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# EXECUTIVE SUMMARY

On 11 December 2024, FIFA will convene an Extraordinary Congress to decide on awarding the hosting of the 2030 and 2034 men's World Cups. With only one bid for each tournament, Football Associations (FAs) will be asked - in an unprecedented single vote covering both events – to approve the selection of Morocco, Portugal and Spain for the 2030 tournament and Saudi Arabia for 2034. In order to be selected, each bid is supposed to meet human rights criteria outlined in FIFA's bidding requirements and based on its Human Rights Policy and Statutes.

On 6 June 2024, Amnesty International and the Sport & Rights Alliance (SRA) published a detailed analysis of the human rights risks associated with hosting both the 2030 and 2034 World Cups. The risks identified were significant in both tournaments, but especially so in relation to 2034, and demonstrated that comprehensive strategies, and in some cases major legal reforms, would be needed to meet FIFA's own human rights requirements.

On 31 July 2024, the FAs of the four bidding nations published their 'Bid Books' outlining their plans for the tournaments, alongside 'Independent Human Rights Context Assessments' and 'Human Rights Strategies' that are part of FIFA's bidding requirements. This briefing compares these documents to the risks identified by Amnesty International and the SRA, concluding that neither bid has adequately demonstrated how they would address key human rights risks related to the tournaments. It raises major concerns about the seriousness with which the human rights criteria within the bidding process has been taken.

Before the vote in December, FIFA will also publish its own evaluation of the human rights strategies. It must not serve to whitewash their evident flaws.

The outstanding risks related to the 2030 World Cup mean that FIFA should make awarding the tournament conditional on the development of a far more comprehensive and credible human rights strategy, with meaningful stakeholder consultation. The outstanding risks related to the 2034 bid in Saudi Arabia remain so severe that, in line with FIFA's own standards, the bid should not be approved until they are fully and credibly addressed through the announcement of major and wide-ranging human rights reforms.

## 2030 FIFA WORLD CUP: MOROCCO, PORTUGAL AND SPAIN

The Bid Book for the 2030 FIFA World Cup submitted by the FAs of Morocco, Portugal and Spain include plans for games to be played in 20 stadiums across 17 cities in the three main host countries (two in Portugal, six in Morocco, nine in Spain) – in addition to the three games in Uruguay, Paraguay and Argentina not covered in this briefing. Plans include a new 115,000-seater stadium outside of Casablanca and new transport infrastructure.

The June 2024 report produced by Amnesty International highlighted a range of human rights risks connected to the 2034 tournament, concluding that “there are serious human rights risks that must be proactively addressed” in relation to labour rights, discrimination, housing, freedom of expression, policing and privacy.

While the Bid Book provides detailed plans for tournament facilities, the accompanying human rights assessments and strategies have serious flaws and omissions. For example, while Morocco's National Human Rights Council (CNDH) provided a detailed human rights risk assessment, the human rights strategy submitted by the Football Federation (FRMF) only commits to 'advocate for' government action to address them. Further, the human rights strategy submitted by the Portuguese Football Federation (FPF) lacks specific details of actions that will be taken, or of the stakeholders and rightsholders consulted in the

IN ORDER TO BE SELECTED, EACH BID IS SUPPOSED TO

## **MEET HUMAN RIGHTS CRITERIA**

**OUTLINED IN FIFA'S BIDDING REQUIREMENTS AND  
BASED ON ITS HUMAN RIGHTS POLICY AND STATUES**



process. The Spanish Football Federation (RFEF) merely re-submitted a risk assessment provided by the country's Ombudsman rather than develop its own strategy. Critically, none the strategies include clear government commitments for legal reform or other measures to uphold human rights in connection with the tournament, or adequate stakeholder engagement.

As a result, there remain many unanswered questions and outstanding risks. There is no commitment, for example, to increase the number of labour inspectors to meet international standards in Portugal and Morocco, nor to repeal legislation criminalizing same-sex acts and extra-marital relations in Morocco. There is no strategy to protect the availability of affordable accommodation for residents in Portugal and Spain, nor details on how people will be protected from forced evictions linked to mass infrastructure projects in Morocco. No new reforms to laws restricting freedom of expression and assembly have been announced in any of the host candidates, nor are there any measures to prohibit the improper use of rubber bullets to disperse crowds.

## **2034 FIFA WORLD CUP: SAUDI ARABIA**

The Bid Book published by the Saudi Arabia Football Federation (SAFF) outlines ambitious plans for the 2034 World Cup - reliant on enormous infrastructure projects that will be dependent on a massive workforce of migrant labour. These include building or refurbishing 11 new stadiums, 185,000 additional hotel rooms and other major projects from transport links to new cities.

Given Saudi Arabia's human rights record, such ambitious plans come with huge risks. The June 2024 report produced by Amnesty International and the SRA concluded that the human rights risks related to workers' rights, discrimination, freedom of expression, forced evictions, policing and privacy in Saudi Arabia were so severe that "it is hard to see how a World Cup could be hosted in the country without widespread violations, unless fundamental reforms are agreed and complied with".

The report was clear that Saudi Arabia should be able to bid to host a World Cup like any other country – but, also like any other country, should not be awarded the privilege to host the tournament unless it could show how it would uphold its human rights obligations.

The human rights assessment and strategy provided alongside Saudi Arabia's Bid Book are deeply flawed and full of critical omissions. The 'Independent Human Rights Assessment' produced by AS&H Clifford Chance – the Saudi partner of global law firm Clifford Chance - includes no analysis of some of the most severe and well-known human rights risks in Saudi Arabia, completely omitting issues such as the repression of the right to freedom of expression, the criminalization of same-sex acts, well-documented forced evictions, the lack of a minimum wage, or the prohibition of trade unions. It also underplays the serious impact on workers of the country's Kafala sponsorship system. The subsequent Human Rights Strategy submitted by the SAFF then, with some exceptions, either makes largely the same omissions, or includes only general and non-specific commitments to reform. Clifford Chance did not respond to a letter from 11 human rights organisations highlighting these serious flaws, other than to say it would be "inappropriate" to comment further and sharing links to company policies.

The failure of the documents submitted by SAFF to address or even recognise some of the most serious human rights risks connected to the World Cup means there remain huge risks of severe and widespread violations if the current bid were approved without the Saudi Arabian authorities providing further legally binding and time-bound commitments to reform.

## CONCLUSION AND RECOMMENDATIONS

It is clear that the human rights part of the bidding processes for both the 2030 and 2034 FIFA World Cups has been deeply flawed. FIFA has undermined its leverage by pursuing a process without competitive bids or separate votes. It has also severely limited the scope of the human rights assessment in Saudi Arabia, in contravention of its own human rights policies and responsibilities. Bidding FAs and governments appear not to have taken the process seriously enough.

