

# An Open Field for Violations: Saudi Arabia's 2034 FIFA World Cup bid



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# Introduction

Saudi Arabia's bid to host the 2034 FIFA men's World Cup fails on many counts to meet the sporting body's human rights requirements, and must be rejected if not beefed up with binding agreements to prevent rights violations. Serious shortcomings in the Saudi proposals leave the field open to direct risk of violations of labour and basic civil rights, as well as the broader risk of legitimising the Saudi authorities' repressive rule.

Detailed research conducted by ALQST in the run-up to the bidding process revealed abuses already taking place in two of the main tournament venues, Neom and Jeddah Central, and our ongoing monitoring of violations in the country provides further damning evidence that the Saudi kingdom is not fit to host this globally significant event.

FIFA is due to take a final decision on awarding hosting rights on 11 December 2024, with Saudi Arabia the sole bidder for the 2034 tournament. Ahead of the vote, on 29 November, FIFA published its own [evaluation](#) of the bid. Mirroring the same fundamental flaws found in the bid itself, the FIFA report substantially minimises the potential human rights risks associated with the tournament, giving Saudi Arabia a "medium" human rights risk rating overall and determining that the bid "qualifies" for consideration, effectively nodding it through unchallenged.

The bid documents submitted by Riyadh make some valid arguments for Saudi Arabia to host the FIFA World Cup, including the youth of its population (63% are under 30) and the sport's massive popularity in the kingdom. Saudi citizens and residents undoubtedly deserve the honour and opportunity of hosting the 2034 tournament to showcase their country, their culture and love of football to the world. But these considerations are heavily outweighed by other factors:

- Serious risks of human rights violations are either inadequately addressed or totally ignored in the bid documentation.
- Awarding the event to Saudi Arabia on this basis would violate FIFA's own policies and procedures.
- Allowing Saudi Arabia's harshly repressive rulers to host the FIFA World Cup would lend them a spurious legitimacy and licence to double down on their notorious abuses.
- Both the Saudi Arabian Football Federation and FIFA itself have barely acknowledged the requirement for stakeholder engagement in the bidding process: the Saudi public have not had their say.

# The FIFA World Cup bidding process and bidding documents

On 4 October 2023, the FIFA Council determined that only member associations from Asia and Oceania would be eligible to host the 2034 World Cup. Saudi Arabia quickly became the sole contender after Australia pulled out of the race. The Saudi Arabian Football Federation (SAFF) formally submitted its bid to FIFA on 29 July 2024 for evaluation during the third quarter of the year and a final decision on 11 December 2024. Among the selection criteria that the FIFA Congress “may consider” are “sustainability and human rights, in particular with respect to following sustainable event management principles and respecting internationally recognised human rights and environmental principles”.

The bid is made up of Saudi Arabia’s [Bid Book](#) and accompanying [Human Rights Strategy](#) for the World Cup. FIFA requires bidding countries to provide such a strategy to outline how they will address human rights risks identified by an “[Independent Context Assessment](#)”, in this case commissioned by SAFF from the Riyadh-based law firm AS&H Clifford Chance.

## The Saudi Bid Book

The [Bid Book](#) is an attractive and professionally produced 245-page document setting out Saudi Arabia’s vision and detailed proposals for hosting the FIFA 2034 World Cup. The bulk of the document, following a FIFA template, describes existing and projected infrastructure and services. The final chapter, of 18 pages, addresses sustainability and human rights, in largely abstract terms. The section on human rights explicitly limits itself to a focus on only “the most prominent topics connected with preparing and hosting mega sporting events”, which it identifies as labour rights, diversity and anti-discrimination, accessibility, safeguarding and security.

This limited focus already falls short of [FIFA’s Human Rights Policy](#). The policy commits international football’s governing body to respecting human rights in accordance with the UN Guiding Principles on Business and Human



Rights (UNGP) and striving to promote their protection across its activities, specifically including bidding for and hosting events. The commitment embraces all internationally recognised human rights, including those contained in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESC). Saudi Arabia has not even joined the ICCPR or ICESC.

The Bid Book repeatedly gives sweeping assurances of the Saudi kingdom's commitment to human rights, but in successive cycles of Saudi Arabia's Universal Periodic Review (UPR) at the UN Human Rights Council, member states and expert NGOs have challenged most of these claims and highlighted persistent gross violations of human rights by the Saudi authorities.

