

Final stage impact assessment

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This Impact Assessment supports the Sporting Events Bill (the Bill). In line with the Better Regulation Framework, this assessment is proportionate to the anticipated impacts of the Bill's provisions. The Bill does not in itself impose any direct costs or restrictions on businesses or households. Instead, it establishes the legal framework under which such measures could be introduced. Any direct or indirect costs would arise only if, and when, secondary legislation is brought forward under this framework to implement specific measures for future, time-limited sporting events, and only where those events meet the criteria set out in the Bill and are hosted (at least partly) within the UK.

The anticipated impacts on businesses and households are expected to be de minimis (below the +£10 million Equivalent Annual Net Direct Cost to Business (EANDCB) threshold) as:

- Any costs will be incurred when making secondary legislation, not this Bill. The Bill's provisions are designed to enable the making of regulations which will prohibit unauthorised commercial activities (for example, ambush marketing and ticket touting), to help protect the market for rights holders and official event sponsors and partners. Impacts on businesses not associated with the event are expected to be minimal and mitigated by the proportionate, time-limited nature of the provisions, and in the case of the advertising and trading measures, their highly localised nature.
- The Bill is expected to have a positive, non-monetised (or difficult to monetise) impact on households by restricting exploitative secondary ticketing, improving access to tickets to major sporting events at prices determined by the event organiser/owner.

1. Introduction

Major sporting events drive significant economic benefits, for example, Birmingham 2022 Commonwealth Games generated approximately £1.2 billion Gross Value Added of UK economic output and nearly £80 million of social value¹. The Sporting Events Bill will establish a legislative framework designed to reduce reliance on bespoke primary legislation by enabling the implementation of event-specific provisions through secondary legislation. In the first instance, it will enable governments to meet their obligations for hosting the UEFA Men's European Football Championship 2028 (EURO 2028)². This framework will also enhance the UK and devolved governments' readiness for events such as the FIFA Women's World Cup (F2035™) and the World Athletics Championships (WAC) 2029, the hosting of which is subject to the results of ongoing bid processes. Analysis in this Impact Assessment is based on the assumption that these events *would* be hosted in the UK in order to illustrate the impacts of the framework legislation. This is not intended to prejudice or prejudice the ongoing bidding processes.

Historically, hosting major events has necessitated the introduction of bespoke primary legislation, such as the London Olympic Games and Paralympic Games Act 2006 and the Birmingham Commonwealth Games Act 2020. As part of the UK and Ireland's successful bid to host EURO 2028, legislation is needed to deliver the suite of enhanced commercial protections required for the tournament. The Sporting Events Bill will provide an "event-agnostic" framework for the application of such provisions to EURO 2028 and, where proportionate to do so, to subsequent future major sporting events.

This Bill will include 'framework' provisions that may be activated for specified events via secondary legislation, subject to defined criteria to determine their applicability, and where required to meet government guarantees or support operational requirements. These provisions include:

- Prohibitions on the unauthorised sale of tickets; unauthorised advertising and trading in and around designated event zones; and, unauthorised association with an event.
- Transport powers to support event delivery.
- A funding power to support bodies responsible for delivering events taking place wholly or partly in England, where no Union-wide benefit arises.

The Bill will provide for event-specific detail, such as the time period during which the provisions apply, the locations affected, and any necessary exceptions to be set out in secondary legislation.

¹<https://www.birmingham2022.com/news/3959746/birmingham-2022-commonwealth-games-contributed-1-2bn-to-the-uk-economy>

² The Scottish Government will rely on the powers in the UEFA European Championship (Scotland) 2025 for EURO 2028.

2. The case for proposed regulation

2.1 The Problem Under Consideration

Major sporting events drive significant economic benefits, for example, in 2023 alone, UK Sport supported events generated £373 million in direct economic impact leveraged from a public investment of just £10.8 million, representing a more than 6:1 return on investment.³ However, these events also give rise to a consistent set of market failures and regulatory challenges. Across nearly all major international events there are risks relating to ambush marketing and unauthorised ticket resale. The biggest international sporting events require hosts to have, or put in place, additional protections, to mitigate these risks. Without targeted legislation, these issues create regulatory uncertainty and delivery risk. This Bill provides a framework to enable the timely and efficient implementation of event-specific legislation, through secondary legislation, to address these issues.

International sports governing bodies (such as UEFA, FIFA, and the International Olympic Committee) routinely require host governments to provide guarantees covering areas including advertising and trading controls, ticketing arrangements, transport management, and protection of commercial rights. These guarantees are required precisely because existing legislation does not adequately address the market failures associated with major sporting events. If the UK cannot provide the legal assurances, it may risk not securing hosting rights and forgoing the associated economic, social and reputational benefits.

Historically, the government has brought forward bespoke, event-specific primary legislation to meet these requirements (for example, the London Olympic Games and Paralympic Games Act 2006 and the Birmingham Commonwealth Games Act 2020). Whilst the current approach of making bespoke primary legislation after an event had been awarded has still enabled the UK to host major events, it has created a reactive and resource-intensive model which introduces regulatory uncertainty during bidding processes. In a competitive global environment, host nations are increasingly expected to demonstrate in advance that they can provide the necessary legal assurances. Given that there are strong commonalities in the provisions required for such events, we consider that the legislative environment could be improved by taking a more proactive, efficient approach. Bringing forward event-specific primary legislation is sub-optimal in a competitive global bidding environment, where host nations are expected to proactively provide certainty and assurance over their ability to deliver rights holder requirements.

The key policy gaps are set out below:

- **Advertising and Trading:** Existing UK legislation does not provide sufficiently targeted or time-limited powers to regulate advertising and street trading at the scale and intensity required for major sporting events. Existing general intellectual property, advertising, and street trading legislation is designed for ongoing activity, not short-term, high-profile international sporting events concentrated in specific locations with significant domestic and global significance and appeal.
- **Unauthorised Association:** Current laws do not adequately prevent ambush marketing by association, where non-sponsor companies can use innovative and

³ UK Sport (2024) Value of Events Report 2023: £373 million in direct economic impact to the UK - <https://www.uk sport.gov.uk/news/2024/03/06/value-of-events-report-2023-launched-alongside-the-sports-cons ultancy>

creative tactics to mislead the public into thinking they are officially connected to the event without directly infringing the event's intellectual property (for example, via the use of registered trademarks). This creates a free-rider problem, where commercial actors benefit from the exposure and reputation of an event without contributing to costs, thereby distorting incentives for sponsorship investment.

- Ticketing: The current legislative landscape in the UK does not generally prohibit the unauthorised resale of tickets to different sporting events, whether individual or multi sport, and only prohibits resale of tickets in England and Wales for designated football matches for public order reasons. It should be noted that government has proposed a series of consumer protection measures for ticket resale for the wider live events sector, including a resale price cap and stronger obligations and penalties for secondary ticketing platforms. As a result of demand and reputational risk, rights holders usually require a near total prohibition on the unauthorised resale of tickets, which requires a more stringent legislative approach, where the majority of resale activity is prohibited, not just that carried out with a view to making a profit.
- Power to Fund: There is no single, authoritative funding power for the UK government to directly provide Exchequer funding for major sporting events taking place wholly or partly in England, where no Union-wide benefit arises. While bespoke acts for the Olympics and Commonwealth Games included financial powers, other events have relied on a combination of existing but limited powers (e.g. the Physical Training and Recreation Act 1937 and the Local Government Act 2003).
- Transport: Existing transport legislation, particularly the Road Traffic Regulation Act 1984, does not provide sufficient flexibility for the scale, duration, and complexity of major sporting events. Time limits and procedural requirements for temporary traffic regulation orders are often incompatible with event delivery needs and bespoke legislative provisions are needed to support operational delivery.

2.2 Why is government action or intervention necessary?

Major sporting events generate significant positive externalities, including economic activity, international visibility, and community benefits, but also impose temporary negative externalities such as traffic disruption and commercial exploitation by non-sponsors. Private and public actors can lack the authority to manage these impacts effectively without statutory powers.

The attractiveness of sponsorship deals for such events often relies on strong legal protections. Without intervention to address ambush marketing, and unauthorised ticket resale, private incentives to invest are weakened, increasing the likelihood of greater reliance on public funding.

By providing framework legislation, the UK will be able to make credible and timely commitments during bidding processes. If the UK cannot provide clear legal assurances over commercial rights and operational delivery, it is unlikely to secure the right to host major sporting events at all. Government intervention through a standing legislative framework is therefore necessary to address these failures efficiently and proportionately.

2.3 What gaps or harms would occur if government doesn't intervene?

In the absence of government intervention, several harms would persist or intensify.

The UK would continue to rely on bespoke primary legislation for major sporting events. This inefficient approach increases impact on government resources, increases delivery risk if legislation is delayed, and creates uncertainty for rights holders and delivery partners.

The UK's international competitiveness as a host nation could be weakened. Countries such as Australia and New Zealand already operate framework legislation that enables them to respond quickly and confidently to rights-holder requirements. Without similar powers, the UK risks being perceived as a higher-risk or less agile host.

Ultimately, failing to secure major events will lead to a significant erosion of the UK's status as a global leader in hosting, along with the diverse benefits this status provides⁴. This includes not only the immediate loss of direct trade and inward investment, but also reduced tourism and local consumer spending, which directly impacts event related jobs and national economic activity. Furthermore, the UK risks a weakened soft power profile through a reduced global presence and a diminished international reputation. Without a credible framework capable of addressing ambush marketing, unauthorised ticketing resale, the UK may be unable to secure hosting rights in the first place, therefore likely forgoing the associated economic, social and reputational benefits.

Permitting ticket sales through third-party platforms enables external sellers to profit from events without sharing their costs, weakening sponsorship value and potentially discouraging private investment. This increases the likelihood of greater reliance on public funding, resulting in increased demands on the public purse as the government may need to commit additional financial support, thereby increasing costs to the taxpayer.

Gaps in ticketing regulation, which enable tickets to be sold at uncapped prices on the secondary market, can enable market distortions and put money into the hands of exploitative touts, reducing access for fans.

The absence of tailored powers for transport, traffic management and street trading increases the risk of congestion and impedes the safe and easy flow of spectators, with potential reputational damage to host cities. These negative externalities can reduce the long-term economic and social benefits that major sporting events are intended to deliver.

While previous governments have addressed these issues through event-specific Acts, that approach is a consequence of the need to correct these market failures and meet the guarantees the government promised to the event rights holders. A single framework is a more efficient and certain mechanism for delivering the necessary protections, but the fundamental case for the Bill is that, without these powers, the market failures would persist and the UK would be less agile, unable to implement event-specific legislation in time for upcoming major sporting events, such as EURO 2028.

⁴ UK Sport (2023) New report reveals economic and social benefits of the UK hosting sporting events - <https://www.uk sport.gov.uk/news/2023/01/12/new-report-reveals-economic-and-social-benefits-of-the-uk-hosting-sporting-events>

3. Summary of long-list and alternatives

This section first outlines the appraisal of the event agnostic approach, comparing the recommended framework approach against the alternatives, such as doing nothing or continuing with bespoke primary legislation for each event. Following this, there are details of long-list options considered for each individual policy area that makes up the Bill: ticketing; advertising and trading; unauthorised association; transport; and the funding power.

3.1 The Framework Approach

The Rationale for Government Intervention

The Bill provides a flexible legislative framework to enable the UK and devolved governments to deliver major international sporting events. Current UK legislation does not fully meet the needs of international rights holders, meaning event-specific primary legislation has historically been necessary. This fragmented approach increases delivery risk, can create uncertainty for rights holders and delivery partners and is no longer fit for purpose in a competitive global environment. This framework approach corrects these market failures efficiently by internalising regulatory costs and streamlining the legislative process. The framework allows the UK to offer legally certain, event-specific protections for ticketing, advertising, trading, and unauthorised association.

Application of the provisions will be flexible and event-specific, using secondary legislation to tailor the scope, timing, and locations affected. This approach allows governments to respond proportionately to the scale and risks of each event, while maintaining core protections across the UK.

Theory of Change

Input

- The Bill, provides a flexible legislative framework for major sporting events

Activities

- Identify the provisions required for each event
- Plan and coordinate measures
- Apply tailored provisions proportionately through secondary legislation for each event
- Engage with enforcement authorities, local government, and delivery partners to ensure clear understanding and operational readiness

Outcomes

- Organisers, sponsors, and enforcement authorities gain clarity on the legislative options available, enabling more informed operational planning
- Secondary legislation allows the framework to be applied flexibly to meet event-specific needs
- Administrative and legislative burdens are reduced by avoiding repeated primary legislation.

- Events rights holders have greater confidence that their commercial and operational requirements can be met.

Long-term Impact

- The framework supports a more efficient, coordinated, and proportionate approach to enacting the requirements of major sporting events. It enhances the UK's credibility when bidding for and hosting such events, provides operational and legal certainty to delivery partners, and ensures that commercial and operational measures can be reliably applied.

Assumptions

- Uptake: Governments and delivery partners will use the framework effectively to plan and implement event-specific measures based on the requirements of event rights holders
- Proportionality: Secondary legislation will be applied in a manner consistent with the scale of the event
- Events Rights Holders: Rights holders will recognise the framework as providing sufficient legal certainty to meet their commercial and operational requirements.

Theory of Change (logic chain)

Standing legislative framework → enables flexible application through secondary legislation → supports planning and operational coordination for each event → reduces reliance on bespoke primary legislation → lowers legislative and administrative burden → provides a predictable mechanism for managing major sporting events → supports rights holders, organisers, and enforcement authorities in event delivery.

SMART objectives for intervention

SMART Objectives

Specific: Establish a permanent legislative framework to support the delivery of sporting events in the UK, with the ability to apply targeted provisions in relation to ticketing, advertising, trading, unauthorised association, and transport. The powers to make event specific regulations are to be used proportionately and only where necessary to protect commercial rights and support operational delivery.

Measurable: Success will be measured by the evaluation of the framework legislation and its application to EURO 2028 and future events, ensuring that the relevant provisions are effectively applied in accordance with event requirements and guarantees provided. The removal of the need for event-specific primary legislation will also be tracked as a key outcome. Feedback from organisers and enforcement authorities following events where the framework is applied will provide qualitative evidence of effectiveness, alongside quantitative data on enforcement action.

Achievable: The objective is achievable because the framework builds on existing regulatory powers and collaborative governance arrangements between the UK government and devolved governments for the delivery of major sporting events. It replicates and streamlines previous successful approaches used in bespoke legislation, taking into account lessons from their implementation.

Relevant: Providing this framework aligns with the government's priority to support the UK's world-class sport sector by enabling the hosting of major international sporting

events that deliver significant economic, social, and cultural benefits. It also helps deliver commitments made to rights holders in relation to such events.

Time-bound: The framework legislation is anticipated to be in place in good time ahead of EURO 2028, with the required statutory instruments laid and in force in sufficient time to ensure operational readiness ahead of the tournament. These statutory instruments will be in force for the shortest possible duration driven by event-specific requirements.

Description of options considered

The options were assessed against a set of Critical Success Factors (CSFs) derived from the policy objectives and operational requirements of major event delivery. The CSFs used to filter options were:

- **Legal certainty:** Ability to provide a clear, consistent, and enforceable statutory basis for measures required to support the delivery of a range of major sporting events
- **Deliverability:** Ability to enable timely and coordinated planning, consultation, and implementation of measures with organisers, sponsors, and enforcement authorities without requiring bespoke legislation for each event.
- **Proportionality:** Ability to be flexible and scalable, minimising unnecessary administrative burden, and avoiding duplication of primary legislation across multiple events.
- **Repeatability:** Ability to support successive events over time, providing a consistent, reliable, and replicable model for event delivery, reducing legislative risk, and increasing the UK's credibility with, and attractiveness to, international rights holders.

Option 1: Do Nothing

Under this option, the government would make no legislative changes and would rely on current laws and regulations when hosting major sporting events. This would require no new legislation, impose no additional regulatory burden, and avoid the costs associated with developing and implementing new statutory powers. It would maintain the current legal environment and preserve parliamentary time in the short term.

However, doing nothing would leave legislative gaps unaddressed. Existing UK law does not fully deliver the protections required by rights holders such as FIFA, UEFA, and the IOC. Without legislation, the UK would risk not meeting the hosting commitments for EURO 2028 and ability of the UK to host future events.

Summary against Critical Success Factors: This option performs poorly against all CSFs. It provides limited legal certainty, relies on ad hoc implementation (low deliverability), offers no scalable or proportional approach, and cannot be reliably repeated across multiple events.

Option 2: Non-regulatory approach

Under this option, the government would seek to address the requirements of major sporting events through voluntary agreements between event organisers, sponsors, ticketing platforms, advertisers, local authorities, and enforcement bodies, alongside government guidance encouraging compliance with event-specific requirements.

Such an approach would utilise collaboration with online marketplaces and ticket resale platforms to discourage unauthorised resale, voluntary codes of practice for advertisers

and traders around event venues, and partnership working with local authorities and organisers to manage commercial activity and transport operations during events.

While this approach would avoid the introduction of new legislation and associated regulatory burdens it was not considered a viable option. It would not provide legal certainty for rights holders and enforcement authorities, and would not provide a clear statutory basis for enforcement activity where breaches occur.

Summary against Critical Success Factors: This option provides moderate deliverability through partnership working but fails on legal certainty, repeatability, and proportionality because compliance is voluntary, inconsistent, and not enforceable across multiple events.

Option 3: Introduce a framework of menu provisions to support the hosting of major sporting events (Preferred Option)

This option establishes a flexible legislative framework that can be applied to specified major sporting events that are not usually held in the United Kingdom. The framework provides a set of core provisions which can be activated on a case-by-case basis through secondary legislation.

This approach ensures that the government can respond proactively and proportionately to the requirements of different events, whether these are taking place across the UK or in one or more of the UK nations, providing certainty for event organisers, sponsors, and local authorities, while reducing the resource and time burden associated with passing bespoke primary legislation.

The framework also provides certainty over the suite of enforcement powers available to address ticket touting, unauthorised advertising and trading, and unauthorised association.

The framework will enhance the UK's ability to meet international obligations, protect the interests of organisers and sponsors, and provide a reliable, long-term mechanism for hosting high-profile global sporting events.

Summary against Critical Success Factors: This option performs strongly against all CSFs. It provides legal certainty, enables coordinated and timely delivery, is proportionate and flexible, and can be applied consistently across multiple events.

Option 4: Introduce bespoke primary legislation for each major sporting event (Counterfactual)

This option would continue the existing approach of introducing bespoke primary legislation for each major sporting event, where required.

A bespoke legislative model would allow the UK government to tailor legislation to the specific requirements of each event, ensuring that any new legislation is narrowly focused and proportionate to the scale, location, and operational needs.

While effective for past events, this approach is sub-optimal. The design, passage and implementation of individual Acts of Parliament for each event consumes significant government time. It also introduces uncertainty for organisers and partners during the

bidding and planning stages, as the passage of legislation cannot be guaranteed within set timeframes.

Summary against Critical Success Factors: This option provides high legal certainty and event-specific proportionality but performs poorly on deliverability and repeatability due to the resource-intensive, bespoke primary legislative process required for each event.

Option	Legal Certainty	Deliverability	Proportionality	Repeatability
Option 1: Do Nothing	X	X	X	X
Option 2: Non-regulatory approach	X	X	△	X
Option 3: Permanent legislative framework (Preferred Option)	✓	✓	✓	✓
Option 4: Bespoke primary legislation for each event (Counterfactual	✓	△	△	X

- ✓ Meets the critical success factor
- △ Partially meets the critical success factor
- X Does not meet the critical success factor

Summary

Options 1 and 2 are not fit for purpose in comparison to Option 3 and 4 because they would fail to provide the necessary legislation required to meet international hosting commitments on a consistent basis. Option 4 would allow these requirements to be met but relies on a resource-intensive primary legislation for each event. Option 3, therefore is the preferred approach, by striking a pragmatic balance by providing certainty, flexibility, and proportionality, enabling the UK to meet international obligations while avoiding unnecessary regulatory burden and repeated use of government time for measures that are strongly precedent.

NPSV: monetised and non-monetised costs and benefits of each shortlist option (including administrative burden)

Costs

- Non-monetised costs:

- Administrative burden on government departments in developing secondary legislation, however, this is significantly lower than bespoke primary legislation.
- Applications of the provisions to different events via regulations may require some familiarisation by those who could be affected. However, we assume this would be negligible, considering that in the counterfactual, these costs would be equally incurred through bespoke legislation.
- While the introduction of new legislation may introduce some compliance costs, notably for local traders and businesses affected by the advertising and trading provisions, these are proportionate and only apply when the framework is activated. In contrast, the do-nothing or non-regulatory options risk substantial indirect costs through lost event hosting opportunities or ineffective protections, which can be significant but harder to monetise.

Benefits

- Monetised benefits
 - The framework's efficiency in eliminating the need for bespoke primary legislation is projected to deliver substantial savings for the government; indicative analysis suggests a total cost saving of time and resources of approximately £5 million over a 10-year period, equating to around £0.5 million annually. More information on the calculation is set out below in the risks and assumptions section.
- Non-monetised benefits
 - The framework approach enables the UK to confidently host major sporting events securing the associated economic, social and reputational benefits. It also significantly reduces monetised and non-monetised costs compared to bespoke event-specific legislation by eliminating the need for new primary legislation for each event.
 - This streamlining will lessen administrative burden for government departments and the call on parliamentary time, thereby shortening lead times, which will bring cost savings.
 - As the Bill will set out the widest version of the offences and extent of the provisions, with the possibility to narrow these by exceptions, or by not applying certain provisions when not needed, it reduces uncertainty over potential regulatory scope of the provisions, avoiding over-compliance costs for organisers and businesses.
 - The UK will also be one of only a small number of countries with such a legislative framework, giving a competitive edge and making the UK a more attractive host compared to key competitor nations.

