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Exploring and Analysing Sports Laws in India

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ABSTRACT

Sports law is employed in the sector of Sports, physical education and its related field. India has been a world leader in its social, cultural and sports heritage. The glory of Indian sports has outshined India in the world to its proximity. It gave eminent players who immensely contributed in the field of sports by setting example for the world by its diversified sports heritage. Sports in India have been one such cornerstone of law which remains disputed with unsettled position. Sports in India has been monitored and regulated by the Government of India through autonomous sports federations, who indeed have monopolistic character and nature in their respective sports field. However, when it comes to accountability and transparency, these sports federations resist against any scrutiny. The on-going legal battles and litigation in this diversified field of sports has forced judiciary to step in and umpire the field. But why there's no focal sports authority other than the Ministry of Sports Affairs? What is the systematic function of the distinct sports authority regulating different sports? Whether the Indian Judiciary's contribution towards developing sports jurisprudence has been negligible or not? Is Alternative Dispute Mechanism an ideal method of resolution of sports disputes?

As the present research revolves around various aspects that fall within the purview of laws related to sports field in India and the recent reforms made in the legislation concerning the subject by exploring and analysing the same. This research paper explores and analyses the critical issues related to the field of sports in the light of relevant judicial responses. It also throws light on how Indian legislators have not shown much interest in contributing to sports jurisprudence and it suggests the key sports reforms for the revival of the glory of sports in India.

I. INTRODUCTION

Sports are considered to be an integral part of a human lifestyle. It has been a significant ingredient to lead a good and healthy life budding with the spirit of friendly competition following human development². Since immemorial time, sports have been seen as a component

¹ Author is a LLM student at Galgotias University, India.

² Anil Kumar Thakur, Reetinder Kaur, *Sports Law in India: Present Status and Future Road Map*, 15 JOURNAL OF ADVANCES AND SCHOLARLY RESEARCHES IN ALLIED EDUCATION (JASRAE), 33-40 (2018)

of the entertainment industry. The glory of Indian sports has outshined India in the world to its proximity. It gave eminent players who immensely contributed in the field of sports by setting example for the world by its diversified sports heritage.

Sports in India have been one such cornerstone of law which remains disputed with unsettled position. It has never been a prevailing issue for the legislators or the policy makers. It is mainly seen as a derivation for entertainment in Indian social space. As per the Seventh Schedule of the Constitution of India, Entry 33 under the State List provides that the State has the jurisdiction to make laws on any matter pertaining to sports. Though it falls under the ambit of State jurisdiction but is played at national as well as international level. This is the reason that even though national sports bodies like Board of Control for Cricket in India (BCCI) and Athletic Federation of India (AFI) are self-governing in nature, the Supreme Court of India and various High Courts have in their judgments proclaimed that regardless the national sports bodies in India are not included within the definition of State in Article 12 of the Indian Constitution but they come within the writ jurisdiction of High Courts under Article 226 of the Constitution of India as they perform state-like functions like, selection of national teams and representing the country in international sports events and forums. So, the object behind the present research is to explore and analyse the various issues related to the field of sports in India in the light of relevant judicial responses. It is important to find out whether the sports legislations in India are effective to the extent for which they were enacted.

II. SPORTS LAWS IN INDIA

Constitutional Perspective

The Constitution of India mirrors the power of the Parliament and the State Legislature provided under Entry 33 of the State List, to make laws in relation to sports.

“33. Theaters and dramatic performances; cinemas subject to the provisions of entry 60 of List 1; sports, entertainments and amusements.”

At the top of the hierarchy there are international sports bodies for each sports made up of national bodies of different countries³. The national sports bodies again consist of the state or provincial bodies of different countries. The provincial state bodies comprise the different districts or clubs⁴. There is no national or state legislation in order to regulate sports in India, rather national as well as provincial sports bodies, clubs, associations or societies are generally

³ 2nd Edition MASTERALEXIS, LISA PIKE, PRINCIPLES AND PRACTICE OF SPORT MANAGEMENT 2 (The Club System: Sports and Community; Massachusetts :Jones and Bartlett Publishers; 2005).