The FIFA bidding process has allowed all of these factors to be airbrushed out of the picture.

Furthermore, the FIFA policy identifies the "salient human rights risks" to be considered as including labour rights, land acquisition and housing rights, discrimination (with particular emphasis on gender issues), security and players' rights. ALQST's exclusive in-depth research has uncovered egregious human rights violations committed in connection with the acquisition of land for [Neom](#) and [Jeddah Central](#), but this area of concern has also been excluded from consideration in the Saudi Bid Book.

## The "Independent Context Assessment"

The [Independent Context Assessment](#) is a 39-page report prepared by Riyadh-based law firm AS&H Clifford Chance, part of the global partnership of London-based law firm Clifford Chance. It was commissioned by the Saudi Arabian Football Federation (SAFF), described in the document as "a private independent organisation that is the football governing body of the Kingdom and a member association of FIFA". In reality, no national body is genuinely independent from the highly centralised and autocratic rule of King Salman and his son Mohammed bin Salman.

The Assessment acknowledges many of its limitations from the outset, offering the following discreet disclaimer:



*The defined scope of this Independent Context Assessment may differ from that of other independent context assessments in relation to other MSEs [mega-sporting events], each of which has been unique to each host country. As such, our assessment addressed the human rights and labour rights topics set forth by the scope of the Independent Context Assessment that we were asked to undertake determined by SAFF in agreement with FIFA.*

In other words, its narrow scope, time frame and terms of reference were imposed on it. It cannot therefore be seen as giving a genuinely independent account of the human rights risks involved in the Saudi World Cup bid.

First, the report was “not intended to review the full human rights context in the Kingdom” but to provide “an assessment of the Kingdom’s alignment with 22 human rights and labour rights instruments [international covenants and agreements] that were specifically selected by SAFF and FIFA”. This excluded instruments that Saudi Arabia has not ratified, such as the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR).

The report notes that Saudi Arabia has also entered reservations with respect to three of the instruments addressed in the assessment – the UN Convention on the Rights of the Child (CRC), the UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) and the International Convention on the Elimination of all Forms of Racial Discrimination (ICERD) – where they potentially conflict with the kingdom’s interpretation of Shariah law.

Second, in terms of methodology, the assessment significantly “did not involve engagement with external stakeholder/rightsholders” because, it says, of the time frame – six weeks – set for drawing up the report. As a result, it was based only on desk research and engagement with a number of government bodies: the Saudi Human Rights Commission, the Authority for the Care of People with Disabilities, the Ministry of Human Resources and Social Development, the Ministry of Interior, and the Ministry of Sport, all facilitated by SAFF. AS&H Clifford Chance also blames FIFA’s prescribed page limit for the lack of detail in its analysis. Third, by organising its analysis under five topics identified by SAFF, namely labour rights, diversity and anti-discrimination, accessibility, safeguarding, and security and human rights, the report ignores many other priority areas, including forced displacement, freedom of expression (barely mentioned) and use of the death penalty.

The Assessment nevertheless raises some significant concerns and makes recommendations to address them, while also expressing reservations about potentially positive legal reforms in Saudi Arabia in relation to labour rights, the rights of women and children, the rights of people with disabilities and measures to combat human trafficking. The report repeatedly notes that “given the recency of these developments... attention should be given to the legal practice, assurance of effectiveness and the persistence of any gaps”.

On 7 October 2024, 11 organisations, including FairSquare, Amnesty International, Human Rights Watch and ALQST, [wrote](#) to Clifford Chance, setting out their concerns about the assessment and inviting the authors to publish an updated report. The law firm did not respond substantively, merely sharing a link to their [policies](#).

## The Saudi Arabian Football Federation's "Human Rights Strategy" in connection with the 2034 FIFA World Cup

FIFA requires hosting candidates to submit a human rights strategy addressing the human rights risks identified in their "independent human rights context assessment" and their plans to prevent and mitigate these risks. They are also required to make explicit public commitments to human rights.

