



## Department for Culture, Media & Sport

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7 July 2025

Louie French, Lincoln Jopp & Lee Dillon  
House of Commons  
London  
SW1A 0AA

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Dear Louie, Lincoln, Lee,

I am writing to follow up on a discussion during the fourth Committee stage debate of the Football Governance Bill on 12th June regarding Clause 45 on prohibited competitions. You and other members of the Committee sought clarification on how the Independent Football Regulator (IFR) would treat 'friendly' competitions, as well as interactions with UEFA.

### **Explaining Clause 45**

First, I would like to clarify how the clause works and how we expect it to be applied by the IFR. The legislation sets out factors that the IFR must have regard to, and steps it must take before specifying a competition as a prohibited competition. For example, to have regard to whether the competition is merit-based or would jeopardise the sustainability of English football competitions, and to determine the views of fans in England and Wales. These factors capture the key issues:

- to protect against unacceptable competitions that do not adhere to the principles of how sport operates in this country
- are not supported by fans, and
- risk undermining the English football pyramid.

We expect the IFR to set out more detail on the framework in its guidance and/or rules, against which it will prohibit competitions consistently and fairly. For example, setting out how it will weigh these factors to come to a decision. The IFR will also be able to set additional factors in its rules, per subsection (5)(b).

The clause does not place a blanket prohibition on any specific type of competition. Nor does it specify any disqualifying criteria that automatically lead to a competition being prohibited. Rather, the IFR is given the power to prohibit competitions and a degree of discretion within the constraints of the legislation. It will be up to the IFR to make the decision whether to prohibit a competition, against its predetermined framework and following the procedure required by the Bill. This procedure rightly includes consultation with the FA and other appropriate parties, offering the opportunity for the relevant competition organiser to make representations, and determining the views of domestic fans.

This approach will safeguard English football against threats that could undermine the fair, open and meritocratic model on which it has been built. While also allowing space for innovation and growth that may be beneficial to the industry and our clubs. By empowering the expert IFR to make the ultimate decision, this also ensures the prohibiting of any competition is not a political decision.



There will also be recourse for affected parties to challenge a decision by the IFR to prohibit, or not to prohibit, a competition. This includes seeking an internal review and then, if necessary, appealing the decision to the Competition Appeal Tribunal.

### **'Friendly' competitions**

On 'friendly' competitions, I want to be clear that the legislation applies to any competition. So the IFR can prohibit any competition that exists currently, or may exist in the future, no matter where the competition is based or which clubs compete in it. Per clause 2 of the Bill, a competition is defined as "a league (or a division of a league), a cup, a tournament or any other competition." Therefore, after having regard to the factors in subsection 5(a) and any other factors specified in rules, the IFR could in theory prohibit a so-called 'friendly' competition. Whether such competitions exist and how the framework applies will be matters for the IFR.

As set out above, the IFR has some discretion when determining the framework it will apply to prohibit competitions. It is very possible, and indeed likely, that 'friendly' competitions would be permitted either as a matter of course, or on a case-by-case basis. For example, because they do not pose a threat to the sustainability or heritage of English football, or because fans may not oppose them. As I set out above, the IFR can also specify additional factors it must have regard to in its rules; this could include whether the competition is deemed 'friendly'.

On the specific question about individual 'friendly' matches - as these are unlikely to meet the definition of competition, they could not be prohibited.

### **Interactions with UEFA**

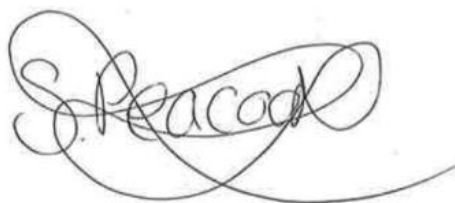
You asked specifically about what happens if UEFA endorses a competition but the IFR prohibits it, or vice versa.

Amongst other factors, the legislation will allow the IFR to prohibit a competition if it undermines the sustainability of English football, is not based on principles of meritocracy, or undermines the heritage of English football. If it determines a competition does not adhere to the principles set out in clause 45, the IFR can prohibit regulated clubs from participating in it. Given the European Super League was the trigger for the Fan-Led Review, the IFR must have power to step in if any competition is set up that is anti-competitive or undermines the heritage of English football.

Given the fan reaction to the closed-shop European Super League, we think it is unlikely that anyone, including UEFA, would seek to replicate the European Super League. Indeed, I would like to reiterate that UEFA is supportive of the Bill including clause 45. We believe UEFA's principles and values on this issue align closely with the government's, and with how this clause has been designed.

I have placed a copy of this letter in the Libraries of both Houses.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Peacock', with a large, looping flourish extending from the end.

Stephanie Peacock MP  
**Minister for Sport, Media, Civil Society and Youth**