

October 27th, 2024

Shri Mansukh Mandaviya
Cabinet Minister,
Ministry of Youth Affairs and Sports (MYAS)
SP-III Section, Department of Sports
Hall No. 103, Stairs 1
Jawaharlal Nehru Stadium
Lodhi Road, New Delhi 110003

Re: Submission of comments on the draft National Sports Policy, 2024.

Respected Shri Mandaviya:

We extend our sincere gratitude to the Ministry of Youth Affairs and Sports (MYAS) for introducing the National Sports Policy, 2024 (Policy), which is an important initiative to demonstrate a commitment towards enhancing sports development in our country, fostering a culture of active participation and supporting athletes at all levels.

At the outset, we thank your good offices for allowing us to make our submissions concerning the draft Policy.

To briefly introduce ourselves, AM Sports Law and Management Co. is a fully dedicated sports and gaming law and advisory practice with offices in New Delhi & Mumbai. For over a decade, we have been working with clients in the sports & gaming industry, at all stages, from strategy development, advisory and contract negotiations to league management and representation of stakeholders (athletes/teams/federations) before various authorities/fora and we understand the need for strengthening the sporting culture in India to achieve excellence in sports. Our founder, Ms. Aahna Mehrotra, has been the youngest member to serve as the Vice Chairperson of the National Anti-Doping Disciplinary Tribunal and was amongst the 200 experts involved, from all over the world (and amongst the only 2 from India), to contribute and review the first ever Global Report on Corruption in Sport published by the UNODC.

In response to the draft Policy, we have collated our comments and attempted to address it in a coherent manner as follows:

A. IMPLEMENTATION MECHANISM

The draft Policy aims to transform India's sports landscape by promoting national excellence, economic growth, and social development while making playing sports a grassroots movement. To achieve these holistic objectives effectively, it is vital to have stringent implementation mechanisms and establish specific measurable metrics.

The Policy framework, as it currently reads, lacks actionable mechanisms to achieve these visions and objectives. For example, the European Sports Policy¹ sets concrete target output timelines, and Australia's Sport 2030² policy includes measurable goals, such as closing the gap in sports participation for Indigenous Australians and achieving gender parity in participation by 2030, amongst others.

We suggest that the Policy must introduce specific targets with attainable deadlines and periodic reporting, akin to Australia's and Europe's approach. This structured approach would serve as a roadmap to realize the Policy's vision and objectives fully. By implementing such a framework, the Policy would not only fulfill its intended purpose but could also potentially set a benchmark as a global standard.

B. ALIGNMENT WITH EXISTING INITIATIVES AND SCHEMES FOR FUNDING AND DEVELOPMENT

The Policy aims to enhance the sports curriculum in educational institutions, linking it with the National Education Policy, 2020 (NEP). However, it falls short in addressing skill gaps specifically within the sports industry. To address this gap, it's crucial to harmonize the Policy with not just the NEP, but also the initiatives undertaken by the National Skill Development Council (NSDC)³ such as the Sports Physical Education Fitness and Leisure Skill Council (SPEFL-SC)⁴, which, in addition to the NEP, can lead the initiative by developing school curriculum that include vocational subjects related to the sports industry.

Additionally, the Policy provides new goals for achieving excellence in sports, briefly referencing initiatives like the 'Khelo India Scheme' and 'Target Olympic Podium Scheme' (TOPS). At the outset, for TOPS to become more effective, it is imperative that officials of the federations, Sports Authority of India (SAI) and those in charge of TOPS are on the same page. An illustration of the difference of opinion existing between the officials of the 3 bodies is on the subject matter 'early specialization sport'. For Policy to truly succeed, it is essential to bridge these differing perspectives and establish a coherent strategy to enable that funds disbursed under TOPS are done towards athletes that will serve the purpose for which TOPS is established. Collaborative discussions

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A42024Y03527>

² [https://www.sportaus.gov.au/_data/assets/pdf_file/0005/677894/Sport_2030 - National Sport Plan - 2018.pdf](https://www.sportaus.gov.au/_data/assets/pdf_file/0005/677894/Sport_2030_-_National_Sport_Plan_-_2018.pdf)

³ <https://nsdcindia.org/>

⁴ <https://nsdcindia.org/nos-listing/40>

among all stakeholders will be key to aligning their goals and create an environment for selecting the right talent.

The Policy also proposes a revamped funding mechanism, including initiatives such as “Adopt an Athlete”, as introduced by the USATF foundation⁵. While new initiatives will serve as a boost, however, it may take time to take shape. Accordingly, it may enable development faster, in India, if existing initiatives and schemes, such as those offered by NSDC, are leveraged on priority.