SAFF's 28-page [Human Rights Strategy](#) is thus based on the limited findings of the severely flawed Independent Context Assessment and covers the same five topics of labour rights, diversity and anti-discrimination, accessibility, safeguarding, and security and human rights. After summarising the main areas for improvement identified by the Assessment, the main section of the Strategy outlines how SAFF proposes to prevent and mitigate the identified human rights risks. It presents an uncritically positive view of measures that the authorities claim to have already put in place or committed to enact in future, but downplays or ignores outright several important points raised in the Assessment. There is only one vague mention of "bridging gaps" in Saudi Arabia's recent legal reforms, and nothing at all on concerns about its reservations in regard to international conventions.

In addition to the five human rights and labour rights topics covered in the Assessment, the Strategy introduces "additional considerations for human rights protections", which include "efforts to prevent and prohibit forced evictions and displacement of local communities" (a brazen attempt to cover up a series of egregious abuses to date; see section 2 below on Land seizures, forced evictions and displacement) and similarly pledges to "empower civil society" (see section 3 on Freedom of expression, assembly and association). Finally, the Strategy covers mechanisms for addressing grievances and plans for stakeholder engagement, on which we also comment in sections 6 and 7 below.





## FIFA Bid Evaluation Report

As part of the selection process for the 2034 World Cup, on 29 November FIFA published its [bid evaluation report](#), along with another for the 2030 tournament. The bulk of the 110-page document presents an evaluation of Saudi Arabia's bid both from a technical perspective and in terms of risk assessment.

In sum, the evaluation serves to substantially minimise the potential human rights risks associated with the tournament, giving Saudi Arabia a “medium” human rights risk rating overall. It uncritically repeats much of the information supplied in the bidding documents, and thus embeds many of the same fundamental flaws. It notes the “substantial concrete commitments” made in the bid, and the reform agenda allegedly underway in the context of Saudi Arabia's Vision 2030, yet fails to specify the nature of the risks involved or the scale of reform required, including in relation to labour rights, freedom of expression and discrimination. Its only cautionary note, giving rise to the less than perfect risk rating, is the “significant effort and time” required for the implementation of reforms, but even this problem is said to be mitigated by the 10-year time horizon. Other key concerns, such as forced evictions and displacement, are not covered at all, and neither are grave rights abuses like use of the death penalty.

Referring to a 2016 academic [report](#), FIFA states that its general approach has been informed by a recommendation to address only “human rights risks connected with a tournament”, rather than the “general human rights context”. It does, nevertheless, refer to the general human rights context, but by making a vague and unsubstantiated argument for the event's potential to contribute to “positive human rights outcomes” that go “beyond the scope of the tournament itself” rather than critically evaluating the current situation.

Meanwhile, it repeats the authorities' claim that “stakeholders from across the Kingdom were engaged” in the bidding process, failing to acknowledge – as even the “independent context assessment” did in relation to its own work – the lack of engagement with external stakeholders including human rights NGOs. The evaluation concludes by determining that the bid “qualifies” for consideration by the FIFA Council and Congress ahead of the 11 December selection, effectively nodding through the heavily flawed bid.



# Key human rights concerns

## 1. Labour rights

**A major human rights concern over Saudi Arabia's hosting and staging of the tournament relates to labour rights, with prevailing labour rights abuses in the country, alongside the extensive infrastructure plans outlined in the bid, creating serious risks of labour exploitation and worker deaths on a massive scale.**

The Saudi bid proposes 15 state-of-the-art stadiums across five host cities, which involves refurbishing four existing stadiums, completing three already under construction, and building eight entirely from scratch, including a 92,000 capacity stadium in Riyadh and a stadium in Neom, itself a whole new megacity in the early stages of construction. Further extensive construction is also proposed, including the refurbishment and building of more than 130 team and referee hotels and training sites, with integrated transport and security facilities. These plans, like the bid itself, play a critical part in Crown Prince Mohammed bin Salman's "Vision 2030" economic programme, which has seen huge investments in the tourism, entertainment and sports sectors.

Construction on this scale will require hundreds of thousands of migrant workers, who make up approximately 80% of the private labour force in Saudi Arabia. They face systematic exploitation and abuse under the abusive *kafala*, or sponsorship, system that ties workers to their sponsors for their residence and work permits. There have been limited reforms to the labour laws in recent years, including the Labour Reform Initiative of 2021 that allows migrant workers, in certain narrow circumstances, to change jobs or leave the country without obtaining their employer's (or sponsor's) consent, but the *kafala* system as a whole remains largely intact and continues to present clear risks of exploitation.

