



The Football Association
Wembley Stadium
P.O. Box 1966
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London, England

2 December 2025

Dear Chief Executive Officer Mark Bullingham and Chair Debbie Hewitt,

We are writing as a coalition of global and regional human rights organisations, trade unions, fan groups, and organisations representing migrant workers to express our deep concerns regarding the human rights risks linked to Saudi Arabia's hosting of the 2034 FIFA Men's World Cup.

We raised these concerns in 2024 ahead of Saudi Arabia's selection as host country. Nearly a year later, our concerns remain unaddressed and grave human rights violations and abuses continue. We urge your football association to call on FIFA to take immediate, concrete action to remove the taint of human rights abuses from the tournament. It can and must use its influence as world football's governing body to press the Saudi authorities to implement meaningful reforms, and national football associations have a vital role to play in this.

Here are two actions we urge you call on FIFA to carry out immediately:

1. Set up a programme of expert **stakeholder and public engagement** in the development of plans and preparations for the FIFA 2034 World Cup. Given the severe restrictions on free speech inside Saudi Arabia, this should include regular consultation with external actors, including human rights NGOs and trade unions.
2. Commission an **independent annual review of compliance with human rights standards** in preparations for the tournament, publicly reporting to the FIFA Congress.

FIFA betrayed its own human rights commitments in awarding hosting rights to Saudi Arabia, and has put many lives at risk

Saudi Arabia was confirmed as host of the tournament on 11 December 2024 despite severe and well-known risks of human rights violations and abuses to residents, migrant workers and visiting players and fans alike. There was no shortage of evidence of migrant workers being routinely exploited, residents forcibly evicted to make way for state projects, activists sentenced to decades in prison for expressing themselves peacefully, and women and LGBTQIA+ people facing legalised discrimination. It was evident that without urgent action and comprehensive reforms, the 2034 World Cup would be tarnished by repression, discrimination and exploitation on a massive scale.

In July 2015, FIFA's Executive Committee (today, the FIFA Council) publicly stated its intention to adhere to the UN Guiding Principles which have over time been integrated into FIFA's own policies. [FIFA's human rights policy](#) states that "FIFA will strive to go beyond its responsibility to respect human rights". However, despite positive steps to recognise its human rights responsibilities, huge challenges remain in implementing them.

Such policies were ignored throughout the 2034 World Cup bidding process. Without competitive bidding there was little chance of bids being rejected, regardless of human rights shortcomings. No consultation occurred with those affected, and no binding measures were established to ensure compliance with international labour standards or broader human rights reforms, leaving serious, and known, risks unaddressed.

A year on, the situation shows no improvement. The repression of Saudi citizens and residents remains deeply entrenched, with serious human rights violations and abuses persisting throughout 2025 and some alarming new trends emerging.

Developments in 2025 show that severe human rights risks related to the tournament have yet to be addressed

1) Labour rights

A major human rights concern regarding Saudi Arabia's hosting of the 2034 World Cup relates to labour rights. The country's record of widespread labour abuses, combined with the extensive infrastructure projects proposed in its bid, including the construction of at least eight new stadiums from scratch, indicates a serious risk of worker exploitation and deaths on a massive scale between now and 2034.

A number of reports published in 2025 have highlighted serious and widespread abuse of migrant workers' rights on Saudi Arabian construction sites amid a building boom fuelled by the tournament. They clearly show that without significant labour reforms, the World Cup will come about at severe human cost, and is already driving unnecessary suffering and injustice.

- [Amnesty International documented](#) labour abuses on the Riyadh Metro project, one of Saudi Arabia's flagship infrastructure projects. Migrant workers from Bangladesh, India and Nepal, who built the network promoted as the "backbone" of the capital's public transport system were forced to pay exorbitant recruitment fees, worked in dangerous heat and earned pitiful wages.