By introducing industry-relevant skills into school programs, students can engage in vocational training from an early age. This approach not only prepares them for potential careers in sports, but also promotes the concept of “Active for Life”. Integrating these skills into the educational framework will ultimately create a more skilled workforce in the sports sector and support athletes in their post-sport careers.

We propose that initiatives such as the SPEFL-SC, which focus on promoting skill development, and the National Sports Talent Search Scheme (NSTSS)⁶ aimed at identifying talent among children aged between 8 to 12, be incorporated into the Policy. Integrating these programs is essential to creating a comprehensive and effective sports development framework in India.

C. SAFETY, ETHICS AND PROFESSIONALISM

The Indian Olympic Committee and International Federations have repeatedly emphasized the critical importance of ‘safe sports,’ underscoring the need for stringent policies to ensure athlete safety and welfare. While the Policy addresses aspects of safety, ethics and professionalism, and outlines the creation of national agencies to uphold a secure and ethical sporting environment, it falls short of providing clear, actionable measures or specific obligations.

In light of the recent events (such as an episode where several participants ran away from the competition venue when they saw Dope Control officers arrive at JLN; and the protests by the wrestlers), we submit that the Policy should include programs aimed at educating individuals (stakeholders across the board) on critical policies and regulations, such as anti-doping, prevention of sexual harassment (POSH), protection of children from sexual offenses (POCSO), age fraud, and the protection that whistleblowers maybe entitled to. We commend initiatives like those recently undertaken by the National Anti-Doping Agency, which, through a Memorandum of Understanding with National Law University, Delhi, aims to strengthen cooperation, academic research, and education in these areas. It is suggested that any educational program should not only emphasize upon the detrimental impact of unethical practices on athletes’ and coaches’ careers, but also ensure that the education should be imparted in a manner that resonates with each stakeholder. For example, explaining the economics of sport in relatable terms: unlike other industries, where outpacing competitors is advantageous (e.g., Samsung vs. Apple), sport thrives on close and fair competition. The human mind is drawn to the thrill of an unpredictable

⁵ <https://www.usatffoundation.org/programs/adopt-an-athlete/>

⁶ <https://nationalsportstalenthunt.com/iFileSAI/adminIndexPage>

outcome—for illustration purposes, an adrenaline rush is absent in re-broadcasts of a match (since the result is already known to a viewer) and accordingly those have little economic value in comparison to live matches (broadcast rights fee paid by broadcasters for Indian Premier League a testament to it). In a similar manner athletes should be given education which not only pertains to fitness and health, but also be taught that if they indulge in any form of malpractices, which leads to the result of a match being known (or becoming obvious) prior to conclusion of a match, the viewership will reduce. Upon reduction of viewership, broadcast revenue and advertising will reduce, resulting in less flow of money in sport – which, in the end, will lead to the athletes suffering on account of lower salaries. An absolute proven case study of this is the viewership of the Indian Premier League having dropped notably, in 2013, following match-fixing allegations. Ultimately, the goal is to develop policies grounded in real-life sporting events, allowing everyone to understand the problem at hand and relate to its solution.

D. SUSTAINABILITY PRACTICES IN SPORTS

In recent years, India has committed to achieving the United Nations Sustainable Development Goals (SDGs)⁷ by 2030, which include targets like affordable and clean energy, efficient waste management, recycling programs, eco-friendly events and promoting good health and well-being.

By integrating sustainability into sports, we can effectively reduce the carbon footprint associated with sporting events. For example, sports organizations can set up recycling programs to minimize waste generated during competitions, merchandising and training. Additionally, highlighting environmental awareness during broadcasts of sporting events (especially those of national importance falling under the Sports Broadcasting Act), viewed by millions, can spread important messages about sustainability. This will also enable attracting the interest of those who may not directly be interested and/or passionate about sports but have other causes, like those related to the environment, close to their heart.

We believe that recognizing the urgent need in the Policy for eco-friendly practices in the sports industry will greatly benefit India's overall well-being. By embedding sustainability at the core of the sports industry, this approach would cultivate a culture of environmental responsibility in sports, transforming it into a true 'People's Movement' where everyone is encouraged to participate in protecting the environment while enjoying sports and contributing towards the SDGs goals. In this way, everyone—from athletes and sports organizations to fans and communities—can take part in safeguarding the environment while enjoying and participating in sports. Such a movement would also align closely with the SDGs, amplifying India's commitment to a greener future. Emphasizing these practices in the Policy would set an exemplary standard for sustainable sports management, demonstrating how sports can contribute meaningfully to global environmental goals.

⁷ <https://india.un.org/en/sdgs?>

E. MENTAL HEALTH SUPPORT FOR ATHLETES

In today's competitive sports environment, mental health is a critical factor in achieving success. The intense pressure to perform can sometimes exceed an athlete's physical limits, making mental resilience just as essential as physical prowess in achieving victory.

