

COMPLAINT REGARDING FIFA'S FAILURE TO IMPLEMENT ITS HUMAN RIGHTS POLICY FOR THE 2034 WORLD CUP IN SAUDI ARABIA

A. INTRODUCTION

1. This complaint is submitted to the Fédération Internationale de Football Association (“FIFA”) regarding the Federation’s failure (i) to carry out adequate human rights due diligence during the bidding process for the men’s 2034 World Cup in respect of Saudi Arabia, and (ii) to fulfil its obligations to ensure that Saudi Arabia, as the host of the 2034 World Cup, upholds international human rights in conformity with FIFA’s own Human Rights Policy (the “Policy”).
2. It is submitted by the undersigned international legal experts who previously provided a report to FIFA during the bidding process in May 2024, which included several recommendations for minimum human rights requirements to be implemented before Saudi Arabia could be awarded the World Cup.¹ FIFA never responded to this report. None of the recommendations were considered or adopted in the bidding process, and as far as it is known, none of them have been implemented in months since Saudi Arabia has become the host State for 2034. It is for these reasons that the authors have prepared the present complaint and submitted it to FIFA’s online Reporting portal under its Grievance Mechanism. It is requested that it will be addressed expeditiously by FIFA under its complaint procedures.²
3. The complaint is rooted in FIFA’s own human rights agenda and policies. In May 2017, FIFA took important steps by establishing the Policy and re-affirmed its commitment to respect human rights “*in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs)*”. According to its own terms, FIFA is “*committed to embedding this policy across our [its] activities through ongoing due-diligence processes, which*

¹ M.PIETH, S.WEhrenberg, R.DIXON KC, *Submission to FIFA regarding Saudi Arabia’s bid to host the men’s 2034 World Cup*, 22 May 2024, cited in G.DUNBAR, [Human rights experts urge FIFA to scrutinize Saudi Arabia before 2034 World Cup vote](#), AP, 22 May 2024.

² FIFA, [Human Rights Grievance Mechanism](#).

includes anchoring respect for human rights in the bidding and hosting of our events and throughout our relationships with third parties”.

4. The Policy emphasises that FIFA *“is committed to respecting all internationally recognised human rights and shall strive to promote the protection of these rights”*.³ This key provision was reiterated in FIFA Statutes under Article 3.⁴
5. FIFA President Gianni Infantino, in prior statements concerning the selection process for World Cup host nations, stressed: *“Whoever ends up hosting the FIFA World Cup must prove that they know and have what it takes to deliver the tournament. Not only that, they must also formally commit to conducting their activities based on sustainable event management principles and to respecting international human rights and labour standards according to the United Nations’ Guiding Principles”*.⁵
6. In line with this statement, FIFA initiated the bidding process for the 2034 World Cup, setting out specific human rights requirements for candidate countries, as a prerequisite for selection. However, the outcome of this process revealed a fundamental failure to conduct adequate human rights due diligence. The human rights assessment of Saudi Arabia, which FIFA relied upon, has been widely criticised for failing to provide a substantive analysis of *“extensive and relevant abuses in Saudi Arabia”*.⁶
7. FIFA’s decision to approve Saudi Arabia as the next host country now places FIFA, in accordance with its own policy, under an obligation to ensure that internationally recognised human rights are upheld in Saudi Arabia. This entails identifying and addressing violations, safeguarding rights, and engaging with the host State to implement measures where no clear strategy exists or where the measures adopted fall short of FIFA’s established standards and international standards generally.

³ FIFA, *FIFA Human Rights Policy*, May 2017.

⁴ FIFA, *FIFA Statutes : Regulations Governing The Application Of The Statutes Standing Orders Of The Congress*, May 2022.

⁵ FIFA, *Guide To The Bidding Process For The 2026 Fifa World Cup*, 7 November 2017.

⁶ Amnesty International, *Saudi Arabia/FIFA : Organizations demand a credible human rights assessment for 2034 World Cup bid*, 28 October 2024.

8. FIFA must not only promote these rights but is also required to ensure their enforcement by establishing strict and clear minimum requirements with which Saudi Arabia must comply in order to meet defined standards consistent with its Policy. A failure to do so would constitute a breach of FIFA's own human rights rules. As highlighted in this complaint, widespread human rights abuses continue to be perpetrated in Saudi Arabia, and no steps are being taken by FIFA to address these in the build-up to the World Cup. Instead, it appears it is business as usual with no changes to be made.
9. With nine years until the tournament, there remains an opportunity for meaningful reforms in Saudi Arabia, driven by the implementation of FIFA's obligations under its Policy. This opportunity must not be missed.

B. FIFA'S LEGAL FRAMEWORK

10. Pursuant to its Policy and Statutes, FIFA has formally recognised and codified human rights standards that the organisation and host countries are required to uphold. Consequently, this framework must be applied in the case of Saudi Arabia's appointment as host of the 2034 World Cup.
11. **Paragraph 2 of the Policy** specifies FIFA's commitment to human rights stating that it "embraces all internationally recognised human rights, including those contained in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work". FIFA acknowledges that its operations may have adverse impacts on the human rights of people such as women, national, ethnic, religious, migrant workers and their families and human rights defenders who require "special attention".
12. By expressly referencing these core international human rights instruments, FIFA's Policy entails an obligation to ensure that the provisions of the Universal Declaration of Human Rights ("UDHR"), the International Covenant on Civil and Political Rights ("ICCPR"), and the International Covenant on Economic, Social and Cultural Rights ("ICESCR") are fully upheld in the context of its operations.

13. In particular:

- the right to equality and non-discrimination (Arts. 2(1), 3, 14(1) and 26 ICCPR; Arts. 2(2) and 3 ICESCR);
- freedom from torture and other inhuman treatment (Art. 7 ICCPR);
- freedom from slavery (Art. 8 ICCPR);
- liberty and security of person, and the treatment of those deprived of their liberty with humanity and respect for the inherent dignity of the human person (Arts. 9 – 10 ICCPR);
- freedom of movement (Art. 12 ICCPR);
- due process (Arts. 14 – 16 ICCPR);
- freedom of expression (Art. 19 ICCPR); and freedom of assembly and association, including the right to form and join trade unions (Arts. 21 – 22 ICCPR).

14. These rights are also codified at the regional level through the Arab Charter on Human Rights (“ACHR”) which was ratified by Saudi Arabia on 15 April 2009 and reinforces the principles enshrined in the UDHR, the ICCPR and the ICESCR.

15. **Paragraph 3 of the Policy**, states that FIFA “*seeks to prevent or mitigate adverse human rights impacts that are directly linked to its operations, products or services by its business relationships, even if FIFA has not contributed to those impacts*”, adding in the following paragraph “*FIFA will strive to go beyond its responsibility to respect human rights, as enshrined in the UNGPs, by taking measures to promote the protection of human rights and positively contribute to their enjoyment*”.

16. **Paragraph 5 of the Policy** identifies its salient human rights risks include (i) labour rights, (ii) land acquisition and housing rights, (iii) discrimination, (iv) security, and (v) players’ rights.