⁴ The Modern Olympic Games: An International Club Event, 5.

set up under the law of societies for the regulation of sports in India. These are autonomous non-profit making private bodies⁵. Though there are various autonomous bodies, in spite of that, it seems apposite that the autonomy of such bodies isn't absolute and the reason behind this is the involvement of sports is specifically made under the Seventh Schedule of the Constitution of India. Furthermore, these sports bodies are registered as associations or societies in different states of India, hence making them fall under the state jurisdictions.

It is erroneous to presume that the sports regulatory bodies or the sporting events are beyond the reach of law, specifically when they are not in compliance with Fundamental Rights as mentioned under Part III of the Indian Constitution. Although, these sports regulatory bodies enjoy autonomy to a great extent but anyway are subject to the discipline of Fundamental Rights provided under the Constitution.

Sports Legislations in India

Speaking of the Indian scenario, sports regulatory bodies, such as Board of Control for Cricket in India (BCCI) and Indian Olympic Association are some regulatory bodies which are autonomous to a great extent. The Government of India set up the Ministry of Youth Affairs & Sports in order to design infrastructure and achieve excellence in numerous competitive events and promote capacity building for broad-basing sports at the national as well as international level. Initially, various National Sports Federations (NSFs) are held responsible for the promotion of sports. These self-ruling bodies, i.e., NSFs are issued with notifications and guidelines time to time by the Ministry of Sports and Youth Affairs for the purpose of their regulation.

Several sports activities are coordinated by the apex body, i.e., the Sports Authority of India. There are various schemes formulated and implemented by the Government of India relating to Awards, events of sports, etc. The National Sports Policy of India of 2001 has the main aim to achieve brilliance in sports at national as well as international levels.

Sports law in India is regulated and governed by:-

- A. Sports Authority of India
- B. National Sports Policy
- C. Sports Law and Welfare Association of India
- D. Sports Broadcasting Signals (Mandatory Sharing with Prasar Bharati) Act, 2007

A. SPORTS AUTHORITY OF INDIA (SAI)

⁵ Mandell R. Sport A Cultural History New York Columbia University Press, 1984, 46.

Sports Authority of India was established on 16th March, 1984 by the Government of India for the purpose of look after of the infrastructure created for the IX Asian Games⁶. The primary objective of SAI was to implement the existing promotions, schemes and development of sports pursuits, to persuade people to conduct research works with an objective to bring development in the sports field and to utilise and construct numerous kinds of facilities, such as residential facilities, necessary infrastructures, various training centres and centres to conduct tournaments, championships, competitions, seminars and conferences at various levels.

For the above-mentioned purposes the Sports Authority of India is divided into four wings, those are, academic wing, operation wing, team wing and stadia wing and each wing is assigned with different set of functions⁷.

B. NATIONAL SPORTS POLICY

National Sports Policy was drawn up in 1984. The primary intention of this Policy was to raise the standards of Sports in the nation. Secondly, it also provided for the reviewing of the progress in raising the standards, every five years, so that further course of action could be determined. So precisely the Policy focuses on development of infrastructure, broad – basing of sports, brilliance in sports, integration with education, and development of National Sports Federations. Though, the National Sports Policy, 1984 comprehensively included every facet needed for encouraging sports in the nation, but failed in implementing the same. In 2001, the National Sports Policy, 1984 was reformulated and National Sports Policy, 2001 was drafted.

The objectives of the National Sports Policy, 2001 were three fold:

- i. The agencies responsible for the promotion and development of sports were required to perform their functions in their own respective areas.
- ii. To spot the National Sports Federation, to set priorities and frame the procedures to be followed by the Federations and to avail government assistance and sponsorship.
- iii. To state the eligibility criteria whenever Government has to release grants to Sports Federations⁸.

The provisions of the National Sports Policy, 2001 requires the Central Government and the Sports Authority of India in work in association with the National Sports Federations and the Indian Olympic Association (IOA) to achieve excellence in sports at national and international

⁶ Thakur and Kaur, *supra* note 1.

⁷ SPORTS AUTHORITY OF INDIA, <https://sportsauthorityofindia.nic.in/index.asp?lang=1> (last visited Jan. 27, 2021).

⁸ Ankita Budhiraja, *Sports Law and its Scope*, LEGAL DESIRE.COM (Jan. 26, 2021), <https://legaldesire.com/sports-law-and-its-scope/>

levels. In order to implement the goals and objectives laid down in the Policy, they must be substantially realised.

