

**INTERNATIONAL JOURNAL OF LAW
MANAGEMENT & HUMANITIES**
[ISSN 2581-5369]

Volume 3 | Issue 5

2020

© 2020 *International Journal of Law Management & Humanities*

Follow this and additional works at: <https://www.ijlmh.com/>

Under the aegis of VidhiAagaz – Inking Your Brain (<https://www.vidhiaagaz.com>)

This Article is brought to you for “free” and “open access” by the International Journal of Law Management & Humanities at VidhiAagaz. It has been accepted for inclusion in International Journal of Law Management & Humanities after due review.

In case of **any suggestion or complaint**, please contact Gyan@vidhiaagaz.com.

To submit your Manuscript for Publication at **International Journal of Law Management & Humanities**, kindly email your Manuscript at editor.ijlmh@gmail.com.

An Analysis of the Interrelationship of Competition Law & Sports in India through Emerging Landmark Case Laws

NAMAN KHANNA¹

ABSTRACT

There has been a surprisingly remarkable development in the organized sporting industry in India and around the globe. Predominantly, professional sports not only have existed for a long time but have actually evolved in terms of capital invested and their impact on society. The largely competitive sports, from the other extreme, have followed traditionally unheard styles. Electronic sports, for example, is an emerging sector which has only just achieved prominence and it is already generating financial success on a global scale. It is essential that the legislation governing it evolves appropriately, with the world of sports continually changing and looking to diversify. For years, competition law has governed the realm of sports and athletics, and over time, the interaction of the two areas has evolved dramatically. This paper would address the relationship between sports and competition law as well as its progression. The interrelationship will be discussed mainly through the help of three major case laws involving the intervention of the Competition Commission of India in the IPL, AFI and AICF cases. Through the help of these pivotal cases, the relationship is further analysed from the perspective of accountability and understanding the pyramidal structure involved in sports and the key to its solution. The research paper discusses what the future holds before concluding by providing suggestions as to how the improvement of the interface between competition law and sports can lead to the advancement of the latter

I. INTRODUCTION

Sports has been transformed into yet another multinational industry by the twin powers of modernization and monetization. Nevertheless, there are indeed a variety of respects in which sporting organizations are radically separate from most corporate organizations. Multiple types of economic restrictions, such as market revenue share, budget limits, promotions, anti-tampering provisions, have culminated in the monopolistic structure of sports associations and

¹ Author is a student at Amity Law School, Noida, India.

the implicit effort to preserve a fair equilibrium between competitors. While these limitations are prevalent in modern sports, these also naturally grabbed the ire of competition law aimed at regulating businesses against anticompetitive restrictions, and their legitimacy through competition law has also been frequently contested in multiple jurisdictions.

The sporting sector are regarded as a major provider to the national economy globally, and the same is applicable to India. Throughout the growth of professional sporting sector, the nation has seen major changes. This may be due to numerous causes, such as the development of the framework for sport. The nation today has numerous sporting centres, significant centres of excellence and numerous training centres provided by the Sports Authority of India that meet with global norms. The franchise based competitions, a rate of increase of over twenty percent is projected to be achieved by the year 2023 accompanied by Khelo-India² and Abhiyan which are excellent government policies.

Conversely, the nation 's rise in competitive sports also has been followed via an improvement in the prominence and influence of professional sports organizations. These sports entities enforce multiple financial as well as other limitations, which are likely to be subject to antitrust investigation. The Competition Act of 2002 (enforced in 2009) aims to control these limitations to insure that no company participates in anti-competitive conduct. Particularly in comparison to the European Union and the North American countries, the growth of competition law in India is relatively modern and the convergence of sports with disciplines is still at its original level. Over the last several years, nevertheless, the CCI has taken some significant decisions that enable us to evaluate the different obstacles raised by this interrelationship of competition law and sports. This research paper will address the three key CCI rulings before digging into different components which will be critical to the potential long term interaction and relationship between sports and competition law in India.