Net Impact

- Overall, the framework approach provides a positive net outcome.
 - Reduced monetised and non-monetised costs compared to bespoke legislation.
 - Administrative burden is lower, providing both cost and time efficiencies.
 - Enables wider benefits (economic, social, reputational) that the do-nothing or non-regulatory options would fail to deliver.
 - Investment in events is protected and risks of indirect costs from having insufficient legislative powers are mitigated.

Minimising administrative and compliance costs for preferred option

By applying the relevant provisions through regulations for each sporting event, the government can respond efficiently and confidently to requirements and commitments. This reduces parliamentary and departmental time and accelerates implementation timelines. Clear statutory conditions for application will ensure the powers are only used for high-profile global sporting events where they are required. Collaborative governance arrangements with devolved governments will further reduce duplication of legislation and improve consistency in approach. Overall, the Bill prioritises proportionality and administrative efficiency.

Impact on small and micro businesses

The framework limits the regulatory reach to specified major sporting events that meet the conditions set out. The provisions that are most likely to impact small and micro businesses are the trading provisions, which could prevent established street and market traders from operating as usual. The intention will be to minimise the potential impact by ensuring that any prohibitions on trading only apply when and where necessary, driven by the competition schedule and operational requirements. Additional mitigations to minimise this burden include allowing affected businesses to apply for authorisations to continue to trade while prohibitions are in place, and ministers applying the regulations may require that information is shared with licensed traders likely to be affected. We expect event organisers to work with local authorities to accommodate existing traders where possible and help identify suitable alternative arrangements where traders are unable to trade as usual.

Business environment

The bill is designed to have a limited and targeted impact on the business environment. By applying powers only to exceptional major sporting events where necessary, the framework minimises unnecessary regulatory burdens on commercial operators, including small and micro businesses. The majority of businesses are unlikely to be affected unless seeking to exploit an event commercially without the right to do so. We anticipate the majority of business-as-usual activity will be unaffected, with the greatest potential impact being street traders in affected areas.

Companies which are predominantly affected by the advertising provisions will be media owners who display out of home advertising. These businesses will be able to seek authorisation to advertise media which does not undermine agreements in place for the event (e.g. sponsorship agreements) or will be able to display advertising which is not subject to controls (because it has been provided with an exception in regulations).

For businesses that do engage with these events, such as sponsors, local vendors, or transport operators, the framework provides clarity on the provisions that are likely to be in place for ticketing, unauthorised association, advertising, and trading and supporting transport delivery. This certainty may reduce risk, support investment decisions, and encourage participation in event-related commercial activity.

Overall, the use of the framework provisions is expected to maintain a stable business environment while providing enhanced protections for those that are formally associated with an event. There may be small disproportionate impacts on local traders relative to the broader business community, and careful consideration will be given to how best to mitigate these impacts when making regulations on a case-by-case basis.

Trade implications

Successfully delivering the world's major sporting events has a positive impact on the UK's global reputation and soft power. For example, they encourage, enable and extend international visits to the UK, and create investment and business opportunities⁵. By providing a flexible and efficient legislative framework, the Bill helps to maintain and enhance the UK's competitiveness for hosting major events. Without the Bill, the UK risks losing market share in hosting events resulting in negative trade implications.

Other wider impacts

The framework is likely to generate positive wider impacts across economic, social, and reputational dimensions. Economically, it supports the UK's ability to host major international events by providing certainty over the legal protections available for organisers and sponsors, which can increase sponsorship revenue, enhance commercial partnerships, and reduce reliance on public funding.

Socially, the framework will help fans and spectators by protecting ticket prices at the levels determined by the event organisers, rather than by ticket touts. The transport and trading provisions will support the safe and easy flow of spectators to and from venues. It also maintains public confidence by targeting commercial activity that is most likely to undermine the integrity of the event.

Reputationally, the framework strengthens the UK's credibility as a reliable host for major sporting events. This may improve the UK's competitiveness in attracting future events and enhance its global standing in international sport. Furthermore, this will provide a significant boost to the UK's soft power as a leading host country, helping to facilitate broader international partnership and trade.

Environmental impacts are expected to be neutral, as the framework does not introduce permanent infrastructure or operational changes.

Risks and assumptions

The framework assumes that hosting major international sporting events of sufficient scale and profile will continue to be of interest to the UK, and that the legislation that can be implemented through regulations is flexible enough to support the requirements of different events. It also assumes that secondary legislation will be applied efficiently and proportionately by the Secretary of State and devolved authorities.

A key assumption is that the Bill will mitigate the risk of inconsistent policy approaches across events taking place in the UK, leading to uncertainty for organisers, sponsors, and local businesses.

A reputational risk could arise if the framework is perceived as overreaching or undermining public freedoms. Mitigatory measures for this include clear statutory conditions, time-limited application, the nature of the offences (mostly aimed at commercial activity), the ability to provide a wide range of exceptions, and authorisation processes.

Indicative government savings:

⁵ UK Sport (2021) Major sport events drive potential £4billion trade and investment boost to UK - <https://www.uk sport.gov.uk/news/2021/11/30/soft-power-trade-and-investment-report>

Assumption 1: Events to which the framework will be applied

Table 1: UK Sport Hosting Target List 2025-2035⁶

Event	Year	Status
UEFA EURO 2028 UK & Ireland	2028	Secured
World Athletics Championships	2029	Live feasibility
FIFA Women's World Cup	2035	Current bid

Assumption 2: Total headcount required for implementation of each option

Option 2 resourcing estimate expected for a medium-sized piece of primary legislation:

- 1 Bill team including 1 Full-time Grade 7 Policy Advisor, 2 Full-time SEO Policy Advisors and 2 Full-time HEO Policy Advisors
- 5 bespoke policy teams, each with 1 Full-time Grade 7 Policy Advisor and 1 Full-time SEO Policy Advisor
- 3 Full-time Legal Advisors and 2 Part-time Legal Advisors

Option 3 resourcing estimate expected for a medium-sized piece of secondary legislation:

- 1 Policy team including 2 Full-time Grade 7 Policy Advisors and 2 Full-time SEO Policy Advisors
- 1 Full-time Legal Advisor

Assumption 3: Length of time working on each option per major sporting event

Option 3: 6 months

Option 4: 2 years from the initial design to Royal Assent of the primary legislation.

Using 2025 ASHE estimates⁷ for hourly pay most representative for each role and a 30% non-wage uplift, the following government savings are:

Table 2: Estimated discounted cost per year for Option 3, Option 4, and the resulting government saving (Difference) - (2025 prices and 2026 Present Value)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Total
Option 3	£0.00	£0.13	£0.13	£0.00	£0.00	£0.00	£0.00	£0.00	£0.11	£0.00	£0.36
Option 4	£1.01	£1.96	£0.95	£0.00	£0.00	£0.00	£0.00	£0.83	£0.80	£0.00	£5.54
Difference	£1.01	£1.83	£0.82	£0.00	£0.00	£0.00	£0.00	£0.83	£0.69	£0.00	£5.18

⁶This is an indicative list of major sporting events that the UK may host over the next 10 years, there hosting is subject to the results of the ongoing bid processes

⁷ ASHE (2025) -

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashtable14>

3.2 Ticketing

The Rationale for Government Intervention

The UK government currently lacks legislative powers to prohibit the unauthorised resale of tickets for major international sporting events, as usually required by rights holders of major international sporting events. At present, legislation creating a criminal offence for the unauthorised resale of tickets applies only to designated football matches under the Ticket Touting (Designation of Football Matches) Order 2007, and was introduced primarily for public order reasons, to preserve fan segregation at domestic fixtures. There is no equivalent legal protection for other sports.

While existing consumer protection legislation provides transparency requirements for ticket resale platforms, it does not regulate whether tickets can be resold, where they can be sold, or at what price.

For EURO 2028, the UK government has committed to prohibit unauthorised ticket resale. However, the UK's existing legal powers do not allow the government to fully meet UEFA's requirements, particularly around enforcement against sellers or platforms based outside the UK. Similar requirements arise for events such as the Olympic and Paralympic Games and FIFA World Cup.

What gaps or harms would occur if the government doesn't intervene?

Lack of government intervention in the secondary ticketing market presents a risk of market distortion if left unchecked. The current legislative landscape in the UK does not generally prohibit the unauthorised resale of tickets for sporting events, with the exception of designated football matches in England and Wales where resale is restricted for public order reasons. Although the government has proposed broader consumer protection reforms for the wider live events sector, including potential resale price caps and stronger obligations and penalties for secondary ticketing platforms, these measures would not address the specific risks associated with major sporting events and are unlikely to be in place in time for EURO 2028.

The business model of ticket touts is to acquire large numbers of tickets on the primary market and resell these at inflated prices, restricting access for fans and creating inequitable outcomes, undermining the integrity and value of major sporting events, which often receive a significant amount of public funding. According to CMA analysis, typical mark-ups on secondary market tickets exceed 50%, with some individual tickets resold for up to six times their original cost.⁸ There is also a risk of tickets being resold by actors operating overseas, limiting the ability of domestic enforcement authorities to intervene effectively.

Without targeted legislative controls, this problem will persist, resulting in a misallocation of resources and a poorer overall event experience. In many cases, rights holders require

⁸ UK Government (2025) Government bans ticket touting to protect fans from rip-off prices – <https://www.gov.uk/government/news/government-bans-ticket-touting-to-protect-fans-from-rip-off-prices?>

a total prohibition on unauthorised resale to manage demand and protect event integrity. Without clear legislation to enable such protections, enforcement is fragmented and gaps remain in effectively regulating resale activity for major sporting events.

Theory of Change

Inputs

- The Bill creates a clear criminal offence for unauthorised resale of tickets to major sporting events
- Effective powers are provided to investigate and enforce the offence
- Legal and operational guidance to support enforcement and compliance

Activities

- Apply the ticketing provisions to major sporting events using secondary legislation.
- Monitor and investigate unauthorised ticket resale, including activity on online platforms and cross-border sales where a UK connection exists.
- Take enforcement action, such as requesting illegal content be taken down, issuing financial penalties, and prosecuting offenders.
- Enable event organisers to authorise platforms to sell or resell tickets legally to provide increased control over ticket distribution.

Outcomes

- By creating a criminal offence and providing powers to relevant enforcement authorities, the legislation enables organisers to control ticket distribution and authorised resale platforms in line with event requirements.
- Strengthened ability for enforcement bodies to act against unauthorised resale of tickets, including through online platforms. This improves compliance and reduces opportunities for organised ticket touting operations that exploit the secondary market.
- Greater control over ticket distribution also allows organisers to manage demand more effectively.

Long-term impact

- In turn, this supports the successful delivery of major sporting events by ensuring that the UK can meet rights-holder requirements relating to ticketing protections.

Assumptions

- Deterrence: High-level 'organised operations' are more likely to be deterred by the prospect of a criminal record than attracted by high profit margins, on the assumption that penalties are sufficiently severe to outweigh financial rewards. This reflects the economic theory of crime, which suggests that potential offenders act rationally by weighing the expected benefits of unlawful activity against the costs of apprehension and punishment. From this perspective, deterrence is achieved by reducing the expected returns of such conduct through increased probabilities of detection and/or the imposition of stricter sanctions⁹.
- Enforcement capacity: Enforcement bodies (local authorities, the CMA) have the resources and capability to use these powers.
- Jurisdictional: Platforms based overseas and sellers with a UK connection will comply with UK law.
- Market shift: Organisers will provide accessible, user-friendly resale platforms and

⁹ Gary Becker, "Crime and Punishment: An Economic Approach", Journal of Political Economy, vol. 76, no. 2 (1968)

fans will use these.

- Rights holder: Rights holders will continue to require strong ticketing protections as part of hosting agreements, and consider the ticket touting offence in the Bill sufficient to meet their requirements.

Theory of Change (logic chain)

Legislative prohibition on unauthorised ticket resale established → organisers gain control over ticket distribution and resale channels → enforcement authorities gain powers to investigate and act against unauthorised sellers → reduced opportunities for large-scale speculative resale and organised touting → greater compliance with event ticketing policies → ticket resale activity is effectively controlled by event organisers → strengthened ability to meet international rights-holder requirements.

SMART objectives for intervention

SMART Objectives

Specific - Establish a criminal offence prohibiting the unauthorised sale of tickets for designated major sporting events, granting organisers exclusive control over ticket sales and authorised resale. Enforcement powers will be available to local authorities, the Competition and Markets Authority (CMA) and Department for the Economy in Northern Ireland.

Measurable - Success will be measured by the enactment of the prohibition and its application to designated major sporting events, alongside evidence of reduced resale activity outside of authorised channels and improved consumer access to tickets at face value. Enforcement outcomes, including penalties and prosecutions, and feedback from event organisers and consumers will provide both qualitative and quantitative evidence of effectiveness.

Achievable - The objective is achievable as it builds on existing consumer protection powers, including Schedule 5 of the Consumer Rights Act 2015, and provisions in the Digital Markets, Competition and Consumers Act 2024. It complements ongoing regulatory activity in the secondary ticketing market and leverages established enforcement bodies and mechanisms.

Relevant - The intervention protects fans from inflated prices and scams, helping to ensure tickets are accessible to fans and members of the public, and reinforces the UK's attractiveness as a host of major sporting events with lasting economic and social benefits, while helping to deliver the requirements of rights holders. Supporting evidence is set out below in the NPSV: Monetised and Non-Monetised Costs and Benefits section.

Time-bound - The offence will be applied for a specified period in relation to each event to which it applies, which will correspond with when and how tickets are made available for the event.

Description of options considered

The options were assessed against a set of Critical Success Factors (CSFs) derived from the policy objectives and operational requirements of major event delivery. The CSFs used to filter options were:

- **Deliverability:** Ability to enable timely, coordinated enforcement of ticket resale restrictions by relevant authorities (e.g. CMA and local authorities)

- **Legal Certainty:** Ability to provide an enforceable statutory basis for prohibiting unauthorised ticket sales, ensuring all stakeholders (organisers, rights holders, consumers and enforcement bodies) understand the law
- **Proportionality:** Ability to use enforcement powers in a manner that effectively deters profit-driven unauthorised resale while minimising unnecessary administrative burden and disruption to those who legitimately need to resell their tickets.
- **Ability to meet international event guarantees:** Ability to certainty to rights holders (e.g. FIFA, UEFA, IOC) that ticketing protections will be applied consistently and effectively for major sporting events, supporting the UK's credibility in hosting such events.

Option 1 - Do Nothing

Under this option the government would not take any further action. This would mean that ticket touting remains illegal only for designated football matches under the *Ticket Touting (Designation of Football Matches) Order 2007*.

Enforcement would remain limited to resale activity in England and Wales concerning designated football matches. The UK would likely be unable to satisfy the requirements made to events where extra-territorial provisions are required or in relation to events which are not designated football matches. Consumers would continue to face exploitative ticket prices, inflated secondary market activity, and heightened risk of fraud.¹⁰

Summary Against Critical Success Factors: This option fails to meet any of the CSFs. Enforcement is limited to a narrow subset of events and regions, provides no new statutory clarity, and cannot deliver the assurances required by rights holders.

Option 2- Non-Regulatory Option

Under this option, the government would rely on cooperation between themselves, event organisers, and the ticketing industry rather than new legislation. The government could facilitate voluntary agreements with major online resale platforms to limit unauthorised resale and improve transparency. The CMA could continue to use existing consumer protection powers to issue guidance or seek voluntary undertakings, while public campaigns could encourage consumers to only sell and purchase through authorised resale platforms.

Although this approach could produce some limited improvements in industry behaviour and consumer awareness, it would lack legal enforceability. Non-compliant or overseas-based platforms could continue to operate beyond the reach of UK authorities, and the voluntary nature of the scheme would provide little deterrent against organised touting operations. While less burdensome administratively, this approach would not satisfy rights holders' demands.

Summary Against Critical Success Factors: This option partially meets deliverability and proportionality through voluntary agreements and guidance, but lacks enforceability and legal certainty, meaning it cannot fully meet rights holders' guarantees.

Option 3 - Framework Legislation (Preferred Option)

Under this option the government creates a new UK-wide criminal offence prohibiting the

¹⁰National Trading Standards (2020) Pair jailed for secondary ticketing fraud – <https://www.nationaltradingstandards.uk/news/pair-jailed-for-secondary-ticketing-fraud/>

unauthorised sale of tickets to specified sporting events. The offence would apply UK-wide and to UK persons and businesses overseas, as well as to overseas traders with a “UK connection.” Enforcement would be delivered through specified bodies such as local trading standards authorities, the Department for the Economy in Northern Ireland, and the CMA, using the established investigatory powers set out in the Consumer Rights Act 2015, the Digital Markets, Competition and Consumers Act 2024, and bespoke enforcement powers set out in the Sporting Events Bill.

This approach would provide legal clarity and enforcement capability, act as a strong deterrent to ticket touting, and restore consumer confidence in the fairness of ticket markets and the integrity of events, which often rely heavily on public funding.

Summary Against Critical Success Factors: This option fully meets all CSFs by creating a consistent UK-wide offence, enabling effective enforcement, applying a strong deterrent, and giving rights holders reliable assurances.

Option 4 - Introduce bespoke primary legislation for each major sporting event (Counterfactual)

Under this option, the government would introduce a prohibition on the resale of tickets for each major sporting event using bespoke primary legislation.

A bespoke legislative approach would allow provisions to be tailored to the specific requirements of each event and rights holder. It would enable the government to introduce targeted offences and enforcement powers that reflect the scale, location and commercial structure of the event. This approach would be resource intensive, creating uncertainty for organisers, sponsors and enforcement authorities and increasing demand on parliamentary time and government resources for the delivery of measures that are strongly precedent.

This option would meet event right holders’ requirements on a case-by-case basis, but it would not provide an efficient long-term solution for the successful delivery of major sporting events in the UK.

Summary Against Critical Success Factors: This option provides legal certainty and would satisfy requirements for each event, but deliverability and proportionality are constrained by the resource-intensive process for developing bespoke primary legislation.

Option	Legal Certainty	Deliverability	Proportionality	Ability to meet international event guarantees
Option 1: Do Nothing	X	X	X	X
Option 2: Non-regulatory approach	X	X	△	X
Option 3:	✓	✓	✓	✓

Permanent legislative framework (Preferred Option)				
Option 4: Bespoke primary legislation for each event (Counterfactual	✓	△	△	✓

- ✓ Meets the critical success factor
- △ Partially meets the critical success factor
- X Does not meet the critical success factor

Summary

Options 1 and 2 are not fit for purpose in comparison to Option 3 and 4 because they would, respectively, fail to address the existing legislative gap and rely on voluntary measures that lack enforceability and deterrent effect. Neither option would provide the legal certainty or meet rights holders' requirements. Option 4 would allow the government to meet event rights holders' requirements but would rely on repeated bespoke legislation, a highly resource intensive process. Option 3 strikes a pragmatic balance by delivering clear, enforceable protections against ticket touting through a consistent legislative framework.

NPSV: monetised and non-monetised costs and benefits of each shortlist option (including administrative burden)

We assume that any costs or benefits from introducing this measure would be a transfer from one business to another, i.e. profit previously made by a secondary ticketing platform or reseller would instead be captured by an official resale platform determined by the event owner (assuming one is introduced). Alternatively, there may be a transfer from a business to a consumer, where the removal of inflated secondary premiums allows fans to retain income that would otherwise have been acquired by ticket touts. Nevertheless, this will also be dependent on consumer behaviour regarding re-sell tickets and therefore would be an indirect effect.

Non-monetised costs

- Expected to be minimal. In the counterfactual scenario, the unauthorised resale of tickets would already be prohibited for relevant events, i.e. profit previously made by a secondary ticketing platform or reseller would instead be transferred to an official resale platform determined by the event owner (who is likely to limit resale costs to the face value of a ticket plus a service fee), and consumers would be expected to benefit from paying lower prices through such a platform.

- Small familiarisation costs for secondary ticket marketplaces and enforcement authorities, as they review guidance and understand how the framework applies to specific events. Compliance is considered straightforward, as resale activity is generally already prohibited by ticket terms and conditions. We assume these costs would be negligible, considering that in the counterfactual, these costs would be equally incurred through bespoke legislation. The legislation is not event-specific, so the ticketing provisions will need to be applied to events via secondary legislation.

Non-monetised benefits

- Consumers would be expected to benefit from paying lower prices through an official resale platform, where costs are likely to include the face value of the ticket plus a service fee. By shifting these transactions to platforms determined by the event organiser, the measure addresses the social costs of poor transparency and inconsistent pricing. This will enhance overall consumer experience and market integrity.
- Consumers may retain money that would otherwise be spent on inflated secondary ticket premiums, depending on resale behaviour
- While an event specific assessment has not been conducted, the broader social utility and consumer benefits can be illustrated using recent indicative analysis¹¹ on the resale of live events tickets above face value. Although EURO 2028, World Athletics Championships 2029 and FIFA Women's World Cup 2035 will represent only a fraction of the total UK live events market, this analysis highlights the significant harm in the unregulated resale sector. Presented in 2024 to 2025 financial year prices, the analysis shows that a price cap, although different from the more stringent ticketing provisions in the Sporting Events Bill, could result in an overall annual reduction of £112 million spent by fans on live events tickets.
- Improved access to tickets through authorised channels, reducing exploitative secondary resale and increasing affordability for fans, including those on lower incomes.
- Protects the commercial rights of event organiser strengthening confidence in hosting arrangements.
- Supports the UK's global reputation and competitiveness as a host nation.
- It minimises the risk of fraud, making it easier for consumers to verify legitimate tickets and for enforcement bodies to identify and act against fraudulent or unauthorised sellers.

