

AI INDEX NUMBER: MDE 22/3855/2021

Below is a letter sent from Julie Verhaar, Amnesty International's Acting Secretary General, to Mr Gianni Infantino, President of the Fédération Internationale de Football Association (FIFA), on 15 March 2021.

Reference: TC MDE 22/2021.1511

Mr Gianni Infantino
President
Fédération Internationale de Football Association
FIFA-Strasse 20
P.O. Box 8044
Zurich
Switzerland

15 March 2021

Dear Mr Infantino,

With less than two years until the 2022 FIFA World Cup kicks off in Qatar and as qualification matches are set to take place later this month, we are writing to urge you, as the President of FIFA, to take urgent and concrete action to ensure the tournament leaves a positive and lasting legacy for all migrant workers in Qatar, and does not give rise to further labour abuse.

Without the two million migrant workers, the World Cup simply would not be possible in Qatar. As you know, men and women, mostly from Africa and Asia, are building the stadiums, the roads, the metro; when the tournament kicks off, they will be taking care of players, fans and officials in hotels, serving them in restaurants, transporting them around and providing security for venues: everyone who visits Qatar to watch or participate in the World Cup will almost certainly be looked after by migrant workers along the way.

When FIFA awarded the tournament to Qatar in 2010, the labour abuse of migrant workers in the country was well-known and it has been [well documented](#) throughout the period in which much of the World Cup infrastructure has been built. This includes workers paying exorbitant and illegal recruitment fees to secure their jobs in Qatar, only to find themselves exposed to forced labour, unpaid wages and excessive working hours, or being deprived of their freedom of movement once in the country. Those working on World Cup-related projects were no exception.¹

LABOUR RIGHTS IN QATAR TODAY

We welcome the significant changes that the Government of Qatar has made to its labour system in recent years, including to the kafala sponsorship system which legally binds migrant workers to their employer. Most recently this includes the abolition of the legal requirement for workers to obtain their employers' permission to [leave the country](#) or [change jobs](#).

Qatar is the first country in the region to make such changes to workers' rights, and we hope it will continue to lead the way for broader regional reform. However, while these legal changes may make it easier for workers to escape exploitative employers, they are unlikely to significantly reduce abuse itself or improve migrant workers' conditions without additional measures to strengthen protections and ensure enforcement of these and other reforms. [Poor implementation](#) and enforcement of Qatar's reforms to date, has meant the impact on many workers' lives sadly appears to have been limited, and serious labour abuses continue in the country.

Progress also remains fragile, with parts of the local business community voicing their opposition to the latest reforms and increasing the risk of the government rolling back on some of the advances on workers' rights made to date. Recent

¹ See, for example: Amnesty International, "*I have worked hard - I deserve to be paid*" *Exploitation on Qatar World Cup stadium*, June 2020, <https://www.amnesty.org/en/latest/research/2020/06/exploitation-on-qatar-world-cup-stadium/>; Amnesty International, *Unpaid and abandoned: the abuse of Mercury MENA workers*, 26 September 2018, <https://www.amnesty.org/en/latest/research/2018/09/mercury-mena-abuses-qatar/>; Amnesty International, *The ugly side of the beautiful game: Exploitation of migrant workers on a Qatar 2022 World Cup site*, <https://www.amnesty.org/download/Documents/MDE2235482016ENGLISH.PDF>

[recommendations](#) from Qatar’s Shura Council are particularly worrying and [would](#), if accepted by the government, revive the worst aspects of the kafala system.

Today, despite improvements to the legal framework, many migrant workers still live and work in difficult conditions in Qatar. They often suffer from delayed or non-payment of salaries, struggle to access justice, and do not enjoy the right to form or join trade unions in order to collectively advocate for better working conditions. The Covid-19 pandemic has only exacerbated their acute vulnerabilities, including heavy debts from high recruitment fees and months of unpaid wages, crowded and unsanitary labour accommodation, and restrictions on movement and accessing effective remedies for their abuse.