Under such conditions workers, particularly low-paid workers recruited from some of the world's poorest countries, are vulnerable to widespread abuse including contract substitution, exorbitant recruitment fees, non-payment of wages, confiscation of passports by employers, and forced labour. Migrant workers in Saudi Arabia's construction industry, who will be building the World Cup infrastructure, typically endure poor working conditions, working long hours outdoors in the country's harsh climate and often suffering from heat stress and other health problems. When workers have lost their lives in the kingdom, their

deaths have not been properly investigated, and their grieving families have not been adequately compensated, as in the case of [Abdul Wali Skandar Khan](#), a 25-year-old Pakistani civil engineer and father of two who died in December 2023 while working on a Neom construction site.



**Abdul Wali Skandar Khan**

As well as the more obvious risks facing construction workers in the context of the World Cup, there are also concerns for domestic workers such as housekeepers, cleaners and private drivers, who are among the most vulnerable categories of migrant workers in Saudi Arabia. A new law for domestic workers that came into effect on 21 September 2024 ostensibly introduced several important protections, but left other concerns unaddressed. As with the 2021 Labour Reform Initiative, the true impact of such legislative changes depends on the quality of implementation and enforcement, which historically have been poor.

Recognising that its operations are labour-intensive, FIFA vows in its Human Rights Policy to “uphold and promote the highest international labour standards” and to ensure “respect for labour standards by its business partners and in the various activities directly linked to its operations”. Its bidding criteria require these labour standards to be implemented by bidders.

SAFF’s Human Rights Strategy for the World Cup claims labour rights are a “fundamental aspect of the Kingdom’s protected rights”, and highlights recent government reforms making “significant improvements”. However, it fails to address several of the concerns raised in the Independent Context Assessment, including employers still being responsible for renewing employees’ work permits and, crucially, the need for assurance of the effectiveness of the reforms “given their recency”.

The Strategy commits SAFF to “reviewing the key findings identified in the independent assessment and proposing necessary measures to address them”, which strongly suggests that it had not yet done so at the time of the bid’s submission. It says it “will develop” a supply chain sourcing code, mandatory welfare standards for workers and “a framework” with government, law enforcement and other stakeholders “to ensure proper implementation and monitoring of workers’ welfare standards (e.g. regular inspections...)”. It also proposes training for judges and law enforcement officers and awareness campaigns for construction companies and workers, but what is fundamentally required, and lacking, is for the authorities to fully dismantle the *kafala* system and bring Saudi Arabia’s labour legislation into line with international standards.

## 2. Land seizures, forced evictions and displacement

**Arbitrary land seizures and forced displacement are longstanding practices of Saudi Arabia's authorities and have accelerated in recent years. Research by ALQST reveals grave 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 and draws attention to the risk of similar violations taking place elsewhere during construction of the proposed infrastructure.**

### Neom

The Saudi Bid Book states that one of the five host cities for the World Cup will be Neom, a futuristic project on Saudi Arabia's Red Sea coast in the province of Tabuk, and the biggest of several giga-projects being developed as part of Vision 2030. It includes a new stadium and related infrastructure situated in "The Line", the proposed 170 km-long, 200 metre-wide linear city forming the centrepiece of Neom megacity. Little of the project or its infrastructure has yet been constructed.

While Neom's promotional videos and spokespeople have described the area earmarked for the project as "virgin land", it has in fact been inhabited for centuries, primarily by the Huwaitat tribe's approximately 20,000 members. First-hand [research](#) by ALQST revealed that in order to proceed with the construction of Neom, the Saudi authorities committed a wide range of serious human rights abuses even before the project was announced, including illegally dispossessing the region's inhabitants of their properties and forcibly evicting them from their homes. Once forcibly evicted, many were denied adequate compensation or alternative housing, and were forced to buy into poorer areas of Tabuk.

In the process, one man, Abdul Rahim al-Huwaiti, was shot dead by security forces in April 2020. Scores of other Huwaitis peacefully resisting the tribe's forcible displacement and speaking out against the injustices inflicted on them were arrested and tried under the kingdom's Counter-Terrorism Law; at least 15 so far have been given prison sentences ranging from 15 to 50 years, and five sentenced to death.



*Abdul Rahim al-Huwaiti*

## Jeddah Central

The \$20 billion Jeddah Central development aims to remodel several neighbourhoods in the historic port city of Jeddah and construct, among other things, a museum, an opera house and the sports stadium featured in the World Cup bid. Jeddah is another of the five host cities.