17. Importantly, beyond the principles set out in the Policy, FIFA emphasised in **Paragraph 6** its proactive role in ensuring that its activities do not cause or contribute to human rights violations. It “*engages in an ongoing due diligence process to identify, address, evaluate, and communicate the risks of involvement with adverse human rights impacts,*” stating that it is “*guided by its human rights approach*”.
18. Recognising that certain national laws and regulations may differ or conflict with international human rights standards, **Paragraph 7** of the Policy sets out the requirement that: “*Where the national context risks undermining FIFA’s ability to ensure respect for internationally recognised human rights, FIFA will constructively engage with the relevant authorities and other stakeholders and make every effort to uphold its international human rights responsibilities*”.
19. In order to guarantee the implementation of its Human Rights Policy, four pillars are identified: (I) commit and embed, (II) identify and address, (III) protect and remedy, (IV) engage and communicate.
20. **Pillar II** focuses on identifying and addressing human rights impacts: “*FIFA defines and implements action plans to address salient human rights risks and tracks the effectiveness of measures taken*”.
21. **Pillar III** outlines FIFA’s commitment to providing remedies, affirming that “*FIFA will require from those organising FIFA tournaments that competent and independent bodies are put in place for reviewing human rights issues and complaints in the context of the organisation of such tournament*”.
22. Given that the bidding process is now complete and concerns regarding Saudi Arabia’s human rights commitment have been publicly raised, **Pillar IV** is particularly relevant: “*FIFA will engage with external stakeholders in a structured manner and will communicate regularly and transparently with its stakeholders and the general public about its efforts to ensure respect for human rights. In this regard, FIFA will work constructively with an independent, expert Human Rights Advisory Board and consult a wide range of stakeholders, including potentially affected groups and individuals and*

their legitimate representatives, on a regular basis. Furthermore, FIFA will communicate on its human rights- related efforts in line with international reporting standards, including via reports linked to specific FIFA events, take part in international and national debates on human rights in sport and participate in specialist platforms to share lessons learnt”.

23. In light of these provisions, and amid strong criticism when Saudi Arabia was officially awarded the tournament in December 2024, FIFA President Gianni Infantino commented on the vote, stating: *“We are of course aware of critics and fears. I fully trust our hosts to address all open points, and I fully expect them to deliver tournaments that meet the world’s expectations. This is what we expect and look forward to: social improvements, positive human rights impacts. The world will be watching, and it is positive that the unique spotlight of the World Cup is on what can and should be improved so that this can be addressed effectively, and we can have real and lasting change”.*⁷

24. However, FIFA cannot discharge its obligation by “fully trusting” the host country to address these issues or by excepting “social improvement and positive human rights” impacts. Under its Policy, FIFA is required to prevent or mitigate adverse human rights impacts directly linked to its operations, take measures to promote and protect human rights and contribute to their enjoyment. Furthermore, FIFA must engage with the relevant authorities and track the effectiveness of the measures implemented.

C. FIFA’S OBLIGATION TO ENSURE FUNDAMENTAL RIGHTS ARE UPHELD BY THE HOST STATE

25. With regard to the bid for the 2034 World Cup, FIFA approved the start of the bidding process in October 2023 and established clear conditions for bidders.⁸ These requirements included:

- *An independent human rights context assessment conducted by an independent firm approved by FIFA.*

⁷ P. MACINNES, [Saudi Arabia confirmed as 2034 World Cup host despite human rights concerns](#), The Guardian, 11 December 2024.

⁸ FIFA, [Human rights and the bidding processes for the 2030 and 2034 FIFA World Cups](#), 4 October 2023.

- *A human rights strategy for the event which should build on the results of the independent human rights context assessment and outline a plan to prevent and mitigate key human rights risks, as well seize human rights-related opportunities in the preparation and hosting of the tournament.*
 - *Several commitments and guarantees with respect to human rights by the bidding member association as well as bidding countries and other entities involved in the bid. The fulfilment of these human rights requirements is an important part of FIFA's human rights due diligence associated with these competitions.*
26. However, on 11 December 2024, FIFA officially announced Saudi Arabia as the host of the 2034 World Cup⁹ based on a flawed human rights assessment. Notably, the assessment produced by AS&H Clifford Chance failed to address issues relating to the rights of freedom of expression and many other essential human rights. Furthermore, human rights organisations have regrettably noted that external actors including individuals potentially affected by human rights abuses linked to the tournament, Saudi Arabian human rights experts and organisations such as trade union, were not consulted during the assessment process.¹⁰
27. Saudi Arabia has been chosen as the next host country despite its appalling human rights record, including violations relating to freedom of expression, arbitrary arrest, detention and mistreatment, migrants' rights and women's rights (as detailed below).
28. Aware of the risks posed by a World Cup hosted by Saudi Arabia, the United Nations Commissioner for Human Rights, Volker Türk, while noting that his office is not directly engaged, emphasised that "*What we are involved in though is to make sure that indeed, in each and every major sporting event, human rights are part and parcel of the way that sports events are not only conceived but also conducted*". This statement reinforces the obligation of the host State to provide clear assurances and to demonstrate consistent

⁹ FIFA, [*Extraordinary FIFA Congress appoints hosts of 2030 and 2034 editions of FIFA World Cup™*](#), 11 December 2024.

¹⁰ Amnesty International, [*Saudi Arabia/FIFA: Organizations demand a credible human rights assessment for 2034 World Cup bid*](#), 28 October 2024.

compliance with human rights obligations throughout every stage of the event's preparation and delivery.¹¹

29. While due diligence steps were required at the bidding stage, FIFA now bears a critical responsibility to ensure compliance with its human rights commitments.
30. In accordance with its Policy, it is required to commit and embed, identify and address human rights impacts connected to its activities, to take measures to protect human rights and provide remedies, engage with stakeholders and communicate transparently regarding human rights efforts.
31. These obligations are ongoing and must be actively fulfilled throughout the preparation and the delivery of the tournament, ensuring that human rights considerations are not only embedded in policy but also effectively implemented in practice.
32. **Given the failure to ensure that human rights standards were met during the bidding stage, and in the light of ongoing human rights violations occurring in Saudi Arabia, this complaint highlights those violations and the steps that should be taken by FIFA to ensure compliance with minimum human rights requirements. To date there is no evidence that such steps have been initiated, let alone that FIFA has any intention of doing so. This complaint highlights these failings so that they can be rectified without delay.**

D. MINIMUM HUMAN RIGHTS REQUIREMENTS THAT ARE NOT YET BEING IMPLEMENTED BY FIFA

33. FIFA must ensure that Saudi Arabia implements minimum human rights requirements in relation to at least four key areas before the 2034 World Cup: 1) freedom of expression and association, 2) arbitrary arrests, mistreatment and the death penalty, 3) judicial independence, 4) migrants' rights, and 5) women's rights. None of these are presently

¹¹ G.DUNBAR, [*Head of UN human rights promises advice to FIFA and Saudi Arabia over 2034 World Cup issues*](#), 9 December 2024.

being undertaken, which must be remedied in accordance with a clear and transparent plan of action.

34. Each of these areas is addressed below by summarising the key violations that are being committed in Saudi Arabia and then identifying the minimum human rights requirements that are yet to be implemented, but which must be addressed urgently by FIFA. The authors look forward to FIFA's responses to each aspect of this complaint.