- [The Building and Wood Workers' International \(BWI\) documented](#) how although there have been some reforms to the Saudi labour laws in recent years, the abusive *kafala* (sponsorship) system has not been abolished, contrary to official claims. It continues to grant employers excessive control over foreign workers regarding their visas, exit permits and ability to change jobs. It thus actively enables exploitation, wage theft, forced labour, and lax health and safety measures. The BWI also noted the lack of labour rights even for Saudi workers.
- [Equidem's report Shattered Dreams, Hidden Trauma documented](#) widespread, systemic abuse of East African domestic and care workers (mainly from Ethiopia, Kenya, Uganda) in Saudi Arabia and the Gulf. Workers were subjected to extreme exploitation — long hours, physical/psychological violence, racial discrimination, contract-substitution, tasks far beyond what was promised, confiscation of passports, restricted movement, lack of rest or pay — conditions matching indicators of forced labour.
- [FairSquare investigated](#) the deaths of 17 Nepali workers employed in construction and other low-paid sectors on major projects in Saudi Arabia, including Neom, one of five designated World Cup host venues. From falling from roofs to exposure to extreme heat, it found there was a “critical absence” of policies or processes to determine the underlying causes of the migrants’ deaths.
- [Human Rights Watch reported](#) on avoidable workplace accidents experienced by migrant workers in Saudi Arabia, based on interviews with the families of 31 deceased migrant workers from Nepal, Bangladesh and India. It found that many such deaths are “erroneously” classified as natural and were not investigated or compensated. HRW has also reported on a series of wage theft cases including in [Aramco](#) and [Mecca](#) project sites that indicate the inadequacies of Saudi Arabia’s wage protection system despite announced reforms, even in high-profile, Public Investment Fund (PIF)-linked projects.

Meanwhile domestic workers, a particularly marginalized group numbering nearly four million, remain excluded from most of the limited protections available through recent reforms, with many facing shocking [abuse, exploitation and gender-based, racial and intersecting forms of discrimination](#).

2) Land seizures, forced evictions and displacement

Arbitrary land seizures and forced displacement, longstanding practices of Saudi Arabia’s authorities, have accelerated in recent years. Research by NGOs revealed large-scale abuses to have taken place already at two tournament venues featured in the Saudi World Cup bid, [Neom](#) and [Jeddah Central](#). This casts severe doubt on their suitability as host cities and highlights the risk of similar violations taking place elsewhere during construction of tournament infrastructure.

Similar abuses have continued throughout 2025, as documented by ALQST. In June, the last remaining residents of Al-Khuraiba, one of the villages affected by widescale evictions to make way for Neom, were [finally dislodged](#). Those in Al Muwaileh village are facing [imminent eviction](#). Meanwhile, scores of local residents forcibly dispossessed at an earlier stage of Neom’s construction, primarily members of the Huwaitat tribe, are [serving lengthy prison terms](#) for having spoken out against the violation of their rights.

3) Freedom of expression, assembly and association

Without meaningful reform in the near future, the Saudi authorities' severe restrictions on freedom of expression, assembly, and association – including the criminalisation of human rights work and journalism – will create serious human rights risks for citizens, residents, and visiting fans, players and reporters during the tournament.

Following sweeping waves of arbitrary arrests, unfair trials and lengthy prison sentences in recent years for exercising their basic rights, many prisoners remain [arbitrarily imprisoned](#) in Saudi Arabia, often subjected to cruel, inhuman, and degrading treatment. Several have continued to be actively prosecuted in the past year, including human rights defender [Mohammed al-Bejadi](#), who in October 2025 was [sentenced](#) to a further 25 years' imprisonment. Those recently targeted by the authorities have also included foreign nationals such as British citizen [Ahmed al-Doush](#) (sentenced in July 2025 to eight years in prison) and a [French national](#) currently still on trial. Both men have faced multiple violations during their detention and legal proceedings. Migrant workers who [protest](#) for their contractually owed dues as a last resort after months of non-payment continue to be detained, threatened and mistreated.

Scores of prisoners have been released since late 2024, some part-way through their sentences and some long after the expiration of their sentences, yet they have rarely been set completely free. Almost all continue to face heavy restrictions, including bans on work, social media and foreign travel that have severe human costs. [Arbitrary travel bans](#), whether imposed during judicial sentencing or applied unofficially, violate both international law and the kingdom's own domestic legislation.

