



Jesper Moller, President  
Jakob Jensen, Chief Executive Officer  
Danish Football Union

Via e-mail:  
[jemo@dbu.dk](mailto:jemo@dbu.dk); [jjen@dbu.dk](mailto:jjen@dbu.dk);  
[Terje.Svendsen@fotball.no](mailto:Terje.Svendsen@fotball.no); [pal.bjerketvedt@fotball.no](mailto:pal.bjerketvedt@fotball.no);  
[Karl-erik.nilsson@svenskfotboll.se](mailto:Karl-erik.nilsson@svenskfotboll.se); [hakan.sjostrand@svenskfotboll.se](mailto:hakan.sjostrand@svenskfotboll.se);

Terje Svendsen, President  
Pal Bjerketvedt, General Secretary  
Football Association of Norway

Karl-Erik Nilsson, President  
Hakan Sjostrand, General Secretary  
Swedish Football Association

Zurich, 7 May 2021  
SG/coj/agr

## **Human rights due diligence and FIFA World Cup Qatar 2022**

Dear Presidents, dear General Secretaries,

Thank you for your letters with respect to human rights and the FIFA World Cup Qatar 2022. We welcome the continued dialogue with the Danish, Norwegian and Swedish Football Associations and other member associations on this important topic.

Let me start by reassuring you of FIFA's steadfast commitment to ensure that the rights of everyone involved in or affected by FIFA's competitions and activities are safeguarded in accordance with article 3 of the FIFA Statutes and [FIFA's Human Rights Policy](#). In this respect, FIFA implements human rights due diligence processes to address human rights risks in line with the UN Guiding Principles on Business and Human Rights. This includes addressing adverse impacts that FIFA risks to cause or to contribute to through its own activities as well as using its leverage with third parties to address human rights risks directly linked to FIFA and its operations.

In relation to the FIFA World Cup Qatar 2022 (FWC 2022), FIFA has gradually expanded its human rights due diligence process linked to tournament preparations since 2016. The initiatives informing this work are defined within the joint [Sustainability Strategy](#) which was developed by FIFA together with its host country delivery partner the Supreme Committee for Delivery & Legacy (SC), and FIFA's Qatar-based subsidiary, FIFA World Cup Qatar 2022 LLC (Q22).

In response to your letter, we are pleased to share (a) an overview of our strategic human rights due diligence process with respect to the FIFA World Cup Qatar 2022 and (b) describe current priorities in that respect. We will also look forward to discussing these and any other points raised in your letter in more detail with you in the forthcoming meeting and in our further exchanges.

### *a) Human rights due diligence process*

In the early years of tournament preparation, the focus of the human rights-related activities by FIFA and the host country were on the planning and construction of stadium and training site

infrastructure. With labour rights reform being an important commitment of the Qatar National Vision 2030 launched in 2008, the SC set up initial labour rights monitoring systems for FIFA World Cup construction workers. FIFA has worked with the SC in the development and further expansion of these processes and over the years has continuously strengthened its engagement with the SC's Workers' Welfare Department.

Measures to safeguard the health and well-being of FIFA World Cup workers are an important priority of the worker-related due diligence systems. These mechanisms include, for example, occupational health and safety measures on site, comprehensive medical checks of all workers, as well as projects to address other potential causes of health hazards, such as heat, nutrition, mental health or Covid-19 (see also [this FAQ](#)). In addition, regular independent inspections are carried out by the international trade union for construction workers, Building and Woodworkers' International (BWI), and the specialised labour rights consultancy, Impactt Ltd.

In 2016, in addition to working with the SC on labour rights protection of FIFA World Cup construction workers, FIFA launched a new phase in our due diligence process with the development of the comprehensive Sustainability Strategy for the tournament. As part of the strategy development process, FIFA worked with independent external experts in conducting a detailed human rights risk assessment. In the development of the risk assessment, a total of 22 independent human rights stakeholders provided responses as part of a web-based questionnaire as well as through bilateral discussions. This process was accompanied closely by FIFA's independent Human Rights Advisory Board. For further details on this process, please refer to the [report on the development of the sustainability strategy](#), published together with the SC and Q22.

The result of this process saw the publication of the joint strategy by FIFA, Q22, and the SC. It includes a firm joint commitment by the three entities to integrate respect for human rights across all activities associated with the tournament. Furthermore, the strategy outlines more specific commitments with respect to key human rights areas, such as labour rights, diversity and anti-discrimination, press freedom, as well as risks associated with safety and security. Ensuring and publicly communicating these joint commitments, along with the 77 initiatives to implement the strategy, has been a pivotal step, and the foundation of the human rights due diligence process for the organisation of the FIFA World Cup Qatar 2022.

Furthermore, starting in 2017, a dedicated team of human rights, accessibility and responsible sourcing experts has been appointed to FIFA's subsidiary, Q22. This team is responsible for the development and operational implementation of the strategy in Doha, working day-to-day and hand-in-hand with counterparts at FIFA and the Sustainability and Workers' Welfare Departments at the SC. The FIFA and Q22 teams are involved in the delivery of all human rights-related initiatives outlined in the strategy.