II. A BRIEF LOOK AT THE HISTORY- THE INDIAN PREMIER LEAGUE & THE DHANRAJ PILLAY CASES.

In under 10 years of passing of the Competition Act 2002, which legally came into effect in 2009, a host of high-profile sports cases were settled by competition authorities in India. Throughout the last decade, the emergence of major sports leagues in cricket, football, badminton, hockey as well as kabaddi³ has led to various conflicts over the distribution of

² Avani Kashyap, Khelo India: Developing sports infrastructure is the primary objective, *The Bridge*, <https://thebridge.in/sports-culture/khelo-india-developing-sports-infrastructure-primary-objective/>

³ Press Trust of India, Following IPL, booming super league culture makes India's sports market sizzle, *Daily Hunt*, (September 19, 2017), <https://m.dailyhunt.in/news/india/english/cricket-epaper-cricket/following+>

broadcasting rights, limitations on participants and competing leagues, raising concerns over potential breaches of Section 3, which bans anti-competitive deals, and Section 4, which rightly forbids abuse of dominance.

The Competition Commission of India's initial significant involvement in the sports industry came with regard to the Indian Premier League inquiry, when it observed that the position offered by the Indian Cricket Control board in the IPL Broadcast Rights Deal with distributors not to coordinate, recognize or help another Indian limited overs rival tournament led to an abuse of dominance.⁴ The next mainstream sports competition case related to a lawsuit filed against Hockey India (now referred to as HI) by Dhanraj Pillay, a retired Indian hockey player, alleging that the stringent conditions enforced by HI by its amended Code of Conduct Policy with its participants on participating in un-sanctioned aspiring private top leagues culminated in unfair constraints on participation in newly-sanctioned private top leagues. Although HI was already in a position of dominance, the CCI found that it had never abused its dominant position nor signed any monopolistic deals with the participants.⁵ While CCI held there was no breach of the competition law, it insisted on HI to put into law an appropriate mechanism of internal management to make sure that its regulatory authority are not used to decide on any issue related to its economic operations.

The above two cases set the foundation for the implementation in India of competition law into the realm of sports. The rulings showed that there has been no protection for sports from the examination of competition authorities in India, unlike baseball across the Us. However, the CCI too has recognised the powers of self-regulation of sports governing bodies with regard to matters which are strictly competitive, such as the recruitment of teams, the composition of sports laws, respectively, as well as with regard to matters which have financial ramifications, such as the awarding of different rights relating to sports competitions or the organizing of tournaments.

III. UNDERSTANDING THE THREE RECENT AND SIGNIFICANT CASE LAWS IN THE FIELD OF SPORTS AND COMPETITION LAW IN INDIA.

The All India Chess Federation Case.

The first case was lodged in the AICF dispute⁶ and against AICF. This petition is different

[ipl+booming+super+league+culture+makes+india+s+sports+market+sizzle-newsid-73529262](#)

⁴ Re Surinder Singh Barmi and BCCI in India, CCI- Case No. 61 of 2010, 2013 SCC OnLine CCI 8.

⁵ Re Dhanraj Pillay and Hockey India, CCI- Case No. 73 of 2011, 2013 SCC OnLine CCI 36 .

⁶ Hemant Sharma v Union of India 2011 SCC OnLine Del 4642; 2012 (1) ILR(Del) 620. ([hereinafter Hemant Sharma v. AICF])