Net Impact

- Overall, the framework approach provides a positive net outcome:
 - By shifting transactions from unauthorised to authorised platforms, the measure addresses social costs of inconsistent pricing and poor transparency, ensuring value is captured by fans and organisers.
 - While the legislation does not guarantee enhanced access or reduced prices, it strengthens the integrity of the ticketing market, reduces

¹¹ DBT (2025) Analytical note on government response to resale of live events tickets consultation - <https://www.gov.uk/government/publications/government-response-to-resale-of-live-events-tickets-consultation-analytical-note-analytical-note-on-government-response-to-resale-of-live-events-tickets-consultation#summary>

exploitative practices, and provides enforceable protections for both fans and rights holders.

Minimising administrative and compliance costs for preferred option

The preferred option minimises administrative and compliance costs by building upon the powers available to enforcement authorities under existing consumer protection legislation, including the Consumer Rights Act 2015 and Digital Markets, Competition and Consumers Act 2024.

Compliance requirements are straightforward, as businesses should generally not be selling or advertising tickets to events where such activity is already prohibited by ticketing terms and conditions (as will be the case for events in scope). No new licensing, registration, or reporting obligations will be introduced.

Impact on business

The new offence is designed to target ticket touting carried out with a view to making a profit, in the course of business, or in a public place. Small and micro businesses should generally not be selling or advertising tickets to events where such activity is already prohibited by ticketing terms and conditions (as will be the case for events requiring legislative provisions), and they have no right to do so. Such businesses should not rely on the resale of tickets on the secondary market as an economic model.

As such, the direct impact on small and micro businesses is expected to be minimal. Transfers of tickets between friends, family, and associates that do not take place in a public place will remain unaffected. There will also be a power to create exceptions to the offence, for example, for charity auctions.

Business environment

The ticketing market in the UK is highly digitalised and dominated by a small number of resale platforms. The introduction of the criminal offence against unauthorised resale is designed to target organised touting and commercially driven activities, rather than the legitimate resale of tickets for events which consumers can no longer attend.

The measure also provides legal certainty for event organisers and authorised sellers, enabling them to enforce resale prohibitions consistently and reduce unfair competition from unauthorised intermediaries. This clarity strengthens confidence in the market, encourages compliance with official ticketing systems, and reduces reputational risks associated with widespread unauthorised resale for profit.

Overall, the business environment is expected to remain largely unchanged for legitimate actors, while the framework strengthens market integrity and ensures that event organisers have greater control over the onward sale of tickets, including the prices at which tickets are sold.

Trade implications

The measure is not expected to have direct material adverse trade implications. There is expected to be an indirect positive impact since major events can be considered as service exports. By prohibiting exploitative secondary ticketing practices, the measure helps to transfer income from ticket touts (many of whom are based overseas) back to fans, whose expenditure directly contributes to the economy. This policy will also enable the UK to meet requirements of international rights holders enhancing competitiveness and reliability as a host nation for major sporting events.

Other wider impacts

The wider impacts of the preferred option are likely to be significant. By preventing inflated ticket resale prices and ensuring tickets can only be legally sold by those authorised by the event owner, fans and spectators will have better access to tickets at prices determined by the organiser.

The growth impact is expected to be small, and its overall impact is currently uncertain. The macroeconomic effects are neutral, with no significant direct impacts on supply side factors. There are indirect, positive, macroeconomic impacts, for example, transferring income from ticket touts (many of whom are based overseas) to fans, whose expenditures directly contribute to the economy.

Risks and assumptions

The primary assumption underpinning this policy is that the UK will continue to host major international sporting events requiring legally enforceable prohibitions on ticket resale. It also assumes that enforcement bodies such as local authorities and the CMA have sufficient powers, under the Consumer Rights Act 2015 and Digital Markets, Competition and Consumers Act 2024, to provide for enforcement in different contexts.

A risk is potential confusion among consumers over the ticketing prohibitions. This can be mitigated through coordinated work between government, event organisers, and enforcement authorities to emphasise the scope and impact of the provisions.

3.3 Advertising and Trading

The Rationale for Government Intervention

Based on analysis by the UK government, existing UK legislation does not provide sufficient powers to regulate advertising and trading activity for time-limited periods in and around areas that are being used for, or in connection with, major sporting events, as required by rights holders. These provisions will be available to the UK government to apply in England or to Scotland, Wales and Northern Ireland with consent of the relevant ministers. Ministers in the Devolved Governments will be able to apply the advertising and trading provisions to their respective jurisdictions.

Existing legislation that controls advertising and trading activity across the UK does not provide for enhanced temporary controls to suspend usual licensing requirements, nor does the legislation consistently provide for effective, proactive enforcement activity where this is required. These provisions are designed to protect the rights of event sponsors, ensure the safe and easy flow of spectators to and from venues, and provide consistency in venue branding and city dressing.

In the absence of legislation, rival businesses to event sponsors, and those seeking to ambush the sporting event for commercial gain, would face limited deterrence and there would be no means to regulate trading and advertising activity conducted. Government intervention is therefore required to correct these behavioural distortions and ensure that there are clear and sufficiently strong measures to address non-compliance with temporary measures, recognising the economic opportunity associated with major sporting events.

Theory of Change

Inputs

- The Bill provides time-limited offences for unauthorised advertising and trading, with exceptions for certain types of advertising and trading provided on an event-specific basis, and the possibility of an authorisations process.
- Enforcement bodies are equipped with powers to investigate and take action against non-compliant activity.

Activities

- Apply the advertising and trading provisions to specified areas being used for or in connection with major sporting events during an event period via secondary legislation.
- Guidance is produced to inform relevant stakeholders about the provisions, including mitigations and enforcement powers available.
- Monitor and enforce compliance, including issuing fixed penalty notices, removing advertising or seizing goods, and coordinating across enforcement bodies.

Outcomes

- The Bill and associated regulations provide clarity and certainty for local businesses, advertisers and media owners on which activities are prohibited and the potential mitigations available. This reduces ambiguity and encourages compliance, helping to manage the behaviour of commercial actors.
- Unauthorised advertising and trading activity is deterred and restricted.
- The advertising and trading provisions enable governments to control commercial activity in and around areas being used for a major sporting event to safeguard commercial rights and ensure spectators can move easily and safely

Long-term Impact

- Ultimately, the legislation supports the successful delivery of major sporting events by protecting commercial rights, preserving the integrity and reputation of events, enabling the UK to meet rights-holder requirements, while minimising unnecessary disruption.

Assumptions

- **Deterrence:** Unauthorised operators are sufficiently deterred by the risk of enforcement action, including penalties and removal of unauthorised advertising or trading activity.
- **Enforcement capacity:** Enforcement bodies (e.g. local authorities) have the resources and capability to enforce the provisions effectively.
- **Compliance:** Businesses, advertisers, and traders understand the requirements of and engage with authorisation processes and other available mitigations where provided.
- **Proportionality:** The provisions are applied in a way that balances protection of commercial rights with minimising disruption to existing business activity.
- **Rights holder:** Rights holders will continue to require protections against unauthorised advertising and trading and will recognise the framework's provisions and their application as sufficient to meet requirements.

Theory of Change (logic chain)

Introduce Framework legislation → Secondary legislation applies time-limited advertising and trading restrictions → clear guidance shared with affected stakeholders (including on authorisation process where provided) → enforcement bodies empowered to act against unauthorised activity → reduced ambush marketing or opportunistic trading → greater compliance with event-specific requirements → greater protection of sponsor rights → improved operational and commercial delivery of major sporting events → strengthened ability of the UK to host world-class events.

SMART objectives for intervention

SMART Objectives

Specific- The UK government and devolved governments will be able to introduce proportionate time-limited provisions regulating advertising and trading activity within specified areas during specified periods in accordance with the requirements of major sporting events.

Measurable- Consistent quantitative measurement will be challenging due to the differing characteristics of events and locations. However, we will consider the number of instances of unauthorised advertising and trading activity during designated periods, and

the use of formal enforcement powers, including the number of Fixed Penalty Notices issued and any goods which are seized or detained. This will be collected by using qualitative and quantitative feedback from enforcement authorities, event organisers, and media owners.

Achievable- The objective is achievable because similar advertising and trading provisions have been introduced successfully through previous event-specific legislation and have been shown to be effective in shaping commercial behaviour around major sporting events.

Relevant- This helps to deliver the government's objectives of supporting the UK's world-class sporting events sector and delivery of commitments in relation to EURO 2028.

Time-bound- The legislation will set out that the advertising and trading restrictions may apply no earlier than 10 days in advance of an event and 5 days following its conclusion, and will ensure they can be applied flexibly but proportionately to meet the requirements of future events.

Description of options considered

The options were assessed against a set of Critical Success Factors (CSFs) derived from the policy objectives and operational requirements of major event delivery. The CSFs used to filter options were:

- **Deliverability:** Ability to enable timely, coordinated enforcement of advertising and trading restrictions by relevant authorities (e.g. local authorities).
- **Legal Certainty:** Ability to provide a clear legal mechanism for prohibiting unauthorised advertising and trading, ensuring all stakeholders, such as businesses, sponsors, and enforcement authorities, understand the provisions.
- **Proportionality:** Ability to apply restrictions in a way that effectively protects commercial rights while minimising unnecessary disruption or compliance burden for local businesses and other stakeholders.
- **Ability to meet international event guarantees:** Ability to provide legally enforceable protections which provide confidence to rights holders (e.g. FIFA, UEFA, IOC) over their application, supporting the UK's credibility in hosting international events

Option 1: Do nothing (counterfactual)

Under this option, no new prohibitions would be introduced, and the government would rely on existing codes of practice and legislation to manage advertising and trading activity. Relevant legislation includes:

Advertising

- UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code)
- Consumer Protection from Unfair Trading Regulations 2008
- Civil Aviation Act 1982 and Civil Aviation (Aerial Advertising) Regulations 1995
- The Town and Country Planning (Control of Advertisements) (England) Regulations 2007

Trading

- Local Government (Miscellaneous Provisions) Act 1982 (Schedule 4, sections 1 and 2)

- Pedlars Act 1871

Relying on existing legislation is unlikely to satisfy the requirements of event organisers / rights holders. It could also undermine the ability to secure investment from sponsors, potentially creating financial risks for event delivery.

While imposing no additional legislative or administrative burden, this option would fail to provide the clarity and certainty necessary to safeguard commercial rights and support event-specific requirements.

Summary Against Critical Success Factors: This option fails against all factors. Existing legislation is fragmented and reactive, providing low legal certainty and limited enforcement capability, offering little protection to commercial rights and failing to meet event requirements.

Option 2: Non-Legislative Approach (Enhanced voluntary and contractual measures)

Under this option, the government would seek to address advertising and trading restrictions through voluntary agreements and guidance.

This includes working with local authorities to maximise use of existing street trading and planning powers; developing voluntary codes of conduct with businesses and potentially coordinating communication campaigns to discourage ambush marketing and unauthorised trading.

The benefits of this approach is that it would avoid the need for new legislation and would minimise additional regulatory burdens. Additionally, it could provide flexibility and could be tailored informally to the needs of individual events.

However, this option would not allow the government to satisfy rights holders requirements that require legislative powers to be put in place. Voluntary compliance mechanisms would lack enforceability and would not provide a sufficient deterrent to deliberate ambush marketing or opportunistic trading. Existing statutory powers were not designed for the scale and time sensitivity of major sporting events. Enforcement through existing legislation would be reactive rather than proactive, and remedies would not be available quickly enough to prevent commercial harm during short event windows.

Previous events, such as UEFA Women's EURO 2022, which have not had clear legislative protections in place have experienced multiple instances of ambush marketing and increased street trader activity. Where enhanced legislative powers have been provided, experience shows that these have been used effectively to remove infringing advertising and seize goods.

While this approach would avoid new regulatory intervention, it would not adequately address the free-rider problem associated with ambush marketing, nor provide the temporary, proportionate and enforceable controls required to protect commercial integrity.

As a result, this option would weaken the UK's ability to secure hosting rights and not satisfy the formal guarantees required by international rights holders. It would also risk

inconsistent application across different local authority areas, reducing clarity and certainty for businesses and delivery partners.

Summary Against Critical Success Factors: Voluntary measures provide some flexibility and minimal disruption but lack enforceability, meaning limited legal certainty, poor deliverability, and inadequate protection for rights holders across events.

Option 3: Framework legislation with time-limited and proportionate restrictions (Preferred Option)

Introduction of framework legislation providing time-limited restrictions on unauthorised advertising and trading in and around areas used for, or in connection with, specified major sporting event locations.

This includes mitigations to minimise disruption for existing businesses while meeting commitments made by the government. Limitations include ensuring activity promoting a cause, campaign or belief is not captured, and a number of exceptions would be provided to the advertising and trading provisions to ensure, where possible, that the impact on existing businesses (e.g. shop signage) is minimal, building on well established precedent from previous events.

The Bill allows a designated body to authorise advertising and trading on a case-by-case basis, and this body may take into account whether a person already has a licence to trade or advertise in an area affected when making an assessment. For trading authorisations, it is anticipated that this role will be undertaken by a public body already involved in delivery of a sporting event, for example, a non-departmental public body or local authority. For advertising authorisations, this could be a private company established by public authorities to deliver an event. This body is likely to incur some costs in determining authorisations, however, these are expected to be absorbed within their overall budget for the event. This body, or another appropriate person, could be required to produce guidance on the operation of the provisions, including any mitigations, with specified persons required to share this with traders that are likely to be affected.

Where an authorisation process is provided for this would be available to advertisers, media owners, landowners hosting advertising space, local authorities, street traders, market stalls, pedlars, outdoor dining spaces, food trucks, buskers, and other local businesses. We anticipate that media owners and out-of-home advertising companies will be able to seek authorisation to display adverts of event partners and sponsors as well as overall event branding and city dressing. Consideration will be given on a case-by-case basis to whether particular types of commercial advertising can be permitted, for example, in product categories which do not conflict within any sponsorship agreements entered into for the event.

If no such process is available, it is expected that more exceptions to the advertising and trading offences would be provided in regulations to ensure, for example, event sponsors and licensees can advertise without being in breach of the advertising offence.

A framework approach will be able to provide greater certainty, consistency and foresight for impacted businesses on the restrictions around advertising and trading activity at sporting events. This will allow expectations to be managed and influence positive

behaviours (for example, encouraging compliance with an authorisations process), more effectively than repeated bespoke primary legislation.

Option 3 would provide a clear, proportionate, and established framework to support the successful delivery of major sporting events, including their commercial integrity, while minimising unnecessary disruption to local businesses.

Summary Against Critical Success Factors: This option meets all the CSFs. It delivers timely, effective enforcement provisions, clear legal certainty, proportionate restrictions, and consistent protections that meet event requirements.

Option 4: Bespoke primary legislation for each major sporting event (Counterfactual)

Under this option, the government would introduce event-specific primary legislation for each major sporting event to prohibit unauthorised advertising and trading. Each Act of Parliament would create offences and enforcement powers tailored to the specific needs of the event including defined geographic areas, timescales, and permitted exceptions.

This approach would provide legal enforceability for each event and create time-bound restrictions on commercial activity to protect rights holders’ interests.

However, this option is resource-intensive and time-consuming, as a separate Act would be required for each event. It introduces uncertainty for organisers and local authorities, as legislative powers may not be in place until well into the planning stage. Repeated use of bespoke legislation could also create inconsistencies across events, reduce efficiency, and place additional burdens on parliamentary time.

This option would meet event right holders’ requirements on a case-by-case basis, but it would not provide an efficient long-term solution for the successful delivery of major sporting events in the UK.

Summary Against Critical Success Factors: This option provides strong legal certainty and event-specific protection but is resource-intensive and can be slow to implement.

Option	Legal Certainty	Deliverability	Proportionality	Ability to meet international event guarantees
Option 1: Do Nothing	X	X	X	X
Option 2: Non-regulatory approach	X	X	△	X
Option 3: Permanent legislative framework (Preferred)	✓	✓	✓	✓

Option)				
Option 4: Bespoke primary legislation for each event (Counterfactual	✓	△	△	✓

- ✓ Meets the critical success factor
- △ Partially meets the critical success factor
- X Does not meet the critical success factor

Summary

Options 1, 2, and 4 are not fit for purpose, in comparison to Option 3. Option 1 would fail to address current legislative gaps. Whereas Option 2 would be inefficient and lead to potential challenges around sufficient implementation time periods. Neither option would provide the legal certainty or meet rights holders' requirements. Option 4 would allow the government to meet event rights holders' requirements but would rely on repeated bespoke legislation, a highly resource intensive process. Option 3 represents a pragmatic balance between the options by delivering clear, enforceable protections against unauthorised advertising and trading.

NPSV: monetised and non-monetised costs and benefits of each shortlist option (including administrative burden)

Costs

- Monetised costs:
 - The measures are assessed over a ten-year appraisal period and include the following events: EURO 2028, WAC 2029 and F2035™ (the hosting of the latter two is subject to the results of the ongoing bid processes).
 - We estimate this will impose a total discounted cost of £1.1 million, with an estimated EANDCB of £0.1 million.
 - This estimate is based on a cautious approach, reflecting the highest likely cost to affected businesses, but assumes potential mitigations are successfully in place for existing traders and the requirement to produce and share guidance with traders and businesses that are likely to be affected.
 - More information on the calculation is set out below in the risks and assumptions section.
- Non-monetised costs:
 - Familiarisation costs are expected to be very small. There may be a small time cost associated with reviewing guidance and applying for authorisation to advertise or trade. This is outlined below in more detail under the risks and assumptions. However, we assume this would be negligible, considering that in the counterfactual, these costs would be equally incurred through bespoke legislation.
 - The framework provisions will not be specific to any one event and will need to be applied on a case-by-case basis via secondary legislation.

Benefits

- Non-monetised benefits
 - Events will be delivered with a clear legislative framework that can be applied to accommodate their requirements.
 - The new powers will streamline the legislative process for major sporting events. This legislative efficiency will make the UK a more attractive and desirable host country for major event organisers, potentially increasing the frequency with which the UK is selected to host these events.
 - The UK will be one of only a small number of countries with such a legislative framework, giving a competitive edge and making the UK a more attractive host compared to key competitor nations.
 - The measures protect the commercial integrity of events by safeguarding sponsor investment, which can help offset the burden on taxpayers.

Net Impact

- The net impact to business is estimated to be well within the £10 million de minimis threshold.
- While the policy imposes modest direct costs on affected local businesses, these are limited in scale, time-bound, and geographically targeted.
- These costs are balanced by broader system-level benefits, including legislative efficiency, improved delivery certainty, and enhanced international competitiveness in hosting major sporting events.
- Compared to the counterfactual of relying on bespoke primary legislation for each event, the framework approach provides a more consistent and efficient mechanism, reducing administrative burden over time.
- Overall, the policy represents a proportionate intervention, with relatively low costs to business and wider indirect benefits for event delivery, sponsor confidence, and the UK's hosting capability.

Table 3: Option 3 (central estimate) vs Option 1 (BAU)

	Costs	Benefits	Business Net Present value	EANDCB
Option 3 (central estimate)	£0.1m	£0.0m	£-1.1m	£0.1m
Option 1 (counterfactual)	£0.0m	£0.0m	n/a	n/a
Net impact	-£0.1m		£-1.1m	£0.1m

Figures rounded to the nearest £0.1m

Minimising administrative and compliance costs for preferred option

To minimise burdens, the prohibitions on advertising and trading will be time and geographically-limited. To support an event agnostic approach, the government applying the provisions will be able to require a specified person to produce guidance and require

specified person(s) to share this guidance with those likely to be affected, such as traders and businesses with a licence to trade on public land. This will significantly reduce the possibility of a lack of awareness of the provisions. The use of Fixed Penalty Notices (FPNs) for enforcement provides a cost-effective alternative to court proceedings for both enforcement authorities and alleged offenders.

Impact on small and micro businesses

As the trading restrictions will predominantly impact businesses which are trading outside of a building within affected areas (e.g. street traders), the offence is likely to have a disproportionate effect on small and micro businesses (businesses that employ fewer than fifty people). We have estimated that the annual impact of the restrictions on these small and micro businesses is around £0.1m in lost earnings, although the impact could be lower when considering mitigations. Taking into account assumptions set out below in respect of EURO 2028, WAC 2029 and F2035™ up to 284 street traders could be impacted by the restrictions and over the appraisal period with a central estimate of 258. The maximum impact of the restrictions on small business, under our assumptions, is £0.2m with a central estimate of £0.1m.

Several measures will help reduce the impact on local businesses. The UK government and devolved governments will be able to provide for a designated body to grant authorisations for advertising or trading activity that would otherwise be prohibited. In reality, this will ensure that appropriate non-commercial or non-competing entities, such as official suppliers and sponsors, can advertise/trade without infringing the advertising or trading offences, in line with any terms and conditions set by the authorising body.

