



Independent Human Rights Context Assessment

Belgium, the Netherlands & Germany bid to
host the FIFA Women's World Cup 2027™

October 2023

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Abbreviations

BNG	Joint expression of interest by the Royal Belgian Football Association, the Royal Netherlands Football Association and the German Football Association
DFB	The German Football Association
FIFA	Fédération Internationale de Football Association
FWWC27	FIFA Women's World Cup 2027™
HRCA	Human rights context assessment
HRDD	Human rights due diligence
ILO	International Labour Organization
KNVB	The Royal Netherlands Football Association
MSE	Mega-sporting event
RBFA	The Royal Belgian Football Association
UN	United Nations
UNGP	United Nations Guiding Principles on Business and Human Rights: Implementing the "Protect, Respect and Remedy" Framework
UNDHR	Universal Declaration of Human Rights

Executive summary

'How does the national context of Belgium, the Netherlands and Germany, including the national legislation and legal practice, impede or enable FIFA and other involved actors to host the FWWC27 in a manner that respects all Internationally Recognized Human Rights'? That is the question Impactt Limited ('Impactt') sought to answer in Q3 2023 as part of BNG's bid to host the FWWC27.

This independent human rights context assessment is intended to provide BNG with a better understanding of the potential adverse impacts of hosting the FWWC27 on the human rights of players, spectators, officials, local communities, workers and other rights holders and present recommendations for mitigating those risks. The findings provided in this report are to be included in BNG's bid submitted to FIFA and are intended to inform BNG's FWWC27 Human Rights Strategy in order to:

- Create a valuable legacy for future generations by improving the social, economic, and environmental wellbeing of rights holders over the long term
- Improve BNG's management of human rights risks

Key observations

The Impactt team conducted assessment activities including desktop research and interviews with several stakeholders. The findings of the assessment highlighted the following:

- The current perception from interviewed stakeholders is that due to the robust legal human rights frameworks of these three countries this is an incredible opportunity to highlight and advocate for the human rights of women and girls in football and in sports in general. Practically speaking, BNG should not use their countries' human rights legal frameworks as foundations to rest upon but to leverage and launch women and girls' human rights into the public discourse in ways no FIFA Women's World Cup™ has to date.
- Perception of the countries' human rights legal frameworks and legal practice was relatively consistent across all research and stakeholders.
- Potential risks identified fell into the following five general categories:
 - Women and players' risks
 - Labour
 - Discrimination and harassment
 - Security and privacy
 - Local communities

Key risks

Key risks identified are:

- Gender-based violence, harassment and discrimination
- Prevalence and exploitation of undeclared workers from outside the EU working in low-skilled jobs necessary to stage and host the FWWC27
- Supply chain labour exploitation
- Antisemitism, anti-Muslim and anti-LGBTQI+ sentiments that lead to verbal and physical attacks against people from these groups
- Excessive use of force by law enforcement when responding to protesters
- Lack of community voice in planning, staging and hosting the FWWC27 and the potential negative impacts as a result of their absence in the process

Key recommendations

Staging and hosting a FIFA World Cup™ involves not only planning for the potential human rights risks. It should also incorporate planning on how to leave a positive legacy when the World Cup is over. The specific context for the BNG bid poses two significant and unique opportunities for leaving a positive legacy:

- Advancing women's rights in sports
- Modelling and influencing businesses to incorporate human rights due diligence into their operations and supply chains

In addition to these general recommendations, other more specific key recommendations include:

- Adopt a gender-focused and sensitive approach to everything from construction projects to sourcing to economic development to creating safe and inclusive spaces
- Work with FIFPRO (and others) to better understand the physical and mental needs of women athletes and the structural barriers to gender equality in football
- Apply a sector specific approach to identifying and mitigating potential adverse human rights labour impacts
- Implement human rights due diligence processes in order to identify and mitigate potential adverse human rights impacts to workers
- Work with law enforcement to train law enforcement on using crowd control tactics that do not incorporate excessive force
- Scenario-based training for officials on weather-related emergencies, terrorism, and protests

Background and methodology

Background

This independent human rights context assessment is intended to provide BNG with a better understanding of the human rights risks associated with hosting the FWWC27 and present recommendations for mitigating those risks. This report, therefore, focuses on how the respective national contexts of each of these countries may impede or enable FIFA and the respective football associations—RBFA, KNVB, and DFB—to host and stage the FWWC27 in a way that respects Internationally Recognised Human Rights, especially in areas where risks of potential adverse human rights impacts have been identified. This study elaborates on whether:

- The national legislation and legal practice in Belgium, the Netherlands, and Germany are in accordance with relevant Internationally Recognised Human Rights
- There are gaps between the national legislation and legal practice and the relevant Internationally Recognised Human Rights in Belgium, the Netherlands and Germany
- The national legislation and legal practice in Belgium, the Netherlands and Germany contradict the relevant Internationally Recognised Human Rights

This is the first step in BNG’s due diligence journey to address potential adverse human rights impacts associated with staging and hosting the FWWC27. In conducting this assessment, we received wonderful support from the Bid team as well as a wide range of human rights experts. Because of the scale of hosting the FWWC27 across these three countries and the limited scope of FIFA’s bid requirement, our approach is not an in-depth human rights risk or impact assessment. Rather it combines desktop research with stakeholder engagement to identify the most likely salient human rights issues expected to arise from hosting the FWWC27. This report, therefore, does not provide a comprehensive overview of every single human rights issue across each of these three countries. Instead, it identifies general areas where the risk of adverse human rights impacts is most likely and significant and prioritizes these for human rights due diligence by BNG. This approach aligns with the UNGPs and supports and informs the BNG bid team’s development of a human rights strategy that is most likely to prevent negative human rights impacts and promote respect for human rights more generally. If BNG is successful in its bid, a more in-depth human rights impact assessment is recommended.

Sport and human rights

A paradigm shift has occurred in recent years when it comes to approaching the hosting of MSEs. In 2016, at the request of FIFA, John Ruggie developed a set of recommendations on what it means for FIFA to embed respect for human rights across its global operations. In 2018 the Mega-Sporting Events Platform for Human Rights established the independent Centre for Sports and Human Rights. High profile sports and human rights

issues have also drawn increased international scrutiny as evidenced by [Impactt's seven annual, independent reports](#) reviewing the welfare of workers involved in staging and hosting the FIFA 2022 Men's World Cup™ in Qatar. Increasingly, sports—and MSEs in particular—are viewed through a human rights lens.

Sport and MSEs face many human rights challenges. There are repeated instances of racism across the globe. Women and girls are often deprived of their right to public participation and face huge gender gaps in sport—like pay packages, sponsorship opportunities, venue selection, locker room facilities, and egregious sexual abuse of young athletes. While states primarily bear the responsibility for countering racism and discrimination, business enterprises like football associations also bear responsibility for respecting these fundamental human rights. Sport associations, clubs and governing bodies have a unique role to play in protecting human rights by not tolerating racism, developing frameworks and action plans to fight human rights abuses, and making sure that athletes have a safe and inclusive environment to bring their full diversity as they take part in events.

UNGPs

Adopted in June 2011 by the UN, the UNGPs are a group of 31 principles that clarify the duties and responsibilities of states and business enterprises to protect and respect human rights in the context of the activities of businesses. They also lay out principles for access to effective remedy when individuals' human rights are affected. As John Ruggie, the author of the UNGPs, noted with regard to FIFA in *"For the Game. For the World."* *FIFA and Human Rights*, "While FIFA is established as an association, it conducts significant commercial activities on a global scale, making the UNGPs the appropriate reference standard." The same can be said about national football associations like the three that are part of this bid. Because they "conduct significant commercial activities on a global scale," the UNGPs are the relevant standard for guiding them how to conduct their businesses in a way that respects the human rights of others.

Saliency test

Those human rights that are at risk of the most severe negative impact through a company's activities or business relationships are the **salient** human rights issues for that company. When identifying the salient issues for BNG's bid for the FWWC27, therefore, we focused on what we felt were the most severe potential negative impacts on human rights. 'Most severe' being defined in the UNGPs as those impacts that should be prioritized due to their (a) scale—*i.e.*, the gravity of the impact on the human right(s); and/or (b) their scope—*i.e.*, the number of individuals that are or could be affected; and/or (c) their remedability—*i.e.*, the ease with which those impacted could be restored to their prior enjoyment of the right(s).