1. Freedom of expression and association

35. In 2022, the UN Office of the High Commissioner for Human Rights (OHCHR) reported that in Saudi Arabia, the Basic Law of Governance “...*does not include express provisions on the right to freedom of association per se*”. Rather, the Basic Law stipulates that the State shall “...*encourage organisations and individuals to participate in philanthropic activities*”.¹²
36. Similarly, in its submission to the Working Group of the Universal Periodic Review on Saudi Arabia, PEN international stressed that “*The Government of the Kingdom of Saudi Arabia does not recognise the right to free expression, and it criminalises certain forms of expression, in particular criticism of the ruling family, the ruling system including the kingdom's official religion, or the government*”.¹³
37. Saudi Arabia severely restricts freedom of expression through an extensive legal framework that criminalises dissident—notably the 2007 Anti-Cyber Crime Law and the 2017 Counter-Terrorism Law, as amended on 19 June 2020.
38. While the 2007 Anti-Cyber Crime Law was introduced to combat cybercrimes such as hacking, identity theft and online fraud, Article 6 criminalises “...*producing something that harms public order, religious values, public morals, the sanctity of private life, or authoring, sending or storing it via an information network*”, and it grants the authorities

¹² UN Office of the High Commissioner for Human Rights (OHCHR), [*Freedom of Association in the Middle East and North Africa*](#), April 2022, p.5

¹³ PEN International, [*Concerning Systematic Restrictions on the Right to Freedom of Expression in the Kingdom of Saudi Arabia*](#), 8 February 2018.

powers to monitor, censor, and prosecute individuals for expressing dissenting opinions on social media.

39. Similarly, the 2017 Counter-Terrorism Law criminalises acts pertaining to the freedom of expression by employing a broad and a vague definition of terrorism under its Article 1:

Any act committed, individually or collectively, directly or indirectly, by a perpetrator, with the intention to disturb public order, destabilise national security or state stability, endanger national unity, suspend the Basic Law of Governance or some of its articles, cause damage to state facilities or natural or economic resources, attempt to coerce any of its authorities into a particular action or inaction or threaten to carry out acts that would lead to of the aforementioned objectives or instigate such acts; or any act intended to cause death or serious bodily injury to a civilian, or any other person, when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a Government or an international organization to do or to abstain from doing any act.

40. In this regard, following a visit to Saudi Arabia in 2017, the UN Special Rapporteur on human rights and counterterrorism expressed concern “...about the unacceptably broad definition of terrorism and the use of Saudi Arabia’s 2014 counter-terrorism law and other national security provisions against human rights defenders, writers, bloggers, journalists and other peaceful critics”.¹⁴ Echoing this concern, Fionnuala D. Ní Aoláin, the UN Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism, observed that “These laws are used to directly attack and limit the rights of prominent human rights defenders, religious figures, writers, journalists, academics, civil activists and all of these groups have been targeted by this law”.¹⁵
41. In 2020, Saudi Arabia amended Article 12 of its Counter-Terrorism Law to authorise the temporarily release of individuals suspected of committing any of the crimes defined within the Law, “...so long as that does not harm the interests of the investigations and

¹⁴ UN News, [Saudi Arabia must reform 'unacceptably broad' counter-terrorism law – UN rights expert](#), 5 May 2017.

¹⁵ Al Jazeera, [Saudi Arabia using 'terror' laws to stifle dissent: UN experts](#), 5 March 2019.

there is no fear of the individual's escape or disappearance".¹⁶ However, the term "*in the interests of the investigation*" remains vague, and UN experts have continued to express serious concerns. In a letter addressed to the Government of Saudi Arabia on 17 December 2020, they emphasised that "*...although there is no agreement on a multilateral treaty on terrorism which inter alia defines terrorism, States should ensure that counter-terrorism legislation is limited to criminalising conduct which is properly and precisely defined on the basis of the provisions of international counter-terrorism instruments and is strictly guided by the principles of legality, necessity and proportionality*". UN experts further voiced concern "*...about the inclusion and criminalisation of several categories of crimes and their compatibility with the requirements of legitimate aim, legality, and necessity and proportionality*". They warned that these provisions risk seriously undermining the right to freedom of expression in Saudi Arabia.¹⁷

42. Furthermore, while Saudi Arabia portrays itself as a kingdom that is modernising, freedom of expression remains particularly curtailed in practice. The Committee for the Protection of Journalists observed that the Saudi government has progressively intensified legal repression since the Arab Spring.¹⁸ Part of the repressive counterterrorism legislation used to justify harsh sentences was introduced through amendment to the law in 2017—shortly after Mohammed bin Salman's appointment as a Crown Prince.¹⁹ According to the executive director of Democracy for the Arab World Now (DAWN), power has become much more concentrated than ever in Saudi Arabia under the Crown Prince's rule, where "*...any criticism of the government, any criticism of Mohammed bin Salman, is met with extreme repression*".²⁰ Indeed, Freedom House noted a growing self-censorship even in private conversations, particularly on matters concerning the Crown Prince's inner circle.²¹

¹⁶ MENA Rights Group, [*The Saudi Presidency Of State Security : An Arm of Repression in the Crown Prince's Kingdom*](#), 21 June 2022.

¹⁷ UN Special Rapporteurs, [*Comments and suggestions on the 2017 Law on Combating Crimes of Terrorism and its Financing*](#), Reference SAU 12/2020, 17 December 2020.

¹⁸ CPJ, [*10 Most Censored Countries*](#), 2015.

¹⁹ ECDHR, [*From tweets to prisons: unraveling the crisis of freedom of expression in Saudi Arabia*](#), 31 October 2023.

²⁰ A.LOWENSTEIN, [*The American PR firm helping Saudi Arabia clean up its image*](#), The Guardian, 22 December 2022.

²¹ Freedom House, [*Saudi Arabia: Key Developments, June 1, 2023 – May 31 2024*](#), 2024.

43. It has been reported that targets now include “ordinary” members of the public who peacefully exercise their right to freedom of expression online. Social media users are extremely cautious about what they post, share, or “like” online due to the possibility of being prosecuted under broadly worded antiterrorism legislation.²² The use of “...*shocking sentences*...” serve as a “...*chilling reminder to all Saudi citizens and residents that any dissent will not be tolerated*”.²³
44. The case of the journalist Jamal Khashoggi, who was killed on 2 October 2018 in the Saudi consulate in Istanbul, has become tragically emblematic. His murder provoked global outrage and cast spotlight on the Kingdom’s wider pattern of crimes against journalists and dissidents who voice criticism.
45. In 2019, the Report of the Special Rapporteur on extrajudicial, summary, or arbitrary executions on the killing of Mr. Khashoggi concluded that it constituted an extrajudicial killing for which the State of Saudi Arabia is responsible.²⁴ It worth noting that, as reported by Amnesty International, Saudi Arabia failed to cooperate with Agnes Callamard, who was in charge of the investigation.²⁵
46. In May 2025, Reporters Without Borders (RSF) in the 2025 World Press Freedom Index ranked Saudi Arabia 162nd out of 180 countries, concluding that journalists live under heavy surveillance, even when abroad and that “*despite societal reforms, journalists are still being detained, and media outlets operate under strict state control*”.²⁶
47. The recent release of Asaad Bin Nasser Al-Ghamdi in February 2025 has drawn attention to the severe restrictions on freedom of expression in Saudi Arabia. Al-Ghamdi was arrested on 20 November 2022, and on 29 May 2024 he was sentenced to 20 years in prison—later reduced to 15 years—for social media posts criticising the government’s Vision 2030 programme and expressing condolences for the death in prison of a prominent human rights defender. After more than two years of arbitrary detention, he

²² Ibid.