Where it is not possible to accommodate existing street traders because of operational requirements, we anticipate the event organisers would work closely with the local authority to identify suitable alternative arrangements.

The UK government and devolved government will have the ability to specify further exceptions to offences via regulations. These exceptions will be tailored to each event to allow usual business activities to continue whenever possible. This approach ensures that trading restrictions remain proportionate to each sporting event, minimising the burden on both existing businesses and non-commercial activities.

Business environment

Option 3: Time-limited and proportionate prohibitions on unauthorised advertising and trading in and around specified areas at specified times.

The regulations made by the UK government or devolved governments to apply the advertising and trading provisions will be required to specify the locations to which the offences apply, the relevant time period for each location, and any applicable exceptions. Application of the provisions will be driven by when and how venues, and connected areas, are used for specified sporting events. As a backstop, the Bill will provide that the advertising and trading provisions can only be applied up to a maximum of 10 days before and 5 days after an event takes place. In most cases we expect offences to be in place for a much shorter period, dependent on the use

of the area for or in connection with the event. This appraisal considers the impacts to business whilst the offences are in place.

To minimise impact, regulations will also provide exceptions to these offences - such as advertising related to the goods sold or services provided at business premises or for providing public transport services. The exceptions will help to minimise disruption on existing businesses and ensure the offences are focused on activities with the greatest potential to undermine the operational requirements of the event, including, for example, ambush marketing campaigns.

For EURO 2028, the UK government will work closely with organisers and local authorities on the application of the provisions to areas in England to ensure proportionality and minimise impact on existing businesses. There will also be a requirement for ministers to arrange for guidance to be issued on the advertising and trading provisions. There will be powers to require relevant bodies (e.g. local authorities) to share such guidance with those who are likely to be affected. As the appropriate national authority will carry out its functions in a public nature, this will have no impact on the EANDCB for the regulations.

Before making exceptions to the offences in regulations, the Bill will require the appropriate national authority to undertake consultation with local authorities for areas which include a place to be affected by the provisions and any other persons the minister considers it appropriate to consult, for example, persons with an existing licence to advertise or trade in such an area.

The appraisal period over which impact to business will be estimated is for events which have been confirmed, or for which live bids in which UKG has or is likely to provide guarantees to right holders.

Trade implications

There are no significant trade implications expected. The provisions are local and temporary, designed to protect the commercial rights of rights holders, thereby supporting the UK's reputation as a reliable host for major sporting events.

Other wider impacts

This measure is expected to have a positive impact on credibility when bidding for major international events by helping to demonstrate compliance with guarantees for the biggest of major sporting events, and provide assurance to rights holders and their sponsors. Providing a clear legal basis for prohibiting ambush marketing helps to protect commercial income and signal the UK's ability to act effectively against such activity. This in turn strengthens confidence in revenue sources for an event and will generate indirect benefits of improving the country's competitiveness as a host nation. This will in turn make it more attractive for securing future global sporting events, helping to drive economic growth.

Risks and assumptions

Assumption 1: Events to which the advertising and trading provisions will be applied

Table 4: UK Sport Hosting Target List 2025-2035¹²

Event	Year	Status
UEFA EURO 2028 UK & Ireland	2028	Secured
World Athletics Championships	2029	Live feasibility
FIFA Women's World Cup	2035	Current bid

Trading

Assumption 2: The host locations which will be impacted by the provisions.

UEFA Men's European Football Championship 2028: All UK host locations have been included, except Hampden Park, Glasgow, as Scotland have introduced bespoke primary legislation.

- Newcastle; St James' Park
- Liverpool; Everton Stadium
- Manchester; Manchester City Stadium
- Birmingham; Villa Park
- Cardiff; National Stadium of Wales
- London; Tottenham Hotspur Stadium
- London; Wembley Stadium

Provisions may also be applied to fan zones that will be established by host cities during the tournament period; these locations are yet to be confirmed.

World Athletics Championships 2029:

- London; London Stadium

FIFA Women's World Cup 2035™: It has been assumed that all UK host locations will be subject to the provisions

- London; Wembley Stadium
- London; Tottenham Hotspur Stadium
- London; Emirates Stadium
- London; Stamford Bridge
- London; Selhurst Park
- Manchester; Old Trafford
- Manchester; Manchester City Stadium
- Birmingham; Birmingham City Stadium
- Birmingham; Villa Park
- Leeds; Elland Road

¹²This is an indicative list of major sporting events that the UK may host over the next 10 years, there hosting is subject to the results of the ongoing bid processes

- Liverpool; Everton Stadium
- Newcastle; St James' Park
- Sunderland; Stadium of Light
- Brighton; American Express Stadium
- Nottingham; City Ground
- Bristol; Ashton Gate
- Belfast; Windsor Park
- Glasgow; Hampden Park
- Edinburgh; Easter Road
- Cardiff; National Stadium of Wales
- Cardiff; Cardiff City Stadium
- Wrexham; Racecourse Ground

Assumption 3: Number of days a typical street trader will be open for during the events and/or number of days restrictions will be in operation

Adopting a cautious approach, reflecting the highest likely cost to affected businesses, it is assumed that a typical street trader would want to be open for trade for the full duration of the event in an attempt to maximise profit from extra footfall. For example, the UCI Cycling World Championships in Stirling, recorded 192,000 visitors during the event week, an increase of 75,000 additional people compared to the week before.¹³ This might vary in reality. As it is not clear how and when the provisions will need to be applied to specified sporting events, we have applied a range of assumptions (high, low and central) in assessing trading days lost.

The **high** estimates are based on the total duration of the event plus an additional fifteen days. This period accounts for the maximum time that the provisions can be applied, which is designed to accommodate the logistics of athletes and officials arriving and departing and events structures being stood down, alongside the competition schedule. In the case of EURO 2028, this has been calculated depending on the first and final use of the venues specified for the competition (as currently scheduled).

The **low** estimate is based on the minimum number of days the venue will be in use for the event, plus an additional day before each use. This accounts for the expectation that the majority of prohibitions will predominantly be based around the competition schedule, as commercial opportunities decrease significantly once spectator activity ends.

The **central** estimate has been calculated as an average of the high and low estimates.

Table 5: EURO 2028 Host Locations

Event Zone Location	Local Authority	Number of days restrictions will be in place* ¹⁴		
		Low	Central	High
Newcastle; St James'	Newcastle City Council	10	20	29

¹³ Stirling Council (2024) Economic benefits of UCI Cycling World Championships to Stirling area revealed- <https://www.stirling.gov.uk/news/economic-benefits-of-uci-cycling-world-championships-to-stirling-area-revealed/>

¹⁴ The exact date of matches for EURO 2028 are not yet known. The exact number of days and specific date for each event taking place will be known when regulations are brought forward.

Park				
Liverpool; Everton Stadium	Liverpool City Council	10	20	29
Manchester; Manchester City Stadium	Manchester City Council	10	21	32
Birmingham; Villa Park	Birmingham City Council	8	20	32
Cardiff; National Stadium of Wales	City of Cardiff Council	12	25	38
London; Tottenham Hotspur Stadium	London Borough of Haringey Council	10	20	30
London; Wembley Stadium	London Borough of Brent Council	16	30	44

Table 6 World Athletics Championships 2029

Event Zone Location	Local Authority	Number of days restrictions will be in place* ¹⁵		
		Low	Central	High
London; London Stadium	London Borough of Newham	10	17	24

Table 7 FIFA Women's World Cup 2035

Event Zone Location	Local Authority	Number of days restrictions will be in place* ¹⁶		
		Low	Central	High
London; Wembley Stadium	London Borough of Brent Council	14	34	54
London; Tottenham Hotspur Stadium	London Borough of Haringey Council	12	33	54
London; Emirates Stadium	London Borough of Islington Council	10	32	54
London; Stamford Bridge	London Borough of Hammersmith and	8	31	54

¹⁵ The exact date of events for WAC 2029 are not yet known. The exact number of days and specific date for each event taking place will be known when regulations are brought forward (subject to results of ongoing bid process).

¹⁶ The exact date of matches for F2035™ are not yet known. The exact number of days and specific date for each event taking place will be known when regulations are brought forward. (subject to the results of the ongoing bid process)

	Fulham			
London; Selhurst Park	London Borough of Croydon	8	31	54
Manchester; Old Trafford	Trafford Council	12	33	54
Manchester; Manchester City Stadium	Manchester City Council	10	32	54
Birmingham; Birmingham City Stadium	Birmingham City Council	10	32	54
Birmingham; Villa Park	Birmingham City Council	8	31	54
Leeds; Elland Road	Leeds City Council	10	32	54
Liverpool; Everton Stadium	Liverpool City Council	10	32	54
Newcastle; St James' Park	Newcastle City Council	10	32	54
Sunderland; Stadium of Light	Sunderland City Council	8	31	54
Brighton; American Express Stadium	Brighton & Hove City Council	8	31	54
Nottingham; City Ground	Nottingham City Council	8	31	54
Bristol; Ashton Gate	Bristol City Council	8	31	54
Belfast; Windsor Park	Belfast City Council	8	31	54
Glasgow; Hampden Park	Glasgow City Council	10	32	54
Edinburgh; Easter Road	City of Edinburgh Council	8	31	54
Cardiff; National Stadium of Wales	Cardiff Council	12	33	54
Cardiff; Cardiff City Stadium	Cardiff Council	8	31	54
Wrexham; Racecourse Ground	Wrexham County Borough Council	8	31	54

Assumption 4: The number of street traders in the areas where advertising and trading provisions could be applied for EURO 2028, WAC 2029 and F2035™

To estimate the number of street traders in relation to each venue or area likely to be affected by the provisions, DCMS contacted local authorities for the most up-to-date figures on the number of street trader licenses around stadiums used for sporting events. Data collected from local authorities was used as the basis for calculating the number of traders that could be in scope, ensuring that estimates reflect actual local trading patterns. This assessment represents a snapshot in time and is expected to vary over the ten-year appraisal period. Consequently, the following range has been applied to account for the potential variations in event zones.

The **low** estimate has been calculated based on all the data acquired by local authorities as well as taking into account a potential 10% decrease in the number of street trading licences.

The **central** estimate was calculated using the local authority data that was collected, supplemented by estimations for the missing data. The estimates for missing data were projected using stadium capacity as a predictor. Using the data that was obtained, this had a correlation of 73% with stadium capacity.

The **high** estimate assumes 10% growth in street traders to account for potential growth in the number of street traders during the appraisal period.

This is summarised in table 6 below. All estimates have been rounded to the nearest 1.

Table 8 Street traders operating in each local authority (as of December 2025)

Event Zone Location	Number of Street Trading licences		
	Low	Central	High
Belfast; Windsor Park	0	5	6
Birmingham; Birmingham City Stadium	4	4	4
Birmingham; Villa Park	0	10	11
Brighton; American Express Stadium	0	9	10
Bristol; Ashton Gate	1	1	1
Cardiff; Cardiff City Stadium	0	9	10
Cardiff; National Stadium of Wales	0	20	22
Edinburgh; Easter Road	0	6	7
Glasgow; Hampden Park	20	22	24
Leeds; Elland Road	0	10	11
Liverpool; Everton Stadium	5	5	6

London; Emirates Stadium	13	14	15
London; London Stadium	1	1	1
London; Selhurst Park	0	7	8
London; Stamford Bridge	11	12	13
London; Tottenham Hotspur Stadium	10	11	12
London; Wembley Stadium	26	29	32
Manchester; Manchester City Stadium	14	15	17
Manchester; Old Trafford	32	36	40
Newcastle; St James' Park	0	14	15
Nottingham; City Ground	0	8	9
Sunderland; Stadium of Light	9	10	11
Wrexham; Racecourse Ground	0	0	0

Numbers rounded to the nearest 1

Assumption 5: The number of street traders that will be unable to trade as a result of the provisions

The following assumptions are based on engagement with local authorities and lessons learned from previous events and are consistent with assumptions for such restrictions in previous similar appraisals (e.g. Commonwealth Games 2022).

The **low** estimate reflects that 50% of traders will be able to continue to trade due to potential mitigations such as authorisations and alternative trading arrangements being put in place, as noted above.

The **central** estimate reflects the likelihood that 75% of traders in the affected area will be unable to trade while the provisions are in place.

The **high** estimate serves as an upper bound where all traders operating in areas where prohibitions apply are unable to trade.

Table 9: Low, Central and High assumption of % street traders impacted

Percentage of Street Traders Impacted (unable to trade)	Low: 50%	Central: 75%	High: 100%
Belfast; Windsor Park	3	4	5
Birmingham; Birmingham City Stadium	2	3	4

Birmingham; Villa Park	6	8	11
Brighton; American Express Stadium	4	6	8
Bristol; Ashton Gate	1	1	1
Cardiff; Cardiff City Stadium	5	7	9
Cardiff; National Stadium of Wales	10	14	19
Edinburgh; Easter Road	3	4	5
Glasgow; Hampden Park	7	10	13
Leeds; Elland Road	5	8	10
Liverpool; Everton Stadium	3	4	5
London; Emirates Stadium	7	11	14
London; London Stadium	1	1	1
London; Selhurst Park	4	5	7
London; Stamford Bridge	6	9	12
London; Tottenham Hotspur Stadium	6	8	11
London; Wembley Stadium	15	22	29
Manchester; Manchester City Stadium	8	11	15
Manchester; Old Trafford	18	27	36
Newcastle; St James' Park	7	10	13
Nottingham; City Ground	4	6	8
Sunderland; Stadium of Light	5	8	10
Wrexham; Racecourse Ground	0	0	0

Numbers rounded to the nearest 1

Assumption 6: Average revenue per day for a street trader

Using table 10, from the Understanding London's Markets report¹⁷, the average takings for a street stall across all market stall types for England is calculated to be £746. As this is in 2017 prices, we adjust accordingly using a GDP deflator to estimate 2025 prices. Due to lack of data availability, we use this as a proxy for the average gross revenue per day for a street trader across each local authority hosting an event across the UK. Where it is known from the acquired data, we use the estimate depending on what stall type exists within the local authority i.e Hot Food would use the £512 estimate.

¹⁷ Understanding London's Markets (2017) - https://www.london.gov.uk/sites/default/files/20171219_gla_markets_report_web.pdf

It has only been partially possible to identify what type of stalls operate in the assumed vicinity of the event locations. Therefore, where possible, we assume the corresponding cost category from table 8 applies as the daily takings and where no information is available, we use the average takings across all stall types to estimate the cost of restricted trade. This may present an overestimate or underestimate.

Table 10: Market Stall Takings per Day, by Stall Type

Stall Type	England
Bags and Accessories	£770
Bakery	£510
Books, Mags & Stationery	£812
Butcher and Fresh Fish	£1,651
Café / Hot Food/ Takeaway	£512
Clothing	£351
Entertainment & Communications	£500
Footwear	£310
Fruit and Veg, Fresh Flowers	£1,481
Grocery	£1,034
Health and Beauty	£348
Household Goods and Textiles	£1,322
Jewellery & Watches	£741
Lingerie / Nightwear / Hosiery	£281
Speciality	£564
<i>All Stall Types - Average</i>	£746

Source: Understanding London's Markets Report 2017, page 67

Assumption 7: Street trading loss of earnings

For a more accurate representation of the loss of earnings that street traders will face as a result of the measure, sensitivity analysis has been conducted using a range of possibilities. This data is very limited, but ensures a more accurate estimate of the costs of the policy. Using revenue would be a conservative approach, but would significantly over estimate the costs as it would not account for the costs associated with street trading.

The **low** estimate uses the approximate average net rate of return for private non-financial corporations provided by the ONS (2025)¹⁸. This represents a conservative baseline where high operational overheads and managed labour costs absorb the majority of daily revenue.

The **central** estimate accounts for the higher profit margins typical of street traders, especially considering the heightened footfall during a major sporting event. There is some evidence from the Nationwide Caterers Association (NCASS) that mobile catering businesses achieve high gross margins (typically 65% to 85%). After accounting for variable costs such as pitch fees and staffing, a 25% net margin represents an approximate take-home earnings for a street trader.

The **high** estimate accounts for street traders selling high-margin products, such as coffee or specialty snacks. This figure is supported by NCASS data showing gross margins for specific products reaching up to 95%. In this scenario, the absence of external labour costs and the ability to scale sales during a high-capacity event allows for a net profit retention of 40%.

Table 11: Approximate Street Trading net profit margins

Low	Central	High
10%	25%	40%

Assumption 8: Street hawkers/peddlers

We assume that as peddlers are highly mobile and should not remain in a fixed location for any substantive period of time, they will be able to move very easily to an area where they may continue trading. Therefore, they will not be impacted in the same way as a street trader who has been licensed to trade in a fixed location by the local authority. It is therefore assumed a hawker/pedlar would seek areas with highest footfall to trade in and identify suitable alternative locations which do not have temporary restrictions placed upon them. As such, we assume there will be no loss of earnings or cost to these businesses.

Assumption 9: Appraisal Period

These measures are temporary during the events over the next ten years of the appraisal period which includes EURO 2028, WAC 2029 and F2035™. Calculations have therefore been made using a 10 year appraisal period for the purpose of estimating Net Present Values.

Familiarisation costs

The appropriate national authority will have a duty to require a person to produce guidance on the advertising and trading provisions and will be able to require this be shared with specified persons (e.g. local traders). This will help businesses likely to be affected by the provisions understand their impact and any mitigations put in place, for example, applying for authorisation from a relevant body. There may be very small

¹⁸ONS (2025) Profitability of UK companies: April to June 2025 – <https://www.ons.gov.uk/economy/nationalaccounts/uksectoraccounts/bulletins/profitabilityofukcompanies/apriltjune2025>

familiarisation costs for those businesses (e.g. street traders and media owners) reading the guidance (time and resource cost) but this is assumed to be very small. Similar measures have been implemented before, therefore, well established media owners are likely to already have some familiarity with the provisions. In addition, it is likely licensed street traders already face restrictions on the days and hours they can trade. Nevertheless, compared to the counterfactual where primary bespoke legislation would be introduced, it is assumed there will be no additional familiarisation cost.

Trading: Monetised Costs

The cost to business in 2026 from trading days lost is estimated through a multi-step calculation based on the assumptions indicated above. The assessment covers the events specified in Assumption 1: EURO 2028, WAC 2029 and F2035™. Firstly, by identifying the total number of days the restrictions will be in place, in which host locations and using the data acquired from Local Authorities, we can identify the total number of street traders who will be impacted by the policy. Following this, by using an approximate average revenue per day of a street trader and their profit margins, an estimated loss of earnings can be calculated. It is worth noting, these are based on assumptions and therefore four different scenarios are presented below to demonstrate the range of plausible costs to business.

In EANDCB terms, the cost under our central scenario is estimated at £1.1m (rounded to the nearest £0.1 million). The costs occur in the year the events take place (2028, 2029, 2035) and there are not anticipated to be any transition costs imposed on business.

Table 12: Estimated discounted loss of earnings (£m) by varying the number of street traders:

- Low (Using number of total returns from LAs)
- Central (Using number of total returns + predicted returns using average number of street traders per 1000 capacity stadiums)
- High (Using a 10% growth in number of street traders from central estimate to account for potential fluctuations in the number of street traders - particularly in high footfall areas, local authorities only have a limited number of pitches available for street trading).

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Total
Low	£0.00	£0.00	£0.17	<£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.41	£0.58
Central	£0.00	£0.00	£0.33	<£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.86	£1.19
High	£0.00	£0.00	£0.36	<£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.92	£1.28

Table 13: Estimated discounted loss of earnings (£m) by varying the number of days traded:

- Low (using estimated number of matches held at each stadium + 1 day before the event commences)
- Central (average of low and high)
- High (total number of days the event + 10 max days prior to the event + 5 days max days post event)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Total
Low	£0.00	£0.00	£0.16	<£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.27	£0.44
Central	£0.00	£0.00	£0.33	<£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.86	£1.19
High	£0.00	£0.00	£0.49	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£1.44	£1.94

Table 14: Estimated discounted loss of earnings (£m) by varying the number of street traders affected:

- Low (50%), Central (75%) and High (100%)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Total
Low	£0.00	£0.00	£0.22	<£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.58	£0.80
Central	£0.00	£0.00	£0.33	<£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.86	£1.19
High	£0.00	£0.00	£0.43	<£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£1.12	£1.55

Table 15: Estimated discounted loss of earnings (£m) by varying the net profit margin of street traders:

- Low (10%), Central (25%) and High (40%)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Total
Low	£0.00	£0.00	£0.13	<£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.34	£0.48
Central	£0.00	£0.00	£0.33	<£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.86	£1.19
High	£0.00	£0.00	£0.52	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£1.37	£1.90

Non monetised benefits: Affected businesses authorised to trade in affected areas benefit from higher than normal sales due to the increased footfall around event times. For example, ONS data from the Six Nations showed observed boosts in international spending in host postal districts during these sporting events. Although spending behaviour appeared to change as a result, overall the impact appeared minimal. This is because it may be offset by reduced spending in the days before or after the event¹⁹. Nevertheless, the events included in the appraisal are expected to have much larger effects. However, it has not been possible to estimate this indirect benefit especially when taking account of the potential economic displacement during the events.

Furthermore, this measure will provide the certainty that safeguards vital sponsor investment and protects the commercial integrity of major sporting events. This proactive approach enhances the UK's global reputation and competitiveness as a reliable host nation. Major events generate significant economic and social benefits, offering an

¹⁹ ONS (2026) Impact of large events on consumer spending in local UK economies: January 2026 - <https://www.ons.gov.uk/economy/economicoutputandproductivity/output/articles/impactoflargeeventsonconsumerspendinginlocalukeconomies/2026-01-08>

invaluable opportunity to showcase the UK globally, instil local and national pride, and drive lasting regional and national legacies²⁰.

