



Sent by e-mail only:

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For the attention of
Kirjaamon yhteystiedot
Markets Unit of Services Department
Ministry of Transport and Communications
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Your reference
VN/19971/2020

Your correspondence of
15 October 2020

Our reference
LCOM/SPY

Date
12 November 2020

Dear Sirs,

Update to list of events of major importance for society: further response by the Union of European Football Association (UEFA)

We refer to:

- your email of 15 October 2020 (and the attached documentation) in which you confirmed the proposed updates to the list of events of major importance for society in Finland including the addition of the opening match, quarter-finals, semi-finals and final of the UEFA European Women's Football Championships (the "**Women's EURO**") as well as the matches of the Finnish team in that competition (the "**Events List Proposal**"); and
- our initial submission to you in respect of this matter dated 15 June 2020 (the "**First Submission**").

Before turning to our views on the Events List Proposal, we would like to thank you once again for allowing UEFA to participate in this process – it is very much appreciated.

Having now considered the Events List Proposal in detail (as well as the accompanying documentation), we note that, in fact, we had largely anticipated the proposed inclusion of all or part of the Women's EURO in the First Submission and have already submitted our key views on this proposal in that document.

We shall not, therefore, repeat those positions in this letter but should be grateful if you would consider that the content of the First Submission (so far as it relates to the Events List Proposal) is effectively re-submitted to you in this letter for your consideration.

The only exception to the foregoing is that, consistent with the position taken in the First Submission, we do not accept the conclusion in Section 4 of the memorandum dated 7 October 2020 relating to the Government Decree amending the Government Decree on Television and Radio Operations in respect of *"Impacts on rightholders and on the markets for broadcasting rights"*.

In particular, we fully reject the view that *"the proposed measures will not have a significant impact on the market for broadcasting rights in Finland for the events to be added to the list."* The full reasoning behind our rejection of this conclusion is set out in detail in the paragraph of the First Submission which commences with the words *"Even before the impact of the COVID-19 pandemic..."* but, in summary, the implementation of the Events List Proposal would clearly reduce competition for the media rights to the Women's EURO with a concomitant negative impact on revenues. That loss of revenue threatens both the ability of women's football to become self-funding and to develop in its own right. We would repeat that UEFA has the interests of the women's game at heart and has a detailed plan to sustainably establish the sport and give it both the exposure and revenues it needs. It is our firm view that, as the governing body for the sport, it is UEFA who is best placed to achieve these aims and that external measures are unnecessary and potentially counterproductive for the reasons explained.

As previously, we would, of course, be happy to discuss any aspect of this letter or the First Submission – just let us know. If you have any immediate follow-up questions, please do not hesitate to contact Simon Parry Head of Media Rights Legal Services at simon.parry@uefa.ch.

Otherwise, we look forward to hearing from you again with an update in due course.

Yours faithfully,

UEFA



Lukas Achermann
Managing Director of Business Affairs