It is clear that FAs and governments bidding to host the 2030 and 2034 World Cups should develop far more credible, binding and comprehensive human rights strategies in close consultation with external stakeholders and rights-holders.

In order to respect its own human rights policies and bidding requirements, FIFA should:

- Make the award of the 2030 World Cup conditional on the development of far more specific and comprehensive human rights strategies, based on meaningful stakeholder consultation and leading to legally binding commitments.
- Halt the process towards awarding Saudi Arabia as host of the 2034 tournament in the forthcoming extraordinary FIFA Congress, unless major and wide-ranging reforms are announced in advance to fully address the most serious human rights risks.
- Ensure its evaluations of the 2030 and 2034 bids are strictly in line with its human rights policies and bidding requirements. Evaluations should be published sufficiently in advance of the 11 December FIFA Congress to enable scrutiny.
- Restore the separate voting process for the 2030 and 2034 tournaments, so that each bid is scrutinized in its own right.
- Commission an independent annual review of compliance with human rights standards in the preparation of all World Cups, publicly reporting to the FIFA Congress.

National Football Associations (FAs) also have clear human rights responsibilities, not least because of the financial revenues they gain from the World Cup (through participation and the redistribution of revenues) and their role in voting for the host as a member of the FIFA Congress. In line with these responsibilities, all FAs should call on FIFA to respect its own human rights commitments and policies. In particular, FAs should:

- Use their leverage with FIFA to ensure stronger, binding human rights commitments are agreed for both the 2030 and 2034 tournaments.
- Call on FIFA to separate the voting process for the two tournaments, and to postpone the 2034 vote until a credible human rights strategy is developed.
- Not vote to award the 2034 FIFA World Cup to Saudi Arabia unless credible and comprehensive reforms are agreed before Congress.
- Propose the establishment of an annual review of compliance with human rights standards in the preparation of all World Cups, reporting publicly to FIFA Congress.
- Develop their own human rights policies in line with the UN Guiding Principles on Business and Human Rights.

# 1. METHODOLOGY

This briefing builds on a report by Amnesty International and the Sport and Rights Alliance (SRA), published in June 2024, which detailed a range of human rights risks connected to the hosting of future World Cups in Morocco, Portugal, Spain and Saudi Arabia.<sup>1</sup> That report drew extensively on analysis and research from human rights organisations, trade unions, UN and regional treaty bodies and experts, media reports and interviews with fans' representative groups. For that report, Amnesty International wrote to FIFA as well as the Football Associations (FAs) and national authorities of Morocco, Portugal, Spain and Saudi Arabia. Only the Portuguese FA responded, acknowledging the letter and committing to meet in the future.

The June 2024 report compared these risks to international human rights law and standards, FIFA's statutes and Human Rights Policy, and the Bidding Requirements published by FIFA for the 2030 and 2034 World Cups. The report did not seek to cover human rights risks in Argentina, Paraguay and Uruguay, who will each host one game in 2030.

This follow-up briefing compares the risks identified by Amnesty International and the SRA, with the 'Independent Human Rights Context Assessments' and 'Human Rights Strategies' submitted by the two World Cup bids, which were published by FIFA on 31 July 2024.<sup>2</sup>

In October 2024, Amnesty International again wrote to FIFA without response, asking them to confirm that they had agreed with the Saudi Arabia Football Federation (SAFF) to limit the scope of its human rights assessment. Amnesty International also wrote to Clifford Chance in relation to flaws and omissions the same human rights assessment. The company responded only to say that it would be "inappropriate" to comment further and shared links to company policies. Amnesty International also wrote to the Portuguese FA (FPF) to ask which organisations were consulted for their assessment and bid. As of 4 November 2024, no reply had been received.

Like the June 2024 report, this briefing focuses on key risk areas identified in FIFA's Human Rights Policy and the human rights standards outlined in the World Cup bidding requirements. It does not seek to cover every human rights issue in the respective countries, instead focusing on those with a close connection to the hosting of a mega-sporting event. While the severe human rights harms of the climate crisis are beyond doubt, the issue is beyond the scope of this briefing.



1 Amnesty International and Sport & Rights Alliance, 'Playing a Dangerous Game', June 2024, Index Number: ACT 30/8071/2024, <https://www.amnesty.org/en/documents/act30/8071/2024/en/>

2 All documents for the 2030 and 2034 World Cup bidding process are available at <https://inside.fifa.com/about-fifa/bidding-processes/bidding-process-wc-2030> and <https://inside.fifa.com/about-fifa/bidding-processes/bidding-process-wc-2034>.

## 2. BACKGROUND: HUMAN RIGHTS CRITERIA FOR THE 2030 AND 2034 FIFA WORLD CUPS



Conmebol's President Alejandro Dominguez (L-2) and FIFA President Gianni Infantino (R-2), accompanied by Paraguay's President Santiago Peña (L) and Uruguay's President Luis Lacalle(R), sign a book of minutes of the 2030 World Cup during Conmebol's 78th Ordinary Congress in Luque, Paraguay on April 11, 2024. © NORBERTO DUARTE/AFP via Getty Image

In October 2023, FIFA launched its bidding processes for both the 2030 and 2034 FIFA World Cups, which resulted in only one bid being submitted for each tournament.<sup>3</sup> For 2030, Morocco, Portugal and Spain were invited to submit a joint bid, with three games also to be held in Argentina, Paraguay and Uruguay – who had previously been rivals to host the entire event. For 2034, Saudi Arabia emerged as the sole bidder as FIFA restricted candidates to the Asian Football Confederation and imposed a deadline of under four weeks to apply.

At the same time, FIFA published its Bidding Requirements for the tournaments. In line with its Human Rights Policy<sup>4</sup>, and similar to the process undertaken for the 2026 FIFA Men's World Cup, FIFA included human rights standards as part of the requirements.<sup>5</sup> This included a requirement for bidding countries to submit a human rights strategy outlining how they will address the human rights

3 *Ibid*

4 FIFA, FIFA's Human Rights Policy – May 2017 edition, <https://img.fifa.com/image/upload/kr05dqyhwr1uhqy2lh6r.pdf>

5 FIFA, Bidding Regulations for the FIFA World Cup 2030™ and the FIFA World Cup 2034™, October 2023, <https://digitalhub.fifa.com/m/51aef03d916e5ad/original/FIFA-World-Cup-2030-and-FIFA-World-Cup-2034-Bidding-Regulations.pdf>



ACCORDING TO FIFA'S BIDDING REQUIREMENTS, A BID'S HUMAN RIGHTS STRATEGY WAS SUPPOSED TO



**OUTLINE THE MEASURES THAT WOULD BE TAKEN TO ENSURE THE BID WOULD COMPLY WITH A RANGE OF UN AND FIFA STANDARDS ON**

**LABOUR RIGHTS NON-DISCRIMINATION**

**FREEDOM OF EXPRESSION POLICING AND MORE**

risks identified by an “independent human rights context assessment”, including “explicit public commitments to sustainability, human rights, sustainable procurement and climate action”.<sup>6</sup> Both were expected to be informed by engagement and consultation with external stakeholders.