²³ Amnesty International, [Saudi Arabia: Alarming crackdown on online expression](#), 14 February 2023.

²⁴ UN General Assembly, [Investigation of, accountability for and prevention of intentional State killings of human rights defenders, journalists and prominent dissidents](#), A/HRC/41/36, 4 October 2019.

²⁵ Amnesty International, [Saudi Arabia: still no justice for state-sanctioned murder of Jamal Khashoggi](#), 29 September 2023.

²⁶ Reporters without borders, [MAP - 2025 World Press Freedom Index](#), May 2025.

was eventually released by the Saudi authorities. However, his release is widely seen as part of the Saudi authorities' attempts to rehabilitate their image on the international stage rather than as evidence of any meaningful or systemic reform.²⁷

Minimum requirements yet to be implemented

48. In November 2017, Federico Addiechi, FIFA's then-head of sustainability and diversity, responding to criticism concerning the violation of the freedom of expression in one of the host countries, asserted that *"If there are any cases of abuse, or even possibility of human rights defenders or journalists being forced into a difficult corner, then according to our statutes and human rights policy FIFA will intervene"*.²⁸ Therefore, FIFA must ensure its equal and consistent application to Saudi Arabia as a host state.
49. FIFA's 2018 Statement on Human Rights Defenders and Media Representatives²⁹ reiterated Paragraph 11 of the Policy, which provides that *"FIFA helps protect those who advocate respect for human rights associated with its activities and is committed to contributing to providing remedy where individuals have been adversely affected by activities associated with FIFA"*. Consequently, FIFA must ensure at a minimum that Saudi Arabia:
- Immediately releases arbitrarily detained individuals, whether they are human rights defenders or not.
 - Immediately amends versions of the 2007 Anti-Cyber Crime Law and the 2017 Counter-Terrorism Law. These must narrow the scope of "terrorism" under the 2017 Counter-Terrorism Law and the broad criminal offences under the 2007 Anti-Cyber Crime Law. The UN Special Rapporteurs must confirm to FIFA that they are content with Saudi Arabia's draft.
 - Complies with FIFA's Statement on Human Rights Defenders and Media Representatives.

²⁷ France24, [Saudi Arabia frees prisoners in apparent easing of crackdown](#), 21 March 2025.

²⁸ T.PANJA, [Ahead of World Cup, Fans Are Warned About Homophobia and Racism in Russia](#), 28 November 2017.

²⁹ FIFA, [FIFA launches complaints mechanism for human rights defenders and journalists](#), 29 May 2018.

2. Arbitrary arrests, mistreatment and the death penalty

50. As reported by Human Rights Watch, “*Between December 2024 and February 2025, Saudi authorities released at least 44 prisoners*”.³⁰ Among them was Salma al-Shehab, a Leeds University PhD student, who was released on 10 February 2025 following her arrest on 15 January 2021 for tweeting the views of Saudi women’s rights activists on Twitter/X; she was subsequently charged with “...*disturbing public order and destabilising the security of society and the stability of the state*”. Her release came after serving a four-year term of arbitrary detention, during which she spent 300 days in solitary confinement.³¹ Commenting on her release, ALQST emphasised that “*Her release is far from freedom, as life under a travel ban means life with a potential threat of arrest*”.³² Other individuals released included Mohammed al-Qahtani, a human rights activist, who was detained due to his peaceful activism. However, at the time of their release, various human rights organisations stressed that it remains unclear whether any of the prison sentences have been quashed, thus leaving individuals potentially at risk of re-arrest and therefore in a state of fear, unable to leave Saudi Arabia.³³
51. The release of long-term prisoners should also not detract from the fact that individuals continue to be detained by Saudi authorities for exercising their freedom of expression, assembly, association, and belief, often on charges that do not constitute crimes under international law, as noted by Human Rights Watch.³⁴
52. A striking example is the case of five individuals—Jalal Labbad, Jawad Qureiris, Abdullah al-Derazi, Yusuf al-Manasif, and Hassan al-Faraj—who participated in anti-government protests in 2011 and were sentenced to death by the Specialised Criminal Court, despite being minors at the time of the alleged offences.³⁵

³⁰ Human Rights Watch, [Saudi Arabia: Dozens Freed But Arrests Continue](#), 7 April 2025.

³¹ Amnesty International, [Saudi woman jailed for tweeting about women's rights freed after four years in prison](#), 10 February 2025.

³² Middle East Monitor, [Saudi Arabia releases PhD student sentenced to 34 years in prison for tweets](#), 12 February 2025.

³³ ALQST, [ALQST welcomes release of Saudi prisoners of conscience, and calls for end to arbitrary detention of countless others](#), 28 February 2025.

³⁴ Human Rights Watch, [Saudi Arabia: Dozens Freed But Arrests Continue](#), 7 April 2025.

³⁵ MENA Rights Group, [Saudi Arabia continues to threaten the lives of minors, disregarding the UN Working Group on Arbitrary Detention's recent Opinion](#), 4 February 2025.

53. On this matter, the UN Working Group on Arbitrary Detention found that their deprivation of liberty was arbitrary as it resulted from their exercise of the rights to freedom of opinion and expression and to peaceful assembly and association.³⁶ The UN Working Group further highlighted Saudi Arabia's poor record, recalling that “...*in its 30-year history, the Working Group has found Saudi Arabia in violation of its international human rights obligations in over 75 cases*”.³⁷
54. On 30 April 2025, UN human rights experts, including the Special Rapporteur on Torture and other Cruel, Inhuman, or Degrading Treatments or Punishments, expressed their “...*dismay at the continuing prosecution and sentencing of child offenders in Saudi Arabia*”.³⁸ They recalled the arbitrary nature of these detentions and affirmed that enforcing a death sentence in these cases constitutes a violation of a state's obligations under international law.
55. It should also be brought to FIFA's attention that the UN experts denounced the alarming figures, noting a sharp increase of the use of death penalty in Saudi Arabia in 2025.³⁹ Amnesty International similarly reported in 2025 that Saudi Arabia doubled their resort to the death penalty, with at least 345 executions compared to 172 the previous year; this “...*mark[s] the highest number of executions in any given year on record with Amnesty International*”.⁴⁰ These findings are consistent with reports by Reprieve, which noted that the rate of executions has risen drastically under Mohammed bin Salman.⁴¹
56. In early May 2025, Middle East Eye confirmed this pattern, reporting that Saudi Arabia had executed two individuals on terrorism-related charges, thus raising the total number of executions to at least 100 in the first months of 2025.⁴² According to MENA Rights Group, there are currently four other minors on death row in Saudi Arabia, making the total number of 9 minors sentenced to death in the Kingdom.⁴³

³⁶ UN Working Group on Arbitrary detention, *Opinion No. 71/2024 concerning Abdullah al-Derazi, Jalal al-Labbad, Yusuf Muhammad Mahdi al-Manasif, Jawad Abdullah Qureiris and Hassan Zaki al-Faraj*, A/HRC/WGAD/2024/71, 18 December 2024, para.125.

³⁷ Ibid, para.144.

³⁸ UN Press release, *Saudi Arabia: UN experts call for immediate release of child offenders*, 30 April 2025.

³⁹ Ibid.

⁴⁰ Amnesty International, *Death sentences and executions in 2024*, 8 April 2025.

⁴¹ Reprieve, ESOHR, *Bloodshed and Lies: Mohammed bin Salman's Kingdom of Executions*, 2023, p.3.