Given the above, achieving national excellence on the global stage requires fully maximizing athletes' potential by supporting both their physical and mental well-being. While the current framework of the Policy emphasizes community physical and mental health through initiatives like physical education and family sports weekends, it lacks provisions for dedicated mental health programs tailored to athletes competing at national and international levels. Another key reason for providing mental health support is the impact of social media. Athletes often face hate speech and verbal abuse online, especially after losing in a competition, which highlights the importance of robust mental health support and effective coping mechanisms.

We submit that the Policy should incorporate programs for mental health support to ensure holistic development and robust coping mechanism development and support such that athletes reach their maximum potential. Additionally, given the rise of social media usage, it is crucial to implement educational initiatives to address hate speech and verbal abuse directed (often by fan clubs) at athletes, which affects the athletes' mental health.

F. SUPPORT FOR ATHLETE TRANSITIONING POST-RETIREMENT

The Policy establishes a framework for Athlete-Centric Sports Development, aimed at creating an accessible and efficient sports system for athletes. However, it overlooks the challenges athletes face when transitioning to life after sports, which is often, in comparison to other professions, at a young age.

A notable example of best practices established in this regard is the High-Performance Centre of Sant Cugat in Spain, which has an Athletes Care Service (SAE)⁸, that provides individualized support for athletes as they navigate life transitions during their careers and upon retirement from sport.

While we have been promoting the idea of athletes becoming a part of sports governance in the country, we have often seen that they are unable to justice to such positions. To address this gap, the Policy must include measures focused on life after sports, helping athletes leverage the skills and experiences gained during their sporting careers. Such measures would not only provide valuable insights for current athletes and support retired athletes in adjusting to life beyond their sport, but also aid in attracting better talent (once people are assured of having ways to make ends meet post-retirement). We further humbly submit that the Policy must create pathways for athletes within the sports industry, ensuring their talents and contributions are not lost. The

⁸ <https://www.sportperformancecentres.org/content/car-sant-cugat-contribution-eu-guidelines-dual-career>

Policy could incorporate a range of initiatives to support athletes, such as career transition programs, partnerships with educational institutions and vocational training centers, offering access to continued education, certification courses, or specialized training across various fields. Additionally, establishing a structured mentorship network and implementing financial literacy programs would empower athletes to make sound financial decisions and support the development and commercialization of their personal brand.

G. EDUCATIONAL INSTITUTIONS IN SPORTS DEVELOPMENT

When creating a framework and establishing guidelines for educational institutions to support sports development and nurturing a sporting culture, it is crucial to emphasize strategies for identifying and cultivating talent within schools and colleges. Research shows that about one-third of children aged between 10 to 17 stop playing sport each year. Unfortunately, young talent and their families often feel that sport takes up too much of their time and keeps them from focusing on other more lucrative aspects of career development, like academia. In India, sport is often regarded merely as a hobby rather than a viable career path. Therefore, a concerted effort is essential to assist young athletes in balancing their sports commitments with other interests, ensuring that we do not lose promising talent.

The Policy briefly discusses the promotion of dual career programs, however we suggest that the Policy may draw inspiration from successful global practices to effectively establish these initiatives. For instance, dual careers, where athletes balance sports with education or professional careers, are increasingly supported across Europe⁹. Many countries recognize the importance of providing athletes with opportunities to develop outside of their sport to ensure long-term success and well-being. The International Olympic Committee has long emphasized the significance of dual careers for athletes, coaches, and their support teams¹⁰. In Germany, the athlete career programs offer resources for educational and professional development. France has established structures to help athletes pursue higher education while training. The UK promotes dual careers through initiatives like the athlete development program, emphasizing flexible study options. In Flanders, Belgium, young athletes in sports such as tennis, swimming and gymnastics can get a special status called “promising young athlete”. This lets them miss up to six (6) hours of school each week for training and ten (10) half-days a year for competitions. In Denmark, when athletes miss school to train with national teams, they get financial support for an extra hour of tutoring for each day they are absent. Such help is enabled by the National Olympic Committee. Overall, European nations are increasingly collaborative with educational institutions and sports organizations to create frameworks that support athletes in managing their athletic and educational aspirations.

We propose that the Policy should attempt at drawing inspiration from the above examples, especially while considering an amalgamation with NEP, and implement such mechanisms, which will then enable young persons, who have an interest in sport, thereby fostering greater

⁹ https://ec.europa.eu/assets/eac/sport/library/documents/dual-career-guidelines-final_en.pdf

¹⁰ <https://olympics.com/athlete365/topics/dual-career>

participation at both national and international levels. The Policy should provide options for children to participate in sports activities without having an adverse impact on their academic goals.