According to FIFA's bidding requirements, a bid's human rights strategy was supposed to outline the measures that would be taken to ensure the bid would comply with a range of UN and FIFA standards on labour rights, non-discrimination, freedom of expression, policing and more. Further, FIFA's requirements make clear that these are “fully binding obligations” that could lead to FIFA not selecting the bid or terminating hosting rights if not met.<sup>7</sup>

The Bid Books, Independent Human Rights Context Assessments and Human Rights Strategies were all published on 31 July 2024.<sup>8</sup> They are to be evaluated by FIFA, before being presented to FIFA Council in the 4<sup>th</sup> Quarter of 2024. Once approved by FIFA Council, they will be submitted to a vote at an extraordinary FIFA Congress on 11 December 2024. In an unprecedented step, in October 2024 the FIFA Council announced that FAs would only be able to vote for the 2030 and 2034 bids as a package – meaning they will have to choose whether to approve or reject both votes together, rather than consider them separately.<sup>9</sup> Until FIFA introduced changes to its statutes in 2024, the organisation's rules had previously prohibited them from selecting two World Cups at the same Congress – a measure intended to prevent a repeat of the allegations and controversies surrounding the votes for the 2018 and 2022 World Cups.<sup>10</sup>

6 For the 2026 World Cup bid by Canada, Mexico and the USA, a detailed 155-page report was produced outlining key legal, policy and practice risks Ergon Associates, “Human rights in Canada, Mexico and the USA in the context of a potential FIFA 2026 World Cup competition”, 7 March 2018, <https://digitalhub.fifa.com/m/5fd4153e87d31602/original/New-Heights-WWC27-Ergon-Human-Rights-Report-for-United-Bid.pdf> (accessed 15 April 2024).

7 FIFA, Overview of the Hosting Requirements for the FIFA World Cup 2034, [Overview-of-Hosting-Requirements-for-the-FIFA-World-Cup-2034- EN.pdf](#)

8 FIFA, July 2024, <https://inside.fifa.com/about-fifa/bidding-processes/bidding-process-wc-2030> and <https://inside.fifa.com/about-fifa/bidding-processes/bidding-process-wc-2034>

9 FIFA, ‘FIFA Council takes key decisions’, 3 October 2024, <https://inside.fifa.com/about-fifa/organisation/fifa-council/media-releases/fifa-council-takes-key-decisions-member-associations-upcoming-competitions>

10 Associated Press, ‘FIFA plans to add slew of new committees years after cutting them in anti-corruption reforms’, 18 April 2024, <https://apnews.com/article/fifa-statutes-committes-infantino-2f724ef9e023493acf772c6b66cae5f8>

### 3. “YALLA, VAMOS”: MOROCCO, PORTUGAL AND SPAIN’S BID FOR THE 2030 FIFA WORLD CUP

The Bid Book for the 2030 FIFA World Cup submitted by the FAs of Morocco, Portugal and Spain include plans for games to be played in 20 stadiums across 17 cities in the three main host countries (two in Portugal, six in Morocco, nine in Spain) – in addition to the three games in Uruguay, Paraguay and Argentina.<sup>11</sup> Plans include a new 115,000-seater stadium outside of Casablanca and new transport infrastructure.



#### KEY HUMAN RIGHTS RISKS

In its June 2024 report, Amnesty International identified a significant number of risks connected with hosting the 2030 FIFA World Cup in Morocco, Portugal and Spain.<sup>12</sup> These include:

- **Labour abuse and exploitation:** All bidding countries face risks relating to labour rights, which should be addressed through revising legislation, ensuring compliance with international labour standards and ensuring structured social dialogue with independent trade unions. The risks to service and hospitality staff exist in all bidding countries, but those to construction workers may be higher in Morocco given the major infrastructure projects planned, the continued presence of child labour and the restrictions on trade unions. Migrant workers face heightened risks in all three countries. Accident rates are above EU-averages in both Portugal and Spain, while numbers of labour inspectors are below international standards in both Morocco and Portugal.
- **Discrimination:** Morocco has passed legislation prohibiting discrimination based on sex, but the criminalization of extramarital sexual relations and “adultery” can prevent women from reporting incidents of sexual violence. Same sex acts are criminalised and 838 people were prosecuted between 2017 and 2020. In December 2023, a UN Committee denounced the persistence of racism in Moroccan football. Portugal and Spain both possess a range of equality laws, but discrimination persists in practice. High-profile cases have highlighted racism in football in both countries, while the abuse and harassment of the Spanish national women’s team and documented abuse of young athletes in Portugal highlight persistent sexism. In both countries, high and rising cases of homophobic and transphobic abuse have been documented.

11 FMRF, FPF and RFEF, ‘Yalla Vamos 2030 Bid Book’, July 2024, <https://digitalhub.fifa.com/m/1d713bc7ba2621fe/original/FWC30-Bidbook-Yalla-Vamos.pdf>

12 References for all of the risks highlighted in this section can be found in the report by Amnesty International and Sport & Rights Alliance, June 2024, cited earlier.

- **Forced evictions and affordable housing:** With new large-scale infrastructure projects planned and weak protections, the risks of forced evictions may be highest in Morocco. The threat of a large influx of visitors also risks exacerbating the severe shortages in affordable housing in Portugal and Spain, including through an increase in the use of short-term holiday rentals. Rents in Spain have already increased by 45% since 2017, while in Portugal, the UN Special Rapporteur on the right to adequate housing has already warned of the impact of “unbridled touristification”.
- **Repression of freedoms:** All three countries recognize the rights to freedom of expression, association and peaceful assembly in law, but restrict them in practice. Morocco, for example, criminalizes criticism of Islam, the monarchy, state institutions and the military, as well as questioning the country’s territorial integrity in relation to Western Sahara. Journalists and human rights defenders have been harassed, arbitrarily detained, beaten and prosecuted. Portugal restricts demonstrations through notification requirements, while fans have faced restrictions and sanctions for “political” banners and chants. Spain criminalizes certain forms of protest and expression, leading to the prosecution of musicians, journalists and social media users.
- **Policing and fan safety:** Police forces in all three countries have used excessive force, including in footballing contexts in recent years. This includes using improper use of rubber bullets to disperse crowds in contravention of international standards. Moroccan football has experienced significant violence and mass arrests in recent years, while Portuguese fans’ representative groups have denounced “real police barbarity” and a Spanish supporters’ group say that the police rarely engage in dialogue and often treat fans “like cattle”. There is a risk of racialized policing in all bidding countries. Portuguese journalists have identified hundreds of police officers responsible for spreading hateful and racist messages online, while in Spain, a 2022 survey showed that 14% of people of African descent had been stopped by police in the previous year, one of the highest rates in the EU.