⁴² Middle East Eye, *Saudi Arabia executes its 100th prisoner so far this year*, 5 May 2025.

⁴³ MENA Rights Group, *Saudi Arabia continues to threaten the lives of minors, disregarding the UN Working Group on Arbitrary Detention's recent Opinion*, 4 February 2025.

57. The UN Committee on the Elimination of Racial Discrimination has long expressed concerns over the disproportionate number of foreign nationals facing the death penalty.⁴⁴ In particular, Yemeni, Jordanian, and Pakistani nationals are overrepresented among those executed compared to their representation within the Saudi population.⁴⁵
58. The death penalty is applied not only against dissidents but also for a range of offences, including vague ‘terrorism-related’ crimes, murder, armed robbery, and arms smuggling. Several individuals executed were convicted of charges such as ‘disrupting the social fabric and national cohesion’ and ‘participating in and inciting sit-ins and protests’.⁴⁶
59. Alarming, a leaked draft of Saudi Arabia’s forthcoming Penal Code confirmed the retention of the death penalty as a primary punishment for a range of offences, alongside imprisonment and fines. It further preserves the wide discretion granted to judges to impose death sentences. The draft code “...as it stands ... shatters the illusion that the Crown Prince is pursuing a truly reformist agenda. Saudi Arabia is at a critical juncture”.⁴⁷
60. If not sentenced to death, detainees are subjected to dire conditions of detention. ALQST found that the prison system failed to meet legal requirements, with poor conditions characterised by overcrowding, poor hygiene and sanitation, and medical and administrative neglect.⁴⁸
61. In addition, “...one of the hallmarks of the era of King Salman and Crown Prince Mohammed bin Salman has been the systematic use of torture for political purposes”.⁴⁹ While Saudi Arabia’s delegation asserted a strict prohibition on torture and their adherence to this principle during its last Universal Periodic Review in 2024, former detainees have recounted disturbing accounts of both physical and psychological torment. These include forced confessions, threats, insults, sleep deprivation, and various

⁴⁴ UN Committee on the Elimination of Racial Discrimination, *UN Committee on the Elimination of Racial Discrimination: Concluding Observations, Saudi Arabia*, 2 June 2003, CERD/C/62/CO/8, para. 18

⁴⁵ Reprieve, ESOHR, *ibid*, p.26.

⁴⁶ Amnesty International, *Saudi Arabia : Manifesto for Repression : Saudi Arabia’s Forthcoming Penal Code Must Uphold Human Rights in Line with International Law and Standards*, 19 March 2024, p.21.

⁴⁷ Amnesty International, *Saudi Arabia : Repressive draft penal code shatters illusions of progress and reform*, 19 March 2024.

⁴⁸ ALQST, *Shrouded in Secrecy: Prisons and detention centers in Saudi Arabia, 2021*, p.45.

⁴⁹ *Ibid*, p.61.

forms of physical abuse such as beatings with sticks and electric wires and slapping.⁵⁰ Human rights organisations have routinely documented violations of torture and other ill-treatment of detainees by Saudi prison guards during interrogations and throughout their pretrial detention.⁵¹

Minimum requirements yet to be implemented

62. As noted above, in its Human Rights Policy, FIFA has made clear its commitment to internationally recognised human rights, including 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 (ICESCR). It should therefore require immediate and concrete action from the Saudi authorities to end arbitrary arrests, the use of torture, and the widespread indiscriminate application of the death penalty. None of these practices comply with the standards FIFA claims to uphold when selecting a host country for its tournament.
63. Accordingly, FIFA must at a minimum require Saudi Arabia to:
- Immediately release all individuals arbitrarily detained, including human rights defenders and others held for peacefully exercising their rights. The current approach contravenes international human rights obligations, including Article 9 of the ICCPR and Article 14 of the Arab Charter on Human Rights (ACHR).
 - Ensure that prison conditions comply with international standards. Saudi Arabia must undertake urgent improvements to end overcrowding, poor sanitation, and medical neglect. These reforms should be subject to independent verification by UN experts.
 - Ensure that all prisoners are treated in full accordance with their human rights. At a minimum, Saudi Arabia must guarantee that no detainee is subjected to torture or cruel, inhuman, or degrading treatment or punishment, in line with Article 7 of the ICCPR and Article 8 of the ACHR.

⁵⁰ ECDHR, *Torture in Saudi Arabia Through the Universal Periodic Review*, 1 March 2024, p.2.

⁵¹ Amnesty International, *Saudi Arabia: Manifesto for Repression: Saudi Arabia's Forthcoming Penal Code Must Uphold Human Rights in Line with International Law and Standards*, 19 March 2024, p.31.

- Align the definition of torture in its domestic legislation with that set out in the Convention against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment

64. With regard to the death penalty, although Crown Prince Mohammed bin Salman has repeatedly pledged to abolish capital punishment for crimes not mandated under *sharia* law, executions continue at an alarming rate.⁵² Under Article 6(2) of the ICCPR, the death penalty must be restricted to only the *most serious crimes*, which international law limits to intentional killing. Thus, Saudi Arabia must be required to:

- Ensure that the forthcoming penal code complies fully with international human rights standards, limiting the death penalty strictly to the most serious crimes, in line with Article 6 of the ICCPR.
- Declare an official moratorium on all executions as an interim step, with a view to fully abolishing the death penalty in law and practice.
- Review the cases of all prisoners currently under sentence of death, with a mechanism in place to commute such sentences.

3. Judicial independence

65. Article 46 of Saudi Arabia's Constitution provides for an independent judiciary, stating that "the judicial authority is an independent power [and that] in discharging their duties, the judges bow to no authority other than that of Islamic Shari'ah". The legal framework provides for "the formation of the supreme judicial council and its functions as well as the organisation and jurisdiction of the courts. Judges are appointed and their service is terminated by a Royal Order upon a proposal by the supreme judicial council as specified by the law" (see Articles 51 and 52 of the Constitution).

⁵² R.SPENCER, [*Saudi Crown Prince Mohammed bin Salman to end death penalty for drug crimes*](#), The Times, 11 July 2020.

66. However, Saudi Arabia’s judiciary, has lost its limited independence as since 2017 the judicial system has been re-structured. For instance, the Saudi Bureau of Investigation and Public Prosecution, which was under the control of the Saudi Ministry of Interior, was replaced by the newly formed Saudi Public Prosecution which now reports directly to the Royal Court. Similarly, the State Security Presidency (SSP) was created to conduct investigations in relation to political cases, detentions, investigations, and intelligence, including all ‘state security cases’ replacing various Saudi security agencies that were under the control of the Saudi Ministry of Interior. Both of these bodies now report directly to the Royal Court. MEDC commenting on these structural changes concluded that “*claims of judicial independence are fiction—every major judicial decision bears the fingerprints of royal authority, creating an unprecedented concentration of legal power under the Crown Prince’s direct control*”.⁵³
67. In its 2023 report, Freedom House when assessing the independence of the judiciary concluded that it has “*very little independence in practice*”. It observed that Judges are appointed by the King and overseen by the Supreme Judicial Council, whose chairman is also the Justice Minister. A special commission of judicial experts is also in place to issue opinions that serve as guidelines for judges on the interpretation of Sharia law. Judges have significant discretion over how they interpret Sharia and are not required to publish an explanation of their judgments.⁵⁴
68. The erosion of judicial independence was already exposed in 2023, when it was reported that ten former judges of Saudi Arabia have been charged with ‘high treason’ on the basis of alleged ‘leniency’ regarding sentences that they handed down in cases involving the prosecution of human rights defenders, women’s rights activists and peaceful dissidents.⁵⁵

⁵³ A. ALAOU DH, [Fact Sheet – Captured Courts: Mohammed bin Salman's Judicial Takeover in Saudi Arabia](#), 25 February 2025.

