagement with government and partner agencies. The Scottish FA's partnership agreement with sportscotland covers participation, welfare, facility

access and affordability, supported by structured communication between national and regional teams."

Ned Sharratt, Researcher (Education and Culture), SPICe

Date: 21/10/2025

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The Scottish Parliament, Edinburgh, EH99 1SP www.parliament.scot

Annexe B

Letter from Ian Maxwell, Chief Executive, Scottish Football Association

Sporting Events of National Interest

Thank you for your letter dated 27 June 2025 regarding the potential expansion of the Listed Events regime to include Scotland Men's A World Cup and European Championship qualifying matches.

The Scottish FA fully supports the principle of making our national teams as accessible as possible to supporters across the country, and we welcome the recent agreement between BBC Scotland and UEFA, which will see men's international matches broadcast free-to-air in the lead-up to the next World Cup. This is a positive step for the visibility of our national teams. However, any proposal to include qualifying matches under Group A of the Listed Events regime must be considered carefully given the significant commercial implications for Scottish football.

The revenue received from sale of television rights for men's international qualifying matches, including World Cup and Euro Qualifiers, as well as Nations League matches, has enabled the Scottish FA to benefit from a stable and substantial revenue stream since the rights were centralised by UEFA.

These rights are the association's single biggest revenue stream and form a significant element of our total income, which allows us to invest into the game at every level.

These revenues directly support:

- Grassroots football including but not limited to: coach education & development, club development, and our community programmes.
- Girls' and Women's enabling record growth in participation and performance pathways.
- Facility Development ensuring that we improve the quantity and quality of football and community facilities across the country via our Pitching In campaign.
- National teams enhancing support structures for both men's and women's squads, from youth to senior level.

Adding all men's A qualifying matches to the Listed Events list would significantly reduce commercial competition and value, reducing broadcast revenue from UEFA for the sale of rights to FTA broadcasters only.

If not subsidised by other means, it would have the inevitable consequence of reduction in participation and development investment across Scotland. This cannot be the Scottish Government's intention.

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We are committed to working with all stakeholders to ensure that football remains accessible while also safeguarding the financial sustainability of the game in Scotland. We would welcome feedback from the Committee on how these objectives can be balanced effectively.

Thank you again for the opportunity to contribute to this important discussion.

Yours sincerely

Ian Maxwell

Chief Executive

Annexe C

Letter from Angus Robertson MSP, Cabinet Secretary for Constitution, External Affairs and Culture, Scottish Government

Sporting Events of National Interest

Thank you for your letter of 27 June 2025 regarding sporting events of National interest.

As you may be aware from what the Scottish Government has set out on this issue, and which I have set out in the Scottish Parliament, the Scottish Government recognises the public support for increased coverage of Scottish football games and we would like a wider range of Scottish sport to be broadcast.

Our view is that women and men's international football matches should be part of the listed events regime of free-to-air sporting events. This is a matter that the Scottish Government has previously argued for, including in our representations on the draft Media Bill. We will continue to strongly support expanding the offer for audiences to enjoy Scottish international football and other major sporting events on free-to-air broadcast TV.

As you are aware, broadcasters are independent from government and the right to broadcast sport is subject to commercial arrangements between broadcasters and the rights holders. Although the Scottish Government cannot influence access rights, and the listed events regime is the responsibility of the UK Government, we maintain a close interest in audience and stakeholder views in Scotland and we meet regularly with representatives of the regulator Ofcom and the broadcasters to urge them to consider how they can ensure that audiences in Scotland receive the best possible level of service.

As you highlighted in your letter, the BBC has agreed a deal to broadcast all Scotland's men's international football matches in the run-up to the FIFA Men's World Cup 2026. While programming decisions are for the BBC, the Scottish Government recognises the public support for increased coverage of Scottish football games and we welcome this outcome, which is great news for the many football fans across Scotland.

While this outcome is a positive step, this does not, as you set out in your letter, offer a long term solution to the issue. It is our view that a fairer and more representative approach is required for the long term. That is why we continue to maintain a close interest in audience and stakeholder views in Scotland, and I and my Ministerial colleagues will continue to represent Scottish interests across broadcasting and sport so that Scottish audiences are receiving the best possible service now and into

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the future. The Scottish Government remains focussed on representing those interests in our engagement with broadcasters, Ofcom and the UK Government.

In coming to a conclusion on what a longer term approach might look like, we do also need to be cognisant of the income from the sale of television rights which the Scottish FA receives and which is used to support the growth and development of the game in Scotland, and the right balance needs to be struck between the ability of rights holders to generate income to support their sport and the accessibility of sporting events for television viewing.

As I have set out in the Scottish Parliament, we could consider these matters more fully if the Scottish Parliament was in charge of broadcasting. We strongly believe that broadcasting decisions which impact audiences, and wider culture and sport in Scotland, should be determined by the Scottish public through the Scottish Parliament.

Yours Sincerely

Angus Robertson

Annexe D

Letter from Stephanie Peacock MP, Minister for Sport, Tourism, Civil Society and Youth, UK Government

Sporting Events of National Interest

Thank you for your letter of 27 June 2025 to the Secretary of State for Culture, Media and Sport about Sporting Events of National Interest.

I am responding as the Minister responsible for sport policy to set out the UK Government's position regarding adding Scotland's World Cup and European Championship qualifiers to Group A events, under the Broadcasting Act 1996.

The UK Government recognises the importance of broadcasting certain sporting events, including the World Cup and the European Championships, to attract significant audience interest. The current listed events regime is designed to ensure that sporting events of national significance are available to as wide an audience as possible, by prohibiting exclusive broadcasting of the event without prior consent from Ofcom. We understand the role of our public sector broadcasters in bringing the nation together for big sporting moments.

Listing does not guarantee that an event will be broadcast live or on a free-to-air channel. Rights holders are not required to sell live rights for listed events, and free-to-air broadcasters are not obliged to purchase them as rights holders and broadcasters are independent of the Government.

In your letter, you note that the BBC has secured an exclusive deal to broadcast Scotland, Wales and Northern Ireland's men's international football in the run-up to next year's World Cup. As this example demonstrates, an event not being listed as either Group A or Group B does not prevent a rights holder from selling full live coverage rights to free-to-air broadcasters.

Given sports policy is devolved, it would be appropriate for the Devolved Governments to consider in the first instance whether there is currently the right balance between rights holders' ability to generate sufficient income and access for Scottish audiences to those sporting events. The UK Government would then take those considerations into account.

Based on all of this, the UK Government believes the current list of events works well to deliver the best outcome and that it strikes an appropriate balance. We will, of course, keep this under review. We would also like to wish Scotland the best of luck in the World Cup Qualifying campaign.

Annexe D

Yours Sincerely

Stephanie Peacock, Minister for Sport, Tourism, Civil Society and Youth

CC. The Rt Hon Douglas Alexander MP, Secretary of State for Scotland