Large-scale evictions and demolitions in relation to the Jeddah Central project began in October 2021 and continued until at least May 2022, affecting more than half a million people. The authorities claimed that the purpose of the widescale demolition of homes and businesses was to allow the redevelopment of run-down urban areas plagued by crime and lawlessness, and to improve the quality of life for citizens. However, [research](#) carried out by ALQST, as well as findings from partner NGOs, painted a very different picture, showing their devastating impact and grave violations of international human rights standards. Contrary to the claims of the authorities, many of the residents received no advance notice of the demolitions, and many were forced out under threat of being sent to prison if the eviction orders were not carried out, regardless of their having proof of ownership of their properties.

Although the Saudi authorities launched a compensation scheme in January 2022, many of the displaced were not given clear information on how to claim for compensation, or given any money or assistance in obtaining alternative accommodation. The compensation scheme in fact applied only to property-owning Saudi nationals, excluding and discriminating against the many foreign nationals living in the area. Others reported difficulty in finding alternative accommodation and schools for their children, as well as higher rents and living costs.

FIFA's Human Rights Policy refers specifically to land acquisition and housing rights, undertaking to promote "the respect of international human rights standards where land acquisition involves expropriations and in particular where people are resettled in the process". Yet the issue is not addressed at all in Saudi Arabia's Bid Book or the Independent Context Assessment, a glaring omission. Meanwhile, SAFF's Human Rights Strategy makes only a token reference to it, brazenly promising to "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 enhancements". This proposition flies in the face of the reality outlined above and, like the Saudi government [response to UN concerns](#) over Neom-related abuses, shows the Saudi authorities abjectly failing to recognise the scale of violations that have already taken place, the risk of such violations being repeated, and the measures needed to prevent this.

### 3. Freedom of expression, assembly and association

**The Saudi authorities' harsh restrictions and sweeping crackdowns on the fundamental freedoms of expression, assembly and association, including the criminalisation of human rights activity and journalistic work, pose an array of immediate human rights risks for Saudi citizens and residents as well as visiting fans and journalists during the staging of the tournament. The lack of these freedoms also accentuates the risks in relation to other thematic areas, including labour rights (see section 1), access to justice (section 6) and stakeholder engagement (section 7).**

Saudi Arabia has no formal constitution, only a Basic Law of Governance that fails to solidify fundamental rights and freedoms. Legal interpretation is largely left to the discretion of individual judges. Freedom of expression, peaceful assembly and association is non-existent, suppressed by a repressive legal framework that falls far short of international standards.

Since [Mohammed bin Salman](#) came to power in 2017, the authorities have carried out sweeping waves of [arbitrary arrests](#) against human rights activists, journalists and writers, advocates of reform, and indeed many ordinary citizens whose opinions fail to follow the government line. Even [football fans](#) have been targeted for exercising the right of free speech in stadiums.

Peaceful dissidents, activists and private individuals expressing even mildly critical or controversial views are routinely tried and sentenced under Saudi Arabia's draconian Counter-Terrorism and Anti-Cybercrime Laws. In the past few years courts have issued extraordinarily long prison sentences and even death sentences for people peacefully exercising the right of freedom of expression, especially online. Prisoners of conscience released after completion of their sentences routinely face restrictions that include arbitrary bans on travel, work and social media activity. In addition to creating a climate of fear, the result of this sustained repression has been to erase all independent civil society including human rights organisations and independent media, eroding opportunities for public scrutiny and accountability.



*Humanitarian aid worker Abdulrahman al-Sadhan is serving a 20-year prison sentence, to be followed by a travel ban of the same length, for peaceful satirical posts he published on X (formerly Twitter).*



*Leading women's rights activist Loujain al-Hathloul has continued to face arbitrary restrictions since her release from prison in February 2021, including a travel ban.*

FIFA's Human Rights Policy commits it to engaging with host countries to minimise any adverse impacts on fundamental human rights, such as freedom of movement, expression and assembly, and Article 11 calls for adequate measures to protect the freedom of human rights defenders and media representatives at risk. Yet the restrictions on these fundamental freedoms in Saudi Arabia's repressive legal framework, notably the Anti-Cybercrime and Counter-Terrorism Laws, are ignored in the Independent Context Assessment, and the rights of free expression, association and assembly are only referred to once in passing. SAFF's Human Rights Strategy makes the same glaring omissions, apart from "aiming" to "make every effort to present a competition that adheres to our commitments, particularly outlined in FIFA Hosting Requirements" (which include press freedom) and promising to develop, in collaboration with the government, "a framework to empower the civil society". In short, the Strategy fails to offer any of the concrete measures needed to protect these fundamental rights, including the unconditional release of prisoners of conscience, revision of repressive laws to bring them into conformity with international standards, and allowing human rights organisations to operate in the country.