4) Death penalty

Despite [pledges](#) from Saudi Arabia's Crown Prince Mohammed bin Salman to reduce use of the death penalty and reserve it for only the most serious crimes, the rate of executions in the kingdom has soared to record highs, underlining Saudi Arabia's current unsuitability to host the tournament, and exposing the serious risks for citizens, residents and visitors alike.

At least [322](#) individuals have been executed in 2025 so far (as of 30 November), with the authorities on course to exceed last year's record number of [345](#) executions. Of these 322 individuals, [220](#) have been executed solely for non-violent drug-related crimes, of whom 172 were foreign nationals from 11 Asian and African countries, including Somalia ([39](#)), Ethiopia ([34](#)), Pakistan ([30](#)), and Egypt (20). Many more are threatened with imminent execution. Rights groups have confirmed a [pattern of abuses](#) suffered by such individuals in the course of their arrest, detention and trial.

[38](#) executions in 2025 have been for offences described as "terrorism"-related, which according to the vague definition in Saudi law can include a wide range of non-lethal acts, exemplified by the sudden [execution](#) in June of Saudi journalist Turki al-Jasser. Meanwhile, the [executions](#) of Saudi youths Jalal Labbad on 21 August 2025 and Abdullah al-Derazi on 20 October 2025, convicted of crimes allegedly committed when they were children, destroy the authorities' claims to have ended this practice, and raises grave fears for other child offenders at [imminent risk of execution](#). All of these executions violate international law,

which bans the death penalty for offences committed by children and for crimes falling short of “the most serious”.

5) Discrimination based on gender, religion and sexual orientation

Many sections of society in Saudi Arabia face discrimination on the basis of their identity, including gender, religion and sexual orientation. In the context of the World Cup tournament there will be heightened risks for Saudi citizens and residents as well as foreign visitors, undermining FIFA’s declared aim to create a “discrimination-free environment”.

While some restrictions on women have been lifted in recent years, women in Saudi Arabia still face systemic discrimination. The 2022 [Personal Status Law](#), presented as a major reform, actually codified much of the oppressive male guardianship system. For example, women must still get their guardian’s consent to marry and must “obey” their husbands. Meanwhile, women human rights defenders and activists continue to face arrest and prosecution. Fitness instructor and women’s rights defender Manahel al-Otaibi, for example, was [re-sentenced](#) in August 2025 to five years’ imprisonment - partly for posting photos of herself at the mall without an abaya (a traditional loose-fitting long-sleeved robe) on social media.

Saudi Arabia’s authorities also [systematically discriminate](#) against members of religious minorities, notably Shi’a Muslims, who are concentrated in the kingdom’s Eastern Province. Al Khobar is set to become another of the World Cup host cities. This discrimination is seen in education, employment and the criminal justice system, with arbitrary detentions and the death penalty applied as a political weapon against Saudi Shi’as.

LGBTQIA+ people in Saudi Arabia suffer acute discrimination and cannot express their sexual orientation or gender identity without risk of criminalisation. Although the website of the Saudi Tourism Authority states that the kingdom [welcomes](#) LGBTQIA+ guests, no steps have been taken to recognise LGBTQIA+ people as having basic rights such as freedom from discrimination, nor is there any indication that the authorities are willing to do so.

6) Lack of grievance mechanisms and access to justice

An overriding human rights concern is the lack of access to justice or effective, independent grievance mechanisms in Saudi Arabia. This seriously limits the possibility of remedy in the frequent event of violations taking place, undermining a key FIFA policy requirement of host countries.

Saudi Arabia’s vast migrant workforce continues to [suffer major barriers](#) to reclaiming unpaid wages when employers fail to meet their contractual obligations. Domestic workers continue to face significant challenges accessing justice. Despite the introduction of new regulations and initiatives including a process for filing disputes electronically with the Ministry of Human Resources and Social Development, the lack of legal support coupled with domestic workers’ extreme isolation, their heavy dependence on their employers, and the ongoing widespread practices of phone and passport confiscation represent major barriers to accessing justice.