*A rubber bullet used by Spanish police forces against protestors in Barcelona, October 2018. (Photo by Andrea Baldo/ LightRocket via Getty Images)*

- **Violations of the right to privacy:** The use of technology should comply with international human rights law and standards. Human rights defenders in Morocco, as well as Catalan politicians, journalists and their families in Spain, have been targeted with Pegasus spyware. In 2023, La Liga, the top professional division of the Spanish men's football league, were warned by Spain's data protection regulator that a tender for a facial recognition system would breach data protection laws.
- **Human Rights Treaties:** The bidding nations have ratified most but not all international human rights treaties. Morocco has not yet ratified the African Charter on Human and Peoples' Rights. Portugal and Spain are parties to the European Convention on Human Rights, the Revised European Social Charter and the Charter of Fundamental Rights of the EU. All three countries are members of the International Labour Organization. Morocco has ratified eight of the ILO's 11 fundamental instruments but has not ratified core conventions on freedom of association (C087) or health and safety (C155), nor the Protocol to the Forced Labour Convention (P029). Portugal and Spain have ratified all 11 fundamental instruments of the ILO.

## MOROCCO, PORTUGAL AND SPAIN'S 'INDEPENDENT HUMAN RIGHTS CONTEXT ASSESSMENTS'

To produce the required Independent Human Rights Context Assessments, FAs of the three main bidding nations each commissioned their national human rights institutions – the National Human Rights Council in Morocco (CNDH - Conseil National des Droits de l'Homme), and the offices of the Ombudsmen in Portugal (Provedor de Justiça) and Spain (Defensor del Pueblo).

**The Moroccan assessment** is the most detailed and tailored for the context of the World Cup, and includes a large number of important recommendations for legislative and policy changes.<sup>13</sup> It covers most of the issues raised by Amnesty International and the SRA, other than the government use of spyware. Recommendations include ratifying outstanding human rights treaties and ILO conventions, decriminalization of extra-marital relations including same-sex relationships, amendments to the criminal code to respect freedom of expression and assembly, bringing labour laws including union rights into line with international standards, ensuring protections for people from land expropriation and forced eviction, and more.

**The Portuguese assessment** covers a number of issues related to the tournament, albeit in less depth and with significant omissions, highlighting existing legislation and policies as well as existing challenges and risks.<sup>14</sup> It calls for better dissemination and implementation of existing measures to tackle discrimination, in addition to greater urgency to address the inclusion of people with disabilities, more resources to protect migrants' rights, training for security forces in combatting violence against women and protections for volunteers. The assessment does not cover a number of key issues raised in Amnesty International and the SRA's report, including restrictions on the right to freedom of assembly, the use of excessive force including rubber bullets by security forces, risks to affordable housing, the low level of labour inspectors and the above-average number of workplace accidents.

13 NDH, 'Analysis study on human rights in Morocco', July 2030, <https://digitalhub.fifa.com/m/6da18ae1b346a2ba/original/Microsoft-Word-2-CLEAN-CNDH-Study-WC30-Final-25-7-docx.pdf>

14 The Portuguese Ombudsman, 'Human Rights Context Assessment – Portugal', February 2024, <https://digitalhub.fifa.com/m/7272faaf35e0a7e/original/Portugal-Independent-Human-Rights-Context-Assessment.pdf>



Digital image of the proposed Stade Hassan II stadium in Morocco, projected to be the largest football stadium in the world with 115,000 capacity. (Photo by Populous via Handout/Getty Images).

**The Spanish assessment** provides a wide-ranging overview of the country's legal framework and challenges in relation to several human rights issues including the protection of minorities, minors, gender equality, LGBTI rights, and people with disabilities; migration, environment, and protections for players and fans within sport (including, in particular racism and xenophobia).<sup>15</sup> It does not, however, provide a tailored assessment in relation to specific risks related to hosting the World Cup, nor does it cover some human rights risks identified by Amnesty International and the SRA. Key areas omitted include risks to workers' rights, the excessive use of force by security forces (including the use of rubber bullets), restrictions on freedom of expression and threats to the availability of affordable accommodation.

With exceptions, there appears to have been limited stakeholder engagement in the development of the assessments. The Spanish Ombudsman does not say whether any external actor was engaged in the development of its context assessment, while it is not clear which organisations were actually involved in Portugal's, despite the Portuguese FA's statement that "meaningful consultations with a wide range of stakeholders" were conducted for the assessment.<sup>16</sup> Indeed, none of the international organisations in the Sport & Rights Alliance, nor the main fans' representative bodies in either Portugal or Spain<sup>17</sup>, were engaged despite asking FIFA on multiple occasions to be included in any process. The NCDH in Morocco states that it consulted nationally through its member networks, albeit not with international organisations.<sup>18</sup>

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15 Defensor del pueblo, 'Human Rights in Spain', July 2024, <https://digitalhub.fifa.com/m/4bee0b9fc48b911a/original/Spain-Independent-Human-Rights-Context-Assessment.pdf>

16 This statement is made by the FPF about the Ombudsman's assessment in its Human Rights Strategy (p16) but the Ombudsman itself does not mention any stakeholder consultation.

17 Interviews with Associação Portuguesa de Defesa do Adepto (APDA) and Accionistas y Socios del Fútbol Español (FASFE)

18 The CNDH says that conducted nationwide consultations with "its three national mechanisms against torture, for children and persons with disabilities as well as its 12 regional human rights commissions." In its human rights strategy, the RFEF explains that the regional human rights commissions include "local representatives of civil society, including NGOs, professional associations, and other civil stakeholders, such as the bar associations, union of journalists, union of doctors etc."

# MOROCCO, PORTUGAL AND SPAIN'S WORLD CUP HUMAN RIGHTS STRATEGY

The Human Rights Strategy proposed by the Moroccan, Portuguese and Spanish FAs state that the tournament “represents a unique and unprecedented opportunity to place human rights at the centre of one of the world’s most significant sporting events” and commits to “embed human rights principles into every aspect” of the tournament.<sup>19</sup>

The overview of the strategy contains broad commitments to raise awareness of human rights, prevent human rights violations through effective policies, guidelines and grievance mechanisms, safe and fair working conditions, promote gender equality and inclusion, safeguard freedom of expression and assembly, minimise the environmental impact and ensure stakeholder engagement.

However, the specific strategies provided by each host country lack meaningful detail about what changes in laws, policies and practices would be implemented, if any. The strategies are provided in the name of the three FAs, and do not appear to provide clear government commitments in relation to the tournament.