Advertising

Similar to previous events, such as London 2012 and the Birmingham Commonwealth Games 2022, owners of media and advertising space will primarily sell their inventory and advertising spaces to event organisers and sponsors. This is often as part of a strategic agreement to allow them to display types of advertising that do not breach the advertising offence (because it is not advertising a product, service or business), or is another category of advertising that is subject to an exception or is likely to be authorised (such as non-commercial advertising). Businesses that secure out-of-home advertising space near event locations, such as event organisers and sponsors, will benefit from higher footfall and exposure associated with the event, having usually made financial contributions towards its delivery. Those that do not gain permission may see a disadvantage but will not have contributed financially to the event. However, the overall business impact is considered neutral. This is because it is assumed that businesses unable to secure space near the venues will simply adopt alternative marketing strategies. This effect is also a secondary impact, as it stems from a voluntary business decision to advertise or not.

²⁰ UK Sport (2023) New report reveals economic and social benefits of the UK hosting sporting events - <https://www.uk sport.gov.uk/news/2023/01/12/new-report-reveals-economic-and-social-benefits-of-the-uk-hosting-sporting-events>

3.4 Unauthorised Association

The Rationale for Government Intervention

Protection of commercial rights is required because event hosting budgets rely on multiple income streams, including sponsorship, ticket sales, and public funding. Sponsorship can generate significant income and ensuring organisers can maximise this revenue stream can help offset reliance on public funding and reduce the financial burden on taxpayers. Current intellectual property laws are designed to protect use of trademarks, designs, copyright and other unregistered rights, but do not cover all examples of ambush marketing which attempt to create an association in the mind of the public with an event but where there is no clear or enforceable intellectual property infringement.

Ambush marketing by association is a prevalent occurrence for major sporting events; these events are highly lucrative and attract an unprecedented amount of public interest and attention which non-sponsors can seek to capitalise upon. For example, a rival to a London 2012 sponsor launched a high profile global TV campaign to coincide with the London 2012 opening ceremony. Research has shown that UK consumers can identify such a non-sponsor as an official sponsor ahead of those businesses that are official sponsors.

Theory of Change

Inputs

- The Bill providing a civil offence for unauthorised association,
- Enforcement powers granted to designate bodies to enable court action to be taken against unauthorised activity.
- Guidance is available to clarify the scope of the offence and what activity is permitted.

Activities

- Apply the civil offence to relevant events, defining the timeframe and scope
- Authorise official sponsor activity while deterring and restricting unauthorised activity
- Monitor and enforce compliance, including through court-based action.
- Ensure appropriate information is available about the scope of the infringement and its application.

Outcomes

- Introducing a clear legal basis to act against unauthorised association will enable rights holders and event organisers to take action against unauthorised ambush marketing in a timely and proportionate manner. This will enable enhanced management of commercial activity linked to the event and help to maintain integrity.
- The provisions balance commercial protections with appropriate mitigations for existing businesses and non-commercial activity. This supports predictability in

how commercial activity is managed around the event and provides greater clarity for businesses and advertisers.

- The offence will help to protect the rights of official sponsors and partners in relation to event association, without restricting non-commercial activity.

Long-term Impact

- The measure supports the successful delivery of major sporting events by helping to ensure that the UK can meet rights-holder requirements and providing a clear and proportionate framework for addressing ambush marketing.

Assumptions

- Deterrence: Businesses are sufficiently deterred by the risk of enforcement action such as injunctions and damages.
- Enforcement capacity: Designated enforcers have the capability and resources to monitor, identify, and act against unauthorised association activity.
- Clarity and compliance: Businesses understand the scope of the infringement, including exceptions and adjust their marketing behaviour accordingly.
- Proportionality: The framework is applied in a way that balances protection of commercial rights with appropriate exceptions. Rights holder: Rights holders will continue to require legal provisions to prohibit unauthorised commercial association and consider the framework provisions as sufficient to meet their requirements.

Theory of Change (logic chain)

Legislation introduced establishing a civil offence for unauthorised association with a sporting event → event organisers gain enhanced control over who can commercially associate with an event → event organisers empowered to act against unauthorised activity → reduced ambush marketing and opportunistic commercial activity → sponsors' rights and investments protected → predictable and controlled marketing environment around events → enhanced commercial integrity and confidence of rights holders.

SMART objectives for intervention

SMART Objectives

Specific - The intervention will establish a time-limited, UK-wide civil offence that grants event organisers control over association with sporting events. The infringement targets unauthorised commercial activity while excluding non-commercial expression and lawful protest, with enforcement powers granted on specified persons such as event organisers or rights holders.

Measurable - Success will be measured through the enactment of the offence, the number of instances of unauthorised association, action taken by designated enforcers, including informal action (cease and desist letters) and court action. Additional indicators could include growth in sponsorship revenue and merchandise sales.

Achievable - The objective is achievable as similar offences have been introduced for previous sporting events and the remedies and reliefs available will generally be the same as those for other intellectual property infringements.

Relevant - The offence will address the guarantees UKG is required to provide to rights holders.

Time-bound - The offence will introduce time limited protections which correspond with the awarding and delivery of events.

Description of options considered

The options were assessed against a set of Critical Success Factors (CSFs) derived from the policy objectives and operational requirements of major event delivery. The CSFs used to filter options were:

- **Deliverability:** Ability of the framework to enable timely enforcement action
- **Legal certainty:** Ability to provide a clear legal prohibition for unauthorised association.
- **Proportionality:** Ability to balance effective protection of commercial rights with minimising unnecessary administrative and compliance burden for government, and affected stakeholders.
- **Ability to meet international event guarantees:** Ability to provide assurances to rights holders (e.g., FIFA, UEFA, IOC) that protections against ambush marketing will be applied consistently and effectively.

Option 1 - Do Nothing

Under this option, no new legislation would be introduced. This would mean the UK would continue to rely on the existing intellectual property law, including the Trade Marks Act 1994 and the Copyright, Designs and Patents Act 1988.

These laws do not provide comprehensive protection against ambush marketing and are unlikely to meet the requirements of major sporting event rights holders. As a result, the UK could face reputational and financial risks, including reduced sponsor confidence and diminished event revenues and failure to provide the level of certainty and assurance required.

Summary against Critical Success Factors: This option fails to meet deliverability, legal certainty, proportionality, or the ability to meet rights holder requirements because enforcement is limited, legal protections are unclear, administrative risks remain high, and rights holders cannot rely on consistent protections.

Option 2 - Non-Regulatory Option

This option would involve the government and event organisers adopting a non-legislative approach, using voluntary codes of conduct, industry guidelines and campaigns to discourage unauthorised association. The UK government could issue best practice guidance outlining acceptable and unacceptable marketing practices.

This approach would lack legal enforceability and would not provide sufficient deterrence to protect the commercial rights associated with international sporting events. Voluntary mechanisms would likely prove ineffective against organised and innovative ambush marketing campaigns.

Summary against Critical Success Factors: This option partially addresses deliverability and proportionality through guidance and voluntary coordination but fails to provide legal certainty or meet event requirements as protections are unenforceable and inconsistent.

Option 3 - Legislative Option (Preferred Option)

The Secretary of State introduces a time-limited civil offence for unauthorised association undertaken in the course of business. It would apply to both direct and indirect marketing activity but include exceptions to protect honest business use, factual references,

journalism, and non-commercial expressions of support.

Based on experience, such a measure strengthens the protections available to rights holders and event organisers for event-related intellectual property and commercial association infringements. This would provide certainty to sponsors over the protection of their investment and the opportunity for genuine brand exposure, free from interference by unauthorised competitors or counterfeiters. In turn, it enhances sponsorship revenue, licensing fees, and merchandise sales, which are critical to funding major sporting events.

Summary against Critical Success Factors: This option fully meets all CSFs. It provides enforceable legal powers (legal certainty), allows effective enforcement action (deliverability), balances protections with administrative efficiency (proportionality), and gives rights holders confidence that protections will be applied effectively across events (ability to meet international event guarantees).

Option 4 - Introduce bespoke primary legislation for each major sporting event (Counterfactual)

Under this option, the government would continue the approach of introducing event-specific primary legislation for each major sporting event where protection against unauthorised association is required.

This option would allow powers to be tailored to the specific needs of each event and rights holder. It would enable the government to introduce targeted offences and enforcement powers that reflect the scale, location and commercial structure of the event.

While this approach would meet the requirements of rights holders, it would require the government to draft and secure the passage of a separate Act of Parliament for each event. This process is resource-intensive, time-consuming and places repeated demands on parliamentary time.

Summary against Critical Success Factors: This option partially meets legal certainty and the ability to meet international guarantees, but deliverability is reduced due to the repeated primary legislative process, and proportionality is lower because of the administrative burden of delivering primary legislation for each event.

Option	Legal Certainty	Deliverability	Proportionality	Ability to meet international event guarantees
Option 1: Do Nothing	X	X	X	X
Option 2: Non-regulatory approach	X	X	△	X
Option 3: Permanent legislative	✓	✓	✓	✓

framework (Preferred Option)				
Option 4: Bespoke primary legislation for each event (Counterfactual	✓	△	△	✓

- ✓ Meets the critical success factor
- △ Partially meets the critical success factor
- X Does not meet the critical success factor

Summary

Options 1 and 2 are less suitable than Options 3 and 4. Option 1 would not close the existing legislative gap, while Option 2 depends on voluntary measures that are neither enforceable nor likely to deter undesirable behaviour. Neither would provide the legal certainty required by rights holders. Option 4 could satisfy rights holders' requirements but would depend on repeated, bespoke legislation, which is highly resource-intensive. Option 3 offers the best option, delivering clear and enforceable protections against unauthorised association within a consistent legislative framework.

NPSV: monetised and non-monetised costs and benefits of each shortlist option (including administrative burden)

We assume if businesses were to go about their business as usual during each event and do not attempt to associate themselves with the event, then they will be no worse off. Consequently, this option doesn't impose a direct cost on businesses. It is assumed this option will not negatively impact business and can only benefit business (indirectly) as those who obtain authorised association will do so (which could be profitable).

Costs

- Non-monetised costs
 - Ahead of the events, it is generally intended that guidance would be made available to support compliance and help organisations understand how they can show support for events without creating an unauthorised association. There may be familiarisation costs for those businesses reading the guidance (time and resource cost) but this is assumed to be very small. Nevertheless, it is also assumed compared to the counterfactual of introducing bespoke primary legislation, there will be no additional familiarisation cost as a result.
 - Such legislative prohibitions on unauthorised association are commonly introduced by hosts of itinerant major sporting events and many businesses will be aware of the need to comply with such provisions as they are implemented on a case-by-case basis; the framework bill will provide certainty and consistency over the scope of the prohibition as it applies to events being hosted in the UK.

- The preparation of secondary legislation to apply the unauthorised association provisions will incur a cost to government resources, although this will be much lower than developing new primary legislation.

Benefits

- Non-monetised benefits
 - Businesses which seek an authorised association will do so because they foresee an economic benefit (e.g. through sponsorship). Although they may bear an initial cost the net effect is assumed to be positive. Because obtaining authorised association is a choice, and businesses who do not do so will be no worse off, this is an indirect benefit.
 - By preventing unauthorised association, the policy secures the exclusive brand rights that justify significant private investment. For example, the London Organising Committee of the Olympic Games successfully raised over £2 billion in private funding, including domestic sponsorship and licensing to fund the London 2012 games. Similarly, for the 2022 Commonwealth Games, £120 million of commercial income was raised²¹. This indicates how private revenue can help offset costs that otherwise would have fallen on the public.
 - Without these protections, the market value of sponsorship packages would likely have diminished, as non-sponsoring brands could have extracted commercial value through “ambush marketing” without contributing to the event’s costs. Therefore, demonstrating the economic benefit of the policy which reduces the burden on the taxpayer.²²
 - By providing legal certainty, this will help deliver significant benefits by enhancing the UK’s global reputation and competitiveness as a host nation for major sporting events. Major events deliver significant economic and social benefits as well as an opportunity to showcase the UK globally. These events instil local and national pride, and provide opportunities to drive local, regional and national legacies.²³

Net Impact

- Overall, we expect the benefits to outweigh the costs.
 - Businesses are largely unaffected unless they choose to pursue authorised association with an event, in which case they incur voluntary costs for potentially profitable commercial opportunities.
 - The framework secures private investment that would otherwise be at risk from unauthorised association, supporting financial sustainability for major events.

²¹ DCMS (2022) Evaluation of the 2022 Birmingham 2022 Commonwealth Commonwealth Games One Year Post-Games Evaluation Report - https://assets.publishing.service.gov.uk/media/660e98f3a43d9100113af14d/Evaluation_of_the_Birmingham_2022_Commonwealth_Games_One_Year_Post-Games_Evaluation_Executive_Summary.pdf

²² DCMS (2013) Meta-Evaluation of the Impacts and Legacy of the London 2012 Olympic Games and Paralympic Games ECONOMY EVIDENCE BASE - https://assets.publishing.service.gov.uk/media/5a7ccdea40f0b6629523bea0/Report_5_Economy_Evidence_Base_FINAL.pdf

²³ UK Sport (2023) New report reveals economic and social benefits of the UK hosting sporting events - <https://www.uk-sport.gov.uk/news/2023/01/12/new-report-reveals-economic-and-social-benefits-of-the-uk-hosting-sporting-events>

- Wider societal benefits arise from clearer governance, strengthened UK hosting credibility, and the economic, social, and cultural impacts of major sporting events.
- Compared to the counterfactual of bespoke primary legislation, the framework reduces administrative burden, increases consistency, and provides early legal certainty for both businesses and event organisers.

Minimising administrative and compliance costs for preferred option

Administrative and compliance would be kept low with the preferred option. The infringement will be civil rather than criminal, meaning that enforcement will be for event organisers or rights holders rather than public authorities. This avoids the need for new funding or training for enforcement bodies. The policy operates through existing intellectual property and civil court mechanisms, relying on familiar procedures for injunctions, damages, and the removal of infringing content.

Rights holders and event organisers are anticipated to use informal remedies, such as cease and desist letters, before resorting to court action. As a result, the compliance burden for most businesses will be negligible, with only those engaged in large-scale marketing activity likely to incur legal or advisory costs.

Impact on small and micro businesses

The proposed creation of a civil offence for unauthorised association with major sporting events is expected to have only a minimal impact on small and micro businesses. The measure will prevent businesses from suggesting a commercial link or official connection to events such as major sporting events without authorisation. However, most small enterprises do not operate in sectors or at scales where such marketing activity is likely to undermine commercial rights or sponsorship.

Business environment

The measure sits within a well-established UK legal framework governing intellectual property. It complements existing laws such as the Trade Marks Act 1994 and the Copyright, Designs and Patents Act 1988. The major sporting events market and events economy depend heavily on secure sponsorship and branding rights, and this policy strengthens confidence in those markets. It follows the successful precedents in bespoke legislation which contained similar temporary protections for event organisers and sponsors. By ensuring clarity and consistency in rights protection, the UK will enhance its position as a reliable host for sporting events.

Trade implications

There are not expected to be any trade implications.

Other wider impacts

The wider impacts of the policy are largely beneficial. Economically, it will improve sponsor confidence, enhance commercial revenues, and could reduce the need for public funding of major events. This, in turn, supports economic activity in connected sectors.

Socially, the policy upholds the integrity of official sponsorships and prevents misleading or unfair commercial practices while still allowing communities and non-commercial organisations to celebrate and support events.

Environmentally, the impact is neutral.

Risks and assumptions

The preferred option assumes that major international sporting events will continue to require enhanced, time-limited protections for commercial rights as a condition of hosting, and that existing intellectual property frameworks alone are insufficient to address ambush marketing by association.

Several risks have been identified and mitigated in the policy. The risk of disproportionate or overzealous enforcement by designated enforcers against small or local businesses is addressed by the ability to create exceptions to the infringement via Regulations and for the Secretary of State to impose conditions upon a designated enforcer related to enforcement activity.

The risk of ambiguity in the definition of “association”, would be addressed through guidance on a case-by-case basis, depending on the application of the offence via Regulations.

A risk of perception of the policy as limiting free expression or protest is mitigated by ensuring the infringement only captures activity undertaken in the course of business.

The reputational risk associated with delegating enforcement powers to private bodies, as is routinely the case with intellectual property infringements, is mitigated by making powers time-limited with powers for Ministers to apply conditions to enforcers.

3.5 Transport

The Rationale for Government Intervention

Existing transport and traffic management legislation does not provide sufficiently flexible powers to effectively plan and manage large-scale operations for major sporting events. Under the Road Traffic Regulation Act 1984 (RTRA), local Traffic Authorities and National Highways can implement Temporary Traffic Regulation Orders (TTROs) and Notices (TTRNs) for limited purposes such as road works, public safety, or litter clearance. While TTROs and TTRNs can be used for all kinds of traffic regulation (i.e. changes to road use), these existing circumstances for their use have been considered insufficient for delivering the necessary transport operations associated with major sporting events; particularly when events span wide areas in busy city regions and require traffic management measures beyond the immediate vicinity or security perimeter of a venue, where existing legislation Section 14 (Temporary prohibition or restriction on roads) and Section 22C (Terrorism) of RTRA already provides sufficient cover for safety-related controls, the statutory purposes themselves are too narrow to support comprehensive event transport operations.

This was observed during the delivery of both the London 2012 Olympics and Birmingham 2022 Commonwealth Games where bespoke legislative provisions were required because existing powers were deemed insufficient for essential activities such as implementing Games Route Networks and facilitating dedicated transport arrangements for athletes and officials.²⁴ Without these expanded powers, local authorities - who are typically responsible for traffic management - are constrained, in this context, by existing legislation.

Current legislation also constrains the Secretary of State's ability to direct an overarching Transport Plan, coordinate multiple traffic authorities, and resolve stakeholder conflicts. As a result, operational planning cannot be fully aligned with international event guarantees without further legislative provision, creating a clear policy gap.

Expanded traffic management powers would allow traffic authorities to implement TTROs and TTRNs specifically for major sporting events, including facilitating transport plans, services, and travel for attendees, athletes, and officials. Such powers would support the creation of dedicated route networks, temporary speed limits, parking adjustments, and venue access management, as successfully implemented in previous events. The theory of change underpinning the intervention is that a standing legislative framework reduces legislative delay and enables earlier operational planning.

Government intervention is justified not only to mitigate operational risk but also to maximise economic and reputational benefits. Major events attract millions of visitors, requiring coordinated traffic management to prevent disruption and maintain smooth operations. The Birmingham 2022 Commonwealth Games, for example, engaged a total

²⁴ The concerns expressed by Birmingham local authorities about the adequacy of existing powers were not made public. When West Midlands colleagues advocated for expanded powers, their communications were formal—primarily through reports—but these documents were not published

of 6.9 million attendees, participants, volunteers and employees and generated £1.2 billion in GVA, supporting thousands of jobs.²⁵ Without robust legislative powers, authorities face legal and operational risk, and the potential for congestion and disruption could undermine both event delivery and the UK's reputation for hosting world-class sporting events.

Additionally, an absence of these expanded powers could limit the traffic management interventions that can be made, thereby increasing the risk of disruption. Transport disruption not only poses reputational risks but can also directly affect event operations, including start times and overall delivery.

Comparable framework based approaches to transport and traffic management for major sporting events are used in a number of other jurisdictions, including Australia²⁶ and New Zealand²⁷, where standing legislative powers allow authorities to activate event specific traffic management measures without the need for bespoke primary legislation for each event. These approaches are intended to provide legal certainty, enable earlier operational planning, and reduce delivery risk while retaining local discretion and time limited application.

The proposed transport powers align with this established international practice by creating a permanent, flexible framework that can be applied proportionately to designated major events, rather than relying on repeated event-specific Acts.

For example, an assessment of the London 2012 Olympic and Paralympic Games by Transport for London²⁸ confirmed that the expanded traffic powers were both effective and essential, particularly in facilitating last-minute operational adjustments during the Games. These powers enabled traffic authorities to respond swiftly to emerging issues, ensuring smooth transport operations for Games stakeholders, including the Games Family and spectators, as well as the wider public. Without these provisions, key delivery partners, such as the Olympic Delivery Authority (ODA), Transport for London, the London Organising Committee of the Olympic Games, and local traffic authorities, would have likely faced significant operational challenges.

Furthermore, the transport provisions proposed in this Bill closely mirror those included in the Birmingham Commonwealth Games Act 2020. An evaluation of the Birmingham 2022 Commonwealth Games transport operation, conducted by stakeholders including Transport for West Midlands, found that these measures were instrumental in streamlining event delivery.²⁹ The Act served as a catalyst for stakeholder collaboration, fostering productive relationships and facilitating coordinated decision-making. Importantly, the Games-specific TTROs provided targeted solutions to event-related transport challenges, including minimising disruption to residents living near venues and ensuring that transport interventions were proportionate, effective, and responsive to local needs.

