

The Welsh Government's Legislative Consent Memoranda on the Sporting Events Bill

October 2026



1. Background

The UK Government's Sporting Events Bill

1. The Sporting Events Bill (the Bill)¹ aims to establish “a common legislative framework that enables the UK Government and the devolved governments, including the Welsh Government, to attract major sporting events to the UK.”² The long title of the Bill states that it is a Bill to:

“Make provision for enabling a common set of legislative provisions to be applied to major sporting events held in the United Kingdom; to confer power to provide financial assistance in relation to sporting events held in England, Scotland or Northern Ireland; and for connected purposes.”³

2. The Bill was introduced to the House of Lords on 14 May 2026. It is sponsored by the Department for Digital, Culture, Media and Sport.⁴

The legislative consent process

3. Standing Orders 29.1 and 29.2 provide that the Welsh Government should lay a legislative consent memorandum when a UK Bill makes provision in relation to Wales that has regard to devolved matters (relevant provision). The memorandum should normally be laid no later than 2 weeks after:

- a Bill that makes relevant provision is introduced into the UK Parliament; or
- any amendment(s) is/are agreed that make relevant provision that goes beyond the limits of any consent previously given by the Senedd; or
- any amendment(s) is/are tabled by a Minister of the Crown (or with the Minister of the Crown's support) that would make relevant

¹ **Sporting Events Bill (HL Bill 003)**

² UK Government, **Sporting Events Bill [HL]: Explanatory Notes**, 14 May 2026

³ **Sporting Events Bill (HL Bill 003)**

⁴ UK Parliament, **Sporting Events Bill**

provision that goes beyond the limits of any consent previously given by the Senedd.⁵

2. The Welsh Government's Legislative Consent Memoranda

The Legislative Consent Memoranda

4. On 18 June 2026, the Trefnydd, Chief Whip and Cabinet Minister for Culture and Sport (the Cabinet Minister), laid before the Senedd a Legislative Consent Memorandum in respect of the Bill as introduced on 14 May 2026 (Memorandum No.1).⁶ The Business Committee subsequently referred the Memorandum to the Culture, Communications, Cymraeg and Sport Committee and the Legislation Committee with a reporting deadline of 9 October 2026.⁷

5. On 18 August 2026, the Cabinet Minister laid before the Senedd a Supplementary Legislative Consent Memorandum (Memorandum No. 2) in respect of amendments that were tabled to the Bill by the UK Government on 8 July.⁸

Provision for which the Senedd's consent is sought

The Welsh Government's view on consent

6. In Memorandum No.1, the Cabinet Minister states that the following provisions of the Bill require the Senedd's consent:

Application of the sporting events framework: clauses 1 to 4

Ticket touting: clauses 5 to 7 and Schedule 1

Advertising: clauses 8 to 10 and Schedule 2

⁵ Welsh Parliament, [Standing Orders](#), April 2026

⁶ Welsh Government, [Legislative Consent Memorandum: Sporting Events Bill](#), 18 June 2026

⁷ Welsh Parliament, [Timetable for consideration: Legislative Consent Memorandum on the Sporting Events Bill](#), June 2026

⁸ Welsh Government, [Supplementary Legislative Consent Memorandum \(Memorandum No 2\): Sporting Events Bill](#), 18 August 2026

Trading: clauses 11 to 13 and Schedule 3

Enforcement: clause 18 and Schedule 6

Supplementary and general: clauses 19 to 24

Final and supplementary provisions: clauses 26 to 30 ⁹

7. A summary of the purpose and effect of these provisions insofar as they relate to devolved Welsh matters can be found from paragraph 13 of Memorandum No.1.¹⁰

8. In Memorandum No. 2, the Cabinet Minister states that the following amendments, which were tabled by the UK Government on 8 July, require the Senedd's consent:

Amendment 7: Application of the Framework to Major Sporting Events (clause 2)

Amendments 10 to 13: Framework Conditions (clause 3)

Amendment 32: Trading Provisions (paragraph 2(4) of Schedule 3)

Amendments 50 and 51: Regulations (clause 27) ¹¹

9. A summary of the purpose and effect of these amendments insofar as they relate to devolved Welsh matters can be found from paragraph 11 of Memorandum No. 2.¹²

⁹ Welsh Government, [Legislative Consent Memorandum: Sporting Events Bill](#), 18 June 2026, paragraphs 13 to 85

¹⁰ Welsh Government, [Legislative Consent Memorandum: Sporting Events Bill](#), 18 June 2026, paragraphs 13 to 85

¹¹ Welsh Government, [Supplementary Legislative Consent Memorandum \(Memorandum No 2\): Sporting Events Bill](#), 18 August 2026, paragraphs 11 to 31

¹² Welsh Government, [Supplementary Legislative Consent Memorandum \(Memorandum No 2\): Sporting Events Bill](#), 18 August 2026, paragraphs 11 to 31

The UK Government's view on consent

10. The UK Government and the Welsh Government agree on the provisions in the Bill as introduced and on the amendments that require the Senedd's consent.

