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For the attention of
Kirjaamon yhteystiedot
Markets Unit of Services Department
Ministry of Transport and Communications
PL 31 / P.O. Box 31
00023 Valtioneuvosto / FI00023 GOVERNMENT

Your reference
VN/11082/2020

Your correspondence of
15 May 2020

Our reference
LCOM/ACE/SPY

Date
15 June 2020

Dear Sirs,

Assessment of the need to update the list of events of major importance for society: response by the Union of European Football Association (UEFA)

We refer to your email of 15 May 2020 (and the attached memo) regarding the assessment of the need to update the list of events of major importance to society in Finland (the "**Events List**") and our other correspondence in respect of this matter.

At the outset, we wish to thank the Ministry of Transport and Communications for including us within the assessment process and welcome the opportunity to make some initial comments in respect thereof.

In this regard, we are conscious that this is the initial stage of the consultation process and so, at this point, we are not proposing to make any detailed submissions, particularly given concrete proposals for changes to the list have not yet been made and it, therefore, remains unclear whether any UEFA competitions will be affected. However, given the reference in the abovementioned memo to women's sport and the criterion of the Commission set out in paragraph (iii) of your memo (which refers to national team participation in the relevant events), we have assumed, for the purposes of these initial comments, that there is a possibility that some or all of the UEFA European Women's Championship (the "**Women's EURO**") may be proposed to be included in the Events List going forwards. Therefore, in the first part of this letter, we set out some preliminary observations regarding this possible inclusion.

We also note that, as at today's date, the only UEFA competition currently included in the Events List is the UEFA European Football Championship ("**EURO**"). Accordingly, in the second part of this letter, we have made a brief submission relating to the inclusion of this competition in the Events List.

Women's EURO

Before making specific comments relating to any possible listing of the Women's EURO, we thought it would be helpful to provide you with an update as to where the women's game now stands in Europe and how UEFA has put the game's development at the heart of its strategy. We will then set out some initial views on how any listing of the Women's EURO would put this development and progress at risk.

As you are no doubt aware, the women's game is currently seeing exponential growth in terms of exposure, popularity and revenues both domestically and internationally. We believe that our efforts in this regard have helped to underpin that growth. These include the establishment of a department at UEFA devoted exclusively to the women's game, the transformation of the UEFA Women's Champions League Final into a single match at a venue independent of the men's final and the unbundling of the sponsorship rights to women's football from the men's game (with the Women's EURO forming a key part of that package of rights). With these (and other) efforts, we hope and expect that the women's game (in all formats) will continue to become ever more significant parts of the overall football calendar.

In addition, UEFA took the prioritisation of the women's game a step further in 2019 when, as part of our five year plan for the sport generally, we adopted a comprehensive strategy to grow the women's game known as "Time for Action" (a copy of this strategy is attached at the Appendix to this letter (the "**Women's Football Strategy**")). You will see from the foreword to that strategy from the UEFA President that UEFA has the core aim of "championing, innovating and accelerating women's football".

In this regard, although UEFA has committed to putting significant financial investment (namely, €50 million over five years) into the women's game (as set out in the abovementioned foreword to the Women's Football Strategy), it is also the case that, to date, the commercial revenues deriving from women's football have not been sufficient to cover the ongoing costs of the delivery of the women's competitions. This is a not insignificant amount of money given, for example, the costs associated with the staging of the Women's EURO. Accordingly, the men's game has effectively been required to make up the shortfall and then contribute the entirety of the investment in all additional projects and initiatives designed to advance the women's game. We are also deeply conscious of the possible impact of COVID-19 upon the sport given it may be particularly vulnerable to the economic fallout from the pandemic as a result of possible lower attendances and reduced broadcaster budgets for media rights. Its growth and journey to becoming a strong and viable product are now, therefore, more at risk than ever.

Given the above, UEFA's core aim is to make the women's game a more financially sustainable proposition in its own right. The strategy for achieving this is set out in the Women's Football Strategy and we would kindly ask that you read this in order to understand further our approach to the women's game. Critically, UEFA has a carefully-crafted plan to grow and promote it so that, in due course, it can effectively "stand on its own two feet". In other words, we want to get to a place where women's football has its own inherent value and contributes to the wider football ecosystem.

In our view, the development of the women's game requires a careful balance to be struck between, on the one hand, its promotion and exposure and, on the other hand, the need to ensure that a strong and sustainable financial model is established to support it. At its heart, UEFA is a sports governing body with

a duty and responsibility to grow and nurture all forms of the game and at all levels. We, therefore, believe it is UEFA itself who is best placed to determine the best way to implement this strategy without external influence or regulation. To be clear, this would mean that, in terms of free-to-air exposure, UEFA would continue to exercise its own good judgment to ensure that, across Europe (and as has historically been the case), the public is not deprived of access to the Women's EURO regardless of whether or not a listed regime has been implemented in the country in question.