For the past four years, FIFA, Q22 and the SC have been working diligently to implement the initiatives set out in the strategy and we report regularly on these activities. In this respect, we would like to highlight in particular the October 2020 [Progress Report](#) on the implementation of the Sustainability Strategy, the [various detailed reports](#) and [FAQs](#) by the SC with respect to the labour rights monitoring programme, including reports by BWI and Impactt Ltd.

*b) Current priorities*

During the first months of this year, the overall tournament preparation has again shifted gears, with a wide range of functional areas at FIFA and Q22 intensifying their preparations, with additional Qualifiers being started, as well as with the contracting of a significant number of service companies being prepared. This also informs the human rights due diligence measures being taken to embed human rights considerations within these activities.

More specifically, the concrete actions currently being delivered as part of the key priorities of the strategy are:

- expansion of the labour rights monitoring systems from construction workers to service workers as FIFA, Q22 and the SC begin to appoint service companies involved in the preparation and delivery of the tournament;
- engagement with Qatari authorities across the labour rights reform process, including in particular the steps taken to implement the reforms adopted in 2020, additional legislative proposals currently under discussion, and further transparency with respect to work and non-work related deaths;
- engagement with Qatari authorities on the revision of the press freedom legislation, including through the newly established Memorandum of Understanding with the Qatari National Human Rights Committee, and the finalisation of tournament-specific media-related policies and procedures;
- implementation of further human rights-related training for public security forces in Qatar providing security during the tournament, as well as planning the integration of human rights expertise at security command centres;
- engagement with Qatari authorities and relevant stakeholders, including fans groups, on the initiatives taken to ensure a welcoming environment in particular for LGBTIQ+ fans and visitors at the tournament;
- implementation of the anti-discrimination monitoring system in collaboration with the Fare Network to identify and address discriminatory incidents at FIFA World Cup Qualifiers;
- efforts to ensure an accessible tournament for disabled fans, including with respect to accessible infrastructure covering the full experience of fans from the airport to hotels to stadia, as well as the provision of accessible game-time services for disabled fans, such as audio-descriptive commentary and sensory rooms;
- embedding of human rights-related policies and considerations in a wide range of related activities across the tournament organisation, such as the volunteers programme, signage, mag and bag controls, and data security - to name a few; and
- development of a tournament-level human rights grievance mechanism that will be launched later this year and available to any person wanting to raise human rights concerns associated with the tournament, as well as respective procedures to address potential concerns.

Over the next months, we will further extend these efforts in line with FIFA's Human Rights Policy and the roadmap set out in the FWC 2022 Sustainability Strategy. We will continue to report publicly about these efforts, with the next progress report to be published in Q3 2021.

In regards to recent media reports discussing fatalities of foreign nationals in Qatar over the last 10 years, many independent observers and experts have since condemned these storylines as being

misleading whilst noting that figures published on mortality rates amongst a given population should follow internationally recognised indicators, such as those defined by the World Health Organisation, and take into account all potential causes of death.

Please be assured that the health and wellbeing of every person working in connection with FIFA's competitions is of the highest importance to FIFA with every lost life a tragedy for families and friends, and a serious concern for employers and authorities. Since construction began in 2014, three work-related fatalities on FIFA World Cup sites and 35 non-work-related deaths amongst FIFA World Cup workers have been recorded. Information on these cases can be found in the SC's Workers' Welfare Progress Reports as well as further public communications.

With respect to FIFA World Cup workers, as an integral part of the systems in place, any serious accidents – including those without fatal consequences - are investigated by a dedicated team of experts at the SC. Since 2018, the procedures for investigations of work-related fatalities have also included experts from BWI to ensure independence, transparency and the best possible learnings from such accidents for the companies concerned and the SC's oversight mechanisms. With respect to wider health and safety reforms within the country, FIFA meets regularly with the relevant authorities and, in particular, closely monitors the work of both the Ministry of Labour and the ILO Office in Doha, including with respect to the ILO's upcoming report on occupational injuries.

Any human rights due diligence process is a continuous effort that requires constant review and strengthening, and we very much welcome this exchange between us, as well as FIFA's ongoing engagement with our member associations and other stakeholders to discuss constructive feedback on our activities. In that respect and as described above, the important questions you raise in your letter relate directly to the ongoing work defined within the joint Sustainability Strategy. We are looking forward to next week's meeting to discuss our human rights work in relation to the FWC 2022 and any further questions and proposals you may have.

In closing, please let me reassure you once again of FIFA's continued and steadfast commitment to human rights. It is clear that the spotlight shone on Qatar due to the FIFA World Cup 2022, as well as the concrete actions by many within Qatar, and others internationally, have already contributed significantly to important human rights reforms within the country. We expect these reforms to be strengthened still further ahead of the tournament, and welcome the commitment of the Qatari authorities to a continuing collaboration with international entities, such as the ILO, beyond December 2022. Together with many independent experts and human rights organisations, we are confident that the changes made will leave a lasting and sustainable legacy in Qatar and the region long after the final ball has been kicked.

Sincerely yours,



Fatma Samoura  
Secretary General