FIFA’S HUMAN RIGHTS RESPONSIBILITY – BEYOND CONSTRUCTION

Against this backdrop, as the World Cup organizer, FIFA has a responsibility to ensure human rights are respected in the context of preparing for and carrying out the tournament. The UN Guiding Principles on Business and Human Rights clarify that business enterprises should “avoid causing or contributing to adverse human rights impacts when they occur” and “seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts”.² The Principles further state that businesses should have in place “a human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights.”³

Amnesty acknowledges the steps FIFA has taken in recent years to live up to these responsibilities, including by establishing its 2017 [Human Rights Policy](#) and a joint [FIFA World Cup Qatar 2022 Sustainability Strategy](#) in October 2019. FIFA commits in its Human Rights Policy to respecting human rights in accordance with the UN Guiding Principles, and says it will strive “to go beyond” these responsibilities “by taking measures to promote the protection of human rights and positively contribute to their enjoyment”.⁴ Further, it has pledged to leave “a legacy of world-class standards and practices for workers in Qatar and internationally”.⁵

When FIFA decided to hold the World Cup in Qatar, FIFA knew – or should have known – that there are inherent risks in hosting the tournament there, due to the country’s heavy reliance on migrant workers and its exploitative labour system. FIFA therefore knew, or ought to have known, that migrants working in all sectors related to the delivery of the World Cup, whether directly linked to official sites or not, would suffer to make it possible. While progress has been made on workers’ rights, the ongoing labour abuse and risks they face in Qatar show that the government and FIFA have much more to do.

FIFA has incorporated a limited liability company, FIFA World Cup Qatar 2022 LLC, which it describes as an “innovative approach to the operating model of the tournament” and states will be responsible for projects related to “competition delivery, tournament operations and services for the FIFA World Cup constituent groups and operations within FIFA World Cup official sites.”⁶ The composition of this joint venture, of which FIFA holds 51% of the shares and Qatar Local Organising Committee LLC holds 49%, means there are clear human rights responsibilities. According to FIFA’s website, projects for which the joint venture will have responsibility include “[t]eam services, training sites, event volunteers, guest management, logistics, catering and accreditation”.⁷ As such, FIFA must ensure that the rights of workers on projects related to World Cup delivery and the tournament operations and services are respected throughout the joint venture’s business operations.

Aside from the construction of essential infrastructure and the tournament operations and services linked to delivery of the competition, whenever a huge sporting event like the World Cup takes place, there is an increase in business for related sectors, such as hospitality and transport, which serve those who attend. As such, as the tournament draws closer we must urgently turn our attention to the thousands of hotel staff waiters and waitresses, taxi drivers, cleaners and security guards, both in officially accredited World Cup sites and unaccredited sites, who will be so crucial in delivering the Qatar 2022 experience for all the football players, officials and fans alike.

² Principle 13, UN Guiding Principles on Business and Human Rights.

³ Principle 15, UN Guiding Principles on Business and Human Rights.

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

⁵ *FIFA World Cup Qatar 2022 Sustainability Strategy*, October 2019, p.5, <https://resources.fifa.com/image/upload/fifa-world-cup-qatar-2022tm-sustainability-strategy.pdf?cloudid=p2axokh26lzaafoutgs>

⁶ *FIFA World Cup Qatar 2022 LLC*, <https://www.fifa.com/worldcup/organisation/lc/>, last accessed 3 March 2021.

⁷ *Ibid.*

The fact that the Supreme Committee for Delivery and Legacy's Workers' Welfare Standards will be expanded in scope and application to include workers "engaged in the provision of services for all sites during the FIFA World Cup 2022™ tournament period"⁸ provides a step in the right direction for those working in Qatar's service sectors. It also indicates a recognition of how essential Qatar's service sector will be for the tournament, and the responsibility that World Cup organizers have towards those working in it.

Since their inception the Workers' Welfare Standards have [improved](#) the working and living conditions of people contributing to the delivery of World Cup stadiums. However, they are still not fully enforced or universally respected⁹ and in some instances have [failed to protect workers](#) from abuse and exploitation in Qatar, and to provide them adequate and timely remedy.

In 2020, FIFA told Amnesty International that its "day-to-day due diligence" of construction workers' rights is carried out by the Supreme Committee, the effectiveness of whose labour standards and systems FIFA said it has "every reason to trust".¹⁰ But this hands-off approach is insufficient: The fact that FIFA was unaware that workers at the Al Bayt stadium had not been paid for up to seven months, despite the Supreme Committee knowing, demonstrates this point.¹¹ If fans, players and officials are to travel to Qatar confident in the knowledge that the migrant workers they will meet on their journey have been paid properly, treated fairly, are free from the control of exploitative employers and not victims of abusive labour practices, there is no room for complacency from FIFA.