**Morocco’s human rights strategy** contains many positive commitments from the Moroccan FA (FRMF) and the National Human Rights Council (CNDH) to *advocate for changes* in legislation and government policy, but critically no state commitment to do so – and thus no guarantees that any changes will in fact be made. For example, while it is commendable that “FRMF and CNDH will encourage both the parliament and the government to ratify key international conventions”, there is no corresponding commitment from the government to do so.

Similarly, the two bodies also commit to “encourage the parliament and government” to act on a significant number of issues, including reforming laws on freedom of expression and association, adopting legislation including on anti-discrimination, child rights and the right to strike, as well as engaging with law enforcement officials and advocating for a national action plan on business and human rights. Yet in none of these areas is there any explicit government commitment to respond positively to this engagement, or any guarantees that laws or policies will be revised. There is also no specific mention of LGBTI rights, other than what may be implicit in a broader anti-discrimination strategy.

There are commitments to act on some areas that are under the control of the FRMF and NCDH, for example the establishment of a decentralised grievance mechanism and a strategy for accessible World Cup infrastructure.

**Portugal’s human rights strategy** outlines a series of risks but for the most part commitments made are general and lack detail. For example, they commit to “strict enforcement of national and international labour laws” and “specific measures to protect the rights of migrant workers”, but do not outline what measures – such as an increase in labour inspectors – would be taken to achieve this. Similarly, they commit to “working with civil society organizations to facilitate peaceful protests and demonstrations,” but propose no changes to the notification systems in law that restrict the right to demonstrate.

The Portuguese FA commits to establishing a Human Rights Committee and sub-committees, including civil society representation, to oversee the implementation of the strategy in each of the seven risk areas. These are labour rights, security, resettlement and eviction, children’s rights, gender and other forms of discrimination, freedom of expression and peaceful assembly, and environmental impact. There is no further information about which specific organisations would be part of these bodies.

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19 FMRF, PFF and RFEF, ‘Proposal for a Human Rights Strategy: FIFA World Cup 2030’, July 2024, <https://digitalhub.fifa.com/m/5df7a2ac820a860e/original/FWC30-Human-Rights-Strategy.pdf>

**Spain's human rights strategy** is a copy of the Independent Human Rights Assessment provided by the Ombudsman. The Spanish FA (RFEF) did not submit a separate, specific human rights strategy for the 2030 tournament. It is therefore unclear what measures, if any, the Spanish FA and government are proposing to address the specific risks associated with the tournament.

Finally, like the human rights assessments, none of the strategies - with the partial exception of Morocco - appears to have been informed by meaningful stakeholder engagement. While the Portuguese FA claims "extensive stakeholder engagement was conducted to inform the Human Rights Strategy," there is again no detail on who was consulted.<sup>20</sup> Much more will need to be done to achieve the "continuous and meaningful engagement with a wide range of stakeholders" that is promised going forward, including their commitment to undertake consultation "in accordance with the AA1000 Stakeholder Engagement."<sup>21</sup> Adherence to this standard necessarily means ensuring inclusive and meaningful consultation on the most significant issues, throughout the entire planning, preparation and delivery phases. This should include rights holders, fans, trade unions, human rights organisations and other civil society bodies.

## CONCLUSION

The vast majority of the risks identified by Amnesty International in its June 2024 report remain substantively unaddressed. While some risks have been acknowledged in the strategies, the commitments made to address them either lack the specificity needed to ascertain if they are meaningful or, in the case of Morocco, are merely commitments to "advocate for" the changes required.

The result is that there remain key risks to which no meaningful guarantees have been provided, including for example to increase the number of labour inspectors to ensure decent working conditions, to repeal legislation criminalising extra-marital or same-sex relations, to ensure the availability of affordable housing and protect people from forced evictions, to guarantee free expression and assembly, or to prohibit the use of rubber bullets to disperse crowds in all three countries. Far more detailed strategies, based on meaningful consultation, will also be needed to tackle racist, sexist, homophobic and transphobic discrimination.

There is no reason why the governments, FAs and national human rights institutions of the three main bidding countries could not embark on a series of positive and meaningful reforms that could strengthen human rights protections in relation to the 2030 FIFA World Cup and also leave a positive social legacy. FIFA should insist on the development of a far more robust and specific human rights strategy, based on meaningful consultation with external national and international stakeholders and rights holders, leading to legally binding commitments that would address key risks.



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20 Amnesty International wrote to the FPF to ask for specific details of who was consulted, but received no reply as of 4 November 2024. In page 18 of its Strategy the FPF says that it consulted NGOs, human rights organizations, community groups, the Ombudsman, government ministries, local authorities and UN bodies and committees.

21 AA1000 Stakeholder Engagement Standard available at <https://www.accountability.org/standards/aa1000-stakeholder-engagement-standard/>

## 4. “GROWING TOGETHER”: SAUDI ARABIA’S BID FOR THE 2034 FIFA WORLD CUP

The Bid Book published by the Saudi Arabia Football Federation (SAFF) on 31 July laid out ambitious plans for the tournament, which is reliant on enormous infrastructure projects built by migrant workers. These include building or refurbishing 11 new stadiums, 185,000 additional hotel rooms transport links and even new cities.<sup>22</sup> Given Saudi Arabia’s human rights record, such ambitious plans come huge with risks of widespread human rights violations from forced labour and forced evictions to discrimination and repression.



### KEY HUMAN RIGHTS RISKS IDENTIFIED

Amnesty International’s June 2024 report identified a range of serious human rights risks connected to hosting the 2034 World Cup in Saudi Arabia.<sup>23</sup> Shared with FIFA and the Saudi Arabian authorities in May 2024, these include:

- **Labour abuse and exploitation:** Despite partial reforms, migrant workers in Saudi Arabia continues to be subjected to the Kafala sponsorship system that limits their rights and facilitates widespread exploitation.<sup>24</sup> There is no minimum wage for migrant workers, illegal recruitment fees are prevalent, and trade unions are prohibited. Trade unions and human rights organisations including Amnesty International have documented numerous cases of forced labour. In June 2024, global trade union Building and Woodworkers International submitted a complaint against Saudi Arabia to the ILO in relation to forced labour and violation of the right to freedom of association .
- **Discrimination:** Despite some limited reforms, women and girls continue to face discrimination, including under the recent Family Law that codifies discrimination in all aspects of family life, including marriage, divorce, child custody and inheritance. Women such as Manahel al-Otaibi have been prosecuted for the clothing they were and the things they have said online. Under the country’s interpretation of sharia law, sexual relations outside marriage, including “adultery”, extramarital and same-sex relations, are prohibited. A leaked draft of Saudi Arabia’s first penal code would further codify this prohibition, while “cross-dressing” is already punished with prison sentences of up to three years. Saudi Arabia prohibits any public practice of a religion other than Islam, while the country’s Shia Muslim minority faces persecution.