Methodology

Impactt's Human Rights Context Assessment (HRCA) methodology is informed by the Danish Institute for

Human Rights framework. The methodology is designed to identify negative impacts of BNG hosting the FWWC27 on (1) the community; (2) the workers; and (3) risks to the wider operating landscape, including their business partners. The primary focus is on impacts to people. This HRCA was informed by, and should be read alongside international document outline International Recognized Human Rights such as:

- The Universal Declaration of Human Rights
- Core UN international human rights treaties
- ILO Declaration on Fundamental Principles and Rights at Work
- The International Labour Organisation (ILO) Fundamental Conventions
- United Nations Guiding Principles (UNGPs)

Desktop research

The HRCA team conducted desktop research to define the parameters for the HRCA through gathering preliminary information on the laws, legal practice, history of human rights issues and areas of impact if BNG were to stage and host the FWWC27. The HRCA team researched:

- The social, economic, political and human rights contexts for Belgium, the Netherlands and Germany
- The level of actual human rights enjoyment in each of the three countries
- Understanding who the relevant stakeholders are, including vulnerable individuals or groups in the local context and relevant state actors
- Human rights risks created by MSEs

Sources consulted included:

- Local and international media
- National laws and policies
- Reports by local and international NGOs
- Reports by national human rights institutions

Stakeholder interviews

Indicators were determined based on the potential risks which came out of desktop research of risks of adverse economic and social impacts of hosting the FWWC27 by BNG. The HRCA team then validated these indicators with interviews of external human rights experts. The set of indicators used in this HRCA were selected at the discretion of the researchers and steered by insights gathered during the scoping stage, the expertise of Impactt and discussions with stakeholders. They are based on Impactt's expertise in assessing human rights.

General recommendations

Leave a legacy

Across all of the human rights risk and recommendations, BNG should not only think about how to address a specific risk in the context of hosting the FWWC27. In addition to being mindful of mitigating risks in the present, BNG should also be looking toward the future and what sort of legacy it will leave behind. This legacy can be achieved not only in physical benefits like job creation, improving accessibility of buildings, or reducing contributions to climate change. They should also be seeking ways to leave a human rights legacy like implementing and modelling human rights due diligence for other companies to better understand how to identify and mitigate adverse human rights impacts on people.

Advance women's rights in sports

Given the strong legal frameworks for protecting human rights in these three countries, winning the bid to stage and host the FWWC27 would be a tremendous opportunity to not only champion human rights, but to focus on and elevate the rights of women and girls. BNG should provide a safe and inclusive atmosphere for all players, spectators, workers, and officials, irrespective of gender. But their human rights strategy should also go beyond that to tackle the ongoing structural issues facing women in sports across the globe. Issues like funding, pay, representation, abuse, harassment and mental health. Global interest in the Women's World Cup™ has been growing and resulted in the FIFA Women's World Cup 2023™ in Australia and New Zealand breaking records for attendance and viewership. BNG should seize this opportunity and leverage the FWWC27 to raise the bar for advancing and promoting women and girls in football.

Implement and model human rights due diligence

Implementing a comprehensive human rights due diligence process should be a key part of BNG's human rights strategy. If BNG wins the bid, it is likely that the EU will have passed some version of the Corporate Sustainability Due Diligence Directive. Regardless of whether the three national football associations are required to comply with this legislation, they should look to implement HRDD that is in line with the UNGPs, the OECD Due Diligence Guidance for Responsible Business Conduct. Starting in January 2024 DFB will be required to comply with the German Supply Chain Due Diligence Act, so all three football associations should take their cues from these normative developments and implement HRDD in their operations and supply chains as well.

National legislation and legal practice

The countries of Belgium, the Netherlands and Germany enjoy a high level of human rights protection both in law and practice. Human rights protection is enshrined in the constitution of all three. Germany's constitution, the Grundgesetz, begins with an emphasis on human rights by stating, 'Human dignity is inviolable.' Further, the Grundgesetz guarantees all rights from the Universal Declaration of Human Rights except for an unlimited right for asylum. Similarly, the constitutions of Belgium and the Netherlands codify fundamental human rights. All three countries also have well established functioning court systems that provide human rights victims access to judicial remedy.

Internationally, each of these countries are member states of the European Union and, therefore, subject to the EU Charter of Fundamental Rights. In addition, all three ratified the European Convention on Human Rights and are members of the Council of Europe. This allows human rights victims (individuals or contracting states) to file complaints against these countries with the European Court of Human Rights. All three countries have ratified eight of the nine UN human rights instruments designated as core international human rights treaties. The one treaty not ratified by any of the three countries is the International Convention on the Protection of the Rights of Migrant Workers and Members of Their Families (1990). Belgium has ratified all 11 ILO Fundamental Conventions and Germany and the Netherlands have ratified 10 of the 11.