H. SUPPORT FROM ORGANIZATIONS TO EMPLOYEES

Many aspiring athletes often withdraw from competitions or training due to workplace restrictions or company policies that do not support their sporting commitments. Therefore, in addition to the aforementioned considerations and the current sports quota jobs offered by government institutions, it is imperative that the Policy encompasses initiatives aimed at creating employment opportunities within the corporate sector, without being overbearing on either, for individuals aspiring to pursue careers in professional sports. By fostering partnerships between corporate entities and sports organizations, the Policy can facilitate pathways for young athletes to gain meaningful employment, whether in coaching, sports management, marketing, or other related fields. Such initiatives not only contribute to the professional development of aspiring sports professionals but also enhance the overall ecosystem of the sports industry. For instance, in Germany, a national pool of companies offers traineeships and employment that are compatible with full-time competitive sport. The German Sports Aid Foundation¹¹ provides financial compensation for the loss of earnings to companies which employ athletes.

We propose that the Policy implement similar mechanisms which allow sports persons to make a reasonable income outside of their playing income.

I. FOCUS ON TECHNOLOGICAL INTEGRATION IN SPORTS

While physical and mental endurance are essential for success in professional sports, technology and data analysis can give sportspersons a crucial edge. Even small improvements in performance can make a significant difference at critical junctures during competitions.

When sports and science, including data and technology, converge, they open up numerous new possibilities. For instance, the Telefónica's technology has turned Cívitas Metropolitano, home of Atlético de Madrid, into a fully digital stadium in Europe¹², offering a unique experience for athletes and visitors. The International Sports Technology Association (ISTA)¹³ champions the integration of technology in sports, facilitating collaboration among industry professionals. The Policy may draw valuable insights from ISTA by leveraging technology to enhance athlete performance and fan engagement. ISTA actively seeks both individual and corporate partners to help shape economic development strategies and connect sports assets with workforce investments, and is currently engaged in building the U.S Center for Sports Innovation. While the Policy highlights the importance of technological advancements, in its strategic framework, it lacks

¹¹ <https://www.viprize.org/charity/german-sports-aid-foundation>

¹² <https://telefonicatech.com/en/successstories/atletico-madrid>

¹³ <https://istassociation.com/>

a clear roadmap for collaboration between sports organizations, educational institutions, medical facilities, and tech companies to build a comprehensive ecosystem.

We propose that establishing strong partnerships among medical companies, technology firms and sports organizations can greatly accelerate sports development in India. These collaborations should focus on creating innovative solutions to enhance athlete performance, develop advanced injury prevention and management systems, and introduce cutting-edge training tools. Additionally, joint efforts can lead to the creation of sports-specific research and development centers, promote sports science education, and generate new business opportunities, all contributing to the broader sports ecosystem and driving economic growth in the country. The Policy may align itself with the initiatives taken by the National Centre of Sports Sciences and Research (NCSSR)¹⁴ to help India enhance access to scientific research and sports technology.

J. CREATE OPPORTUNITY FOR GLOBAL DIPLOMACY

India has yet to fully harness the power of sports as a tool for global diplomacy, despite its potential to advance both social and diplomatic objectives. Sports can serve as an effective medium for fostering international relations and enhancing a nation's global presence.

The Policy outlines goals to host international events and establish sports exchange programs, which shall serve as great steps towards increasing India's international visibility. Following the advent of the IPL, the league culture mushroomed in India, however, a basic research tells us that in a 10 year period (2008 to 2018) over 30 leagues were started in the country but only 7 survived to see a second season (less than 25% success rate). We can take a more proactive role by developing a structure to support sports leagues (wherein international talent comes to India and participates, thereby giving our athletes an opportunity to play against some of the best talent and also develop from playing in the same team as them) to strengthen its global diplomatic efforts.

By encouraging other sports to establish similar high-profile leagues, India can further establish itself on the global sporting map. Creating global-level leagues would not only aid developing our own athletes and give them the much-needed exposure (especially the younger lot), but also draw international athletes and spectators, foster cross-cultural exchanges and open avenues for economic and diplomatic partnerships. Such initiatives would enable India to use sports as a strategic platform to build stronger international alliances and enhance its soft power outside of cricket.

We submit that the Policy should include such strategies to increase India's global presence to foster stronger international partnerships.

¹⁴ https://yas.nic.in/sites/default/files/NCSSR_0.pdf

K. SPORTS MANUFACTURING INITIATIVES

While the Policy briefly mentions fostering a thriving environment for sports startups and entrepreneurship, it fails to elaborate upon the same.

The Policy may introduce a Production Linked Incentive (PLI)¹⁵ scheme specifically aimed at the manufacturing of specialized sports equipment to boost India's self-reliance and global competitiveness in the sports sector. By focusing on the production of items such as sports gear, high-quality training equipment, protective gear, and other precision-based equipment, this initiative would not only support the 'Made in India' movement but also address gaps in domestic manufacturing and reduce reliance on imports.