11. Specifically, Memorandum No.1 sets out that the UK Government agrees with the Welsh Government that the Senedd's consent is required for:

- clauses 1 to 4;
- 5 to 7 and Schedule 1;
- 8 to 10 and Schedule 2;
- clauses 11 to 13 and Schedule 3;
- clause 18 and Schedule 6;
- clauses 19 to 24; and
- clauses 26 to 30.¹³

12. In Memorandum No. 2, the Cabinet Minister states that:

- the UK Government believes that amendments 10 to 13 require the Senedd's consent; and
- the UK Government's assessment of the provisions that engage the consent process, as set out in Memorandum No.1, has not changed as a result of the other UK Government amendments.¹⁴

Delegated powers

13. The following provisions confer regulation-making powers on a Minister of the Crown or on the Welsh Ministers in relation to devolved Welsh matters:

¹³ Welsh Government, **Legislative Consent Memorandum: Sporting Events Bill**, 18 June 2026, paragraphs 86 to 87

¹⁴ Welsh Government, **Supplementary Legislative Consent Memorandum (Memorandum No 2): Sporting Events Bill**, 18 August 2026, paragraphs 38 to 39

Provision(s)	Power	Exercisable by	Scrutiny procedure
Clause 2(1)	To apply one or more of the parts of the sporting events framework to a sporting event	The Secretary of State with the consent of the Welsh Ministers. The power to apply the ticket touting, advertising or trading provisions is also vested in the Welsh Ministers, provided that the three conditions in clause 4 are met Amendments 10 to 13 remove the second of the three conditions in clause 4 (the requirement for events covered by the Sporting Events Framework to not be regularly hosted in the UK), thereby broadening the circumstances in which the Sporting Events Framework may be applied.	As introduced: approval procedure if they are the first such regulations, otherwise the annulment procedure. Amendment 7 subjects all regulations made under clause 2 to the Senedd approval procedure or, in urgent cases, the Senedd confirmation procedure. Consequently, under clause 27, if the Welsh Ministers propose to delegate a discretion, the draft Regulations which do so will be subject to the approval of the Senedd. Amendment 50 provides that regulations made under the confirmation procedure cease to have effect after 40 days (excluding periods where the Senedd is dissolved or in recess for more than four days) beginning on the day on which the regulations are made unless they are

			confirmed by resolution of the Senedd.
Clause 21(1)	To increase, to a maximum of £1000, the maximum financial penalty amounts payable under a fixed penalty notice served by an enforcement authority for breach of the advertising provisions (in Schedule 2) or trading provisions (in Schedule 3)	The Secretary of State with the consent of the Welsh Ministers. The Welsh Ministers may exercise the power in relation to matters that are within the legislative competence of the Senedd	Annulment
Clause 21(5)	To amend the financial penalty ceiling in relation to advertising offences, trading offences and ticket touting offences for the purpose of reflecting changes in the value of money	The Secretary of State	Negative
Clause 26(1)	To make provision that is consequential upon the Bill	The Secretary of State	Negative

14. Clause 27 sets out that regulations made under the Bill, including by the Welsh Ministers, may:

- include consequential, supplementary, incidental, transitional or saving provisions;
- make different provision for different purposes or areas; and
- confer functions on a person (including functions involving the exercise of a discretion).¹⁵

The Welsh Government's engagement with the UK Government

15. The Cabinet Minister does not comment on the Welsh Government's engagement with the UK Government in relation to the Bill in Memorandum No.1. However, in Memorandum No. 2, she states that "Welsh Government and UK Government officials have continued to engage regularly in relation to the Bill, including on amendments affecting Wales" since Memorandum No.1 was laid.¹⁶

The Welsh Government's position as set out in the memoranda

16. The Cabinet Minister stated in Memorandum No.1 that it is "appropriate to deal with these provisions in a UK Bill":

*"Given the Senedd's limited legislative competence in this area, it would not be possible for the Senedd to legislate in similar terms to this Bill for Wales."*¹⁷

17. The Cabinet Minister set out that while there are "positive elements of this Bill with respect to its role in supporting the delivery of future major sporting events in Wales", she would bring forward a recommendation to the Senedd on whether to give consent to the Bill "once the Welsh Government has analysed the wider impacts of the UK legislative programme for Wales."¹⁸