because it also originated in 2011 from the orders of the Delhi High Court on a written petition requesting the High Court to order the Ministry of Youth Affairs and Sports as well as the AICF not to bar or attempt to bar chess players affiliated mostly with opposing entity, the Chess Association of India (CAI).⁷ The AICF appealed to the Fédération Internationale des Échecs (FIDE), the global chess ruling body, to withdraw the scores of some competitors from the ELO and to bar four players from competing in unlicensed tournaments arranged by the CAI.⁸ Conversely, the High Court ordered the CCI to investigate the violation of the competition law claimed in the application. The CCI concluded through its July 2018 directive that the implications of engaging in any illegal activities according to Clause (z) of the AICF Code of Conduct for Professionals are very serious because it requires a permanent ban and that there is no opportunity to request approval or any proceeding where participants might have an excuse. Furthermore, it pointed out the fact that neither the bylaws nor the AICF statute specified what an illegal competition is, nowhere does it prescribe any criteria for the issuance of competition's permits.⁹ The Commission consequently found that even the guidelines and prohibitions implemented by the AICF for playing in unauthorised competitions had both the purpose and the consequence of limiting the freedom of movement of chess masters and of prohibiting future organisers from joining. Subsequently, such actions contributed to the deprivation of access to the market and to the abuse of dominance as provided in the Competition Act, 2002.¹⁰

The ICL (Indian Cricket League) Case.

The next petition was lodged in 2013 by the Indian Cricket League (ICL) owners against the BCCI.¹¹ The ICL had been a conference that was privately funded. They claimed that, because they viewed them as a competitor, the BCCI placed a variety of restrictions on them. Such limitations included the banning of players, orders to connected organisations to remove ICL-related player jobs, absence of availability to cricket infrastructure.¹² Furthermore, any bidder 'interested in any dispute of any sort' against the BCCI was expressly exempt from the qualifying criteria for the transfer of advertising right to the IPL, culminating in the expulsion

⁷ Ibid.

⁸ Press Trust of India, The Banned Chess Players seek Compensation, Business Standard, (July 26, 2018), https://www.business-standard.com/article/pti-stories/banned-chess-players-seek-compensation-118072601469_1.html

⁹ Hemant Sharma v. AICF, paragraphs 58-62.

¹⁰ Section 4(2), Competition Act 2002.

¹¹ Pan India Infra projects Private Limited v. Board of Control for Cricket in India (BCCI), Competition Commission of India Case No. 91 of 2013.

¹² Press Trust of India, CCI orders probe against BCCI for abuse of dominant position, The Economic Times, (June 5, 2018), <https://economictimes.indiatimes.com/news/sports/competition-commission-orders-probe-against-bcci-for-abuse-of-dominant-position/articleshow/64465817.cms?from=mdr>

of ICL owners which refused their entry to the industry.

The BCCI described the relevant market as the association of recognized professional county cricket competitions in India. Taking into consideration its dominance in the organisation of cricketing competitions, CCI found BCCI dominant in the industry, an important role in the governance of the game that enables it to establish regulatory barriers for tournaments and offer additional privileges.¹³ In addition, the fact that it confers such privileges on the ICC and has essential jurisdiction in the hierarchical system of sporting administration. The inquiry found BCCI absolutely guilty of Section 4, maintaining that, by failing to identify ICL, it deliberately prevented the complainant from engaging in the applicable sector and took discriminatory measures. ICL as well as its member firms were also repossessed in the subsequent revenue sharing business. The CCI also ordered an inquiry by DG. A definitive decision on the case is yet to be made by CCI on the basis of the DG analysis. However, if proven to be guilty of violating the Statute, the body may face severe penalties. A punishment of fifty two crore also was levied on BCCI for misuse of dominant power in an earlier decision.¹⁴

This case law is a great example of where and how regulatory agencies' decisions can have a ginormous effect on the life of private corporations. The Indian Cricket League was a profitable enterprise since it was first launched in 2007, with sponsorship from international cricketers, state and local governments¹⁵ as well as a massive number of Zee media financing. Nevertheless, as mentioned in the case above, its ultimate downfall was due to the absence of funding from BCCI and its unfair competition activities. In addition, BCCI gave "amnesty" to Indian players participating in the ICL, on conditions that all relations with the League are severed.¹⁶ The above continues on to illustrate that, if they wish, sports organisations will use systemic and unjust treatment of an individual primarily to cause its destruction. From the other end, the BCCI 's unconditional sponsorship for the IPL has rendered it one of the world's wealthiest competitions.¹⁷

¹³ Ibid.