To maximize the impact, the Policy should offer financial incentives to manufacturers of advanced sports equipment, reducing production costs and encouraging innovation. It should also establish partnerships between Indian manufacturers, research institutes, and international experts to ensure products meet global quality standards. To ensure that our athletes use equipment manufactured locally, manufacturers should be encouraged to ensure global quality standards pertaining to both performance and safety. Patents (marrying sports good with technological advancements) must also be encouraged in the manufacturing sector by spreading awareness. Export promotion schemes, such as subsidies and simplified regulations, can boost the price competitiveness of Indian sports goods in international markets. Additionally, the Policy should facilitate infrastructure development by setting up specialized sports manufacturing hubs and innovation centers to drive research and development in sports technology. Finally, skill development programs are essential to train the workforce in producing high-tech sports equipment, ensuring domestic industries meet global precision requirements, which can be enabled through collaborations with NSDC.

We submit that the Policy should include such strategies which would enable India to position itself as a leading global manufacturer of sports equipment, lower the cost of domestic sports goods and boost its presence in the international market.

L. COMMUNITY ENGAGEMENT ACTIVITIES AND INFRASTRUCTURE

The Policy emphasizes the importance of regular participation in sports and lays emphasis on promoting a culture of active living through initiatives like the 'Yoga Challenge' and the '10,000 Steps a Day Challenge'. To effectively promote active engagement in daily life, it must prioritize the establishment of accessible sports centers and facilities that enable individuals to partake in recreational activities without risk (we often hear of runners meeting with road accidents, which then deters people). Further, as India has industrialized, there has been a notable decline in physical activity levels. To combat this trend, it is crucial to provide access to sports facilities in close proximity to residential communities (the establishment of turfs is a prime example of the

¹⁵ <https://www.investindia.gov.in/production-linked-incentives-schemes-india>

growth of participation in recreational sports). Comprehensive planning and development projects should be initiated to create these facilities, ensuring that sports are accessible at the grassroots level. By implementing these measures, we can enhance participation in physical activities and promote healthier lifestyles for everyone.

We suggest that the Policy should mandate the establishment of community sports centers in easily accessible locations within residential areas. This initiative should include detailed guidelines for planning and developing these facilities, ensuring they cater to diverse recreational needs. Additionally, the Policy should promote partnerships with local organizations to enhance outreach and engagement at the grassroots level, fostering increased participation in physical activities and encouraging healthier lifestyles.

M. GOOD GOVERNANCE WITHIN SPORTS ORGANIZATION

The Policy acknowledges the critical importance of good governance in the sports sector, however, it lacks a comprehensive strategy for ensuring accountability at both national and state levels. While the recognition of governance, along with the circulation of the National Sports Governance Bill, 2024, is a positive step, the absence of clear frameworks and mechanisms to hold stakeholders accountable undermines the effectiveness of the Policy. Without robust accountability measures, it becomes challenging to monitor the implementation of policies, assess performance, and ensure that resources are utilized effectively. Therefore, it is essential for the Policy to incorporate detailed strategies that outline the responsibilities of various governing bodies and establish transparent reporting and evaluation processes. This would not only enhance the integrity of the sports governance system but also build public trust and confidence in its operations. For example, in contrast, China's centralized system enforces stringent oversight of sports organizations across all tiers, including governmental and semi-governmental entities¹⁶.

We propose that the Policy implement research programs to identify governance-related challenges within the sports sector. It should establish specific accountability frameworks that clearly outline responsibilities at all levels, develop robust mechanisms for monitoring the performance of sports organizations, and ensure that the Policy's objectives are achieved effectively.

N. E-SPORT

The Policy currently overlooks the inclusion of e-sports, which are increasingly gaining popularity and participation across various demographics. Acknowledging the significance of these activities is crucial for fostering a comprehensive sports culture that reflects contemporary interests and trends. To address this gap, the Policy should explicitly recognize e-sports within its framework, highlighting their role in promoting skills such as critical thinking and problem solving. It should also establish guidelines for the organization and regulation for these activities, ensuring

¹⁶ <https://www.aspeninstitute.org/wp-content/uploads/2023/10/worldsportsystemsfullfinal-china.pdf>

inclusivity. Furthermore, the Policy should invest in the development of dedicated facilities for e-sports, providing communities with the necessary resources to engage in these activities. While an attempt was made during COVID-19 to popularize e-sports, the efforts seem to have dried out shortly after. In 2024, it was encouraging to see the Hon'ble Prime Minister invite gamers and address the challenge they face pertaining to games of skill v. those of chance (betting). Implementing programs aimed at nurturing talent in these fields is essential, including training initiatives, competitions, and scholarships for aspiring athletes. Finally, conducting research to assess the impact and potential of e-sports will provide information for future Policy directions.