22 Saudi Arabia Football Federation, ‘Growing Together: The Saudi Arabia FIFA World Cup 2034 Bid’, July 2024, <https://digitalhub.fifa.com/m/5590de2b652bef03/original/The-Saudi-Arabia-FIFA-World-Cup-2034-Bid-Book.pdf>

23 References for all of the risks highlighted in this section can be found in the report by Amnesty International and Sport & Rights Alliance, June 2024, cited earlier.

24 The Kafala sponsorship system is where a worker’s visa and right to work are tied to their employer. For further information see Amnesty International, ‘Don’t worry, it’s a branch of Amazon’, October 2023, Index Number: MDE 23/7229/2023, <https://www.amnesty.org/en/documents/mde23/7229/2023/en/>





Free Saudi Voices action in front of the Saudi Arabia Embassy in Washington, D.C. calling on Saudi Arabia's authorities to release all those wrongfully detained for exercising their freedom of expression, 2nd of May 2024. (Photo by Arab Rights and Research Council).

- **Repression of freedoms:** Saudi Arabia severely restricts freedom of expression, association, and assembly. Independent human rights organizations, political parties, and trade unions are banned, while journalists, activists, and women's rights advocates face arrest and imprisonment. High-profile cases include Salma al-Shehab, sentenced to 27 years simply for tweeting her support for women's rights. Broad anti-terrorism laws are used to silence dissent, with harsh penalties for protests, including executions. No independent media exists, with journalists facing censorship, repression, and imprisonment. According to the Committee to Protect Journalists, 35 journalists have been arrested between 2012 and 2024 in Saudi Arabia, including 10 in 2019 alone. Amnesty International has documented 82 cases of individuals prosecuted for exercising their rights to free expression, peaceful assembly or association since 2013 – though the real figure is likely to be much higher. A 2024 leaked draft penal code suggests further criminalization of free expression, with no signs of improvement.
- **Forced evictions:** Human rights organisations have already documented mass forced evictions in proposed World Cup host cities. In NEOM, members of the Huwaitat tribe faced compulsory evictions and land expropriations in violation of international law, and Saudi government forces used lethal force and sentenced 15 members of the tribe to prison terms of up to 50 years in response to protests. In Jeddah, Amnesty International documented demolitions without adequate notice periods or compensation, affecting more than 558,000 residents.
- **Violations of the right to privacy:** The planned use of technology in "smart cities" such as NEOM may pose risks of mass surveillance at the World Cup, while the Saudi Arabian authorities have adopted new technologies to hack the online accounts of government critics and intercept communications. Saudi Arabia has also faced legal action over the use of Pegasus spyware to target and hack the phones of women's rights activists, political dissidents, journalists and their family members.
- **Human Rights Treaties:** Saudi Arabia has not ratified the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR) or core International Labour Organization (ILO) conventions related to freedom of association and collective bargaining (C87 and C98).

# SAUDI ARABIA'S 'INDEPENDENT HUMAN RIGHTS CONTEXT ASSESSMENT'

The Saudi Arabia Football Federation (SAFF) commissioned AS&H Clifford Chance – a Saudi-based company that is integrated into the global Clifford Chance law firm – to undertake the human rights assessment for its bid for the 2034 tournament.<sup>25</sup> In October 2024, a group of 11 organisations wrote to Clifford Chance criticising the human rights assessment, highlighting that the document is flawed and limited in scope and warning that they risked being linked to abuses connected to the tournament.<sup>26</sup> Clifford Chance responded only to share their human rights policies and say it would be inappropriate for them to comment further. In October, Amnesty International also wrote to FIFA asking them to confirm that they had agreed with SAFF to limit the scope of the assessment, as stated by AS&H Clifford Chance, and no response was provided.

## KEY FLAWS IN AS&H CLIFFORD CHANCE'S ASSESSMENT OUTLINED BY THE ORGANISATIONS INCLUDE:

- 1. FIFA and SAFF agreed to severely limit the scope of the assessment that AS&H Clifford then agreed to conduct.** Analysis of human rights protections in a number of treaties not ratified by Saudi Arabia was explicitly excluded, despite being included in FIFA's human rights policies and many being considered as having the status of customary international law.<sup>27</sup> Given that Saudi Arabia has not ratified many of the most fundamental human rights treaties and ILO Conventions (see above), this puts a gaping hole in what is supposed to be a comprehensive assessment. The result is stark – the assessment fails entirely to mention the reality that trade unions are banned, there is no minimum wage for migrant workers, same-sex activity is criminalized, forced evictions have been well-documented and there are severe restrictions on freedom of expression. It also underplays the continued real-life impact on workers trapped under the Kafala system, despite some reforms.
- 2. The assessment is selective in its reference to analysis and recommendations by UN bodies.** For example, while some recommendations made by treaty monitoring bodies such as the UN Committee on the Elimination of Discrimination against Women (CEDAW), the UN Committee on the Elimination of Racial Discrimination (CERD) and the UN Committee Against Torture (UNCAT) are acknowledged in the assessment, it omits many other relevant concerns raised by the same bodies. Inexplicably, the assessment also does not mention the fact that Saudi Arabia is the subject of a complaint at the ILO, submitted in June 2024 by global trade union Building and Wood Workers International (BWI), in relation to allegations of widespread forced labour.

25 AS&H Clifford Chance, "Independent Context Assessment Prepared for the Saudi Arabian Football Association in relation to the FIFA World Cup 2034", July 2024, <https://digitalhub.fifa.com/m/3520525e1ccff4af/original/Context-assessment-of-the-impact-of-hosting-the-tournament-on-human-rights-Saudi-Arabia-World-Cup-2034-Bid-329623.pdf>.

26 For the full analysis, see the letter signed by 11 human rights organisations, published on 28 October 2024, <https://fairsq.org/wp-content/uploads/2024/10/Clifford-Chance-Full-memorandum.pdf>

27 FIFA's Human Rights Policy says that "FIFA's commitment embraces all internationally recognised human rights, including those contained in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work."



FIFA President Gianni Infantino speaks on stage during FIFA Football Summit 2023 on December 21, 2023 in Jeddah, Saudi Arabia. (Photo by Harold Cunningham - FIFA/FIFA via Getty Images)

**3. The assessment relied on desk research and consultation only with government ministries, with no broader consultation.** It “did not involve engagement with external stakeholders or rights holders.”<sup>28</sup> Indeed, no human rights organization, trade union, other civil society organization or rights-holders known to Amnesty International or members of the SRA have been consulted – despite Amnesty International and others explicitly requesting this on numerous occasions. It did not make any reference to analysis contained within Amnesty International’s June 2024 report.