The legal framework in all three countries, therefore, is largely consistent with the relevant international human rights standards and instruments. Asylum seeker data captured by the UNHCR indicates a possible gap in legal practice when it comes to granting asylum to refugees and migrants. According to 2022 data from the UNHCR the three countries reject new applications for asylum at the following rates:

- Belgium – 42%
- The Netherlands – 11%
- Germany – 55%

This may mean that asylum seekers from certain countries during an event such as the FWWC27 (which may include athletes) might have a difficult time finding asylum in Germany and Belgium. However, all three countries have a robust legal process for asylum seekers, so the risk of violating human rights is low. Nevertheless, relations with the various federal agencies handling asylum applications should be managed for the event.

In all three countries there are areas where enforcement and implementation of human rights are difficult, for example in Belgium, where the UN Committee against Torture has documented a problem with overcrowding and understaffing of prisons and Amnesty International alleges 'violations of the human rights of detainees' in Belgian prisons. And all three countries have been criticized for law enforcement using excessive use force to control protesters. However, the robustness of the judicial systems for redress of these issues is strong.

Priority risks and recommendations

Women and player risks

Risks

- Gender-based violence and harassment. The presence of sometimes aggressive groups of men can deter women's participation in public events and create intimidating conditions on public transportation, thereby exposing women to heightened risks. Unwanted touching in large crowds, unwanted sexual comments and the prevalence of sexualized female images in sponsor advertising are also potential risks. Including the egregious sexual abuse of women athletes.
- Gender-based discrimination across the sport of football. Gender gaps in sponsorship opportunities, venue selection, locker room facilities and pay packages. Also, a risk of women and girls being deprived of their right to public participation in different ways.
- Women who have been subject to discrimination, violence, abuse and harassment in their home countries bring those wounds with them to the FWWC27. Being in an unfamiliar place and the competitive environment can make them even more vulnerable to further abuse and exploitation.

Recommendations

- Use the hosting of the FWWC27 as a platform to tackle gender inequality, the absence of women's voices, gender-based violence and harassment and the results of those human rights abuses (*e.g.*, being deprived of full public participation) at all levels of football in each of the host countries.
- Adopt a gender-sensitive and gender-focused approach throughout the FWWC27 activities to minimize the risk of additional adverse impacts on women and girls.
- Improve gender equality in access to legacy programs which may disproportionately concentrate on men's professional football.
- Ensure access for all athletes to mental health support practitioners during the FWWC27.
- Work with the players' union to better understand and tackle the structural barriers to gender equality.

Labour

Risks

- Exploitation risks to undeclared workers from outside the EU which will fill much of the temporary demand for low-skilled workers surrounding hosting FWWC27. This exploitation may even reach the level of labour trafficking as in the July 2022 discovery of 174 workers (Filipino, Turkish and

Bangladeshi) illegally employed at the Borealis factory in Antwerp, Belgium.

- Safety and health risks to workers due to the short lifecycle of hosting the FWWC27 and the extra pressure to meet deadlines for projects as the event approaches
- While large-scale construction projects to build stadiums may not be necessary with this bid, it is anticipated that the host countries and cities—much like Paris is doing to prepare for the 2024 Olympic Games—will undertake construction projects to improve older structures, enhance infrastructure and accelerate efforts to combat climate change (*e.g.*, installing solar panels, insulating buildings, adding cycle paths). The labour risks from these projects include the labour risks above as well as supply chain risks unique to the product(s) being installed.
- Labour exploitation in consumer goods (*e.g.*, food and beverage/agriculture, apparel & footwear, electronics) supply chains due to increased purchase of products to sell.
- Restrictions to freedom of association and abilities of workers to organize due to the higher use of temporary labour agencies and migrant workers.
- Due to the high percentage of women in the hotel, catering and tourism sector, there is an increased risk of gender-based violence, sexual harassment, and gender discrimination.