⁵⁴ Freedom House, [‘Freedom in the World 2023: Saudi Arabia](#), 2023.

⁵⁵ IBAHRI, [Saudi Arabia : IBAHRI issues letter of concern over former judges' arrest](#), 3 July 2023.

Minimum requirements yet to be implemented

69. It is imperative that Saudi Arabia is required to establish an independent judiciary and upholds the rule of law. In accordance with the OSCE Office for Democratic Institutions and Human Rights' 2023 Warsaw Recommendations on Judicial Independence and Accountability, judges must:

- Be appointed independently by a body that is not connected to the executive in any capacity.
- Be able to carry out their duties free from undue pressure.
- Not be appointed on limited or probationary terms.
- Not face the threat of removal or transfer from one court or tribunal to another.
- Not be prosecuted for 'high treason' or otherwise penalised on the basis of alleged 'leniency' in judgments, particularly in cases involving human rights defenders, women's rights activists, and peaceful dissidents.

70. FIFA must require that these reforms are implemented without delay, and their enforcement must be subject to rigorous monitoring.

4.Migrants' rights

71. In April 2025, the International Labour Organisation (ILO) highlighted the rising migration of African workers to the Arabian states, where they now make up 37.2% of the labour force, as well as migrants from South and Southeast Asian countries such as India, Pakistan, Bangladesh, and the Philippines in search of better working opportunities than in their home countries. However, the ILO acknowledges that such workers in Arabian states many face “...serious decent work deficits, including exploitative recruitment, restrictive policies, and limited access to rights and justice”.⁵⁶

⁵⁶ ILO, [*ILO expands FAIRWAY programme to advance decent work for African migrant workers in the Arab States*](#), 2 May 2025.

72. Saudi Arabia is no exception to this trend, with 13.4 million migrants accounting for 42% of the country's population and representing 80% of the private sector labour force.⁵⁷ With the Kingdom's Vision 2030 heavily dependent on this labour force, migrants are employed in a wide range of sectors, including construction, hospitality, private health services, and retail.⁵⁸
73. In the context of Saudi Arabia's extensive reliance on migrant workers, particular concern arises from the *kafala* system, under which the Kingdom grants local individuals or companies sponsorship permits to employ foreign workers, thus rendering them dependent on their local sponsor for their employment and legal statutes. This framework has been linked to "...low wages, poor working conditions, and employee abuse. Racial discrimination and gender-based violence".⁵⁹ ALQST has described it as "...an abusive recruitment framework that ties foreigners working in the kingdom to an individual resident", entrenching the migrants' position of dependence and subordination *vis-à-vis* their sponsor.⁶⁰
74. In March 2021, Saudi authorities introduced reforms to the *kafala* system to allow workers, under certain circumstances, to change employers and apply for an exit permit to leave the country without obtaining their sponsor's consent.⁶¹ Similarly, in October 2023, the Ministry of Human Resources and Social Development enacted new regulations for domestic workers, including a ban on passport confiscation, the establishment of maximum working hours (ten hours per day), minimum age restrictions (21 years old), and provisions allowing contract termination by domestic workers under certain circumstances.⁶²
75. However, as Human Rights Watch has consistently emphasised, "*Saudi Arabia's legal and regulatory framework is failing to address widespread abuses that originate from the*

⁵⁷ Human Rights Watch, [Saudi Arabia Falls Short of Respecting Migrants' Rights](#), 26 June 2024.

⁵⁸ F.BEL AIR, [As the Gulf Region Seeks a Pivot, Reforms to Its Oft-Criticized Immigration Policies Remain a Work in Progress](#), MPI, 5 December 2024.

⁵⁹ Council on Foreign Relations, ['Backgrounder: What is the Kafala System?'](#), 18 November 2022.

⁶⁰ F.BEL AIR, *ibid.*

⁶¹ ALQST, [The Soaring Fantasy, The Harsh Reality : Human Rights in Saudi Arabia in 2023](#), January 2024.

⁶² Kingdom of Saudi Arabia Secretary-General of the Council of Ministers, [Ministerial Decision No. 40676 of 2 October 2023 \(03/17/1445 AH\)](#), October 2023 cited in ALQST, [The Soaring Fantasy, The Harsh Reality: Human Rights in Saudi Arabia in 2023](#), January 2024, p.50.

kafala system".⁶³ While recent reforms represent a step forward, they remain limited as they fail to provide effective protection to migrant workers, including provisions that fail to set a minimum wage, allow the employer to choose the weekly rest day, and which lack proper enforcement mechanisms.⁶⁴ Concerns also persist over the implementation and enforcement of these measures; ALSQST stressed that "*The real impact of the new law now rests on the degree of implementation and enforcement, which historically has been poor*".⁶⁵

76. In January 2025, as the country "...embarks on the massive construction programme required to deliver the [FIFA World Cup] tournament...", the African Regional Organisation of the International Trade Union Confederation (ITUC-Africa) called for an independent monitor to assess migrant workers' conditions in Saudi Arabia. FIFA's General Secretary, Mattias Grafström, stated that the Federation intends to "engage constructively" with international labour rights organisations. He noted that "*The FIFA World Cup will shine a spotlight on Saudi Arabia for the years to come, which can provide an opportunity for actors within the country and beyond to promote positive change*".⁶⁶ Reinforcing this position, FIFA's Director of Media, Bryan Swanson, affirmed that FIFA will "...engage with international labour organisations throughout the process" and highlighted that FIFA has implemented "...far-reaching human rights due diligence measures..." in connection with its tournaments since 2016 and continues to strengthen these systems.⁶⁷

77. The imperative of monitoring migrant worker's conditions is reinforced by recent investigations, including one published by *Play the Game* in February 2025 which revealed that migrant workers "...are trapped in debt bondage, having paid illegal recruitment fees to secure employment in Saudi Arabia". This report revealed that one worker had paid an agent 650,000 taka (approximately 5,350 US dollars)—amounting to nearly twice the average annual household income in rural Bangladesh—to obtain a work visa, forcing him to "...work for free for two years..." to repay his debt. Others reported

⁶³ Human Rights Watch, "[Die First, and I'll Pay You Later](#)", Saudi Arabia's 'Giga-Projects' Built on Widespread Labor Abuses, 4 December 2024.

⁶⁴ Amnesty International, [The State Of The World's Human Rights](#), April 2025, p.318.

⁶⁵ ALSQST, *ibid*, p.50.

⁶⁶ P.MACINNES, [Fifa rejects request for monitoring of migrant workers' conditions in Saudi Arabia](#), The Guardian, 27 January 2025.