It should be noted that the assessment did highlight a number of areas within the scope of the report that should be addressed, even while ignoring others. These include the fact that employers still have responsibility for renewing workers’ visas and ambiguities in the Labour Law regarding protections for non-Saudi workers on short-term contracts. It highlighted a need for greater precision in anti-discrimination language in legislation, noted the impact of reservations on implementing international conventions<sup>29</sup> and proposed improvements that could be made in terms of accessibility and safeguarding, including for children and people with disabilities. It mentioned the lack of clear guidelines on the use of firearms by private security guards and concerns raised by the UN Committee Against Torture “about the historical capacity of judiciary to address impunity, victim redress, and due process.”<sup>30</sup>

28 AS&H Clifford Chance, page 4.

29 Saudi Arabia has ratified the Convention on the Rights of the Child, the Convention on the Elimination of All Forms of Racial Discrimination and the Convention on the Elimination of All Forms of Discrimination against Women, but in all cases has entered reservations stating that it does not consider itself bound by any provisions that conflict with sharia law.

30 *Ibid*



*Migrant workers gather at their accommodation in Qadisiya labour camp, Saudi Arabia. Photo by Faisal Al Nasser/REUTERS*

## SAUDI ARABIA'S WORLD CUP HUMAN RIGHTS STRATEGY

Saudi Arabia's Human Rights Strategy outlines SAFF's commitment to "ensure that every aspect of preparing and hosting the FIFA World Cup 2034™ adheres to our commitments to relevant international standards for promoting and protecting human rights."<sup>31</sup> However, given that the human rights strategy is "based on the findings" of AS&H Clifford Chance's deeply flawed human rights context assessment, it suffers from many of the same omissions and limitations.

On paper, the human rights strategy includes a number of broad commitments to strengthen Saudi Arabia's human rights protections in some areas, yet critically fails to meaningfully address – or even mention – some of the most serious risks. Further, commitments made generally lack any specifics that would make it possible to understand if they were meaningful or are accompanied by language that would limit their scope. In short, the strategy fails to demonstrate how many serious human rights violations connected to the 2034 FIFA World Cup would be prevented.

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31 Saudi Arabian Football Federation, "Human Rights Strategy in connection to the 2034 FIFA World Cup", July 2024, <https://digitalhub.fifa.com/m/13280f46a4c28e06/original/Human-Rights-Strategy-Saudi-Arabia-FIFA-World-Cup-2034-Bid-147112.pdf>.

The following table highlights a non-exhaustive selection of the commitments from the human rights strategy, alongside a selection of key gaps.

ISSUE	COMMITMENT	GAP
<p><b>Labour rights</b></p>	<p>“Upholding fundamental conventions concerning forced labor, child labor, non-discrimination, and occupational health and safety”, including in supply chains.</p> <p>This includes “verify[ing] that our legislations and practices align with our commitments to various international agreements”, as well as enhancing laws where required, developing worker welfare standards and a supply chain sourcing code.</p> <p>They commit to developing a “framework with government, law enforcement, and relevant stakeholders to ensure proper implementation and monitoring of labor law and workers’ welfare standards” and to conduct “promotional and awareness campaigns”.</p>	<p>There is no explanation on how conventions would be upheld or what laws would be enhanced, if any.</p> <p>There is no commitment to reform the country’s exploitative Kafala system, permit trade unions and other forms of workers’ representation, introduce a minimum wage for migrant workers or ratify remaining ILO Conventions.</p> <p>There are no specific new measures to enhance health and safety protections, for example in relation to the risk of heat stress.</p> <p>There is no commitment that welfare standards will apply to all workers connected to the World Cup preparation and hosting, beyond those not working on official tournament sites (such as on related transport projects, hotels etc).</p> <p>There are no specific commitments to ensure improved access to remedy when labour abuses occur.</p>
<p><b>Discrimination</b></p>	<p>“Cultivating a competition environment free of discriminatory practices, and striving to eradicate discrimination based on race, ethnicity, gender, disability, or any other protected characteristic.”</p> <p>SAFF commits to “continuously verify” that laws and practices align with their international commitments and undertake training and awareness raising for the Saudi public, judges and law enforcement.</p>	<p>There is no recognition of the existence or impact of existing discriminatory laws or state practices.</p> <p>There is no commitment to reform the range of discriminatory laws impacting women and criminalising LGBTI people, nor any explanation of any measures to ensure their safety and freedoms.</p> <p>A draft of a forthcoming new penal further codifies these discriminatory practices.</p>

ISSUE	COMMITMENT	GAP
<p><b>Security and freedoms</b></p>	<p>“Work with the relevant government authorities and stakeholders to prevent and mitigate any security-related risks, through validating and enhancing the preparedness of security forces engaged in activities associated with the competition to adhere to international standards, including UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, and UN Code of Conduct for Law Enforcement Officials.”</p> <p>This includes “verifying laws”, including the forthcoming penal code, are in line with international commitments and developing a code of conduct for law enforcement and private security.</p> <p>Collaboration with public and private security actors to ensure surveillance “respects the privacy and human rights of attendees.”</p>	<p>There is no explanation of what measures will be taken to meet the broad commitment on standards for security services.</p> <p>There is no commitment to reform laws and practice that currently severely criminalise free expression, association and assembly, limit fair trial rights or lead to the practice of torture.</p> <p>The draft of the forthcoming penal code cited codifies severe restrictions on the rights to freedom of expression, thought and religion, and fails to protect freedom of peaceful assembly, as well as use of the death penalty as one of Saudi Arabia’s primary punishments, and permits corporal punishments such as flogging.</p> <p>There is no commitment to release human rights defenders or provide protections for journalists, whistleblowers and human rights activists.</p> <p>There is no detail of laws or measures to be taken to ensure privacy, nor to prohibit the current use of invasive spyware.</p> <p>Commitments appear to focus more on ensuring security during the tournament, rather than creating an environment enabling scrutiny and free expression during the preparation stage.</p>



**THERE IS NO COMMITMENT TO RELEASE HUMAN RIGHTS DEFENDERS OR PROVIDE PROTECTIONS FOR JOURNALISTS, WHISTLEBLOWERS AND HUMAN RIGHTS ACTIVISTS.**