¹⁴ *Re Surinder Singh Barmi v. Board of Control of Cricket in India*,), Competition Commission of India Case No. 61 of 2010.

¹⁵ Times News Network, ICL can use the Eden Gardens, The Times Of India, (August 23, 2007), <https://timesofindia.indiatimes.com/sports/new-zealand-in-india-2016/top-stories/ICL-can-use-Eden-Gardens/articleshow/2305476.cms>

¹⁶ Press Trust of India, 79 players granted BCCI amnesty after ICL exodus, NDTV Sports, (June 2, 2009), <https://sports.ndtv.com/cricket/79-players-granted-bcci-amnesty-after-icl-exodus-1598468>

¹⁷ Saurav Bhagat, IPL brand value rises 7% to \$6.8 billion in 2019 : Duff & Phelps, Next Big Brand, (September 20, 2019), <https://www.nextbigbrand.in/ipl-brand-value-rises-7-to-6-8-billion-in-2019-duff-phelps/>

The Athletics Federation of India Case.

This case concerned a petition against AFI¹⁸ surrounding the resolution made from one of its Annual General Meeting in 2015 to operate as anti-competitive against the state-level affiliate organizations, its leaders, and participants who promote unregulated marathons despite no AFI approval.¹⁹

At first, the CCI came to the conclusion that there was a strong case involving a breach by AFI of the requirements of Section 4 of the Act and ordered the DG to examine the petition. Nevertheless, the CCI did not include a violation of its final decision. It found that the case was centered on the drafted minutes of the 2015 General meeting and that nothing that could be alleged to be abusive under Section 4 of the Act was included in the closing moments of that session.²⁰ The CCI further asserted that the research found that just 11 marathons out of more than three hundred held annually around the nation were acknowledged by AFI. Therefore, it concluded that the limitations put by AFI on organisers of marathons or running events do not have enough effect of restricting the demand for organising sporting events in India or even of defaulting the market to organisers, promoters and participating competitors. Consequentially, the CCI ruled that its behaviour was not coercive even though AFI was just in a dominant position.

Considering that its actions did not restrict participants, promoters, organisers as well as other investors from engaging in non-AFI-approved activities, the Commission correctly found AFI not liable of Section 4 of the Act. In particular, the nation has various marathons organised by private organisations, including India Running, Run for India and Procam Global. Though no official figures are available, some reports position India's marathon participation rate of increase at over one hundred and fifty percent from back in 2009 to when estimated in 2014.²¹ The flowering of privately organised marathon activities is certainly a key cause, but there may be multiple factors behind this yearly growth. Therefore, the dominance of AFI has not produced any detrimental consequences in a sector marked by balanced and robust competitiveness.

¹⁸ Re Department of Sports, MYAS v. Athletics Federation of India, Competition Commission of India - Reference Case No. 01 of 2015- SCC OnLine CCI 17: [2016] CCI 18.

¹⁹ Press Trust of India, CCI orders probe against Athletics Federation Of India, *The Economic Times*, (March 17, 2016), <https://economictimes.indiatimes.com/news/politics-and-nation/cci-orders-probe-against-athletics-federation-of-india/articleshow/51443981.cms?from=mdr>

²⁰ Ibid paragraph 55-56.

²¹ Townscript, Marathon Analysis- Indian Running Industry, Townscript Blog, (November 12, 2019), <https://blog.townscript.com/india-running-events-industry-report/marathon-analysis/>

IV. THE IMPACT OF THESE CASES ON EVOLUTION OF COMPETITION LAW IN INDIAN SPORTS FROM THE PERSPECTIVE OF ACCOUNTABILITY.

The increasing acceptance of competition law as a legal and successful means of transparency for sports administrative and governing bodies is one of the big changes that these cases represent. Competitors and investors incensed by the rulings of governing bodies see the accountability of competition law as a supportive mechanism to ensure transparency. This is especially demonstrated in the case of the AICF, in which the Delhi High Court themselves, in a written petition, ordered an inquiry by the CCI as a remedy. While the written petition requested a writ of mandamus against the AICF, the High Court found that perhaps the claims against the AICF could violate the terms of the Competition Act and ordered the CCI to conduct an in-depth inquiry. The decision of referring to the Competition Commission has been, in the opinion of the researcher, exceptional in consideration of the substantial powers enjoyed by the High Courts in India through Article 226 of the Indian Constitution and the protracted recent experience of judicial control across sport under written authority.²² It was a crucial judicial recognition of the importance of competition law in sports that the court decided not to interfere personally and requested an inquiry by the Competition Commission of India.