Saudi Arabia has no formal constitution guaranteeing fundamental rights and, in the absence of a criminal code, legal interpretation is left to judges' discretion. Meanwhile, the authorities use vaguely formulated and [restrictive laws](#) to stifle basic rights: the Counter-Terrorism Law categorises a wide array of non-violent acts as "terrorism"; the Anti-Cybercrime Law restricts free speech online; and the Law on Associations and Foundations tightly controls the formation of NGOs.

The vagueness of Saudi Arabia's legal framework is compounded by a criminal justice system [notorious for its abuses](#). Judicial proceedings routinely fall short of international standards and fair trial guarantees. Common violations include the denial of access to lawyers and court documents, undue delays, reliance on torture-tainted confessions, and the holding of trials in secret. Such fundamental flaws commonly produce miscarriages of justice, and there are no independent or effective domestic grievance mechanisms to challenge these.

Research and analysis by MENA Rights Group, with input from ALQST and the European Saudi Organisation for Human Rights, has determined the Saudi Human Rights Commission, established in 2005 with a mandate to address human rights complaints, in fact acts as a [tool for whitewashing](#) the kingdom's poor human rights record and covering up gross abuses, according to MENA Rights Group.

Recommendations

The 2034 World Cup was awarded to Saudi Arabia without adequate safeguards to address the severe and known risks to workers, residents and other groups, in clear disregard of FIFA's own human rights commitments. It is all the more essential, therefore, that the tournament's hosting is now tied to far more specific, stringent and comprehensive human rights strategies, developed through meaningful stakeholder consultation.

Such measures are crucial to protecting lives and advancing fundamental freedoms in host country Saudi Arabia over the next decade. Not to take such measures would put many lives at risk, and place on FIFA a heavy responsibility for many of the human rights abuses that will otherwise follow, as well as national football associations who voted in favour of the bid.

As preliminary measures, we urge you to call on FIFA to:

- **ensure expert stakeholder and public engagement in the development and oversight of plans, preparations and risk mitigation for the tournament.** This essential and overarching component has so far been missing from the FIFA 2034 Men's World Cup process. Given the severe restrictions on fundamental rights and freedoms inside Saudi Arabia, this should include regular consultation with external actors, including human rights NGOs and trade unions;
- commission an **independent annual review of compliance with human rights standards in preparations for the 2034 tournament** (and other World Cups), publicly reporting to the FIFA Congress.

- **exert urgent pressure on Saudi Arabia's authorities** to carry out the vital measures, listed in the annex to this letter, necessary **to satisfy FIFA's requirements of a FIFA tournament host country.**

In particular, FIFA must insist that the Saudi authorities:

- **implement pressing human rights and labour reforms, including adherence to international labour standards for all workers in the country**, and ensure that workers receive full remedy for any violations;
- grant external stakeholders, including human rights NGOs, trade unions and UN experts, **access to the country to monitor abuses associated with the tournament and implementation of reforms.**

We look forward to your prompt response (ideally by 11 December). Please note we may publish your response in full or in part, at our discretion. Please note we may publish your response in full or in part, at our discretion. We are also writing to FIFA and other national football associations and plan to publish about our letters, alongside any responses received, on 11 December, to mark the one-year anniversary of Saudi Arabia's selection as host for the 2034 World Cup.

Yours sincerely,

- ALQST for Human Rights
- Amnesty International
- Building and Wood Workers' International (BWI)
- DAWN
- Equidem
- European Saudi Organisation for Human Rights (ESOHR)
- FairSquare
- Football Supporters Europe
- Gulf Centre for Human Rights (GCHR)
- Human Rights Watch
- International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA World)
- Law and Policy Forum for Social Justice (LAPSOJ), Nepal
- MENA Rights Group
- Sport & Rights Alliance
- Transparency International

Annex: Recommendations for Saudi Arabia's authorities to meet FIFA's host country requirements

HUMAN RIGHTS LAWS AND STANDARDS

- Ratify without reservation outstanding international human rights treaties including the ICCPR and its Optional Protocols, the ICESCR and its Optional Protocol and the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.
- Ratify ILO Conventions 87 and 98 related to freedom of association and collective bargaining, and Conventions 155 and 187 related to health and safety.
- Withdraw reservations that are incompatible with the object and purpose of ratified treaties, including reservations on 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.
- Develop national due diligence legislation in line with international business and human rights standards to ensure that all companies are required to assess and address human rights risks across the full value chain.