¹⁵ Welsh Government, [Legislative Consent Memorandum: Sporting Events Bill](#), 18 June 2026, paragraph 81

¹⁶ Welsh Government, [Supplementary Legislative Consent Memorandum \(Memorandum No 2\): Sporting Events Bill](#), 18 August 2026, paragraph 32

¹⁷ Welsh Government, [Legislative Consent Memorandum: Sporting Events Bill](#), 18 June 2026, paragraphs 92

¹⁸ Welsh Government, [Legislative Consent Memorandum: Sporting Events Bill](#), 18 June 2026, paragraphs 93

18. Memorandum No. 2 was laid after the Welsh Government updated its revised Principles on UK Legislation in Devolved Areas (the Principles), which were published on 14 July 2026.¹⁹ The Cabinet Minister notes in Memorandum No. 2 that further consideration has been given to the creation of so-called “concurrent plus”²⁰ powers in the Bill. She states that:

“... I am content with the creation of concurrent plus powers, given it would not be possible for the Senedd to legislate in similar terms to this Bill for Wales and with respect to the cross-border planning and delivery associated with major sporting events.”²¹

19. However, the Cabinet Minister also notes that the Principles affirm that a carve-out is required to Schedule 7B to the Government of Wales Act 2006 in relation to any concurrent plus powers (so that they are capable of being removed by the Senedd without constraint). She welcomes the UK Government's engagement to date in relation to these powers.²²

20. Subject to these ongoing discussions, Memorandum No. 2 reaffirms the Cabinet Minister's support for the Bill's objectives which, she states, “enable appropriate, targeted and time limited protections and controls to be put in place for specific events.” However, she concludes that “further clarity is required regarding clause 4 and clause 26” before she can bring forward a recommendation on consent.²³

3. Committee consideration

21. We considered Memorandum No.1 at our meeting on 13 July 2026.²⁴ We wrote to the Cabinet Minister on 20 July to seek her views on a range of issues in relation to that memorandum, including:

¹⁹ Welsh Government, **Written Statement: Welsh Government Principles on UK Legislation in Devolved Areas**, 14 July 2026

²⁰ Concurrent plus powers are powers that are vested in both the Secretary of State and the Welsh Ministers, but where the Secretary of State can only exercise the powers with the Welsh Ministers' consent.

²¹ Welsh Government, **Supplementary Legislative Consent Memorandum (Memorandum No 2): Sporting Events Bill**, 18 August 2026, paragraphs 34 to 35

²² Welsh Government, **Supplementary Legislative Consent Memorandum (Memorandum No 2): Sporting Events Bill**, 18 August 2026, paragraphs 36 to 37

²³ Welsh Government, **Supplementary Legislative Consent Memorandum (Memorandum No 2): Sporting Events Bill**, 18 August 2026, paragraphs 41 to 46

²⁴ **Legislation Committee, 13 July 2026**

- engagement with local authorities in relation to local weights and measures authorities;
- how regulations made under the Bill relate to online ticket touting, advertising or trading activities;
- the delegated powers in clause 27(1)(c); and
- cross-border working.²⁵

22. We received the Cabinet Minister's response on 7 September. In it, the Cabinet Minister states that:

- the UK Government undertook targeted engagement with a range of stakeholders. The Welsh Government has invited views from relevant stakeholders in Wales, including local authorities, but has not conducted a formal consultation exercise;
- the Bill itself does not give rise to any costs, and that event-specific costs and duties will be assessed when regulations are developed;
- there are “no specific uses in mind” for the power to sub-delegate functions in clause 27(1)(c), but that the power enables regulations to (where justified) impose a duty to comply with guidance, confer a discretion, or include ambulatory references to external documents or sources of information. The letter also states that any regulations made under clause 2 would be subject to the Senedd approval procedure, as a consequence of amendments agreed at report stage in the House of Lords;
- she does not anticipate any significant challenges arising from the provisions in the Bill in relation to cross-border working by the Competition and Markets Authority or other enforcement authorities;
- discussions continue with the UK Government in relation to securing appropriate carve-outs from the Government of Wales Act 2006 in relation to the “concurrent-plus” powers in clause 4 of the Bill; and

²⁵ **Letter to the Trefnydd, Chief Whip and Cabinet Minister for Culture and Sport**, 20 July 2026

- the Welsh Government considers there is a clear rationale for legislating through a UK Bill in this instance.²⁶

23. On 30 September, we received a letter from the Cabinet Minister in which she stated that, following “ongoing positive” engagement with the UK Government, she is recommending the Senedd gives consent to the relevant provisions in the Bill.²⁷

24. We considered the Cabinet Minister’s response dated 7 September alongside Memorandum No. 2 at our meeting on 14 September, and her response dated 30 September at our meeting on 5 October.²⁸ We considered and agreed our report at our meetings on 21 and 28 September, and 5 October 2026.²⁹

4. Our view

Legislative consent

25. We note the Welsh Government’s and the UK Government’s assessments of the provisions within the Bill that require the consent of the Senedd, as set out in the memoranda.