In this regard, it is imperative that FIFA takes swift action to strengthen its own human rights due diligence processes so that it can effectively identify, prevent and mitigate human rights abuses directly linked to the delivery of the World Cup – for example in FIFA accredited hotels, training grounds and other venues – in a timely manner. This includes carrying out its own independent and regular monitoring of World Cup projects and venues. Where necessary, it must also be able to effectively redress such abuses.

Further, while FIFA might not be directly linked to human rights harm occurring in service sectors operating outside of FIFA accredited World Cup sites, it nonetheless has a responsibility to mitigate human rights risks that arise from the increase in business in these related sectors created by the tournament. At a minimum, this means FIFA should use the full extent of its influence to urge Qatar to urgently implement and enforce the government's own reforms to ensure that the labour rights of all migrant workers are protected.

Qatar 2022 will be the first time the World Cup has been held in the Middle East, and in a region passionate about football, it will be a moment of great excitement for many. But if the tournament is to truly leave a lasting legacy of human rights change, we urge you, as its President to urgently ensure that FIFA:

- Conducts human rights due diligence and publicly discloses its due diligence policies and practices in accordance with international standards for the 2022 World Cup, to identify, prevent, mitigate and address adverse human rights impacts – including in recruitment – throughout its operations, business relationships and supply chains, including those related to FIFA World Cup Qatar 2022 LLC. This should include carrying out its own independent and regular investigations into the working conditions of migrant workers on all World Cup-related sites, as well as before entering into any new contracts with service providers such as hotels or catering, and making public the findings and any resulting actions taken.
- Takes action, in cooperation with the Qatari authorities, international agencies and civil society, to remediate the harms suffered by workers on all World Cup-related sites and projects, and publicly discloses the actions taken.

⁸ *FIFA World Cup Qatar 2022 Sustainability Strategy*, October 2019, p.29, <https://resources.fifa.com/image/upload/fifa-world-cup-qatar2022tm-sustainability-strategy.pdf?cloudid=p2axokh26lzaafoutgs>

⁹ A recent audit conducted at the request of the Supreme Committee also showed ongoing compliance issues among contractors on existing World Cup sites. For example, the audit raised concerns around the working conditions of workers employed by security contractors, particularly in relation to working hours and rest days, and advised that "as the demand for security and hospitality services increases, leading up to the Tournament, these non-compliances must be closely monitored and remediated." Impactt, *Annual External Compliance Report of the Supreme Committee for Delivery & Legacy's Workers' Welfare Standards Building a legacy: laying the foundation*, p.7, <https://impacttlimited.com/wp-content/uploads/2020/07/IMPA09-2020-Qatar-Annual-Report-v12-Digital.pdf>

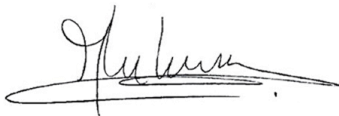
¹⁰ Letter to Amnesty International, dated 9 June 2020, available here: <https://www.amnesty.org/en/documents/mde22/2500/2020/en/>

¹¹ Amnesty International, "I have worked hard - I deserve to be paid" *Exploitation on Qatar World Cup stadium*, June 2020, <https://www.amnesty.org/en/latest/research/2020/06/exploitation-on-qatar-world-cup-stadium/>

- Takes remedial action, in cooperation with other relevant actors, if human rights abuses have occurred at any point in FIFA's supply chain, service or business relationships and publicly discloses the actions taken.
- Uses its influence, publicly and privately, to urge Qatar to fully implement and enforce its labour reforms and takes further measures to protect all workers, including those employed in service industries essential to the delivery of the tournament, from labour abuse.¹²
- Publicly commits to include human rights criteria and a human rights due diligence process in all future FIFA tournament awarding decisions, with clear policies and practices to identify, prevent, mitigate, and address any potential human rights risks arising from the tournament.

I thank you for your consideration of these important matters and assure you that Amnesty International stands ready to provide further information on any of these issues and recommendations.

Yours sincerely,



Julie Verhaar
Acting Secretary General

¹² For details on the specific measures Amnesty International recommends to Qatar, see: *Reality Check 2020: Countdown to the 2022 World Cup – Migrant workers' rights in Qatar*, November 2020, <https://www.amnesty.org/download/Documents/MDE2232972020ENGLISH.PDF>