LABOUR RIGHTS

- Reform labour laws and policy to ensure compliance with international human rights law and standards, in partnership with the ILO and the global unions.
- Introduce legislation to fully abolish the kafala system by:
 - i) Removing all requirements for foreign nationals to obtain the permission of their current employer before moving jobs.
 - ii) Removing all requirements for foreign nationals to notify or obtain the permission of their current employer and the government in order to leave the country.
 - iii) Decriminalising “absconding” and refraining from detaining migrant workers for having “run away” and, in the meantime, penalising employers who file such cases as a retaliatory measure.
 - iv) Taking steps to further reduce migrant workers' dependence on their employers, including for their entry into, exit from and their legal presence in the country.
 - Ensure both Saudi and foreign nationals in all occupations are covered by a non-discriminatory national minimum wage that guarantees a living wage and is periodically reviewed.
 - Ensure that wage protection measures in place are fully enforced to prevent widespread wage delays. Remove the severe restrictions in the Expatriate Worker Wage Insurance Service that hinder wage theft victims from being eligible for and accessing their contractually owed dues in full.
 - Investigate and prosecute companies that violate the law requiring employers to cover all costs associated with a migrant workers' recruitment and put in place reimbursement mechanisms for workers who have paid recruitment fees.
 - Remove restrictions on freedom of association and collective bargaining, and respect the right of all workers, including foreign nationals, to form and join trade unions.

- Put in place comprehensive measures to protect migrant workers' health and safety, including in their accommodation and workplace, and ensure that they can access health care without discrimination.
- Ensure appropriate and evidence-based heat protection for outdoor workers, including by enforcing guidelines that impose work stoppages during extreme heat conditions as determined by the Wet Bulb Global Temperature index instead of calendar-based midday work bans. Ensure additional protections including access to cold water, shaded rest areas and proper personal protective equipment (PPE).
- Ensure there are sufficient and well-trained labour inspectors, at least in line with ILO benchmarks.
- Conduct regular and unannounced inspections of World Cup-related worksites and labour accommodation to ensure they are in line with national and international law and standards.
- Publish extensive, disaggregated data related to the deaths of migrant workers, and commit to properly investigating underlying causes of migrant workers' deaths with a view to strengthening health and safety protections. Such data should be disaggregated by race, ethnicity, national origin, gender and other characteristics to ensure compliance with international obligations under ICERD. Ensure that all deaths, regardless of time, place and cause, are adequately compensated such as via life insurance schemes.
- Provide effective grievance mechanisms to ensure remedy is provided to all migrant workers who are subjected to labour abuse and exploitation while working on projects related to the World Cup.
- Take comprehensive measures to address systemic racism and racial and intersectional discrimination embedded in migration policies and prevent racial discrimination against migrant workers.

HOUSING AND LAND

- Conduct and publish independent assessments on the site of each proposed World Cup stadium and related infrastructure and guarantee that these developments do not infringe the right to adequate housing of local populations.
- End the use of forced evictions and practices of intimidation and violence against local populations including for people inhabiting sites intended for World Cup-connected development.
- Ensure that any evictions, and compensation and resettlement measures, comply with international human rights law and standards, including the UN Basic Principles and Guidelines on Development-Based Evictions and Displacement. This should include those forcibly displaced from the site of NEOM.

FREEDOM OF EXPRESSION, ASSOCIATION AND ASSEMBLY

- Reform national legislation to expressly guarantee the right to freedom of expression, association and peaceful assembly, in line with international human rights law.
- Amend or repeal legislation that is used to restrict freedom of expression, including the Law of Combating Crimes of Terrorism and its Financing, Anti-Cybercrime Law, Anti-Harassment Law and Law of Protection from Abuse. Amend the draft penal code to bring it into line with international law.