²⁵ Midlands Engine Observatory (2022) Economic Impact of the Commonwealth Games in Birmingham – https://midlandsengineobservatory.org/wp-content/uploads/2022/10/Economic_impact_of_the_Commonwealth_Games_in_Birmingham.pdf

²⁶ NSW Government (2009) Major Events Act 2009 – <https://legislation.nsw.gov.au/view/whole/html/inforce/current/act-2009-073>

²⁷ New Zealand Government (2007) Major Events Management Act 2007 – <https://www.legislation.govt.nz/act/public/2007/0035/latest/DLM411987.html>

²⁸ TfL (2012) Games Performance: Part 1, Item 06 – Part-1-Item06-TfL-Games-Performance-Final-corrected

²⁹ This was not published.

The Sporting Events Bill addresses the potential failure of traffic authorities to comply with the Secretary of State direction by including a clause allows the Secretary of State to act in its place and recover associated expenses as a debt.

Establishing permanent, flexible powers would ensure consistent, efficient, and reliable transport management for future events, eliminate the need for ad hoc legislation, and strengthen the UK's standing as a confident and capable host of international sporting events.

Theory of Change

Inputs

- The Bill provides transport provisions that can be applied to major sporting events
- Existing traffic management powers under current legislation, clarified and codified for use under the framework.
- Guidance and protocols for authorities on applying transport powers in a proportionate and event-specific manner

Activities

- Apply transport provisions to designated events through secondary legislation, defining scope, timing, and locations.
- Plan, consult, and coordinate transport measures among central and devolved governments, local authorities, and event organisers.
- Implement traffic management interventions, including road closures, diversions, and crowd movement controls, as appropriate.

Outcomes

- A framework enables traffic authorities and delivery partners to plan, consult and coordinate transport measures at an earlier stage, where appropriate, reducing the risk of delay caused by late legislative change, compressed implementation timelines, or uncertainty over the legal basis for traffic management interventions.
- By providing a clear and consistent mechanism for applying transport-related powers, the provisions support more coordinated decision-making between relevant authorities and delivery partners. This helps to manage transport operations around event venues and associated areas in a structured and proportionate way.
- The framework also provides greater clarity on when and how powers may be used, supporting more predictable planning processes and helping to reduce the need for reactive or last-minute interventions.

Long-term Impact

- The intended result is more timely, coordinated and proportionate transport planning, supporting effective event delivery while minimising disruption, and enabling the UK to meet rights-holder expectations in relation to transport and operational readiness.

Assumptions

- Implementation: Traffic authorities and delivery partners make use of the framework in a timely and coordinated manner when planning for events.
- Capacity: Relevant authorities have the resources, expertise, and capability to design and implement transport measures effectively.

- Coordination: Effective collaboration takes place between central government, devolved administrations, local authorities, and event organisers.
- Proportionality: Transport powers are applied in a way that balances event requirements with the needs of local residents, businesses, and wider transport users.

Theory of change (logic chain)

Standing legislative framework → earlier legal certainty of powers → reducing government time on legislation → earlier traffic management planning and coordination → reduced reliance on late legislative change → reduced risk of delay and operational disruption.

SMART objectives for intervention

SMART Objectives

Specific - Traffic authorities to be empowered through delivery of a designated major event being added, on a permanent basis, to the circumstances under which they can use existing traffic management powers; and that they use them where considered useful to deliver events. This should eliminate the need to deliver duplicative, event-specific legislation, and enable transport planning to be delivered with greater confidence.

Operationally, success will be defined by improved journey time reliability on designated routes, reduced unplanned network disruption, and effective access management for athletes, officials, residents, and businesses.

Measurable - Concerning the objective specifically of enabling traffic authorities to regulate road use to support major event delivery, measures of success will include whether this change is enacted in the form of the framework Bill, and whether this eliminates all need to pursue individual event-specific legislation in the future.

Additional event-level metrics could include:

- Average journey times on key event corridors compared with baseline conditions.
- Number and duration of transport disruptions attributable to event operations.
- Stakeholder satisfaction scores from LTAs, operators, and delivery partners.
- Compliance rates with temporary traffic measures.

In terms of the operational effect of delivering this legislation, it is challenging to measure consistently given unique characteristics of each event and location. Anecdotal and qualitative feedback from previous events has indicated the importance of expanded traffic regulation powers in ensuring smooth running of event operations and minimising disruption. This will continue to be the goal. Lessons learned and feedback exercises with traffic authorities and other relevant delivery bodies will be conducted following a major event where these powers have been used.

Achievable - The objective is achievable because expanding traffic regulation powers is precedent in previous event-specific legislation and has proved broadly uncontroversial. We are also not creating a new power per se but extending the circumstances and reasons for which existing powers can be exercised.

Relevant - Providing the tools to help deliver effective transport and traffic management for major events is relevant to the government's priority to support the UK's world-class sport sector. Successful event delivery, assisted by effective transport management, will deliver substantial economic and cultural value to the UK.

Time-bound - Legislation will set out the time limited periods within which the transport provisions may be applied.

Description of options considered

Before detailed appraisal, a long-list of potential policy approaches was developed to address the identified policy gap relating to traffic management powers for major sporting events. The long-list was designed to capture the full range of possible interventions, including regulatory and non-regulatory options.

These options were then assessed against a set of Critical Success Factors (CSFs) derived from the policy objectives and operational requirements of major event delivery. The CSFs used to filter options were:

- **Deliverability:** Ability to support operational transport planning and implementation at the scale required for major events.
- **Legal certainty:** Ability to provide a clear statutory basis for transport measures and enforcement.
- **Proportionality:** Ability to minimise unnecessary disruption to businesses, residents and road users while enabling effective event delivery.
- **Ability to meet international event guarantees:** Ability to provide the legal assurances required by international rights holders when bidding for and hosting events.

Options that did not sufficiently meet these CSFs were not taken forward to the short-list for detailed appraisal, but are presented below for transparency.

Option 1 - Do Nothing

Under this option, transport delivery for Major Sporting Events would rely solely on existing traffic management powers and voluntary cooperation between local authorities and relevant stakeholders. No new legislation or additional statutory powers would be introduced. Against the critical success factors of deliverability, legal certainty, proportionality, and the ability to meet international event guarantees, this option presents significant limitations.

This approach would impose no additional legislative or administrative burden on HMG or traffic authorities and would maintain familiarity with current processes, as delivery partners would continue operating within established frameworks.

However, existing traffic management powers are limited and may not be sufficient to support the complex operational requirements of major international sporting events. This increases the risk of congestion, delays and operational challenges, as well as broader reputational impacts, if visitor flows cannot be effectively managed within existing constraints. This creates material risks to operational deliverability at the scale required for major international events.

There is also a risk of damaging relationships with key stakeholders, particularly local authorities, who would be relied upon to deliver critical aspects of traffic management. Previous event-specific legislation has established a clear precedent for providing bespoke traffic powers, and removing that clarity could reduce confidence in the government's approach to supporting effective event delivery. This lack of assurance weakens the UK's ability to demonstrate compliance with international event guarantees, which typically require clear and enforceable transport powers.

There would be no direct regulatory impact on small, micro or medium-sized businesses under this option. However, businesses could experience indirect disruption if transport planning is ineffective. Small and micro businesses in particular may be more vulnerable to access restrictions, reduced footfall and operational delays arising from major events. As a result, impacts on businesses would be less predictable and potentially less proportionate than under options with a clearer statutory footing.

Poor transport coordination could also result in wider negative economic impacts if accessibility is reduced and visitor movements are constrained, limiting the overall economic benefits associated with hosting major sporting events.

Mitigation would rely on enhanced travel demand management, voluntary stakeholder engagement and proactive communication with road users and delivery partners. However, in the absence of enforceable statutory powers, these measures would be limited in their effectiveness and would not provide the same level of legal certainty or operational clarity.

Summary against Critical Success Factors: This option is not recommended. It performs poorly against key CSFs: deliverability is limited because existing powers may be insufficient for major event operations, risking congestion and delays; legal certainty is weak without enforceable statutory powers, undermining stakeholder confidence and compliance with international guarantees; and proportionality is compromised as impacts on businesses and the public would be unpredictable. Overall, a "do nothing" approach provides minimal assurance for coordinated transport, operational reliability, or successful event delivery.

Option 2: Non-regulatory approach (Memorandum of Understanding and communications)

Under this option, transport planning for major sporting events would be supported through non-statutory mechanisms, including the development of Memoranda of Understanding (MoUs) with affected local traffic authorities and enhanced communications encouraging road users to avoid specified routes ahead of events. No new legislation or additional statutory powers would be introduced. This option does not meet the deliverability critical success factor, as it relies entirely on voluntary and non-statutory mechanisms.

This approach would avoid legislative change and reduce administrative burden, while providing flexibility to tailor arrangements to individual event requirements. It would also enable continued dialogue and voluntary cooperation between central government, local authorities and other stakeholders. While flexible, this approach does not meet the legal certainty critical success factor because arrangements are not enforceable.

However, these arrangements would not be legally enforceable. MoUs and communications rely on voluntary participation, creating a risk that key partners may not fully comply, act inconsistently, or be unable to deliver agreed actions in a timely manner. As a result, transport measures may be fragmented or delayed, undermining coordinated event delivery and increasing operational uncertainty. This option does not meet the deliverability or legal certainty critical success factors due to the absence of enforceable powers.

Existing limitations in enforceability could also expose planning decisions to inconsistency, reducing confidence among delivery partners and potentially affecting the ability to meet international hosting commitments. There is a risk that reliance on goodwill alone would not provide sufficient assurance for complex transport requirements associated with major sporting events. This option does not meet the critical success factor relating to the ability to meet international event guarantees.

There would be no direct regulatory impact on small, micro or medium-sized businesses under this option. However, businesses could still experience indirect impacts if transport planning proves ineffective or if last-minute adjustments are required. Small and micro businesses may be particularly vulnerable to disruption arising from congestion, restricted access, or uncertainty around traffic management arrangements. Unpredictable impacts mean this option does not meet the proportionality critical success factor in practice.

Mitigations for this approach would need to include strengthened stakeholder engagement, proactive communication and early planning discussions with local authorities and partners. However, even though these mitigations could improve coordination, they would not address the fundamental absence of enforceable statutory powers. As a result, mitigations are insufficient to meet the deliverability and legal certainty critical success factors.

Summary against Critical Success Factors: This option is not recommended. Although voluntary cooperation may support dialogue and flexibility, it would not provide the legal certainty, consistency or deliverability required to ensure effective transport management for major sporting events. The absence of statutory underpinning means it performs poorly against key critical success factors, particularly in relation to deliverability, legal certainty, proportionality, and ability to meet international event guarantees. As a result, it cannot reliably meet the standards necessary to support coordinated planning and successful event delivery. Overall, this option does not meet the critical success factors.

Option 3: Introduce a permanent legislative framework for major sporting event transport powers (Preferred Option)

This option would remove the need for event-specific legislation by establishing Sporting Event TTRO powers in perpetuity that may be applied to particular major sporting events that are designated as such under the Bill. Similar to Option 2, traffic authorities would have statutory powers to implement targeted restrictions and other measures designed to support operational delivery and keep the region moving, specifically in connection with designated sporting events. This option meets the deliverability critical success factor by removing reliance on event specific primary legislation.

This approach provides a clear statutory basis for event-specific traffic management powers and enables traffic authorities to implement targeted restrictions where necessary

to support effective event delivery. This option meets the legal certainty critical success factor by establishing powers in advance of individual events.

It breaks the recurring cycle of requiring bespoke legislation. By embedding the framework in statute on a permanent basis, it streamlines planning, reduces administrative burden for future events, and removes uncertainty associated with securing new primary legislation each time. This option meets the deliverability critical success factor by reducing timing and resourcing risks.

Planning and bidding for major sporting events would likely proceed with greater confidence, as governments and delivery partners would be able to demonstrate that appropriate traffic management powers are already available within an established statutory framework. This option meets the critical success factor relating to the ability to meet international event guarantees.

However, there would remain some administrative burden in preparing and consulting on transport plans for each designated event. The application of the powers would still require operational implementation and stakeholder engagement.

There is also potential for temporary disruption to businesses and households arising from event-related traffic measures. Although such impacts would be time-limited, restrictions such as road closures or access controls may affect local operations during the period in which they are in force.

While the framework provides statutory powers, measures may not be fully tailored to each individual event in granular detail (although in practice there is likely to be limited variation in how the RTRA would need to be amended or applied compared with previous event-specific Acts).

Businesses may experience both positive and negative impacts under this option. Positive impacts may arise from increased tourism, visitor spend, and more predictable transport planning that supports smoother event delivery. However, businesses may also face temporary access restrictions or delivery delays as a result of event-related traffic measures.

Micro, small, and medium-sized businesses may be more exposed to disruption due to limited resources to absorb short-term operational impacts. Effective consultation and engagement processes can help identify and mitigate disproportionate effects, and previous major events have demonstrated that exemptions or tailored arrangements can be provided where appropriate (for example, access passes or targeted support programmes implemented during previous Games). These mitigations support the proportionality critical success factor, particularly for small and micro businesses.

The requirement to consult on the event transport plan, which forms part of the wider transport provisions in the Bill, ensures that local concerns are identified and addressed in advance. This reinforces the proportionality critical success factor.

Flexibility in implementation enables tailored solutions to minimise negative impacts. Although ordinary TTROs may remain in place for up to 18 months, sporting event TTROs will be subject to bespoke time limits and may only be in force from four weeks before the start of the event until five days after its conclusion. The process for revoking

these orders will also be simplified by removing the requirement for a seven-day public notice period, enabling restrictions to be lifted promptly once they are no longer necessary.

The exercise of these powers would remain at the discretion of the relevant traffic authorities, typically local authorities, which are under a statutory duty to consider the needs of all road users and wider public interests when making traffic orders. Section 122 of the Road Traffic Regulation Act 1984 requires authorities to have regard to access to premises, the protection of amenities, environmental considerations, and the facilitation of public transport before exercising their powers to secure the safe and efficient movement of traffic and adequate parking provision. This duty will continue to apply when exercising sporting event TTRO powers, helping to ensure proportionality.

Monitoring and evaluation mechanisms can further identify and address any unintended consequences arising from implementation.

Summary against Critical Success Factors: This is the preferred option. Against the critical success factors, this option performs strongly on deliverability, legal certainty, proportionality, and the ability to meet international event guarantees by providing early legal certainty, scalable powers, and a consistent framework that reduces timing and resource risks. Overall, this option meets all critical success factors.

Option 4: Introduce bespoke primary legislation for each major sporting event (Counterfactual)

Under this option, the government would continue the precedent of enacting bespoke legislation to support the delivery of a single major event. This would include amending the RTRA to provide statutory powers for traffic authorities to implement targeted restrictions where necessary to support event operations.

Against the critical success factors of deliverability, legal certainty, proportionality, and the ability to meet international event guarantees, this option performs better than doing nothing but still presents material limitations.

This approach provides a clear legal basis for event-specific traffic management powers and enables authorities to implement tailored restrictions to support effective delivery. It ensures measures are legally grounded and aligned to the requirements of the individual event, recognising that amendments to the RTRA are typically limited in scope and similar to those used for previous events. This option therefore performs relatively strongly against the legal certainty criterion for individual events.

However, this approach does not remove the need for significant resource to deliver bespoke legislation for each major event. An ongoing administrative burden remains associated with preparing, consulting on and securing passage of transport-related provisions. This weakens performance against the deliverability criterion, particularly where legislative timelines are compressed or uncertain.

Previous event-specific legislation has sometimes created uncertainty for local authorities and stakeholders regarding the scope and application of transport powers, which can complicate planning and operational delivery. There is also a risk that if powers or

associated measures are not in place in a timely manner, or if legislation were delayed or did not progress as intended, this could create operational uncertainty for event delivery. This weakens performance against the deliverability criterion, particularly where legislative timelines are compressed or uncertain.

In addition, the implementation of event-specific traffic measures may result in temporary disruption to businesses and households, particularly where restrictions affect access routes or local traffic circulation.

Businesses may experience both positive and negative impacts under this option. Positive effects may arise from increased tourism, visitor spend, and more structured event planning that provides clarity over transport arrangements. However, businesses may also face temporary access restrictions, delivery delays, and operational disruption during the period in which event-related traffic measures are in force. While these impacts are generally time limited, the need to design mitigations repeatedly for each event can reduce proportionality and consistency across events.

Micro, small, and medium-sized businesses may be more exposed to disruption due to comparatively limited resources to absorb short-term impacts. Effective consultation and engagement can help identify and mitigate disproportionate effects, with opportunities to provide exemptions or targeted mitigations where appropriate.

For example, in the build-up to the Birmingham 2022 Commonwealth Games, transport organisers delivered a Travel Advice to Businesses programme.³⁰ Communications teams engaged directly with businesses within Local Area Traffic Management Plan zones to advise on planned restrictions and available support. Measures included providing access passes through traffic restrictions and facilitating access to free event tickets to support engagement and mitigate impact.

The requirement to consult on the event transport plan, which is likely to remain a feature of future event-specific legislation, helps ensure that local concerns are identified and addressed in advance. This supports proportionality at an individual event level but does not address cumulative inefficiencies across multiple events.

Flexibility in implementation allows for tailored solutions to minimise negative impacts. Although ordinary TROs can remain in place for up to 18 months, bespoke time limits are anticipated for any TTROs enabled specifically to support a major event. For example, for the Birmingham 2022 Commonwealth Games, such TTROs were limited to a defined period before and after the event (e.g. from three weeks before the start to five days after the conclusion). The process for revoking orders was also simplified by removing the requirement for a seven-day public notice period, enabling restrictions to be lifted promptly once no longer necessary.

The exercise of these powers would remain at the discretion of the relevant traffic authorities, most commonly local authorities, which are under a statutory duty to consider the needs of all road users and wider public interests. Section 122 of RTRA (Exercise of functions by strategic highways companies or local authorities.)³¹ requires authorities to

³⁰ Birmingham 2022 (2022) Travel information for local businesses – <https://www.birmingham2022.com/getset/local-businesses/travel>

³¹ UK Government (1984) Road Traffic Regulation Act 1984: Section 122 – <https://www.legislation.gov.uk/ukpga/1984/27/section/122>

have regard to access to premises, protection of amenities, environmental considerations, facilitation of public transport, and other relevant factors before exercising their powers to secure the safe and efficient movement of traffic and adequate parking provision. These duties would continue to apply when using amended TTRO powers to support a specific event, helping to ensure proportionality in decision-making.

Monitoring and evaluation mechanisms can further identify and address any unintended consequences arising from the application of these powers.

Summary against Critical Success Factors: This option is effective in providing a clear legal foundation for delivering event-specific transport measures, however it is resource-intensive and does not address the recurring needs of multiple events, thus scoring poorly against critical success factors relating to proportionality, deliverability and the ability to meet international event guarantees. There is a risk that late delivery of bespoke legislation results in reduced preparation time meaning additional work is required to assess impacts and develop mitigations in a scenario without legislation.

Option	Deliverability	Legal Certainty	Proportionality	Ability to meet international event guarantees
Option 1: Do Nothing	X	X	△	X
Option 2: Non-regulatory approach (MoYs and communications)	X	X	X	X
Option 3: Permanent legislative framework (Preferred Option)	✓	✓	✓	✓
Option 4: Bespoke primary legislation for each event	△	✓	△	△

- ✓ Meets the critical success factor
- △ Partially meets the critical success factor
- X Does not meet the critical success factor

Summary

Following initial assessment against the Critical Success Factors, Options 1 and 2 were discounted from the short-list as they failed to meet key requirements relating to deliverability, legal certainty and the ability to meet international event guarantees.

As a result, Options 3 and 4 formed the short-list and were taken forward for fuller appraisal, including consideration of operational impacts and qualitative cost-benefit assessment. Option 3 is identified as the preferred option.

Option 3 strikes a pragmatic balance by providing a consistent, enduring mechanism for event-specific traffic management, removing the need for repeated bespoke primary legislation while retaining flexibility in how powers are applied. By establishing powers in advance, it reduces administrative and parliamentary burden, provides earlier legal certainty, and enables local authorities and delivery partners to plan with greater confidence and coordination. The framework supports proportionate, time limited application of measures at an event level, while ensuring the UK can reliably meet international event guarantees and deliver major sporting events effectively.

NPSV: monetised and non-monetised costs and benefits of each shortlist option (including administrative burden)

The core aim of the ticketing, unauthorised association, and advertising and trading provisions is to establish an agile framework for enhanced commercial rights protections. This is essential to meet common rights holder commitments and to make the UK a more attractive host for major sporting events. These protections are typically required by event rights holders as a condition of awarding hosting rights and are therefore critical to the UK's ability to secure major sporting events. This is not the case for the transport measures. These provisions do not directly contribute to securing hosting rights in the same way as commercial protections. Instead, their core objective is to streamline the legislative process for implementing transport powers associated with major sporting events. By including these powers in a forward-thinking framework the government can significantly reduce the time and resource burden associated with event delivery while still ensuring spectator safety and coordinated transport management.

Costs

- Non-monetised costs:
 - Temporary traffic disruption and congestion for the wider public and non-event traffic during major sporting events.
 - Example: London 2012 Olympic Games – 54% of regular commuters adjusted travel to avoid disruption (Transport for London data).³²
 - Familiarisation and compliance costs for local authorities, traffic management bodies, and enforcement agencies.
 - Legislation is not event-specific, which may require additional secondary legislation for future events to enable all powers.

Benefits

- Monetised benefits

³² TfL (2012) Olympic Legacy Monitoring: Personal Travel Behaviour during the Games - <https://content.tfl.gov.uk/olympic-legacy-personal-travel-report.pdf>

- Option 3 avoids repeated legislative drafting for each event, delivering estimated efficiency savings of £5 million over 10 years, or approximately £0.5 million per year.
- Streamlined administrative processes reduce time and resource burdens for government while maintaining transport powers to support major sporting events.