C. SPORTS LAW AND WELFARE ASSOCIATION OF INDIA

The Sports Law & Welfare Association of India (SLAWIN) is a non-profit, national, professional, organization whose common goal is the understanding, advancement, and ethical practice of, "Sports Law" in India for the promotion of Sports, by bringing Legal Practitioners and Sports persons together⁹.

The Sports Law and Welfare Association of India has numerous aims to achieve, some of them are, to provide educational opportunities and disseminate data regarding specific areas of sports law, provide a forum for lawyers representing athletes, etc., establish rules of ethics for sports persons, and many more.

D. SPORTS BROADCASTING SIGNALS (MANDATORY SHARING WITH PRASAR BHARATI) ACT, 2007

The Sports Broadcasting Signals (Mandatory Sharing With Prasar Bharati) Act, 2007 (In short Sports Act) was enacted by the Parliament with an objective to provide access to the largest number of listeners and viewers, on a free to air basis, of sporting events of national importance through mandatory sharing of sports broadcasting signals with Prasar Bharati, through Doordarshan channels. Section 3(1) of the Sports Act reads as under:

“No content rights owner or holder and no television or radio broadcasting service provider shall carry a live television broadcast on any cable or Direct-to-Home network or radio commentary broadcast in India of sporting events of national importance, unless it simultaneously shares the live broadcasting signal, without its advertisements, with the Prasar Bharati to enable them to re-transmit the same on its terrestrial networks and Direct-to-Home networks in such manner and on such terms and conditions as may be specified”¹⁰.

III. RECOMMENDATIONS OF MUKUL MUDGAL AND JUSTICE R.M. LODHA COMMITTEES

In 2012 during Indian Premier League (IPL), certain players were alleged of being involved in taking money for betting and spot-fixing and to deal with this a disciplinary committee was set by the BCCI. After inquiry BCCI banned those for different lengths of time. This decision was

⁹ SPORTS LAW AND WELFARE ASSOCIATION OF INDIA, <https://www.sportslawindia.info/aboutus.htm> (last visited Jan. 27, 2021)

¹⁰ MINISTRY OF INFORMATION AND BROADCASTING, <https://mib.gov.in/sites/default/files/Noticedated17october2018onwebsite.pdf> (last visited Jan. 25, 2021)

challenged before the High Court of Bombay. The petition challenging BCCI's decision was dismissed by the Bombay High Court. Later, an appeal was filed before the Supreme Court of India for quashing the BCCI's disciplinary committee's decision and to constitute a separate and independent committee to deal with the matter. A multi-member panel was set by the Supreme Court, that is, the Mukul Mudgal Committee. After looking into the matter, the said Committee submitted its recommendations along with inquiry report and other inferences recorded by the Committee to the Supreme Court by concluding that the measures so taken by the BCCI were insufficient and unproductive, also employment of players in franchise group companies should be avoided in future. The Committee expressed its concern for the need of more effective and strict control on Players' agents, investigating agency, match-fixing events and the laws must be made stringent.

In the wake of Mukul Mudgal Panel Report, in January 2015 Justice R.M. Lodha Committee was set up. One of the most important recommendations made by the Lodha Committee was to set up distinct governing bodies for BCCI and IPL and also recommended for the constitution of a Player's Association in order to safeguard the interest and affairs of the cricketers. Also, the Committee suggested reduction of the number of members in the IPL Governing Council and the Working Committee.

IV. JUDICIAL APPROACH

In India, national sports bodies field the national team representing the country for participation in international competitions where good performance is a matter of pride for the entire nation¹¹. These bodies also give telecasting and broadcasting rights to the successful bidder for hefty sums and also earn revenues from advertisement in sports events¹². They also take disciplinary action against the erring players including debarring them from the game. These bodies control even domestic matches or games within the country¹³.

The case of *Ajay Jadeja v. Union of India*¹⁴ began a new era of legal reforms in the field of sports. Lack of proper coordinated investigation, integrity issues toward sports, procedure for dealing with the complainant and several other controversies attached with it. It was held in this case that as the sporting bodies perform public functions and therefore, are subject to the writ jurisdiction of High Court.

¹¹ Grayson E. former President of the British Association for Sport and Law, in his inaugural presidential address 1 (1) Sport and the Law Journal, 1993.

¹² Annual Report - 08, Ministry of Youth Affairs & Sports (Govt. of India). : 59, 2007.