²⁶ Letter from the Trefnydd, Chief Whip and Cabinet Minister for Culture and Sport, 7 September 2026

²⁷ Letter from the Trefnydd, Chief Whip and Cabinet Minister for Culture and Sport, 30 September 2026

²⁸ Legislation Committee, 14 September 2026

²⁹ Legislation Committee, 21 September 2026; Legislation Committee, 28 September 2026

Conclusion 1. We agree with the Cabinet Minister that the Senedd's consent is required in relation to clauses 1 to 4; 5 to 7 and Schedule 1; 8 to 10 and Schedule 2; clauses 11 to 13 and Schedule 3; clause 18 and Schedule 6; clauses 19 to 24; and clauses 26 to 30.

Conclusion 2. We agree with the Cabinet Minister that the Senedd's consent is required in relation to the following amendments, tabled in the name of the UK Government: 7, 10 to 13, 32, 50 and 51.

The legislative consent process

A recommendation on consent

26. We note the Cabinet Minister's position in Memorandum No.1 that the Welsh Government will bring forward a recommendation to the Senedd on whether to give consent once it has analysed the wider impact of the UK legislative programme for Wales. This is consistent with the first seven memoranda laid by the Welsh Government this Senedd.

27. In a letter to the First Minister dated 8 July 2026, we asked why the wider impact of the UK legislative programme would influence a recommendation from a Welsh Minister on an individual Bill.³⁰ We note the assurances of the Counsel General Rt. Hon. Elfyn Llwyd in his response:

"The approach taken at the start of this Senedd term reflected the particular circumstances of the King's Speech announcing a new UK Government legislative programme coinciding with the formation of the new Welsh Government."³¹

³⁰ [Letter to the First Minister of Wales](#), 8 July 2026

³¹ [Letter from the Counsel General](#), 28 August 2026

Conclusion 3. We do not accept that a Welsh Government decision to carry out an analysis of the impact of the UK Government's legislative programme as set out in a King's Speech is an acceptable reason for not including a consent recommendation in an individual Bill.

Recommendation 1. If the Welsh Government is unable to confirm its recommendation on consent in a first legislative consent memorandum laid before the Senedd, it must set out clearly the reasons. Consideration of the wider implications of a King's Speech should not be used as a reason to withhold a view on consent in relation to a specific Bill.

28. The Cabinet Minister also withholds a recommendation on consent in Memorandum No. 2. However, she did so because she was seeking further clarity regarding the delegated powers in clause 4 and clause 26, rather than for the reasons stated in Memorandum No.1. We discuss these matters from paragraph 40 below.

29. We note the Cabinet Minister is now recommending that the Senedd gives its consent to the relevant provisions in the Bill. Confirmation from the Cabinet Minister about her views on consent is welcome. However, the explanation we received simply mentions "ongoing positive engagement with UK Government", rather than providing us with full details of the intergovernmental discussions.

Recommendation 2. The Cabinet Minister should write to all Senedd Members at the earliest opportunity, and sufficiently in advance of the Senedd's debate on the legislative consent motion, to set out the full details of why she is now recommending that the Senedd should grant its consent to the relevant provisions in the Bill, including whether the Welsh Government has secured appropriate carve outs to the Government of Wales Act 2006.

Adherence to the two-week deadline for laying legislative consent memoranda

30. Memorandum No.1 was laid on 18 June 2026, five weeks after the introduction of the Bill to the UK Parliament. Memorandum No. 2 was laid on 18

August 2026, over five weeks after the relevant amendments were tabled by the Welsh Government. Of the 13 memoranda laid to date by the Welsh Government, none were laid within the two-week deadline set out in Standing Orders.

31. We have written to the First Minister to urge the Welsh Government to better observe the Standing Order requirement for legislative consent memoranda to be laid normally no later than two weeks after the introduction of a relevant Bill to the UK Parliament, amongst other matters.³²

32. This Bill - as with a number of others triggering the legislative consent process during the first few months of the Seventh Senedd - was introduced very soon after the Welsh Government was formed. We note the reflections of the Cabinet Minister for Government Effectiveness and the Constitution about the challenges of the timing of the King's Speech, and acknowledge that this may have had implications for the ability of the Welsh Government to adhere to the two-week deadline set out in Standing Orders for laying a legislative consent memorandum. In principle, we consider that analysing the relevant provisions of a Bill and coming to a view on consent so soon after the establishment of a new government is a reasonable example of where the two-week deadline may be difficult to meet.