The argument concerning AFI is also equally critical in this respect. The petition was already lodged by the Government of India 's Department of Sports, Ministry of Youth Affairs and Sports (MYAS). The MYAS has exerted reasonably comprehensive regulation of national and regional sports governing bodies via the scheme of acknowledgment, monetary and equipment funding and taxation waivers as given in the National Sports Development Regulation and Code.²³ Thereby, to combat the AFI, it had many weapons in its array. The MYAS, however, preferred to file a complaint with the CCI. Another significant move forward towards enshrining the Competition Law in sports in India seems to be the announcement of the MYAS not using its administrative authority and to look for solutions underneath the Competition Act of 2002. Both of these cases indicate that competition law is not only used by incensed athletes and businesses, but also by parts of the judiciary and the national government as an important mechanism for regulating the operation of sports governing bodies. Thus, in sports governance and development in India, this practice can be an extra source of transparency.

²² Manoj Mate, 'The Rise of Judicial Governance in the Supreme Court of India', *International Law Journal-Boston University*, Volume 33- 2015, Pages 169- 170.

²³ Mukul Mudgal, *Sports and Law in India: Developments, issues and Challenges*, New Delhi, LexisNexis- 2016, Pages 54-64.

V. ERADICATING THE INFLUENCE OF THE PYRAMID STRUCTURE IN SPORTING GOVERNANCE

The CCI has recognised the problems raised by the pyramidal system of sports regulation within competition law in every one of those three cases, because the hegemony and market domination of the sports governing bodies is an intrinsic result of such a pyramid structure. For example, in the AICF scenario, the CCI agreed that a scheme of authorization under the sports administration pyramid mechanism is a common sports governance occurrence.²⁴ Comparably, in the ICL situation, it was noted that the sports governing bodies participating in the organisation of tournaments are placed to the benefit as they still have the ability to allow everyone else to arrange similar activities and to negotiate terms for such an organization.²⁵ The very same precept is seen in the case of the AFI where even the CCI observed that because the OP is the leading organiser of athletic development in India, it has a significant advantage above the other organisers of sporting events, and also the supreme entity to monitor and administer athletics sports and similar events in this nation.²⁶

The CCI has also refrained from referring to the hierarchical model of sports governance and the resulting limits arising from the potentially anti-competitive and unconstitutional model. In addition, while certain regulations surrounding players and arranging sporting competitions frequently provide a restricting atmosphere for economic policies that are intrinsic to sport, the CCI agreed that they'd be justified in the light of sport.²⁷ Therefore, the very fact that any of the regulations of a sports association have a restricting effect on player movement or even on the right to participate does not render such rules counter to the standards of competition law. The question will be to decide whether the limitation of competition is an important condition for the growth of sport or the protection of its reputation. This methodology is most specifically expressed in the context of the AICF case, in which the Commission investigated the essence of the limitations and their effect on sports by holding that the allocation of deductible earnest money investment and entrance fees wasn't really anticompetitive and was used for prize awards, player cash rewards and other promotional events. Correspondingly, the CCI permitted the use of wild card entry grants to certain athletes on a limited basis, recognising that these activities are part of the sport that is globally recognised and enabled promoters to give unique

²⁴ Hemant Sharma v. AICF, Paragraph 55.

²⁵ ICL case (Pan India Infra projects Private Limited v. Board of Control for Cricket in India (BCCI), Competition Commission of India Case No. 91 of 2013.)- Paragraph 48.