## 4. Discrimination

**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.**

The oppressive male guardianship system that treats adult women as minors continues to blight the lives of women in Saudi Arabia, despite the well-publicised removal of certain restrictions in recent years. The Personal Status (or Family) Law of 2022 was touted by the authorities as a major progressive reform, but has proved to affirm and codify many of the discriminatory features of the system relating to marriage, divorce, child custody and inheritance. It also contains legal loopholes that continue to allow discretionary interpretation. Crucially, “disobedience” by a woman towards her male guardian (father, husband, brother or even son) remains a crime, leaving her subject to the dictates of her guardian and vulnerable to domestic violence. Young women and girls accused of such “disobedience” are placed in [Dar al-Re'aya](#) (literally “care homes”), detention facilities notorious for their ill-treatment of inmates.

Meanwhile, women human rights defenders, women’s rights activists, and even private individuals simply expressing support for women’s rights continue to be targeted by the authorities for arrest and prosecution, and those released from prison have often been placed under travel bans.



*Fitness instructor Manahel al-Otaibi was sentenced to 11 years in prison because of her choice of clothing and support for women’s rights. In prison, she’s faced repeated physical and psychological abuse.*

Lesbian, gay, bisexual and transgender (LGBT) 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 LGBT guests, no steps have been taken to recognise LGBT people as having basic rights such as freedom from discrimination, nor is there any indication that the authorities



are willing to do so. LGBT football fans and spectators at the 2034 World Cup, if held in Saudi Arabia, cannot be confident that they will not face extreme risk of violation of their human rights.

Saudi Arabia's authorities have also systematically discriminated against members of Muslim religious minorities, notably Shi'a Muslims, who are concentrated in the Eastern Province of the country, where 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 (see section 5) used disproportionately as a political weapon against Saudi Shias.

An ALQST [survey](#) of Saudi nationals in exile, a growing demographic over the past decade, found that respondents left Saudi Arabia for a variety of reasons but frequently mentioned a lack of political freedom (63%), a lack of religious freedom (49%), feelings of vulnerability because of sexual orientation (20%), and domestic violence (25%).

FIFA's Human Rights Policy makes overt references to discrimination and striving to create a "discrimination-free environment", and places particular emphasis on promoting gender equality. Even the Independent Context Assessment, despite its significant limitations, raises concerns about women's rights in Saudi Arabia, including the kingdom's reservations with regard to the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), as well as to the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD) and the Convention on the Rights of the Child (CRC). It states that "[p]articular focus will need to be placed on protecting vulnerable groups such as migrant workers, women, children and historically marginalised groups". However, these concerns are not addressed at all in SAFF's Human Rights Strategy, and it makes no mention of any of the concrete measures needed to genuinely combat existing patterns of discrimination, including abolition of the male guardianship system.

## 5. Other rights violations, as part of an overall climate of repression

As well as the many overt human rights risks related to hosting a mega-sporting event, there are other grave rights abuses committed in the country, including rampant use of the death penalty and systematic torture and ill-treatment, that illustrate the climate of repression in the country and further underline Saudi Arabia's unsuitability to host the tournament.

### *Use of the death penalty*

Saudi Arabia has for years been among the countries carrying out the highest number of executions in the world. Despite a [pledge](#) from Mohammed bin Salman in 2018, [repeated](#) as recently as 2022, to reduce use of the death penalty, the rate of executions has continued to soar. In the first ten months of 2024 alone, at least 250 individuals were executed, more than the total figure for any whole year in Saudi history. With executions sometimes carried out in secret, the real figures may be even higher.