We submit that by incorporating the aforementioned elements, the Policy can ensure a more holistic approach to sports that resonates with current trends and future expansion.

O. FIGHT AGAINST MANIPULATION OF COMPETITIONS

The Policy fails to address the critical issue of combating competition manipulation, which is essential for maintaining the integrity of sports. To rectify this oversight, the Policy should include several key actions and establish a comprehensive framework for monitoring and investigating instances of competition manipulation, ensuring transparency and accountability within the sporting community. For instance, the Convention on the Manipulation of Sports Competitions, commonly known as the Macolin Convention¹⁷, is the first international law on the manipulation of sports competition. It calls for co-operation between the public authorities, sports organizations, betting operators and competition organizers to effectively prevent, detect, and sanction such manipulative practices. By establishing a unified legal framework, the convention aims to facilitate cooperation in tackling this pervasive global threat.

We submit that the Policy should prioritize the issue of competition manipulation to maintain the integrity of sports. This can be achieved by establishing a framework for monitoring and investigating manipulative practices, enforcing strict penalties, promoting educational initiatives and creating a robust reporting mechanism. Additionally, we recommend fostering collaboration between national bodies and tech and data companies to strengthen these efforts. By focusing on the fight against competition manipulation, the Policy can safeguard the spirit of sports and enhance public trust, building a fair and equitable environment for all.

P. REFORMATIVE SPORTS PROGRAMS FOR JUVENILES

The Policy could leverage sports as a transformative tool to address juvenile delinquency, utilizing it as a means for social development. Reformatory sports programs could provide juveniles with opportunities to engage in healthy activities, fostering personal growth, discipline, and teamwork. These programs can help instill positive values and life skills, steering youth away from negative influences. For instance, the Policy take inspiration from programs such as Right to Play in the United States¹⁸.

¹⁷ <https://www.coe.int/en/web/sport/macolin>

¹⁸ <https://righttoplayusa.org/en/>

We submit that participation in sports is linked to improved mental health outcomes, including reduced anxiety and depression. Reformative sports programs could provide an outlet for emotions and can enhance overall well-being. Incorporating sports programs into juvenile rehabilitation can significantly reduce recidivism rates. This investment in youth can lead to long-term societal benefits and a reduction in crime rates, ultimately contributing to safer communities.

Q. EXEMPLARY GLOBAL SPORTS POLICIES

Countries like Australia, China, and those in Europe have attained remarkable success and excellence in sports through several key elements. Below are some of the pivotal activities practiced to drive progress in sport.

1. Practices Adopted by Australian Sports Commission (ASC):

a. Australia's Sports Participation Strategy¹⁹:

- (i) The problem statements were identified during the consultation and design process. Key issues include a lack of confidence and skills among individuals engaging in sports, the compromise of open space availability due to changing community demographics and the need for ongoing efforts to enhance diversity, etc.
- (ii) Based on the consultation, a strategic planning cycle is implemented – the strategy consists of four phases aimed at creating a unified system leading up to the Brisbane 2032 Olympic and Paralympic Games. The first three phases focus on collaboration with stakeholders, allowing for ongoing adjustments to enhance flexibility and responsiveness. The fourth phase aims to capitalize on the momentum from the 2032 Games to foster lasting improvements in sports participation in Australia.
- (iii) The strategy focuses on the enablers and listening to the community, taking a proactive approach to advocating for sport, diversity and inclusion of technology and digitalization.
- (iv) The sports ecosystem is being built around four P's (People, Places, Partners and Programs).
- (v) The impact will be measured by both qualitative and quantitative measures such as social, individual and societal outcomes. An implementation plan will be created for each horizon, outlining deliverables and success measures for each priority area. Progress will be reported annually to ensure accountability, supported by an online document for transparency.

¹⁹ https://www.ausport.gov.au/_data/assets/pdf_file/0006/1127616/Australias-Sport-Participation-Strategy-Play-Well.pdf

b. Australia's High-Performance Strategy²⁰:

- (i) Australia's High-Performance Strategy 2032 aims to enhance the country's sporting excellence in preparation for the Brisbane 2032 Olympic and Paralympic Games. The strategy focuses on several key areas of providing comprehensive athlete development with clear pathways and transition support, lead with vision, integrity, and accountability to foster thriving environments and working together toward shared goals and enhancing collaboration across the system.
- (ii) The ASC's four performance objectives focus on ensuring top athletes excel in critical competitions, identifying and nurturing future high-performance athletes, utilizing cutting-edge knowledge and innovation to enhance the effectiveness of athletes, coaches, and support teams, and developing organizations that attract and retain diverse talent to maximize human potential in the high-performance workforce.

c. ASC Restorative Program:

- (i) The ASC Restorative Program has been created to acknowledge and address the experiences of former Australian Institute of Sport (AIS) scholarship athletes who suffered harm due to inappropriate practices or abuse during their time at the AIS.