Even before the impact of the COVID-19 pandemic, we were at a critical and delicate stage of the development of the women's game. Now, more than ever, we strongly believe it would be counterproductive for the Women's EURO to be listed in any way because, from a revenue and funding perspective, it would remove the ability of UEFA to structure its media rights arrangements around the world (including in Finland) in such a way as to optimise revenues whilst ensuring the women's game develops in terms of audience and popularity. In this regard, the key issue is that any listing limits the number of prospective bidders for the media rights to the relevant event. This reduces competition which consequently limits the potential growth of investment in the competition. In other words (and applied to the women's game), the imposition of an artificial barrier to competition means the market does not operate naturally with a negative impact on the possible revenues which might flow into women's football at exactly the time when UEFA, and the women's game in general, is seeking to take advantage of the recent successes in building the sport and overcome any possible negative commercial consequences of COVID-19. Although we agree and accept that exposure is a critical component in the development of the sport, the creation of a sustainable financial model is also important and UEFA, being best placed to determine how those factors are balanced (as described above), should not be artificially and unnecessarily restricted from implementing a strategy which achieves those aims and allows women's football to grow and become self-sufficient.

In addition to our general observations above as to why the listing of the Women's EURO is unnecessary and would be counterproductive, we would also take the opportunity to question whether, notwithstanding the efforts of UEFA mentioned above (and taking into account the core criteria for listed events set out in the memo), the Women's EURO has today established itself as an event of such national and cultural significance (and special "resonance") that it should be included in the Events List (whether in whole or part). At this stage, we simply do not believe it has the "take-up" or audiences for it to be genuinely stated to be an event which serves as a "catalyst of cultural identity" (see paragraph (ii) of the Commission's criteria in your memo). In this regard and prior to any concrete proposals for additions to the Event Lists being made, we shall not develop these points further (with, for example, audience data) but would reserve the right to do so in due course.

UEFA European Football Championship

As set out in your memo, the opening match, quarter-finals, semi-finals, final and the matches of the Finnish team in the EURO currently form part of the Events List. For reasons similar to those set out above in respect of the Women's EURO, our view is that EURO should be removed in its entirety from the Events List. As set out above in respect of the Women's EURO, UEFA has, in practice, adopted its own policies to ensure that the public is not deprived of access to EURO. Again, this approach is applied across Europe irrespective of any listed events regime which may or may not be in place. In other words, there is no

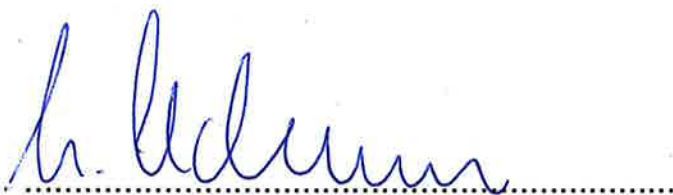
need to have legislation in place to ensure free coverage of EURO – we would ensure this as a matter of course anyway – a fact demonstrated by the fact that UEFA has, in practice, licensed the *entirety* of the editions of the EURO in 2012, 2016 and 2020 to YLEISRADIO OY for full free-to-air broadcast in Finland (the 2012 edition being via an arrangement with the European Broadcasting Union).

If EURO is not to be removed from the Events List, we feel strongly that there should be no further expansion of that list to include the remaining matches of EURO. This is not only for the reasons set out above but also because none of the Commission criteria set out in your memo as “indicators of importance to a Member State’s society” are met in respect of those remaining matches. In this regard, we do not think EURO should be treated as a single “event” and that each match should, for these purposes, be assessed individually. Accordingly, a match between Wales and Switzerland as part of EURO 2020 would, for example, not have any “special resonance” with, or a “distinct cultural importance” to, the Finnish population. Self-evidently, such a match would also not feature the Finnish national team or be traditionally on free-to-air television and command “large television audiences”. It is, therefore, our firm view that, if EURO is not to be removed in its entirety from the Events List, there should be no further expansion of the number of matches included within it.

Our understanding and belief, as at today’s date, is that no other UEFA competition is under consideration as part of the assessment process and we have, therefore, not included any other UEFA competition in these initial observations. You will understand, however, that we need to reserve our right to make submissions in respect of any other UEFA competition if it were ultimately to be included in the proposals later this year.

We hope that the content of this letter is of assistance and would, of course, be happy to discuss any aspect of it – just let us know. If you have any immediate follow-up questions regarding any aspect of it, please do not hesitate to contact, in the first instance, Simon Parry, Head of Legal – Media Rights at simon.parry@uefa.ch. Otherwise, we look forward to hearing from you again in when the next stage of the process is launched.

Yours faithfully,



Lukas Achermann
Managing Director of Business Affairs

Enclosure(s)

Women’s Football Strategy