Nearly a third of those executed this year were sentenced to death for drug-related crimes in violation of international human rights law, which prohibits use of the death penalty for offences falling below the threshold of the "most serious" crimes. Many others have been executed for non-lethal offences described as terrorism-related, which can include a wide range of acts such as taking part in protests. Other individuals are currently at risk of execution on charges relating to freedom of expression.

The Saudi authorities are also failing to deliver on promises to end use of the death penalty for minors through the flawed 2018 Juveniles Law. In practice, they continue to [execute](#) and hand down [death sentences](#) against child defendants, and at least nine young men are currently at risk of execution for offences committed when they were below the age of 18 (in some cases as young as 12), in violation of international human rights law. Their sentences all followed grossly unfair trials that failed to meet basic standards of due process, including by denying them legal counsel and access to criminal files and admitting coerced confessions as evidence in court.



*Abdullah al-Derazi is one of several young men at imminent risk of execution for alleged protest-related crimes which date back to when they were children.*

## **Torture and ill-treatment**

Conditions in Saudi Arabia's harsh prison system, of which no independent monitoring is permitted, are notoriously poor for all inmates, and some prisoners also face cruel, inhuman and degrading treatment. There have been cases of [deliberate medical and administrative neglect](#) leading either deliberately or at the very least recklessly to a number of deaths in detention. Detainees have also been subjected to severe physical and psychological torture, including beatings, electrocution, death threats and sexual harassment. The practice of [enforced disappearance](#) is systematic and widespread in Saudi Arabia, and is frequently applied to prisoners of conscience. Disappeared individuals are at heightened risk of further human rights violations, such as torture, while they are held outside the protection of the law.

FIFA's Human Rights Policy commits world football's governing body to "make every effort to uphold its international human rights responsibilities", yet the Independent Context Assessment and SAFF's Human Rights Strategy make little to no mention of the grave human rights breaches outlined above. The Assessment discusses the Juveniles Law, and the need for assurance of its effectiveness, under the topic of "Safeguarding", but without highlighting concerns regarding use of the death penalty for juvenile defendants. SAFF's Human Rights Strategy, meanwhile, baldly claims that the Juveniles Law "offers various protection to youth, including that a person under the age of seven who commits a punishable act shall not be subject to criminal prosecution". This effectively confirms that children aged eight and above can be prosecuted as criminals, while ignoring the abhorrent reality that juvenile defendants are still being sentenced to death.

The Assessment notes comments by the UN Committee Against Torture (CAT) about the historical use of corporal punishment, i.e. flogging, in Saudi Arabia, but ignores [other concerns](#) raised by CAT about abuses such as the torture and ill-treatment "commonly practised in prisons", and the Saudi authorities' use of the death penalty. The Strategy is likewise silent on these issues.

What is required is, as a minimum, a moratorium on use of the death penalty, with a view to its abolition, and an end to torture and ill-treatment in prisons.

## 6. 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 event of violations taking place.**

The vagueness of Saudi Arabia's legal framework, which enables the authorities to suppress fundamental freedoms, is compounded by a criminal justice system that lacks transparency and is notorious for its abuses. Judicial proceedings in Saudi Arabia routinely fall short of international standards and fair trial guarantees. Common violations, in both the regular criminal courts and the Specialised Criminal Court that handles terrorism-related cases, include the denial of access to lawyers and court documents, undue delays, reliance on torture-tainted confessions, and the holding of trials [in secret](#) without independent monitoring or observers. Such fundamental flaws commonly produce miscarriages of justice.

Furthermore, there are no independent or effective domestic grievance mechanisms to challenge such miscarriages of justice. The Saudi Human Rights Commission (SHRC), 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. The SHRC's role reflects the wider climate of impunity in the country, and contributes to the shielding of the authorities from public scrutiny.

In May 2018, FIFA launched a Human Rights Grievance Mechanism for those who consider their rights to have been violated while performing work related to FIFA's activities. Its Human Rights Policy also states that FIFA will "seek to promote or cooperate in access to remediation where it is otherwise linked to adverse [human rights] impacts through its relationships with third parties".

The Independent Context Assessment discusses mechanisms for addressing grievances, including those supposedly in place such as the SHRC, and recommends the establishment of a "purpose-built grievance mechanism". It cites the UN Committee Against Torture (CAT)'s reservations regarding "the capacity of the judiciary to act effectively to address issues of impunity", another point not addressed in SAFF's Human Rights Strategy. Other concerns [raised](#) by CAT about Saudi Arabia's justice system, such as the Specialised Criminal Court being "insufficiently independent of the Ministry of the Interior", are not addressed at all.