²⁶ The AFI Case (MYAS v. Athletics Federation of India, Competition Commission of India - Reference Case No. 01 of 2015)- Paragraph 51-54.

²⁷ Ibid.

talents a shot. While the CCI took the view that perhaps the bluntness of the fines levied for participating in an unauthorised competition rendered the steps anti-competitive, the above mentioned procedures and criteria were licenced by the CCI as they served valid sporting goals and were not discriminatory.

Further, an example of this strategy is the ICL order that considers a prima facie case of exploitation of the dominant position. The observation that perhaps the series of events and the existence of the constraint suggested that the applicable criteria also were not placed in favour of any athletic interest, but instead were deliberately aimed at the opposing competition, was among the imaginative forces for the CCI. Even so, these two decisions in the cases were further based on the earlier CCI decisions in the Indian Premier League and Dhanraj Pillay cases, whereby there is a need to enforce the proportionality principle on a case to case basis was stressed. In fact, by its independent consideration of multiple types of constraints, the AICF order reiterates what such a case to case procedure entails. Those orders affirmed that while no clear exception from competition law for sports can be given in India, sporting practises and preferences may also excuse some crippling limitations which may be deemed unacceptable in other undertakings.

VI. HOW WILL TECHNOLOGY EFFECT THIS INTERRELATIONSHIP?

The relationship between sports and competition law is expected to get even more complex with fast technical advancement. Through the advancement of the high-speed internet, for example, digital distribution has now become a financially feasible choice for the distribution of sporting tournaments' broadcasting rights, particularly in developed nations such as the United States and Europe. The clearest illustration of this progression is the English football Premier League. The rights to air this league's games have been the property of Sky and British Television Sports for decades. The sudden introduction of Amazon Prime who has begun streaming some games from the latest 2020 season forward has been a big breakthrough.²⁸ The transition marks a dramatic break from the procedure that has been adopted for years by regulatory bodies. In addition, as we've seen, thru technical advancement, the emergence of new markets such as electronic sports, the selling of information obtained throughout live games has also been made possible. The role of regulatory authorities is expected to get more complex as new income sources and industries evolve. It would be fascinating to see how these problems are reacted to by the regulatory competition authorities.

²⁸ Andy Wilson, Why are Premier League fixtures being shown on Amazon Prime?, *The Express*, (December 26, 2019), <https://www.express.co.uk/sport/football/1220804/Amazon-Prime-Premier-League-fixtures-why-on-Amazon-football>

VII. WHAT DOES THE FUTURE HOLD?

With technology and time advancing, more problems are bubbling to the surface with regard to regulatory authorities, and our sporting strategy needs to be re-evaluated to ensure proper regulation and eliminate anti-competitive activities. When the governing bodies of our sports were to be responsible and their roles clear, distorting activities that contribute to anti-competitive conduct may be reviewed into compliance. It is essential to provide an autonomous watchdog of sports in India to bring about transparency, such as the TRAI in the network industry, this agency could act to control governmental bodies in sports and insure that an equal and open competitive market exists and that competition in that environment prospers.

The enactment of a Legislation upon the grounds of the Australian Sports Commission Act , which was passed in 1989 to form the Sports Commission of Australia, could bring about such a move. This commission is the Australian Government's legislative regulator which is committed to advancing an active major sports programme that provides all Australian people with greater involvement in competitive sports. To insure that sport is available, the commission partners with a number of national sports associations, local governments and colleges. It was also important to devise a dispute settlement body on the lines of the Appeal Sports Tribunal to ensure controls and safeguards inside the framework. If the economic importance of sports rises by marketing, sponsorship deals, ticket purchases, a Sports Arbitration Tribunal, together with an independent regulatory body, may better distinguish the economic roles of governmental authorities from the associated functions of their traditional sports. It would also further decrease the probability of their continued abuse of dominance in this pyramidal structure.