Given Australia's success in sports and its commitment to providing comprehensive programs aimed at achieving excellence²¹, India can benefit from studying these initiatives. By adopting and implementing similar policies and strategies, India can enhance its own sports development framework and work towards achieving its athletic goals. Further, borrowing from the examples set by Australia, the same could aid India in implementing similar strategies to achieve its goal of hosting the Olympics in 2036.

2. Practices Adopted by General Administration of Sports of China:

Given their shared challenges, such as overpopulation and rapid economic growth, India could make use of similar strategies as those adopted in China. By leveraging these commonalities, India can implement effective measures to enhance its sports infrastructure, talent development, and overall athletic performance.

a. Five Year Plan to Promote Sports in City²²:

- (i) By the end of 2025, each citizen will have access to an average of 2.6 square meters of sports facilities.

²⁰ https://www.ausport.gov.au/_data/assets/pdf_file/0006/1127616/Australias-Sport-Participation-Strategy-Play-Well.pdf

²¹ <https://www.ausport.gov.au/programs#Australian-Sports-Commission>

²² <https://www.shine.cn/sport/2109245464/>

- (ii) Previous access stands at 2.35 square meters, up from 1.76 square meters in 2015.
- (iii) Approximately 8,000 new sports venues and facilities were to be built, including football pitches, outdoor activity centers, and sports parks.
- (iv) The plan includes a clear, state-driven funding structure.
- (v) Efforts are made to improve digital management capabilities of venues.
- (vi) More sports and health-related lectures introduced in schools, neighborhoods, and workplaces to promote healthy lifestyles.

b. Proposed Measures for the 14th Year Plan in Sports Development²³:

- (i) Tax incentives for eligible sports enterprises, including research and development deductions and support for small businesses, alongside property tax benefits for sports venues.
- (ii) Enhance intellectual property by promoting market-oriented sports broadcasting rights, establishing evaluation standards for intangible assets, and supporting associations in asset development.
- (iii) Improve the sports consumption environment by enhancing credit records for market players and cracking down on illegal operations.
- (iv) Integrate sports land layout into national planning and increase support for new construction land for the sports industry.
- (v) Utilize public spaces for sports facilities and encourage private investment in their construction.
- (vi) Launch a national competition for sports science and technology innovation.
- (vii) Train hospitals to develop sports rehabilitation therapists and promote an integrated health service model.
- (viii) Focus on activities like mountaineering and hiking to enhance forest tourism.
- (ix) Establish a mechanism for regular, accurate sports industry data release.

3. Practices adopted by European Commission²⁴:

- a. The Erasmus Program is the European Union's initiative aimed at supporting education, training and sport across Europe. India can leverage valuable insights from Erasmus to enhance its own Policy, especially in alignment with the NEP. The following actions have been adopted by Erasmus:
 - (i) Corporation partnerships: The program is designed for organizations to develop joint activities that promote sport and physical activity, address integrity threats like doping and match-fixing, support dual careers for athletes, enhance good governance, and foster tolerance and social inclusion.