Instead, the Strategy complacently lists Saudi Arabia's various existing "mechanisms and channels for addressing grievances", all of which are thoroughly

discredited for their rampant abuses, including the criminal courts, the SHRC, the *Diwan al-Mazalem* (Board of Grievances, an administrative court) and “*kollana amn*”, a phone app that encourages members of the public to report on each other.

Serious reforms to the country's legal system would include abolishing the Specialised Criminal Court and bringing the SHRC's practices into conformity with the Paris Principles for accredited national human rights institutions.

## 7. Stakeholder and public engagement

**Another overriding human rights concern is the need for stakeholder and public engagement, an essential component so far missing from the Saudi plans for staging the World Cup.**

The Saudi Bid Book claims 89% public support for the World Cup bid on the basis of a YouGov poll, but given that the country's leadership tolerates no opinions contrary to the official line, it is impossible to accurately gauge public opinion on any politically sensitive matter. Meanwhile, regardless of the popularity or otherwise of the bid, any assessment of the human rights risks of hosting the tournament, and how to eliminate or mitigate them, requires full public and expert input. The prospect of this, however, is severely undermined by the underlying restrictions on fundamental rights in Saudi Arabia discussed in section 2. The authorities prevent all forms of public representation, including political parties, trade unions, independent civil society and human rights NGOs, stakeholders who would ideally form a key part of the necessary consultation. The authorities' insistence on shielding themselves from scrutiny also extends to international actors, with independent monitors, NGOs and UN fact-finding experts denied access to the country.

FIFA's Human Rights Policy states that the body will engage and consult with a wide range of external stakeholders, yet throughout the process of Saudi Arabia's World Cup bid FIFA has so far failed to ensure any such meaningful engagement. AS&H Clifford Chance's human rights assessment did not involve any external stakeholders or rightsholders, only a handful of government bodies with SAFF's facilitation, and despite requests from international human rights groups such as Amnesty International and ALQST to contribute to the consultation, FIFA has not allowed this to happen.

## Conclusion: The decision facing the extraordinary FIFA Congress on 11 December 2024

Saudi Arabia's bid to host the 2034 FIFA men's World Cup fails on many counts to meet the sporting body's own human rights requirements. Serious shortcomings in the Saudi proposals leave the field open to direct risk of violations of labour and basic civil rights, as well as the broader risk of legitimising the Saudi authorities' repressive rule.

Detailed research conducted by ALQST in the run-up to the bidding process revealed abuses already taking place in two of the main tournament venues, Neom and Jeddah Central, and our ongoing monitoring of violations in the country provides further damning evidence that the Saudi kingdom is not fit to host this globally significant event.

Saudi citizens and residents undoubtedly deserve the honour and opportunity of hosting the 2034 tournament to showcase to the world their country, their culture and their love of football. But these considerations are heavily outweighed by other factors:

- Serious risks of human rights violations are either inadequately addressed or totally ignored in the bid documentation.
- Awarding the event to Saudi Arabia on this basis would violate FIFA's own policies and procedures, and leave the Federation's claim to uphold human rights in tatters.
- Allowing Saudi Arabia's harshly repressive rulers to host the FIFA World Cup would lend them a spurious legitimacy and licence to double down on their notorious abuses.
- Both the Saudi Arabian Football Federation and FIFA itself have barely acknowledged the requirement for stakeholder engagement in the bidding process. The Saudi public, and the migrant workforce, and besieged human rights defenders, have not been allowed to have their say – and they are the ones who will continue to suffer if their deeply repressive government is undeservingly rewarded with hosting rights to the FIFA World Cup.

**FIFA is due to take a final decision on awarding hosting rights for the World Cup on 11 December 2024, with Saudi Arabia the sole bidder for the 2034 men's tournament. Ahead of the vote, on 29 November, FIFA published its own [evaluation](#) of the bid, which mirrors the same fundamental flaws as the bid itself and substantially minimises the potential human rights risks associated with the tournament. Although the evaluation thus appears to green-light the heavily flawed Saudi bid on 11 December, the FIFA Congress must demand major changes and credible guarantees that rights will be protected, or else reject it and seek to make alternative arrangements.**



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