⁶⁷ B.SWANSON, [Fifa is committed to protecting migrant workers in run-up to 2034 World Cup](#), 7 February 2025.

enduring wage theft and extortion, stating that “...*they have worked for four months but only received one month’s salary...*” and “...*many (are) forced to pay about a quarter of their meagre wages each month to their Saudi sponsor for their residence permit*”.⁶⁸

78. Migrant workers further disclosed that those who have protested against non-payment of wages were subsequently raided by the authorities—a clear act of intimidation and coercion. Furthermore, given the prohibition on trade unions, migrant workers were unable to organise collectively “...*owing to the fear of arrest, further intimidation, discrimination, or even detention under falsified charges*”.⁶⁹
79. Saudi Arabia continues to prohibit migrant workers from joining trade unions and participating in collective bargaining or strikes.⁷⁰ Such practices fully contradict FIFA’s Policy, which clearly states that host countries must adhere to international labour and human rights standards.
80. In addition to the systematic abuses faced by migrant workers across all sectors, including illegal recruitment fees, debt, low wages, and restricted rights, those employed on construction sites are further exposed to hazardous conditions. In October 2024, the documentary *Kingdom Uncovered: Inside Saudi Arabia*, which was broadcast on ITV (a British television channel), reported that 21,000 Indians, Bangladeshis, and Nepalis had died in Saudi Arabia since 2017 working on the country’s Saudi Vision 2030.⁷¹ This risk is particularly acute given that “*The construction related to the 2034 World Cup is unprecedented in size and scale and expected to take until 2032 to complete*”.⁷²
81. In March 2025, *The Guardian* revealed that Muhammad Arshad, a Pakistani foreman in his mid-30s, died working on the construction of the Aramco Stadium in Al Khobar, a new stadium being built for the 2034 World Cup.⁷³ His death marked “...*the first reported fatality among migrant workers associated with the tournament’s infrastructure*

⁶⁸ P.PATTISSON, [*Debt, sweat, and abuse: The price of building Saudi Arabia's sporting future*](#), *PlaytheGame*, 11 February 2025.

⁶⁹ BWI, [*Migrant Worker Conditions in the Kingdom of Saudi Arabia: An Overview of Worker Abuses Linked with Forced Labour*](#), 2024, p.16.

⁷⁰ *Ibid*, p.12.

⁷¹ ITV, [*Kingdom Uncovered: Inside Saudi Arabia*](#), 3 October 2024.

⁷² Human Rights Watch, [*“Die First, and I’ll Pay You Later”, Saudi Arabia’s ‘Giga-Projects’ Built on Widespread Labor Abuses*](#), 4 December 2024.

⁷³ P.PATTISSON, [*First migrant worker dies building a World Cup stadium in Saudi Arabia*](#), 21 March 2025.

projects”.⁷⁴ In response, Saudi Arabia’s Sports Minister declared that an investigation had been initiated to determine the circumstances of the incident and to establish accountability, asserting that workers’ safety was being taken “seriously”.⁷⁵

82. However, workers were reportedly instructed to delete any video footage of the incident and refrain from discussing it with others. Such reports are particularly concerning given that, under Saudi labour law, only deaths or injuries resulting from work are classified eligible for compensation. In the majority of cases involving injuries or fatalities, Saudi authorities have consistently failed to conduct an adequate investigation, instead attributing these to “natural deaths” or “cardiac arrests”. As a result, most workers fail to receive compensation.⁷⁶

Minimum requirements yet to be implemented

83. As reiterated by FIFA President Gianni Infantino, “*Whoever ends up hosting the FIFA World Cup must ... formally commit to conducting their activities based on sustainable event management principles and to respecting international human rights and labour standards according to the United Nations’ Guiding Principles*”.
84. Saudi Arabia has been a member State of the ILO since 1976 and has ratified 19 ILO Conventions, including seven of ten core Conventions.⁷⁷ It recently announced the launch of National Policy to prevent forced labour according to the Forced Labour Convention 1930 (No. 29),⁷⁸ and the Promotional Framework for Occupational Safety and Health Convention 2006 (No. 187) will enter into force in June 2025.⁷⁹
85. However, it is submitted that while the ratification of legal instruments and the launch of policies are positive steps, they are insufficient to deliver tangible results. Ensuring the effective respect of international labour standards demands immediate and substantial

⁷⁴ ECDHR, [Pakistani Worker Muhammad Arshad Dies During 2034 World Cup Stadium Construction in Saudi Arabia](#), 2 May 2025.

⁷⁵ ESPN, [Saudi minister defends World Cup workers’ treatment after death](#), 20 April 2025.

⁷⁶ Human Rights Watch, [“Die First, and I’ll Pay You Later”, Saudi Arabia’s ‘Giga-Projects’ Built on Widespread Labor Abuses](#), 4 December 2024.

⁷⁷ ILO, [Ratifications for Saudi Arabia](#), 2025.

⁷⁸ DLA Piper, [Forced labour policy has been implemented](#), 14 March 2025.

⁷⁹ ILO, *ibid*.

measures that can have a meaningful impact on the rights of migrants who are working in Saudi Arabia.

86. In order to ensure Saudi Arabia's compliance with its Human Rights Policy, FIFA must mandate the host State to achieve the following:

- Dismantle the *kafala* system in full and monitor the implementation of the March 2021 reforms to the *kafala* system by:
 - establishing a minimum wage equivalent to that of Saudi nationals and ensuring that all workers' owed wages are compensated;
 - removing illegal recruitment fees to secure employment in Saudi Arabia;
 - ensuring that domestic workers are granted the right to negotiate their weekly rest day with their employers.
- Allow migrant workers to be permitted to join legitimate and independent trade unions in accordance with Art. 22 ICCPR and Art. 35 ACHR and consult them to monitor the treatment of migrant workers.
- Ensure that an independent board of experts can monitor compliance with labour rights and the UN's Guiding Principles of Business and Human Rights by granting access to construction sites.
- Facilitate and monitor investigation in the event of worker deaths on construction sites and ensure that families receive compensation.

5. Women's rights

87. In 2024, the World Economic Forum's Global Gender Index of 146 countries listed Saudi Arabia as 126th, underscoring the continuing gender inequalities within the Kingdom.⁸⁰ Despite recent reforms, the report indicates that significant gaps remain.

⁸⁰ World Economic Forum, [*The Global Gender Gap Index 2024 rankings*](#), June 2024.

88. Although Saudi Arabia ratified the Convention on the Elimination of All Forms of Discrimination against Women in 2000, the Committee on the Elimination of Discrimination against Women (CEDAW) stressed the reluctance of Saudi Arabia to withdraw its reservations to the Convention, which “...constitute[s] an obstacle to the implementation of the Convention as a whole”.⁸¹
89. In October 2024, CEDAW in its concluding observations in its fifth periodic report of Saudi Arabia, “...notes with appreciation the State party’s significant policy changes and legal advancements to mainstream gender equality and women’s rights in its legislative, regulatory and policy frameworks”, however, the Committee was also concerned about the persistence of discriminatory stereotypes against women and girls, reports on harassment and reprisals against women human rights defenders and activists, the maintenance of the death penalty, and the persistence of the male guardianship system.
90. CEDAW notably questioned the authorities regarding reports of torture perpetrated against women who protested the male guardianship system, noting that such protests frequently result in prolonged imprisonment and the imposition of travel bans. UN experts have also stressed that the guardianship system enables male guardians to exert control over women and exposes them to domestic violence, observing that “...when women left home without permission, guardians could compel them to return through the courts”. The Saudi delegation failed to adequately address these concerns, merely indicating that “...husbands were not allowed to impose obedience on their wives; such actions were grounds for the dissolution of marriages and decisions on guardianship considered the opinions of mothers and medical professionals”.⁸²
91. Alarming, the Saudi delegation responded that there was no restriction on the freedom of movement of women except when they had violated the law, and that restrictions aimed to ensure the security of society and prevent the repetition of crimes.⁸³

⁸¹ Committee on the Elimination of Discrimination against Women, [*Concluding observations on the fifth periodic report of Saudi Arabia*](#), CEDAW/C/SAU/CO/5, 30 October 2024, para.11.