¹³ Zee Telefilms and Others v. Union of India & Others, (2005) 4 SCC 649

¹⁴ 95 (2002) DLT 14

The above-mentioned principle was upheld in the case of *Zee Telefilms and Others v. Union of India & Others*¹⁵ by the apex court. This case is referred as the Magna Carta of Sports Law in India. The question that arose in this case was BCCI's arbitrary termination of broadcasting rights agreement. Here, the aggrieved party, that is, Zee Telefilms filed a writ petition under Article 32 of the Constitution of India before the Supreme Court. Although, a writ under Article 32 can only be filed against the authorities which are declared as 'State' under Article 12 of the Indian Constitution. The Supreme Court held that BCCI did not constitute to fall within the ambit of 'State' as per Article 12 of the Constitution. However, Justice Sinha (minority opinion) opined that BCCI constitutes to fall under 'State'.

Apart from the case of Zee Telefilms, there are numerous decisions which contribute to the jurisprudence of Sports Law in India. As in the case of *K. Murugan v. Fencing Association of India, Jabalpur*¹⁶, the Supreme Court discussed the significance of sports in India. The issue that arose in this case was regarding the election of the members to executive council of the Indian Olympic Association (IOA). The Supreme Court commented upon the same as:

“This does not appear to us to be a matter where individual rights in terms of the rules and regulations of the Society should engage our attention. Sports in modern times have been considered to be a matter of great importance to the community. International Sports has assumed greater importance and has been in the focus for over a few decades. In some of the recent Olympic Games, the performance of small States has indeed been excellent and laudable while the performance of a great country like India with world's second highest population has been miserable.”

Sports experts in India remain ungoverned as there is absence of enthusiasm of States. Hence, the sports bodies come in to play their part of role in governing the same. There are several sports bodies and federations, such as Board of Cricket Control India (BCCI) for Cricket, All India Football Federation (AIFF) for Football, Indian Hockey Federation for Hockey, Sports Authority of India and Indian Olympic Association at the apex. This shows that there is no focal sports authority to govern all the sports game other than the Ministry of Sports Affairs, which also works externally to administer these sports bodies. There are occasions where the financially sound sports bodies such as BCCI have repudiated to join the Ministry and are only integrated with to gain monetary advantages. This issue was discussed in the case of *Zee Telefilms v. Union of India*¹⁷, it was said that *“the Sports bodies largely remain unaccountable*

¹⁵ Zee Telefilms, (2005) 4 SCC 649

¹⁶ 1991 SCC (2) 412

¹⁷ (2005) 4 SCC 649

to the state or any other central body inside the territory of India, which however should not be the case considering the importance of sports in the modern arena.”

Therefore, a specific enactment is required for the entire nation, though there are certain enactments such as the National Sports Development Code, 2011 which governs the National Sports Federation of India, but as sports is held to be a part of the State List of Seventh Schedule of the Indian Constitution, the above-mentioned Code's validity was upheld in the case of *Indian Olympic Association v. Union of India*¹⁸ by the Delhi High Court. At present there are two draft Central Bills i.e. the Prevention of Sporting Fraud Bill, 2013 and the National Sports Development Bill, 2013, which are to be promulgated, and if did then it would give further belief and acceptance in the existence of Sports Laws in India.

V. ALTERNATIVE DISPUTE RESOLUTION AND SPORTS LAWS IN INDIA

Arbitration is a form of Alternate Dispute Resolution technique which is preferred to resolve disputes outside the courts. This legal technique exists in international sports through the Court of Arbitration for Sports (CAS) in order to resolve international sports disputes as are referred to it. It is considered as the most prominent forum which was created by the International Olympic Committee in 1983¹⁹.

The accomplishment of the aim of CAS in Australia, Canada and Australia stands evident to the success of alternate dispute mechanism in resolving sports disputes internationally. Although, it is prominent at this point to discover the reasons as to why there is an unexpected and sudden influx towards these institutions. Owing to the dearth of focal sports bodies in India, the clue is taken from foreign judgments to resolve sports disputes here.

The general disinclination of Sports authorities cure the countless deficiencies in litigating sports disputes and submitting the same to the jurisdiction of national courts has been the major drawback.

For instance, the track star Butch Reynolds case excellently brought a legal action which went on for four years and some fifteen stages of litigation and arbitration. Eventually, the International Amateur Athletic Federation (IAAF) refused to appear in the proceedings which resulted in the winning of Reynolds with a \$27 million judgment.