As set out in Section 3.1, indicative analysis estimates that removing the need for bespoke primary legislation could deliver total savings of approximately £5 million over a 10-year period, equivalent to around £0.5 million per year. Proceeding with Option 3 would therefore generate meaningful efficiency savings for the government while maintaining the necessary transport powers to support major sporting events.

The Framework Approach estimated discounted cost per year for Option 3, Option 4, and the resulting government saving (Difference)

- *Option 2: Introduce bespoke primary legislation for each major sporting event (Counterfactual)*
- *Option 3: Introduce a framework of menu provisions to support the hosting of major sporting events (Preferred Option)*

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Total
Option 3	£0.00	£0.13	£0.13	£0.00	£0.00	£0.00	£0.00	£0.00	£0.11	£0.00	£0.36
Option 4	£1.01	£1.96	£0.95	£0.00	£0.00	£0.00	£0.00	£0.83	£0.80	£0.00	£5.54
Difference	£1.01	£1.83	£0.82	£0.00	£0.00	£0.00	£0.00	£0.83	£0.69	£0.00	£5.18

The assumptions made to generate the table above can be found in Section 3.1. This analysis does not specifically assess the Transport measure in isolation, as this measure would never be applied independently but would always be implemented as part of the wider legislative package

- Non-monetised benefits
 - Support the safe and easy flow of spectators to and from venues.
 - Major events can increase footfall to businesses in the vicinity of event locations, for example, ONS data from the Six Nations showed observed boosts in international spending in host postal districts during these sporting events, indicating a shift in spending behaviours caused by the events.³³
 - Events will be delivered with clear legislation in place to deliver these major events more smoothly.
 - The new powers will streamline the legislative process for major sporting events. This legislative efficiency will make the UK a more attractive and desirable host country for major event organisers. This could increase the likelihood that major sporting events are hosted in the UK. Any wider economic benefits described above would therefore only arise if the framework contributes to more major sporting events being held in the UK.

Net Impact

- Overall, we expect these non-monetised benefits to outweigh the non-monetised costs.

³³ ONS (2026) Impact of large events on consumer spending in local UK economies: January 2026 - <https://www.ons.gov.uk/economy/economicoutputandproductivity/output/articles/impactoflargeeventsonconsumerspendinginlocalukeconomies/2026-01-08>

- Estimated £5.18 million in government time saved over 10 years compared to bespoke legislation (Option 4).
- Facilitates smooth, safe, and coordinated transport management, maintaining spectator safety and operational readiness.
- Potential for increased business footfall, improved spectator experience, and enhanced UK competitiveness as a host nation.

Minimising administrative and compliance costs for preferred option

The proposed transport measure in the Bill is an enhancement of existing powers for Traffic Authorities (TAs), meaning no new training or substantial compliance costs are anticipated for TAs or their partners, as they will apply familiar processes to a broader set of scenarios. TAs will only need to familiarise themselves with the bespoke time limits and simplified revocation procedures for the Sporting Event TTROs and TTRNs, a one-off cost considered very limited and not monetised in the assessment. Governments can advise relevant TAs on these aspects as part of the wider formal event designation process. Crucially, the establishment of a standing legislative framework will generate significant administrative savings for the government as indicated above, by removing the need to draft, consult on, and pass bespoke primary legislation for each future major sporting event.

Impact on Businesses

The overall impact to business is expected to be neutral.

The introduction of Sporting Event TTROs and TTRNs is unlikely to have any impact on businesses, compared to the BaU approach, as it will not be changing the amount of visitors in a major event's local area. The certainty of these powers at the outset may assist in terms of planning to protect footfall and local access.

In the longer term, if the Bill contributes to more major events being hosted in UK, there could be small additional impacts on businesses arising from associated transport disruption. However, given the high uncertainty around future successful bids, these potential effects cannot be reliably quantified and have not been treated as a direct transport impact within our estimates.

Evidence from previous events suggests that impacts on businesses during periods of road restriction are often offset within local economies. A 2010 assessment of compensation for business losses arising from road works highlighted that there is often an element of "windfall" effect, where losses for some traders may be balanced by gains for others in the same area.³⁴ This suggests that while individual small and micro businesses may experience positive or negative short-term effects from event-related restrictions, the aggregate impact across a locality is likely to be broadly neutral.

Experience from the London 2012 Olympic and Paralympic Games further illustrates the importance of engagement and communication. Following the Games, organisations such as the Freight Transport Association and the Road Haulage Association praised the

³⁴ House of Commons Library (2010) Roads: compensation for loss of business from road works Standard Note SN/BT/200 – <https://researchbriefings.files.parliament.uk/documents/SN00200/SN00200.pdf>

operation of London's road network and the support provided by transport authorities in helping freight operators prepare.³⁵

A survey of 100 large companies in London by Deloitte³⁶ found that 42 per cent saw an increase in demand during the 2012 Games, compared with 27 per cent who reported a decrease. 77 per cent of retailers reported an increase in demand from new customers, while 68 per cent of respondents in the travel, hospitality and leisure sectors reported increased demand for their goods and services. Deloitte also stated that businesses 'have been helped enormously by the smooth running of the city, particularly the relative lack of transport problems

An academic study examining business engagement during the Games³⁷ found that impacts varied by business size and sector. Large organisations were generally the most resilient, supported by tailored, one-to-one engagement from transport authorities that enabled them to implement mitigation measures such as remote working, staggered hours and adjusted staffing levels. Medium-sized businesses demonstrated mixed preparedness, often relying on clear communication to understand potential disruption but facing resource constraints that limited their ability to adapt. Small and microbusinesses were the most vulnerable, with limited capacity to absorb additional costs or adjust operations, particularly where restrictions directly affected their premises or supply chains.

The study concluded that effective communication, rather than the road closures themselves, was the key factor in promoting adaptation and maintaining trust. While the visibility and prestige of major events encouraged cooperation, structural constraints meant that smaller businesses remained more exposed to disruption. These lessons highlight the importance of early engagement and clear communication in mitigating potential business impacts under the proposed framework, and they will inform our approach to supporting future major sporting events hosted in the UK.

Business Environment

The measures will support a more attractive and stable business environment by strengthening the UK's ability to host major sporting events, which have historically delivered significant economic benefits. For example, the Birmingham 2022 Commonwealth Games generated approximately £1.2 billion in economic output (measured as gross value added), £79.5 million in social value, and 22,380 full-time equivalent (9FTE) years of employment through delivery and legacy activity.³⁸

³⁵ Transport for London (2012) London 2012 Games Transport – Performance, Funding and Legacy – <https://content.tfl.gov.uk/Part-1-Item06-TfL-Games-performance-Final-corrected.pdf>

³⁶ Deloitte's study was not published but is referenced within London 2012 Games Transport – Performance, Funding and Legacy: <https://content.tfl.gov.uk/Part-1-Item06-TfL-Games-performance-Final-corrected.pdf>

³⁷ Impacts and Lessons from the London 2012 Olympic Games Travel Demand Management Program – an Independent View - <https://cris.brighton.ac.uk/ws/files/349950/Impacts%20and%20Lessons%20from%20the%20London%202012%20Olympic%20Games%20Travel%20Demand%20Management%20Program%20%20an%20Independent%20View.pdf>

³⁸ One year post Games evaluation report

<https://www.gov.uk/government/publications/evaluation-of-the-birmingham-2022-commonwealth-games-one-year-post-games-report>

In the longer term, a more efficient and predictable framework may increase the likelihood of England successfully hosting additional major events. This could generate wider economic and regeneration benefits, as seen in Birmingham, where the Commonwealth Games acted as a catalyst for broader neighbourhood renewal, including housing development.³⁹ However, given the uncertainty associated with future bidding outcomes, these potential indirect impacts have not been monetised within the transport assessment.

Impact to Households

The direct impact of these measures on households is expected to be neutral. The introduction of Traffic Regulation Orders and Traffic Regulation Road Notices changes the legislative mechanism by which transport powers are implemented rather than the nature or scale of restrictions themselves. Therefore, any change in local disruption is expected to be minimal. While smoother delivery may marginally reduce disruption for local communities, this effect is likely to be limited.

Trade implications

The measure is not expected to have material adverse trade implications.

Other wider impacts

The wider impacts of the policy are expected to be largely positive. Benefits arise primarily from improved road safety where temporary closures or restrictions reduce overcrowding and create safer conditions for pedestrians, spectators and road users. Managing travel demand during major events, including the use of targeted road restrictions where necessary, may also encourage a shift towards active travel and public transport, reducing reliance on private vehicles. This can indirectly contribute to lower greenhouse gas emissions, reduced noise, and improved air quality.

On the other hand, there are some potential negative impacts to note. Where road restrictions or closures affect everyday travellers, there may be short-term reductions in productivity and increased disruption across the road network. This could lead to longer commute and delivery times, alongside higher congestion in surrounding areas. Increased journey times and fuel consumption may disproportionately affect individuals and businesses that rely on car travel, including potentially vulnerable road users with limited transport alternatives.

However, evidence from the London 2012 Olympic and Paralympic Games demonstrates that these impacts can be effectively mitigated through strong communications and travel behaviour change.⁴⁰ During the Games, media and government messaging encouraged people to adjust their travel patterns, with some leaving the city temporarily and a significant number working from home. As a result, traffic flows in central and inner

³⁹ Interim Evaluation of the Birmingham 2022 Commonwealth Games: Interim Evaluation Report (2023) – https://assets.publishing.service.gov.uk/media/63c0298c8fa8f513b7a1a1db/Interim_Evaluation_of_the_Birmingham_2022_Commonwealth_Games_-_Interim_Evaluation_Report.pdf

⁴⁰ Brighton & Sussex Universities (2018) Impacts and Lessons from the London 2012 Olympic Games Travel Demand Management Programme: An Independent View – <https://cris.brighton.ac.uk/ws/files/349950/Impacts%20and%20Lessons%20from%20the%20London%202012%20Olympic%20Games%20Travel%20Demand%20Management%20Program%20%20an%20Independent%20View.pdf>

London decreased substantially, and serious and severe disruption fell by around 20 per cent during the Olympic Games period.⁴¹ Compliance with restrictions was high, at approximately 97 per cent, and although Games lanes were introduced for accredited vehicles on sections of the Olympic Route Network, higher-than-expected public transport usage meant that a large proportion of these lanes remained open to general traffic (around 60 per cent during the Olympics and 70 per cent during the Paralympics).⁴²

These findings suggest that any congestion impacts associated with event-related transport measures can be managed and reduced where accompanied by effective planning and communications. Given the continued normalisation of flexible and remote working since 2012, similar mitigation effects may be achievable in future events through early engagement and coordinated messaging.

Risks and assumptions

Key risks with relying on primary legislation is time delays within the legislative process. Additional risks include uncertainty in forecasting transport demand, stakeholder compliance levels, and external factors such as industrial action or severe weather.

The assessment draws on established evidence from previous major sporting events, including London 2012 and Birmingham 2022, and on the practical experience of traffic authorities and delivery partners in planning and implementing temporary traffic management at scale. While the precise form of transport measures will be event specific and set out through secondary legislation, the analysis reflects well understood operational requirements and risks associated with major events, including the need for early legal certainty, multi authority coordination and clear governance arrangements. The framework approach mitigates these risks by enabling earlier engagement, consultation and planning, while retaining statutory safeguards on proportionality, duration and local discretion. Any remaining uncertainty will be managed through event specific regulations, guidance and post event evaluation, ensuring that lessons learned from each application of the framework inform future use.

⁴¹ Brighton & Sussex Universities (2018) Impacts and Lessons from the London 2012 Olympic Games Travel Demand Management Programme: An Independent View – <https://cris.brighton.ac.uk/ws/files/349950/Impacts%20and%20Lessons%20from%20the%20London%202012%20Olympic%20Games%20Travel%20Demand%20Management%20Program%20%20an%20Independent%20View.pdf>

⁴² Transport for London (2012) London 2012 Games Transport Performance, Funding and Legacy Report – <https://content.tfl.gov.uk/Part-1-Item06-TfL-Games-performance-Final-corrected.pdf>

3.6 Funding Power

The Rationale for Government Intervention

There is currently no single, robust, and legally sound funding power that enables the UK government to directly provide Exchequer funding to the relevant body to deliver major sporting events taking place wholly or partly in England, where no Union-wide benefit arises. Previous bespoke legislation has provided clear financial assistance powers, delivery mechanisms, and assurance requirements. For other major sporting events, funding has been delivered through a combination of existing powers, including section 3 of the Physical Training and Recreation Act 1937, section 31 of the Local Government Act 2003, and, more recently, section 50 of the United Kingdom Internal Market Act 2020 (UKIM). However, the UK government lacks a single, robust, power to provide funding directly for major sporting events held in England. This gap reduces the efficiency and assurance with which future major sporting events can be supported, particularly where funding may be required at pace during the event delivery time.

Theory of Change

Inputs

- The Bill provides a statutory funding power for major sporting events taking place wholly or partly in England, where no Union-wide benefit arises.
- Clarity over funding provision for major sporting events.

Activities

- Allocate funding efficiently to delivery bodies across the event lifecycle

Outcomes

- This approach gives delivery bodies confidence over funding provision to support planning and decision-making across different stages of event delivery
- Clear status basis for funding major sporting events strengthens accountability supporting the delivery of economic, social, and community benefits associated with major sporting events.
- By providing a clear legal basis for funding, the framework reduces the need for ad hoc processes and supports a more predictable approach to allocating public funding

Long-term Impact

- The intended result is a streamlined, consistent funding mechanism that supports effective delivery of major sporting events, enables delivery bodies to receive the funding for operational and legacy objectives, and reinforce the government's ability to host high-profile events taking place wholly or partly in England, where no Union-wide benefit arises.

Assumptions

- Uptake: The government make use of the statutory funding mechanism where appropriate across the event lifecycle
- Administrative efficiency: The single funding power is implemented in a way that reduces complexity compared to previous ad hoc arrangements
- Governance: Appropriate oversight and accountability mechanisms are applied to ensure transparent use of public funds
- Capacity: Delivery bodies have the capability to plan and deliver events effectively with certainty over the provision of funding.

Theory of Change (logic chain)

Statutory funding power established → direct financial support provided to relevant delivery bodies → more efficient allocation of resources → improved operational planning and delivery of major sporting events → → successful event delivery with maximised economic, social, and community benefits → UK's capability and reputation as a host nation strengthened.

SMART objectives for intervention

The objective is to establish a clear statutory power that enables the Secretary of State to provide direct financial assistance to organisations responsible for delivering major sporting events hosted wholly or partly in England. This will be available in addition to Section 50 of UKIM, which provides Ministers with the power to provide financial assistance for events with union wide benefits.

These organisations may include public bodies such as UK Sport and Sport England, national governing bodies, and dedicated delivery vehicles, including non-departmental public bodies or special-purpose companies established for a specific event.

The funding power is intended to support both the core operational delivery of major sporting events and associated activity, including legacy programmes and social impact initiatives designed to generate long-term economic, social, and community benefits. Enabling funding to be provided directly to the relevant delivery body, will remove reliance on complex, indirect funding routes that can create inefficiency and uncertainty.

SMART Objective

Specific - Establish a statutory power enabling the Secretary of State to provide financial assistance, in full or in part, directly to organisations responsible for the delivery of major sporting events in England. This includes funding for operational delivery, legacy programmes, and social impact initiatives, without the need for funding to be routed indirectly through intermediary bodies.

Measurable - Success will be measured by the enactment of the funding power and its use to provide direct financial assistance to delivery bodies for major sporting events. Evidence of effectiveness will include reduced complexity and time taken to allocate funding, clearer accountability for expenditure, and positive feedback from delivery organisations on the efficiency and flexibility of funding arrangements.

Achievable - The objective is achievable as it builds on existing government funding practices and delivery models for major sporting events. It formalises and streamlines arrangements that are already used in practice, removing unnecessary administrative layers while remaining consistent with established public finance and governance frameworks.

Relevant - Providing a direct funding power aligns with government priorities to support the successful hosting of major sporting events that deliver economic growth, community engagement, and social value. It ensures that delivery bodies are adequately resourced to meet hosting commitments and maximise legacy outcomes, while improving value for money and administrative efficiency.

Time-bound - The funding power will be available for future major sporting events hosted wholly or partly in England, ensuring that delivery organisations can access funding at the appropriate stage of planning and delivery. This also establishes a lasting mechanism to support future events without the need to rely on less robust or ad hoc funding solutions.

Description of options considered

The options were assessed against a set of Critical Success Factors (CSFs) derived from the policy objectives and operational requirements of major event delivery. The CSFs used to filter options were:

- **Deliverability:** Ability to enable timely financial support for event delivery, allowing organisers, governing bodies, and other stakeholders to plan, bid, and execute events with confidence.
- **Legal certainty:** Ability to provide a clear statutory basis for the provision of public funding.
- **Consistency and repeatability:** Ability to provide a reliable, long-term mechanism for funding major sporting events, avoiding the inefficiencies, delays, and variations associated with event-specific legislation.

Option 1 - Do Nothing (Non Regulatory)

For this measure, the 'Do Nothing' and 'Non-regulatory' options are effectively the same, as there is no mechanism to distribute public funding without statutory authority.

Therefore, under this option, the government would continue to rely on existing legislative powers to provide funding for sporting events, as statutory authority is required and non-legislative mechanisms would not be sufficient. Funding would therefore continue to be assessed and approved on a case-by-case basis using the most appropriate mechanism.

Doing nothing would continue to create inefficiencies and uncertainty when funding major sporting events in England and perpetuate the need to develop ad-hoc funding solutions. Ultimately as statutory authority is required to use public funding this was not considered a viable option.

Summary Against Critical Success Factors: Option 1 fails to meet the CSFs. It is slow, inconsistent, and legally uncertain, providing no reliable framework for funding major sporting events. Event delivery risks are higher, and there is a continued reliance on inefficient ad-hoc solutions.

Option 2: Introduce bespoke primary legislation for each major sporting event (Counterfactual)

Under this option, the government would continue to introduce event-specific funding powers for each event hosted in England, where required. Each piece of legislation would set out the scope of financial assistance, eligible delivery bodies, and any associated assurance or reporting requirements.

While this approach would provide a clear funding power for each event, it would be

inefficient and resource-intensive. It would also introduce uncertainty for delivery bodies, as funding powers may not be in place until legislation is passed, potentially delaying early-stage planning, bidding, or delivery activity.

This option would also lack consistency. Each event-specific power would be designed independently, increasing the risk of variation in funding scope, conditions, and assurance arrangements across events. This could reduce transparency, complicate oversight, and undermine value for money.

Summary Against Critical Success Factors: Option 2 partially meets the CSFs. While it provides legal certainty for individual events, it is inefficient, slow to deliver, and lacks consistency or repeatability across multiple sporting events.

Option 3 - Introduce primary legislation to give funding power for all future major sporting events (Preferred Option)

This approach would introduce a new funding power to provide the Secretary of State with a clear legal basis to provide financial assistance for the delivery of sporting events that take place wholly or partly in England that do not have a union wide benefit. It would fill the current legislative gap by allowing funding to be directed to any relevant body involved in event delivery, including UK Sport, Sport England, national governing bodies, charities and private businesses.

The power would enable the Secretary of State to provide financial assistance in various forms, such as grants, loans, guarantees, or indemnities, and to attach conditions to that funding, including repayment, assurance, and reporting requirements. Importantly, it would not create a duty to fund, meaning decisions would remain subject to affordability. The new power would also allow funding to be provided across the full life cycle of an event, from feasibility and bid stages through to delivery, evaluation, and legacy programmes. This would ensure that the government can support both pre-event and post-event activities as needed, without the need for bespoke legislative arrangements, helping to provide legal certainty and improve the efficiency and consistency of funding for future events.

Summary Against Critical Success Factors: Option 3 fully meets the CSFs. It provides timely funding; clear legal authority; and a consistent, repeatable mechanism for supporting major sporting events.

Option	Legal Certainty	Deliverability	Consistency and repeatability
Option 1: Do Nothing (Non regulatory)	X	X	X
Option 2: Bespoke primary legislation for each event (Counterfactual)	△	✓	X
Option 3:	✓	✓	✓

Permanent legislative framework (Preferred Option)			
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- ✓ Meets the critical success factor
- △ Partially meets the critical success factor
- X Does not meet the critical success factor

Summary

Options 1 and 2 a are not fit for purpose in comparison to Option 3 because they would, continue to rely on a range of legislative powers that fail to address the specific funding needs of England-only major sporting events, and perpetuate an inefficient and resource-intensive approach requiring bespoke primary legislation for each event. Option 3 provides a clear funding power that addresses the existing legislative gap, improves efficiency and consistency, and reduces legal and delivery risk. It balances flexibility and assurance, enabling the government to support major sporting events across their full lifecycle while avoiding the uncertainty, complexity, and repeated use of ad hoc legislation.

NPSV: monetised and non-monetised costs and benefits of each shortlist option (including administrative burden)

This measure does not impose a cost or saving to businesses or households. In the counterfactual, funding for major sporting events would continue to rely on a combination of existing powers and bespoke legislation for individual events. However, there is currently no single, robust, and legally sound funding power to provide direct Exchequer support to delivery bodies for major sporting events held wholly or partly in England, where no Union-wide benefit arises. This provision establishes a clear single statutory mechanism that can be used for the above specified sporting events, rather than requiring case-by-case arrangements. While this increased efficiency may result in marginal reductions in government administrative effort, these are expected to be minimal.