⁸² United Nations, [*Experts of the Committee on the Elimination of Discrimination against Women Praise Saudi Arabia’s Efforts to Promote Women’s Economic Empowerment, Ask about Progress in Abolishing the Male Guardianship System and Promoting Women’s Access to Justice*](#), 9 October 2024.

⁸³ Ibid.

92. The Committee also expressed concerns over indications that the draft Penal Code does not adequately protect women from gender-based violence, including harassment, domestic violence, or marital rape.⁸⁴
93. When human rights defenders and activists advocate for the abolition of the male guardianship system and travel restrictions, the State's reliance on the 2017 Counter-Terrorism Law and the 2007 Anti-Cybercrime Law raises particularly serious concerns.⁸⁵
94. In Saudi Arabia, women who advocate for women's rights continue to be exposed to the risk of arbitrary detention, as exemplified by the case of Salma al-Shehab, who has spent more than four years imprisoned on terrorism-related charges for posting tweets. While her release in February 2025 marks a positive development, many others remain imprisoned for their online advocacy for women's rights. Among them is Manahel al-Otaibi, 31,⁸⁶ who, along her sisters, was one of the first to post using the hashtag #IAmMyOwnGuardian to call for an end to the male guardianship system.⁸⁷
95. On 9 January 2024, Manahel al-Otaibi was sentenced by the Specialised Criminal Court to 11 years in prison for "terrorist offences". In February 2025, Amnesty International reported that her family remains prohibited from communicating with her and that her whereabouts are unknown, exacerbating grave concern given the reports of "...*torture, sexual harassment, months of solitary confinement, ill-treatment, and medical neglect she suffered...*", which reportedly occurred mainly during periods "...*when she was completely cut off from the outside world*".⁸⁸
96. In this context, and in line with Vision 2030, which purports to "...*emphasise women's role in development by improving and activating their capacities at the local and international levels as an important element of society*",⁸⁹ Saudi Arabia adopted the

⁸⁴ Committee on the Elimination of Discrimination against Women, [Concluding observations on the fifth periodic report of Saudi Arabia](#), CEDAW/C/SAU/CO/5, 30 October 2024, para.29.

⁸⁵ Ibid, para.17.

⁸⁶ Amnesty International, [Saudi woman imprisoned for tweeting in support of women's rights released after four-year ordeal](#), 10 February 2025.

⁸⁷ T.LEVITT, D.PARENT, [Saudi fitness instructor stabbed in face while jailed over women's rights posts](#), The Guardian, 2 October 2024.

⁸⁸ Amnesty International, [Saudi Arabia : Woman unjustly convicted for posting messages on social media in support of women's rights is subject to enforced disappearance](#), 13 February 2025.

⁸⁹ Kingdom of Saudi Arabia, [Vision 2030, Women's Empowerment](#).

Personal Status Regulations on 21 February 2025, which supplemented the Personal Status Law (PSL) codified in March 2022. The new regulations consist of 41 articles, described by the Saudi Gazette as “...a significant step in enhancing the legal framework governing family affairs”.⁹⁰

97. Under this new legislation, the automatic transfer of a woman’s guardianship from her previous guardian to her husband upon marriage, a traditional practice, may now be challenged. Article 15 allows women to seek the transfer of guardianship to a more eligible guardian. However, while this provision acknowledges the possibility of abuse by guardians, it does not terminate this system, perpetuating a discriminatory legal provision.
98. Amnesty International Deputy Director for Advocacy Sherine Tadros, commenting on Saudi Arabia’s presidency of the UN Commission on the Status of Women (CSW69) in 2025, aptly stressed that “*Saudi Arabia cannot prove its commitment to women’s rights merely by securing a leadership role in the commission. It must demonstrate its commitment through concrete actions domestically*”.⁹¹
99. While Saudi authorities have repeatedly asserted that Vision 2030 includes programs to expand women’s access to services, increase their participation in the labour market, and enhance their empowerment—citing a rise in women’s labour force participation to 37% in 2024—such measures fall short of fulfilling Saudi Arabia’s international obligations. Commitment to women’s rights cannot be confined to economic advancement alone but must extend to guaranteeing the full range of rights enshrined in the Convention on the Elimination of All Forms of Discrimination against Women and other binding international instruments.

Minimum requirements yet to be implemented

100. To ensure that Saudi Arabia complies with its Policy, FIFA must set clear requirements which would ensure the implementation of fundamental women’s rights including by:

⁹⁰ Saudi Gazette, [Saudi Arabia implements new personal status regulations](#), 23 February 2025.

⁹¹ J.HAUSER, [Saudi Arabia to chair UN forum on women’s rights and gender equality](#), 28 March 2024.

- Immediately and unconditionally releasing women human rights defenders who are being detained for exercising their fundamental rights.
- Withdrawing reservations that are incompatible with the object and purpose of the Convention on the Elimination of All Forms of Discrimination against Women.
- Ensuring that women have equal rights regarding marriage, divorce, custody and guardianship over their children, and inheritance.
- Amending the definition of abuse and violence to cover all forms of gender-based violence, regardless of guardianship relationship.
- Amending the Personal Status Law to criminalise marital rape (and, relatedly, remove the requirement for women to “*submit*” themselves to their husbands in order to receive financial support). Saudi Arabia must comply with the Istanbul Convention when it amends this law by, for example, identifying how marital rape will be prosecuted (Arts. 49–58).
- Limiting the scope of the male guardianship system so that women will be the legal guardian for their child if it is in the child’s best interests, as per Art. 33(3) ACHR.

E. CONCLUSION AND INDEPENDENT OVERSIGHT

101. FIFA’s Policy requires adherence to international human rights standards by both bidding states and the host State selected. Despite the codification of these obligations and the clear criteria established at the bidding stage, there is compelling evidence that such obligations have not been respected in practice.

102. Given that Saudi Arabia presently falls significantly short of meeting the obligations set out in international human rights instruments, there are minimum standards that FIFA must impose on the host State. To date, FIFA has failed to take steps to do so.

103. In the current circumstances, unless FIFA support tangible reforms and undertakes active monitoring, the 2034 World Cup will constitute a clear violation of FIFA's own Policy.
104. FIFA must develop a concrete and transparent action plan in collaboration with the Saudi authorities, rather than relying on the host State to act unilaterally. This plan must incorporate the minimum requirements set out in this complaint, ensure their immediate implementation and establish robust mechanisms for ongoing monitoring. To date, no such steps have been initiated by FIFA.
105. To secure meaningful and lasting change, and to avoid the failures witnessed during the bidding stage, independent oversight is essential. Such oversight must include qualified experts drawn from the victims' groups, human rights organisations and other relevant civil society actors. There is as yet no evidence that FIFA is seeking to establish such independent and impartial oversight.
106. These are all fundamental failings that must be rectified by FIFA without delay. It is hoped that this complaint will be addressed by FIFA constructively and in the spirit of his own human rights policies.

Respectfully submitted,

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