This on the perverse case wouldn't have happened if the dispute was referred to the Specialized Sports Dispute Resolution authorities/bodies.

¹⁸ W.P. (C) 2310/2012, CM APPL.4946 & 17545/2012

¹⁹ Gaurang Kanth, *Emergence of Sports Law in India*, INDIAN LAW JOURNAL, (last visited Jan. 28, 2021) <https://www.indialawjournal.org/archives>

The resolution of dispute through litigation gets pointlessly extended and complicated. The well-known *Lindland's* case²⁰ included two contenders for a solitary weight-class position on the United States wrestling group for the 2000 Olympics in Sydney. The non-achiever of the match, Matt Lindland, complained that the winner, Keith Sieracki, had utilized illicit holds. The dispute experienced thirteen phases of litigation and arbitration in the federal Courts, including fruitless appeals to the United States Supreme Court, as well as the CAS. Eventually, the offended party won both his case and the silver medal in the Olympics. A basic couple of step arbitration process would have been ideal. In addition, ADR mechanism permits the parties to get opportune hearing, low overall costs, confidentiality, adaptability and a decision made by a specialist acquainted with sports. Confidentiality is one of the significant features of ADR measure in sports. We experience a daily reality such that athletes are respected ethically high in the general public. Media glare could harm this aspect of Sports. Aside from the achievement pace of the Sports dispute resolution bodies specialized in alternate dispute resolution mechanism like CAS, these are few of the advantages of having resort to Alternative dispute resolution. In the light of the contentions progressed above, I propose that Alternative Dispute Resolution on a comparative scale is an ideal method of dispute resolution for sports disputes. A legal action brought at the eleventh hour of a Sports competition can distort the competition. It brings up vital issues of respecting judiciary and proceeding with the competition as well as associated inquiries concerning the qualification of the player. In 1994 winter games, elite skater Tonya Harding²¹ was blamed for physical assault on her United States competitor. The outcomes of this ideal suit brought about serious difficulties to the United States Olympic Committee. According to this in 1998, the United States Congress amended the Amateur Sports Act, 1978. As per the amendments, a Court may not comprehensively impose any injunction against the United States Olympic Committee within 21 days of the start of a significant Sports Competition. Interestingly, none of the Indian Legislations or judicial pronouncements has imposed any such ban restricting such ideal suits/litigations.

ADR measure permits the parties to get convenient and timely hearing, confidentiality, low overall costs and flexibility. Further, arbitrators have prowess in the field. Aside from the success pace of the Sports dispute resolution, bodies specialized in alternate dispute resolution mechanism such as Court of Arbitration of Sports; these are some of the benefits of having resort to Alternative Dispute Resolution (ADR)²².

²⁰ Lindland v. United States Wrestling Association, 227 F.3d 1000 (2000)

²¹ Tonya Harding v. United States Figure Skating Association, 851 F. Supp. 1476 (D. Or. 1994)

²² Shubham Borkar and Parimal Kashyap, *Sports Law in India*, KHURANA & KHURANA ADVOCATES AND

VI. CONCLUSION AND SUGGESTIONS

For Sports and Sportsmen to prosper, Sport law needs to thrive in India; the intervention of the Legislature is must. India need to comprehend that “sports” is not any more an irrelevant cluster of athletes fighting for top position but it additionally includes intricate legal issue and the entire career of the athletes is at stake. There is a distinct legal system emerging from this field and ought to be given satisfactory consideration.

Sports Law is certainly a rewarding profession. An endeavour ought to be made to improve the sporting environment with the guide of law. Sport is not restricted to amusement alone but is a matter of National pride. The rise of Indian Cricket League and Indian Premier League has begun to raise vital issues with respect to Competition Law in the recent occasions. This satisfactorily exhibits the need to improve Sports Law in India.²³

The Indian Sports industry has advanced significantly. Sports have assumed a corporate structure with the number of commercial interests included. With expanding market development and the requirement for clear and comprehensive legal documentation, sport issues are gradually turning into a significant concentration as agreements should have the option to explain parties' expectations and responsibilities, should ensure the competitor's and the brand's big-picture interests and should factor in regulatory, legal and various risks inherent in the industry. The nation has arrived at a phase where we need an enactment that manages sports law. To fulfill the expanding needs of the evolving situation, national as well as international, it is significant that a uniform code for sports be promoted.