33. However, neither Memorandum No.1 nor Memorandum No. 2 sets out a recommendation from the Cabinet Minister about whether the Senedd should grant its consent to the Bill, as discussed above. On balance, therefore, it is not clear to us why the Welsh Government was unable to lay the memoranda closer to the two-week deadline set out in Standing Order 29.

³² [Letter to the First Minister of Wales](#), 3 July 2026

Conclusion 4. We see no reason why the memoranda could not have been laid closer to the two-week deadline set out in Standing Order 29.

Recommendation 2. The Cabinet Minister should clarify why she was unable to lay the memoranda within the two-week deadline as set out in Standing Order 29.2.

Recommendation 3. The Welsh Government should make every effort to observe the two-week deadline for the laying of legislative consent memoranda, as set out in Standing Order 29.2.

Delegated powers

34. The Bill contains two concurrent powers: the power under clause 2(1), which is the primary power that will be used to apply the sporting events framework to specific events, and the power under clause 21(5), which relates to financial penalty ceilings. These powers can be exercised by the Welsh Ministers (insofar as they relate to devolved matters), or by the Secretary of State with the consent of the Welsh Ministers.

35. We note the Welsh Government's view as set out in its Principles that concurrent powers "should not be created", unless "exceptionally agreed". However, of the 10 Bills that have triggered the legislative consent process to date, four³³ confer a power to take action in a devolved area on both the Secretary of State and the Welsh Ministers, with or without consent mechanisms, or otherwise create a situation whereby both the Secretary of State and the Welsh Ministers have a power to take action in a devolved area.

36. In light of the number of Bills that have triggered the legislative consent process that contain concurrent powers, we intend to write to the First Minister and Counsel General to seek their views on the extent to which the UK Government legislative approach is consistent with the Welsh Government's 'Principles of UK Legislation in Devolved Areas', alongside other matters.

37. Concurrent powers that are subject to consent from the Welsh Ministers can be seen as offering a greater level of protection of the devolution

³³ Public Office (Accountability) Bill, Representation of the People Bill, Sporting Events Bill, Railways Bill

settlement when compared to concurrent powers without consent mechanisms. We have some sympathy for this argument.

38. However, as we have noted previously,³⁴ the making of subordinate legislation by the Secretary of State under any concurrent power bypasses Senedd scrutiny and approval procedures. Should a Welsh Government be minded to do so, a Welsh Minister could consent to the Secretary of State making subordinate legislation that has regard to devolved Welsh matters, anticipating that making the same legislation him/herself would face significant opposition in the Senedd.

39. We feel that it is too early for us to come to a principled view on the use of concurrent powers. However, we do not believe that the inclusion of such powers in almost half of the Bills which have engaged the consent process in the first four months of the Seventh Senedd can plausibly be described as 'exceptional', as the Welsh Government's Principles intend.

40. We will continue to pay particular attention to concurrent powers throughout this Senedd, and to scrutinise the Welsh Government's approach to their inclusion in Bills which trigger the consent process. We note the Cabinet Minister's acknowledgement that the powers in the Bill are not, currently, consistent with the Principles in that they cannot be removed by the Senedd without constraint.

41. Notwithstanding any views we have on the substance of the Principles itself, or indeed on the appropriateness of the delegated powers, we welcome the Cabinet Minister's explicit consideration in Memorandum No. 2 of the extent to which the Bill is consistent with the Principles. We hope such explicit consideration will improve the transparency of the legislative consent process, not least because we expect this routine consideration will demonstrate that the Welsh Government is consistently applying its Principles to all relevant UK Parliament Bills.

42. To this end, we have written to the Counsel General and the Cabinet Minister for Government Effectiveness and Constitution to encourage the Welsh Government to use the Principles as the basis for assessing what recommendation will be given to the Senedd.

³⁴ Legislation Committee, **The Welsh Government's Legislative Consent Memorandum on the Public Office (Accountability) Bill**

Conclusion 5. The Cabinet Minister's explicit consideration in Memorandum No. 2 of the extent to which the Bill is consistent with the Welsh Government's Principles on UK Legislation in Devolved Areas is to be welcomed.

43. We ask that the Cabinet Minister responds in writing to the recommendations and conclusions we make in this report.