VIII. SUGGESTIONS AS TO HOW THE INTERFACE OF COMPETITION LAW & SPORTS CAN AID THE ADVANCEMENT OF SPORTS.

Government funding and expenditure in sports is limited in developing nations like India, particularly at the local community level. Consequently, fines should really be sparingly enforced and directives must be given by the relevant authorities to implement action to support the advancement of sports at all levels. In the longer term, the government's funding infusion would work to ensure that administrative bodies would not have to depend primarily on private player proceeds.

A clear distinction should really be made between commercial operations and regulating authorities' purely administrative or operational roles. Like we have established, sporting governing bodies produce large sums of revenue from different business activities.

These operations are inseparably related to their legislative and corporate roles on many instances. Demarcation of these operations will enable the authorities take reasonable steps to ensure that these organizations are able to experience various degree of independence based on the scope of the roles they undertake.

There is a need to strike the right balance regarding transparency and the freedom of governing bodies. The over regulation in India by state and competition law regulatory bodies hinders the successful operation of sports governing bodies, but they cannot really be left unregulated, given the degree of their supremacy. Hence, it is important to maintain a mutually beneficial equilibrium amongst the two.

There is a need to establish and modify policies and legislative frameworks for sports. The sports regulatory framework and environment in India is not especially useful, particularly with regard to governmental bodies. It is important to formulate and enforce regulations based on various sports and their growth at multiple stages. Consequently, the government has a really key role to play in this regard. In order to respect equitable market values, accountability throughout all sports government departments needs to be maintained. The way in which broadcasting privileges are given, the grounds for excluding such players and athletes, the conditions for acknowledging unlawful activities, if they are made simple, predictable, open and transparent, would build sustainable consumer rivalry and eliminate the need for frequent instances where competition regulators have to intervene.

IX. CONCLUSION

Through an in-depth analysis of notable three cases, the directions of the CCI have increased the critical significance of competition law in the supervision of sports governing bodies in India. Though the use of judicial oversight by law and courts to regulate the sports governing bodies has been relatively commonplace in India, with writs having being granted by the Supreme Court and High Courts in different sports leagues²⁹, the use of competition law in the cases mentioned above illustrates the supportive role and function that professionalism can play in strengthening transparency of these bodies. Evidently, as seen by the order of the High Court of Delhi to facilitate an inquiry by the CCI and the option of Ministry of Sports to submit a grievance notice, the opportunities under competition law are recognized by separate departments of the government as a means of incorporating liability within these sports administrative bodies.

²⁹ Saurabh Bhattacharjee- WBNUJS, *The Schizophrenia & Judicial Review of Modern Sports*, Volume 8 (2015) – WBNUJS Law Review, Pg. 154-156.

The three recent case laws further contribute to the intensifying norm of intrinsic proportionality outlined by the CCI in the context of Dhanraj Pillay in its evaluation of the effect of competition law on prohibitions emanating from the framework of pyramidal structure of sports. In reiterating the principle that the dominant position of the sports governmental bodies does not in itself make the constraints enforced by these bodies unconstitutional, such directives demonstrate how, on the grounds of their supposed sporting rationale, the validity of those restrictions is decided. Therefore, the CCI has indeed improved its versatile, case to case methodology that requires the specificity of sports to be considered and have a pivotal role. If regulatory authorities, judiciary, and policymakers understand and function wisely, the interface and framework of competition law and sports, while taking into account the needs of various parties including players, spectators and participants, will create an atmosphere suitable for the development of competitive sporting activities.

The relationship between competition law and sports is an essential part of a broader pattern of growing legal interest in the area. The contractual and legal presence of professional athletes , for example, introduced labour and employment law concerns to the foreground and the monetization of different rights eventually led to intellectual property law matters, particularly trademarks and patent ownership. In comparison, it is also possible to observe the relevance of contract as well as tort law in certain circumstances. Consequently, as described in this paper, many sports related competition law disputes are arising now than ever, notably with sports governmental bodies growingly engaged in economic operations. Thus , it is indeed paramount that comprehensive research is performed on this framework in order to make insure that organized sports grow as per fair and reasonable market standards.