Like India, USA and UK don't have a national enactment/legislation to control sports and the sports federations in the nation. Although, the enactment of legislations in all the three classifications of sports law, i.e. amateur, professional and international athletes of US offers security to the interest of the athletes. The key issues faced by the Indian sports include:

- Mistakes in management Non-accountability for results
- Inefficient or inappropriate deployment of funds
- Undemocratic or unethical electoral practices in sports bodies
- Prejudice in selection procedures for national teams²⁴

Therefore, India needs a national legislation for advancement, improvement and uniform

IP ATTORNEYS, (last visited Jan. 27, 2021) <https://www.khuranaandkhurana.com/2019/01/04/importance-of-sports-law-in-india/>

²³ *Id.*

²⁴ Kanth, *supra* note 18

regulation for sports in India. Sports figures as Entry 33 in the State list of the Seventh Schedule of the Constitution of India. In spite of the fact that there was a proposition to include sports in Concurrent List over which both state as well as centre will be competent to make laws, although, the government has failed to do so. Moreover the government has failed to implement the National Sports Policy of India even after its repeated endeavours. The Parliament must enact a national legislation on sports wherein:

Firstly, it will accommodate building up a Sports Commission to regulate sports in India. The Sports Commission will:

- support talent identification and promote and foster development and participation in sports at all levels of foundation, participation, performance and excellence;
- advise the Ministry of Sports and Youth Affairs regarding sports.;
- monitor and take measures to ensure the proper use of funds allocated by the Sports Commission to sports federations;
- ensure an adequate allocation of funds and resources to national and provincial sports federations and their affiliated bodies;
- must oversee the implementation of sports policies in India etc.

Secondly, the enactment on sports will focus on advancement of game, directly from the school level by coordinating sports with education by making it a necessary subject of learning up to the Secondary School level.

Thirdly, in addition to the Union and State Governments, the supported inclusion of different organizations, including the Panchayati Raj Institutions, Educational Institutions, Local Bodies, Sports Associations/Federations in the utilization, creation and proper maintenance of the Sports infrastructure like play fields and stadium, both in rural and metropolitan regions.

Fourthly, the sports associations and federations will no more be independent and self-governing and will enlist itself under this legislation rather than registering under the Societies Registration Act and the assignment of funds to these associations/federations will be steered through the Sports Commission set up under the Act. These federations/associations should be responsible to the Sports Commission in regard of fund. The Sports Commission will have the power to carry out investigation in regard of any misappropriation of funds.

Fifthly, the Sports Commission will be empowered to carry out dispute resolution. It will be empowered to comprise boards/panels for adjudicating disputes and punish offenders for infringement of set of principles or code of conduct.

Sixthly, the association like Sports Authority of India will be heavily influenced by the Sports Commission and will exclusively target organizing different sports activities in India²⁵.

Therefore, in a nation like India, where practically all sports are being played, unless there is an order of an appropriate enactment/legislation with that impact, it is impossible to bring issues to light about the same among the people of India.

²⁵ *Id.*

VII. BIBLIOGRAPHY

Primary Sources:

- The Constitution of India, 1950
- Sports Broadcasting Signals (Mandatory Sharing with Prasar Bharati) Act, 2007
- National Sports Policy, 2001

Secondary Sources:

- JUSTICE MUKUL MUDGAL edited by LOVELY DASGUPTA & SHAMEEK SEN, SPORTS LAW IN INDIA POLICY, REGULATION AND COMMERCIALISATION (Sage Law 2018)
- Justice Mukul Mudgal Committee Report
- Justice R.M. Lodha Committee Report

Web Sources:

- <https://www.khuranaandkhurana.com/2019/01/04/importance-of-sports-law-in-india/>
- <https://legaldesire.com/sports-law-and-its-scope/>
- https://www.indialawjournal.org/archives/volume3/issue_2/article_by_Gaurang.html
- <http://ignited.in/I/a/56726>
- <https://www.amity.edu/abs/abr/pdf/Vol%2014%20No.2/2.pdf>
- <https://lawtimesjournal.in/sports-laws-in-india-protection-and-challenges/>
- <http://www.legalserviceindia.com/legal/article-3287-shortcoming-of-sports-law-in-india.html>