²³ https://www.gov.cn/zhengce/content/2019-09/17/content_5430555.htm

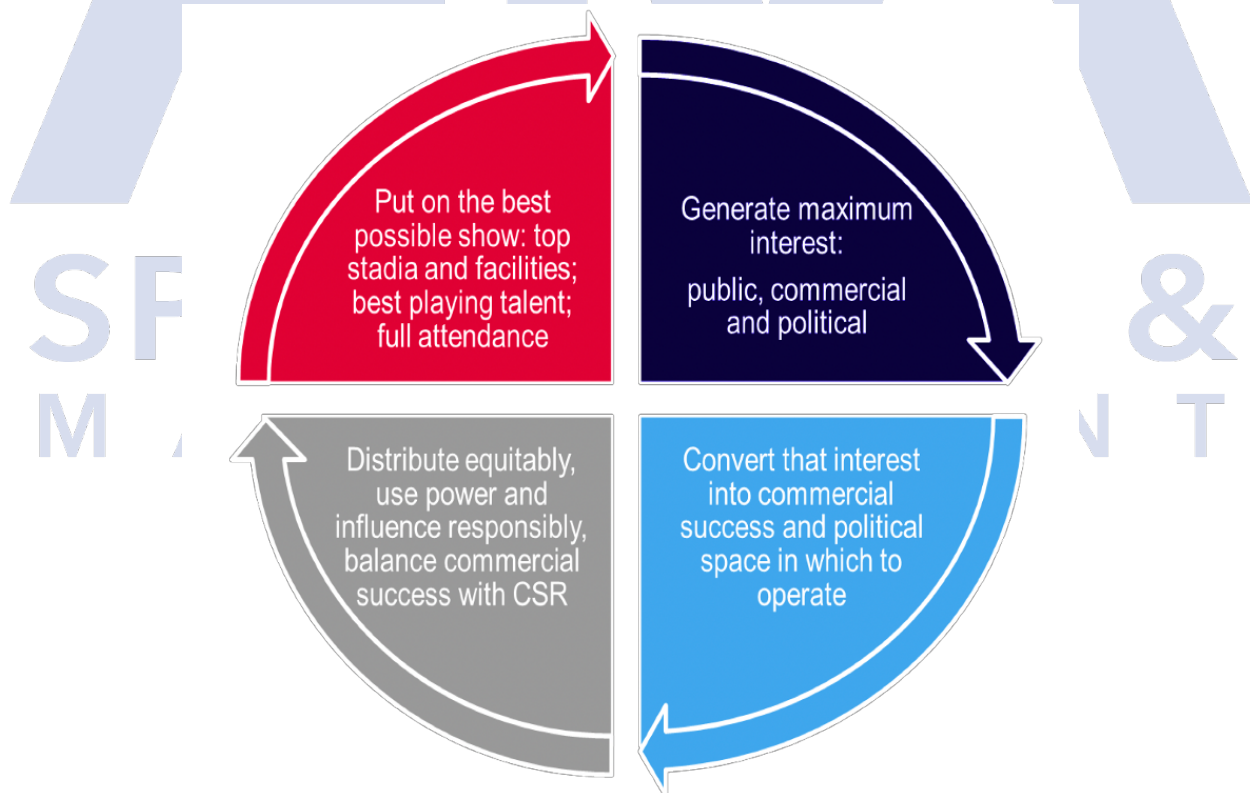
²⁴ <https://erasmus-plus.ec.europa.eu/opportunities/opportunities-for-organisations/sport-actions>

- (ii) Small-scale partnerships: Designed for grassroots organizations, less experienced entities, and newcomers. They feature simpler administration, smaller grant amounts, and shorter durations compared to cooperation partnerships, making them more accessible for those just starting out.
- (iii) Not-for-profit events: The initiative is designed to promote sports activities, support social inclusion through sport, encourage volunteering, combat discrimination, and boost participation in physical activity.
- (iv) Capacity building in the field of sport: Designed to support sports activities and policies to promote values and help individuals grow personally and socially, creating stronger, more connected communities. Supporting projects specifically aimed at integrating marginalized groups, such as refugees, ethnic minorities, and people with disabilities, into sports activities.

Overall, the sports initiatives of Erasmus have contributed to better participation in sports and physical activities, enhanced cooperation among sports organizations across Europe, improved skills and education in the sports sector.

R. CONCLUSION

The simple overall strategy adopted by the Policy should be the below virtuous cycle:



While the Policy makes a commendable effort to encompass a wide range of sectors within the sports ecosystem, its major shortcoming lies in the absence of clear and actionable implementation strategies. Merely acknowledging the importance of diverse sectors such as grassroots development, corporate sponsorship and community engagement is not sufficient. There must be a well-defined roadmap to translate these intentions into tangible outcomes. Without specific strategies, stipulating how to operationalise these inclusive measures, stakeholders may struggle to understand their roles and responsibilities in executing the Policy effectively. Furthermore, the lack of concrete timelines, benchmarks, and accountability mechanisms could lead to inconsistency across different sectors and levels of governance. This gap not only hampers the effectiveness of the Policy but also risks diminishing the enthusiasm and investment of various stakeholders who are eager to contribute.

To truly harness the potential of the Policy's comprehensive vision, it is imperative to develop and incorporate robust implementation strategies that guide actions, foster collaboration, and ensure that the diverse interests of all sectors are met with practical and measurable results.

The collaborative framework should include mechanisms for the fair distribution of financial, social, and professional benefits, ensuring that all relevant parties (particularly grassroots organizations and emerging talent) receive their rightful share. The Policy must outline a clear roadmap for reinvesting these gains back into the sports sector. This reinvestment can fund initiatives such as talent development programs, infrastructure enhancements and community engagement activities, fostering a cycle of growth that elevates the entire sports ecosystem. By promoting a culture of fairness and shared success, the Policy can help create a sustainable sports environment that not only benefits sportspersons but also strengthens the broader community, ultimately contributing to the nation's advancement.

To conclude, India can build a stronger, more inclusive, and robustly competitive sports environment by learning from the best practices of Australia, China and European countries (countries that have consistently achieved sporting success). By setting clear goals, making small strides towards the larger goal consistently, improving governance, focusing on athlete welfare and embracing technology, India can achieve lasting success in global sports.

Thanking you.

Yours sincerely,

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