ISSUE	COMMITMENT	GAP
<b>Forced evictions</b>	“We will continue our efforts to prevent and prohibit forced evictions and displacement of local communities for the development of FIFA World Cup 2034™- related infrastructure and provide adequate compensation and relocation support to affected residents and implement any required enhancement.”	There is no explanation of what changes, if any, will be made to current laws or practices that facilitate forced evictions on a major scale – including those already documented in World Cup host cities such as NEOM and Jeddah – or remediate those that have already happened.
<b>Grievance mechanisms</b>	<p>“Our goal is to create, with FIFA, mechanisms for all individuals who have been negatively impacted by activities associated with the preparing and hosting of the FIFA World Cup 2034™. These mechanisms shall ensure that affected individuals are informed about their options for lodging complaints and grievances, and they have confidence in the effectiveness of these channels.”</p> <p>They commit to developing grievance mechanisms based on the principles of the UN Guiding Principles and “utilize and improve” existing mechanisms, including existing national legislation and courts.</p>	<p>Any proposed grievance mechanism will be seriously undermined unless there are fundamental reforms to Saudi laws and policies that severely restrict freedoms, deny rights to due process and limit access to justice.</p> <p>The Saudi judiciary is also heavily politicised, with no separation of powers between the legislative, executive and judicial branches of government. The widespread practice of discretionary sentencing without judicial precedent results in the arbitrary imposition of punishments that vary in severity across similar offences and cases.</p>

## CONCLUSION

Given the scale of Saudi Arabia’s plans for the World Cup, the severity of the known human rights risks and the weakness of the bid’s human rights strategy, it is clear that the 2034 tournament is highly likely to be tarnished by exploitation, discrimination and repression on a significant scale unless much more specific, legally-binding and time-bound measures are agreed. There will be a real human cost paid by workers, activists, residents and fans.

The proposed Human Rights Strategy does not identify or address the most serious human rights risks linked to the tournament. In line with its own policies and the criteria set out in its own Bidding Requirements, FIFA should not put forward Saudi Arabia as a proposed host to the FIFA Congress for the 2034 tournament until a comprehensive, credible and meaningful human rights strategy is developed.

## 5. CONCLUSION AND RECOMMENDATIONS

The human rights components of the bidding processes for both the 2030 and 2034 FIFA World Cups have been deeply flawed. FIFA undermined its leverage by pursuing a selection process without competitive bids or separate votes. It has also severely limited the scope of the human rights assessment in Saudi Arabia, in contravention of its own human rights policies and responsibilities. FAs appear not to have taken the process seriously enough. Unless this is urgently rectified, we will again see the predictable and preventable human rights violations experienced in past tournaments, perhaps on an even greater scale.

For the 2030 World Cup, a far more comprehensive and credible human rights strategy is required to properly manage the significant outstanding risks, and to seize the opportunity of using the tournament to drive human rights progress. There is no room for complacency.

For the 2034 World Cup, the outstanding risks are more severe and the likelihood of widespread violations of human rights in Saudi Arabia – for workers, fans, journalists, residents, players and activists alike – are extremely high. The human rights strategy provided by SAFF does not begin to touch upon the scope and scale of the reforms needed to prevent the 2034 tournament from causing or contributing to severe violations, and clearly does not meet FIFA's human rights criteria. Without change, critical voices will be repressed, fans will face discrimination and workers will suffer exploitation. People will die.



*Labourers work on a steel mesh at a construction site in Saudi Arabia's capital Riyadh on May 23, 2022 during a heat wave. (Photo by Fayed Nureldine / AFP) (Photo by FAYEZ NURELDINE/AFP via Getty Images)*



***Without change, critical voices will be repressed, fans will face discrimination and workers will suffer exploitation. People will die.***

FIFA now has a choice about whether it wants its flagship tournament to be a driver of progress or to be tarnished by severe human rights violations. In order to respect its own human rights policies and World Cup bidding requirements, FIFA should:

- Ensure its own evaluations of the 2030 and 2034 bids are strictly in line with its human rights policies and bidding requirements. The evaluations should be published sufficiently in advance of the FIFA Congress on 11 December to ensure scrutiny.
- Restore the voting process for the 2030 and 2034 tournaments, so that each bid is scrutinized in its own right.
- Make the award of the 2030 World Cup conditional on the development of far more specific and comprehensive human rights strategies, based on meaningful stakeholder consultation and leading to legally binding commitments.
- Halt the process towards approving Saudi Arabia as host of the 2034 World Cup at the forthcoming extraordinary FIFA Congress, unless major and wide-ranging reforms are announced in advance.
- Commission an independent annual review of compliance with human rights standards in the preparation of all World Cups, publicly reporting to the FIFA Congress.

National Football Associations (FAs) also have clear human rights responsibilities too, not least because of the financial revenues they gain from the World Cup (through participation and the redistribution of revenues) and their role in voting for the host as a member of the FIFA Congress. In line with these responsibilities, all FAs should call on FIFA to respect its own human rights commitments and policies. In particular, FAs should:

- Use their leverage with FIFA to ensure stronger, binding human rights commitments are agreed for both the 2030 and 2034 tournaments.
- Call on FIFA to separate the voting process for the two tournaments, and to postpone the 2034 vote until a credible human rights strategy is developed.
- Not vote to award the 2034 FIFA World Cup to Saudi Arabia unless credible and comprehensive reforms are agreed before Congress.
- Propose the establishment of an annual review of compliance with human rights standards in the preparation of all World Cups, reporting publicly to FIFA Congress.
- Develop their own human rights policies in line with the UN Guiding Principles on Business and Human Rights.

Finally, it is clear that FAs and governments bidding to host the 2030 and 2034 World Cups should develop far more credible, binding and comprehensive human rights strategies in close consultation with external stakeholders and rights-holders. Full recommendations for each of the four bidding countries are provided in the June 2024 report by Amnesty International and the Sport & Rights Alliance.<sup>32</sup>


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<sup>32</sup> Amnesty International and Sport & Rights Alliance, 'Playing a Dangerous Game', June 2024, Index Number: ACT 30/8071/2024, <https://www.amnesty.org/en/documents/act30/8071/2024/en/>



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# HIGH STAKES BIDS

## DANGEROUSLY FLAWED HUMAN RIGHTS STRATEGIES FOR THE 2030 AND 2034 FIFA WORLD CUPS

The FIFA men's World Cup is the most watched sporting event in the world with enormous social, political and economic impacts that go well beyond the game itself. It has also long been mired in controversy, scandal and human rights violations.

In December 2024, 211 FIFA member associations will vote on whether to approve Morocco, Portugal and Spain as hosts of the 2030 men's World Cup and Saudi Arabia as hosts of the 2034 tournament. To be selected, each of these bids is supposed to meet binding criteria on how they will protect workers' rights, prevent discrimination, uphold the right to housing, guarantee freedom of expression and more.

This briefing analyses the human rights strategies submitted by the bidding nations for both tournaments, comparing them with FIFA's requirements and a detailed risk assessment produced by Amnesty International in June 2024. It concludes that neither bid has adequately demonstrated how they have met FIFA's human rights criteria. While a more credible human rights strategy is required for the 2030 tournament, the outstanding risks in Saudi Arabia are so severe that FIFA should halt the bidding process for the 2034 tournament until major reforms are introduced.