Impact on small and micro businesses

The introduction of the funding power is not expected to impose any direct costs or regulatory burdens on small or micro businesses. The power is primarily designed to enable the Secretary of State to provide financial assistance to bodies involved in the delivery of sporting and sporting-related events therefore small and micro businesses will not experience any additional burdens

Minimising administrative and compliance costs for preferred option

The policy has been designed specifically to simplify and streamline existing funding arrangements for major sporting events, thereby reducing administrative burdens on both government and delivery partners. By establishing a single, clear statutory power for England-only funding, it removes the need to rely on a range of legal powers which require consideration on a case-by-case basis helping to increase government efficiency.

Business environment

This provision will have minimal direct impact on the business environment, as it primarily affects the funding relationship between government and event delivery bodies rather than imposing regulatory requirements on private companies.

Legacy programmes and social initiatives funded via the power may also create new business opportunities in sectors such as hospitality, tourism and event management indirectly benefiting the wider economy.

Trade implications

The policy is not expected to have any trade implications.

Other wider impacts

The preferred option is expected to generate a range of indirect positive impacts beyond the immediate policy objective.

By providing a clear and consistent legal mechanism to fund major sporting events, the measure supports the UK's international competitiveness as a host nation.

The policy may also contribute to wider economic and social benefits associated with major events, including regional economic growth, tourism, skills development, and community engagement initiatives delivered through legacy programmes. These impacts are achieved because the legislation provides certainty and protection for commercial investment, encourages sponsorship, and ensures resources can be effectively allocated to event delivery and associated programmes. By reducing financial and operational risks, the framework increases the likelihood that planned projects and legacy initiatives are successfully implemented. While these benefits arise primarily from the events themselves rather than the funding power, the legislation acts as an enabling mechanism that supports their delivery.

Risks and assumptions

The preferred option assumes that the Secretary of State will provide funding for major sporting events in England as needed, and that delivery bodies have the capacity to manage and report on funds effectively.

Key risks have been identified and mitigated. The risk of inconsistent application of funding across events or delivery bodies, will be managed through guidance, standardised procedures, and oversight. The risk of legal or governance challenges, should funding decisions be perceived as arbitrary, is mitigated through clear statutory powers, conditions, and transparency. Additionally, governance and reporting requirements help ensure that delivery bodies operate most effectively and that resources are managed appropriately.

4. Regulatory scorecard for preferred option

Part A: Overall and stakeholder impacts

(1) Overall impacts on total welfare		Directional rating
<p>Description of overall expected impact</p> <p>The primary impact of the Bill, as a legislative framework, is to enable the UK to confidently host major international sporting events, tackling persistent market failures, such as ambush marketing. The framework also provides the required protections for major sporting event rights holders, crucial for unlocking the socioeconomic and reputational benefits of hosting major events. Furthermore, the framework leads to significant cost-reduction and efficiency for the government, by removing the need for resource-intensive, bespoke primary legislation for every future major sporting event.</p> <p>The overall impact on total welfare is rated as positive, because the bill is crucial in guaranteeing the legislative means to host major events. This supports the nation's welfare through socioeconomic benefits generated by those events, enhanced international competitiveness and a positive distributional impact for households by restricting exploitative secondary ticketing.</p>		<p>Positive</p>
<p>Monetised impacts</p> <p>There have not been any monetised assessments made on overall welfare owing to data availability.</p> <p>The framework is projected to deliver substantial savings for the government though. Indicative analysis suggests a total cost saving of time and resources of approximately £5 million over a 10-year period, equating to around £0.5 million annually.</p>		<p>Neutral</p>
<p>Non-monetised impacts</p> <p>This legislative efficiency will make the UK a more attractive and desirable host country for major sporting event owners, potentially increasing the frequency with which the UK is selected to host these events. This will help drive significant economic benefits, such as the £1.2 billion Gross Value Added generated by the Birmingham 2022 Commonwealth Games and the £373 million direct economic impact generated by UK Sport-supported events in 2023.</p>		<p>Positive</p>

	UK businesses often enjoy increased business during events, especially in the locality of major sporting events from increased footfall. It will also protect fans by ensuring better access to tickets at prices set by event organisers and supporting the safe flow of spectators.	
Any significant or adverse distributional impacts?	The Bill is anticipated to have a neutral overall distributional impact. While minor distributional effects exist, mainly affecting certain businesses and positively benefiting households, the largest negative impact stems from the advertising and trading provisions on small and micro businesses. However, this is expected to be minimal due to the small monetised cost and the implementation of mitigations.	Neutral

(2) Expected impacts on businesses

Description of overall business impact	<p>The overall expected impact on business is rated as positive because the framework protects authorised businesses and enhances the commercial environment of major sports events. It supports investment decisions for businesses engaged with events and safeguards sponsor and commercial partner investment.</p> <p>Any negative impacts are limited and targeted, with the framework designed to minimise unnecessary regulatory burdens on most commercial operators. The Bill's provisions are only applied to exceptional major sporting events, meaning the majority of business as usual activity is expected to be unaffected.</p> <p>Businesses not associated with the event are expected to see minimal impacts, mitigated by the proportionate, time-limited, and, in the case of the advertising and trading provisions, highly localised nature of the provisions.</p>	Positive
Monetised impacts	The advertising and trading offences are the only measures which have been monetised: -£1.1 million (-£0.4 million to -£1.9 million) of lost earnings over a 10 year appraisal period.	Negative
Non-monetised impacts	The framework has several non-monetised benefits, primarily aimed at protecting authorised businesses and enhancing the overall commercial environment of major sports.	Positive

	<p>For businesses that formally engage with the events (e.g. sponsors, local vendors, transport operators), the framework provides clarity on the measures likely to be in place, which may reduce risk and support investment decisions.</p>	
<p>Any significant or adverse distributional impacts?</p>	<p>The advertising and trading provisions are likely to have a slight disproportionate effect on small and micro businesses, specifically street traders.</p> <p>The estimated impact of these restrictions is around £0.1 million in lost earnings for street traders. Across the events which have been forecast, up to 284 street traders (across EURO 2028, WAC 2029 and F2035™) could be impacted by the prohibitions on trading in areas used for, or in connection with, sporting events. It must be recognised that this measure would also occur in the counterfactual, as decreed through primary legislation for the event would still be required to be enabled.</p> <p>To reduce this impact, the Bill provides for an authorisations process for advertising or trading that would otherwise be prohibited. For example, this could be available to official sponsors or those with an existing licence to trade or advertise in an affected area. The relevant government must arrange for guidance to be published about the application of those provisions and will be able to require this be shared as necessary (e.g. local authorities could be placed under a duty to share this with licensed traders in their area likely to be affected).</p>	<p>Negative</p>

(3) Expected impacts on households

<p>Description of overall household impact</p>	<p>The overall impact on households is expected to be positive, primarily driven by the ticketing offence. The regulation is designed to improve access to tickets at prices determined by event organisers by prohibiting unauthorised resale and protecting the integrity of ticket markets. This transfers income from ticket touts back to fans, increases the affordability of major events and ensures expenditure is captured within the economy. Finally, by enabling the successful delivery of major sporting events, the Bill secures significant positive externalities for households, including economic</p>	<p>Positive</p>
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	activity, enhanced international visibility and broader community benefits.	
Monetised impacts	None of the Bill's measures had monetisable impacts on households.	Neutral
Non-monetised impacts	<p>The overall non-monetised impact of the Bill on households is expected to be positive, primarily owing to the ticketing provisions.</p> <p>The benefits largely stem from prohibiting unauthorised resale and protecting the integrity of ticket markets, thereby improving access and affordability, ensuring fuller attendance at the events, and enhancing availability for fans and members of the public.</p> <p>Furthermore, by enabling the successful delivery of major sporting events, the Bill helps secure significant positive externalities for households, including economic activity, enhanced international visibility, and broader community benefits.</p>	Positive
Any significant or adverse distributional impacts?	<p>The Bill is expected to have a positive distributional impact on households.</p> <p>The ticketing offence is designed to have a positive impact on households by prohibiting exploitative secondary ticketing resale, thereby improving access to tickets at prices determined by the event organiser. This increases affordability and benefits fans, including those on lower incomes, by transferring income from ticket touts back to fans, whose spending contributes directly to the local economy.</p> <p>The restrictions, particularly around advertising and trading, are temporary and localised to areas being used for or in connection with sporting events. The monetised costs to businesses are limited to these specific areas.</p>	Positive

Part B: Impacts on wider government priorities

Category	Description of impact	Directional rating
<p>Business environment: Does the measure impact on the ease of doing business in the UK?</p>	<p>The Bill is expected to have a limited and targeted impact on the overall business environment, as the provisions only apply to exceptional major sporting events, minimising unnecessary regulatory burdens on most commercial operators.</p> <p>For businesses that formally engage with the events, the framework provides clarity on the measures likely to be in place for ticketing, unauthorised association, advertising, and trading and transport. This certainty may reduce risk, support investment decisions, and encourage participation in event-related commercial activity.</p> <p>Overall, the Bill's efficient and predictable legislative framework significantly enhances the UK's reputation and attractiveness as a reliable host nation for major international sporting events. This improves the business environment by safeguarding the investment of event sponsors and commercial partners, which is expected to enhance sponsor confidence, increase commercial revenues, and ultimately reduce reliance on public funding for major sporting events.</p>	<p>Neutral</p>
<p>International Considerations: Does the measure support international trade and investment?</p>	<p>No measures are expected to directly impact trade. However, the Bill establishes a flexible and efficient framework which significantly enhances the UK's reputation and competitiveness as a reliable host nation for hosting events. This safeguards the investment of event sponsors and commercial partners, many of whom are likely to be based overseas. This is expected to improve sponsor confidence, enhance commercial revenues, and reduce reliance on public funding for major events.</p>	<p>Neutral</p>
<p>Natural capital and Decarbonisation: Does the measure support commitments to improve the environment and decarbonise?</p>	<p>The Bill's overall framework is expected to have a neutral impact on the environment and decarbonisation efforts. The measures do not introduce permanent infrastructure or operational changes.</p>	<p>Neutral</p>

5. Impact of Bill Measures

This section estimates the qualitative and quantitative impacts of the measures in the Bill. All of these measures will require supporting secondary legislation to set out more fully how they will operate, which will be subject to scrutiny and assessment. This imposes limits on how fully the potential impacts can be assessed at this stage. Therefore, the analysis focuses on the total benefits calculated on a ten year basis from the legislation coming into effect. In that ten year period, the UK is expected to bid for, or has secured, three major sporting events where use of this framework may be required. These are the indicative list of events:

1. The UEFA Men's European Football Championship 2028 (EURO 2028)
2. The World Athletics Championships 2029 (WAC 29) (hosting is subject to the ongoing bid process)
3. The FIFA Women's World Cup 2035™ (F2035™) (hosting is subject to successful bid)

We have described the anticipated impacts that may occur based on the estimates from previous event specific legislation in the London Olympic Games and Paralympic Games Act 2006 and the Birmingham Commonwealth Games Act 2020. The consideration of the framework approach has not been calculated, as provided qualitative and quantitative impacts of the use of framework legislation bears no inherent cost to business, rather, its effect is on government efficiency.

Table 16: Overview of monetised costs and benefits of measures (2025 prices and 2026 Present Value across ten-year appraisal period)

Bill Measure	Shortlist Number (above)	Impact felt through	Total Benefits (PV)	Total Costs (PV)	NPSV	EANDCB	EANDCH
Ticketing	3.2	Secondary	Qualitative	Qualitative	Qualitative	N/A	N/A
Advertising and Trading	3.3	Primary	£0.0	£1.1m	-£1.1m	£0.1	£0.0
Unauthorised Association	3.4	Secondary	Qualitative	Qualitative	Qualitative	N/A	N/A
Transport	3.5	Secondary	Qualitative	Qualitative	Qualitative	N/A	N/A
Funding power	3.6	Secondary	Qualitative	Qualitative	Qualitative	N/A	N/A

Table 17: Overview of the qualitative benefits/costs of measures

Bill Measure	Shortlist Number (above)	Impacts
All		The new powers will streamline the legislative process for major sporting events by reducing the time the government spends passing event-specific primary legislation. This increase in legislative efficiency makes the UK a more attractive and desirable host country for major event organisers, potentially increasing the frequency of hosting these events.
Ticketing	3.2	<p>Costs: The measure is not expected to impose a direct cost or saving to businesses, as any impact is assumed to be a transfer from one business to another. There is expected to be a small familiarisation cost.</p> <p>Benefits: There will be improved access to tickets at prices determined by event organisers, restricting exploitative secondary ticket touting, increasing affordability, and benefiting fans, including those on lower incomes.</p>
Advertising and Trading	3.3	<p>Costs: There is expected to be a small familiarisation cost.</p> <p>Benefits: The measure overall protects the commercial integrity of events by safeguarding sponsor investment and supporting operational requirements around the safe management of spectators.</p>
Unauthorised Association	3.4	<p>Costs: There is expected to be a small familiarisation cost.</p> <p>Benefits: The measure strengthens the protection of event-related commercial association rights, providing certainty to official sponsors and commercial partners that their investment will be protected from interference by unauthorised competitors.</p>
Transport	3.5	<p>Costs: There is expected to be a small familiarisation cost.</p> <p>Benefits: The measure, however, will ensure efficient traffic management and mitigate the risk of congestion and operational failure which could otherwise undermine event delivery and the UK's reputation for hosting world-class events.</p>
Funding	3.6	Costs: NA

power		Benefits: The measure will provide a clear and legally robust funding power that ensures England-only events can be funded lawfully, addressing an existing legislative gap and reducing legal and delivery risk.
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6. Monitoring and evaluation of preferred option

The government is committed to an evaluation of the application of provisions in the Sporting Events Bill within 12-18 months of EURO 2028. EURO 2028 is anticipated to be the first major sporting event delivered using the framework powers. The evaluation will consider the efficacy of provisions applied to EURO 2028. The government intends to keep the use and application of the powers in the Bill under regular review to ensure it is delivering the requirements of a range of major sporting events and being applied proportionately.

Due to the time-limited and event-agnostic nature of the provisions, the government does not intend to undertake a formal post-implementation review within five years. In addition, the anticipated impacts on businesses and households are expected to be de minimis (below the +£10 million EANDCB threshold). As a result, a post-implementation review was not considered proportionate for this Bill. Instead the department intends to monitor the operation of the provisions in the Bill and, where appropriate, undertake an evaluation of the efficacy of provisions once it has been applied to a number of events with varying requirements over an extended period of time, including those events which have been modelled in the Impact Assessment (depending on the outcome of the respective bid processes).

Monitoring Impacts and Data Collection

The impact of the legislation will be monitored through a combination of quantitative and qualitative data collection, for example:

- **Ticketing measures:** Enforcement authorities, including the CMA, local authorities, and other specified bodies, will monitor compliance through enforcement activity undertaken, including investigations, financial penalties, and prosecutions. Data will be collected on unauthorised resale activity.
- **Advertising and trading measures:** Local authorities will monitor compliance through enforcement activity during designated event periods, including inspections, investigations, Fixed Penalty Notices issued, seizure of goods or documents, and any cases escalated to court. Data will be collected on instances of unauthorised advertising and trading, and enforcement action taken as a proxy indicator of non-compliance and deterrence.
- **Unauthorised association measures:** Data will be gathered on the number of high-profile examples of ambush marketing by association, alongside enforcement statistics, including cease and desist letters issued, formal warnings, and any court action undertaken. Monitoring will also assess unintended impacts, including any disproportionate effects on small businesses, local organisations, or non-commercial entities.
- **Transport measures:** Local authorities and transport agencies will monitor the operation of event-specific traffic management powers through operational reporting and performance data, including congestion levels, journey times, road closures, traffic flows, and incidents. Data will be collected on the effectiveness and efficiency of the measures, including average journey times on specified event routes compared with baseline conditions, the number and duration of network disruptions attributable to event measures, and compliance rates with temporary traffic regulation orders and associated restrictions.

- **Funding measures:** DCMS will continue to review funding arrangements.

This data will be supplemented with qualitative stakeholder feedback from event organisers, sponsors, local authorities and business communities to provide a full assessment of effectiveness, proportionality, and operational impact.

Assessment of Objectives, Unintended Consequences and Risks

The longer term evaluation will assess whether the Bill has met its original objectives:

- Ensuring compliance with hosting obligations and guarantees provided to rights holders.
- Preventing unauthorised ticket resale, ambush marketing, and unauthorised commercial association.
- Enabling safe and effective operational management of major events, including transport planning.
- Providing a predictable and enforceable legal environment that supports private investment in event delivery.

The evaluation will also identify unintended consequences, including any disproportionate or unexpected administrative burdens on businesses, particularly small and micro enterprises, or local authorities. It will assess whether enforcement practices were proportionate and whether secondary legislation created any unforeseen operational or commercial impacts.

Some of the potential risks to evaluation success could include incomplete or inconsistent data reporting, changes in event requirements, or emergence of unanticipated ambush marketing practices. These risks will be mitigated through ongoing monitoring and updating our evaluation methodology when required.

External Factors and Data Sources

External factors that may influence the success of the intervention include:

- Changes in rights-holder requirements or bidding standards.
- The emergence of new ambush marketing practices not currently addressed by the legislation, market or economic conditions that affect ticket demand or sponsor activity.
- Changes in the capacity or effectiveness of enforcement authorities.

Existing data sources, such as local authority reports, stakeholder feedback, and official event statistics, will be used to inform the evaluation. Where gaps are identified, additional surveys or targeted data collection will be undertaken. No significant barriers are anticipated in accessing the required data.

Evaluation after the first major use-case and continuous review of the provisions up until a longer term formal review can take place using multiple case studies will ensure that the application of the framework's provisions can be refined in response to operational lessons, market changes, or evolving international requirements, safeguarding the UK's long-term ability to host world-class sporting events efficiently and reliably.

7. Minimising administrative and compliance costs for preferred option

The preferred option is expected to result in minimal compliance and administrative costs for businesses in the first instance. By establishing a standing legislative framework for major sporting events, the approach reduces legislative complexity, avoids duplication of processes, and lowers familiarisation costs across government, regulators and industry stakeholders. Rather than requiring bespoke primary legislation for each event, the government will be able to apply relevant provisions through regulations, enabling a more efficient and proportionate response to specific required and international commitments.

In the longer term, the Bill is expected to reduce administrative burdens by creating a predictable and consistent regulatory environment for event organisers, sponsors, local authorities, and businesses operating near event venues. Clear statutory conditions will ensure that the powers are applied only to high-profile global sporting events where they are necessary. This stability reduces compliance risks associated with unclear or fragmented legal frameworks.

There will likely be some familiarisation costs as businesses, enforcement authorities, traffic authorities, and event organisers review guidance and understand how the framework and event-specific regulations apply in each case. While the framework provides a level of predictability in the types of measures that may be introduced, each event will require consideration of its specific regulations and guidance. These costs are expected to be limited as the measures will apply only to a small number of time-limited sporting events and within defined geographic areas. To support an event-agnostic approach, the government will be able to require specific persons to produce guidance and share it with those likely to be affected, such as traders and businesses licensed to operate on public land. Engagement with stakeholders, including event organisers, local authorities, and small and micro businesses, will help ensure that regulatory requirements remain practical and proportionate.

Administrative burdens will be further reduced by building on existing enforcement structures and legal mechanisms. Enforcement relating to ticketing, advertising, and trading will draw on established investigatory and civil enforcement powers under existing consumer protection legislation, including the Consumer Rights Act 2015 and the Digital Markets, Competition and Consumers Act 2024. Compliance requirements are straightforward, as businesses should not be selling or advertising tickets in breach of event terms and conditions. No new licensing, registration, or routine reporting obligations will be introduced. Instead, compliance will largely involve adhering to clearly defined, time and geographically-limited restrictions during designated event periods, thereby limiting ongoing administrative requirements.

The proposed transport measures represent an enhancement of existing powers for Traffic Authorities, meaning no new training or substantial compliance costs are anticipated. Authorities will apply familiar processes, with only limited one-off familiarisation required in relation to bespoke time limits and simplified revocation procedures for sporting event traffic measures. Governments will be able to advise relevant authorities on these aspects as part of the formal event designation process.

Where appropriate, implementation periods will allow businesses and local authorities sufficient time to prepare for new provisions introduced under the framework, notably the

advertising and trading provisions. These provisions will also be subject to consultation before regulations are brought forward, enabling the government to consider potential impacts on small and micro businesses and refine requirements to avoid disproportionate impacts and costs. The framework's flexible design also allows measures to be applied only where necessary, thereby seeking to minimise burdens on existing businesses.

Overall, the preferred option minimises administrative and compliance costs by creating a flexible, standing legislative framework that builds on existing powers, avoids new routine obligations, and applies measures only where and when necessary. By reducing duplication, limiting burdens to time- and geographically-defined event periods, and relying on established civil enforcement mechanisms, the Bill delivers a proportionate and efficient approach that supports major sporting events while keeping costs low for businesses, enforcement bodies, and government.

8. Declaration

Department:

Department for Culture, Media and Sport

Contact details for enquiries:

... better-regulation@dcms.gov.uk

Minister:

... Minister for Sport, Tourism, Civil Society and Youth

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed:

Sign here 

Date:

Date

11/5/26