- Permit the establishment and operation of independent Saudi Arabian media, civil society organisations and human rights monitors, and grant access to World Cup construction and development sites.
- Refrain from harassing, prosecuting and imposing excessive and disproportionate penalties against anyone, including Saudi Arabian and international human rights defenders, who exercise their freedom of expression and right of peaceful assembly.
- Immediately release all prisoners held solely for expressing their rights to freedom of expression, assembly and association and immediately lift all remaining restrictions, especially travel bans, imposed on those who have been conditionally released from prison for exercising these rights.
- Respect the right to freedom of expression within stadiums, provided that the expression does not constitute prohibited speech under international law.
- Refrain from imposing blanket bans or other unnecessary or disproportionate restrictions against certain forms of expression such as flags, banners or chants. Where any restriction is to be imposed, it should be clearly prescribed, and must be non-discriminatory, necessary, proportionate and aimed at protecting a specified legitimate interest.

CRIMINAL JUSTICE AND USE OF THE DEATH PENALTY

- Impose an immediate moratorium on death sentences and executions, with a view to abolishing the use of the death penalty before the tournament.
- Ensure that those arrested and detained are not subjected to torture or cruel, inhuman and degrading treatment or punishment. Where allegations of torture or ill-treatment have been made, prompt, independent and impartial, transparent, effective and thorough investigations must be initiated and those found culpable prosecuted in a fair trial.

DISCRIMINATION

- Review, amend or repeal laws that discriminate against women, including the Personal Status Law, to bring them in line with international human rights standards.
- Repeal laws that criminalise consensual sexual relationships between adults, including same-sex relationships and sex outside marriage and zina, as well as any other laws that discriminate against individuals on grounds of their gender, gender identity, gender expression, sexual orientation and sex characteristics.
- Repeal anti-Shi'a legislation and introduce legal provisions to guarantee the human rights of Saudi Arabia's Shi'a population, including their freedom of religion and expression.
- Enact legislation explicitly prohibiting direct and indirect discrimination in line with Article 1 of ICERD.
- Tackle systemic racism, sexism and racial, gender and intersectional discrimination faced by migrant workers, religious minorities, and racialised groups, and ensure their human rights without any discrimination.
- Firmly condemn discriminatory, sexist, homophobic and racist rhetoric, and reiterate the right of racialised people and people of diverse genders and sexualities, including athletes and all fans, to be free from discrimination.
- Promptly, effectively and impartially investigate any instances of discrimination on the grounds of race, gender, gender identity, gender expression, sexual orientation or

sex characteristics, and physical violence against racialised people and people of diverse genders and sexualities. Any investigations must establish any discriminatory motive associated with those attacks.

FAN SAFETY AND POLICING

- Provide comprehensive training, including through dialogue with support associations of participating teams, to all police officers involved in the tournament on engagement with fans, nonviolent de-escalation and cultural sensitivity towards foreign fans.
- Ensure that security forces are properly trained, in accordance with the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, to work with football crowds and respond effectively to incidents without resorting to excessive force.
- Ensure police are properly trained on international standards on the use of force and firearms, and on the appropriate use of specific less-lethal weapons such as teargas and kinetic impact projectiles.
- Explicitly prohibit the use of rubber bullets to disperse gatherings due to their inaccuracy and the high risk of serious injury associated with their use.
- Take steps to prevent racial discrimination and dismantle racial and discriminatory policing.
- Ensure all incidents involving the use of force by the police are subjected to prompt, independent, impartial, effective and thorough investigations. Where violations are found to have been committed, ensure that victims have access to effective remedies and that individual police officers are criminally prosecuted, including by incorporating independent mechanisms for investigating policing.

PRIVACY AND SURVEILLANCE

- Enforce a ban on the sale, transfer, export or use of highly invasive spyware, and enforce a moratorium on the purchase, sale, transfer, export and use of all spyware until a human rights regulatory framework that governs surveillance in line with international human rights standards is implemented.
- Ban the use, development, production, sale and export of remote biometric or facial recognition technology for mass surveillance