Recommendations

- Each of the three national football associations should incorporate human rights due diligence into the management of their operations and supply chains. In January 2024 DFB will need to comply with the German Supply Chain Due Diligence Act because of its number of employees. By the time of the FWWC27 the EU is likely to pass some form of the Corporate Sustainability Due Diligence Directive which may or may not cover DFB, KNBV and RBFA. Regardless, these regulations, as well as the UNGPs and the OECD Due Diligence Guidance for Responsible Business Conduct, provide guidance on how to approach human rights due diligence that should be adopted.
- Apply a sector specific approach to identifying and mitigating potential adverse human rights labour impacts. Focus on developing a labour rights strategy for sectors most impacted by staging and hosting FWWC27:
 - Hotel, catering and tourism
 - Cleaning
 - Construction
 - Private security workers
- In addition to a sector specific approach pay specific attention to the plight of vulnerable workers by championing labour rights of and developing strategies of respect for the following groups:
 - Migrants
 - Women

- Young workers
- Recognise the positive role that trade unions can play in the workplace and the important contribution they can make to the success of the 2027 FWWC. Consider entering into an agreement like the one between [London 2012 and the Trades Union Congress \(TUC\)](#) where agreement was reached on a set of Principles of Cooperation that set out in detail how they would work together to deliver and stage the Games.
- Develop processes for inspections of worksites and locally based mechanisms for responding to worker grievances.

Discrimination and harassment

Risks

- *Antisemitism and anti-Muslim sentiment* – While all three countries have strong anti-discrimination laws protecting against discrimination based on race, religion and nationality, discrimination and harassment persists. There have been credible reports of attacks and hate speech in all three countries including antisemitism and anti-Muslim sentiment.
- *LGBTQI+* – Risk of the creation of hostile and discriminatory environments towards LGBTQI+ people due to discriminatory spectator behavior like chants involving ethnic, racial, gender, and sexual orientation slurs.
- *Accessibility* – There are strong legal protections for disabled persons; however, access to stadiums, public transport and other older buildings may need to be improved. There is also a potential risk of disruption of services to people with disabilities due to hosting the FWWC27.

Recommendations

- The ability of individuals with learning, perception or other similar impairments to enjoy the Competition should be carefully considered.
- Work with venue owners to institute a hotline for antisocial behaviour within venues.
- Active public campaigns against discrimination and harassment.
- Training of law enforcement.
- Ensure adequate access to buildings and stadiums and protect against disturbances to community-wide parking and access to public transportation for disabled people.

Security and privacy risks

Risks

- *Terrorism* – High-profile events such as the FWWC27 have an increased risk of terror attacks which poses security risks to all involved— players, spectators, officials, workers, local communities.
- *Weather-related emergencies* – The increased possibility of extreme weather-related emergencies heightens risks to people's safety during these events due to the gathering of large crowds who can at times be unruly.
- *Freedom of expression & right to peacefully assemble* – When law enforcement tries to guarantee people's safety amid large, unruly crowds, there is a risk of infringing on people's fundamental rights like the rights to freedom of expression and peaceful assembly in public places.
- *Excessive use of force* – There is a risk of law enforcement using excessive force to manage large unruly crowds as seen in all three countries during the COVID-19 pandemic.
- *Journalists and human rights defenders* – If questions or facts arise in connection with the staging and hosting of FWWC27 that are deemed embarrassing or politically damaging, restrictions, prohibitions or punitive measures may be imposed to isolate, defame, or silence journalists and human right defenders. While this risk is low in the host countries, the consequences are serious, so it should be closely monitored.
- Reliance by law enforcement on technology like facial recognition and artificial intelligence is increasing in these countries. This leads to an increased risk of invasion of privacy and using these tools in discriminatory ways.

Recommendations

- Work with law enforcement bodies to create rules surrounding the use of digital surveillance.
- Ensure law enforcement and private security firms are fully trained to act in accordance with the 1979 United Nations code of Conduct for Law Enforcement Officials and the 1990 United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials.
- Host or urge scenario-based training that includes how to respect human rights issues in various emergency and law enforcement situations. At a minimum, personnel should be taught how to respect the following freedoms:
 - Freedom to peacefully assemble and protest
 - Freedom of individual speech and self-expression
 - Freedom from violence and right to safety
 - Freedom from invasion of privacy
- Look for ways to strengthen law enforcement relationships with local communities and to involve local

communities policing activities.

- Work with governments and law enforcement agencies to implement policies surrounding the use of digital surveillance in ways that balance the need to assist law enforcement with the right to individual privacy.

Community risks

Risks

- Risk of negative impacts on lower-income renters due to increased pressure on the housing market. Potential exacerbation of gentrification, eviction, and extreme rent pressures.
- Displacement of homeless and transient populations from tourist and centre city areas leading up to the FWWC27.
- Temporary displacement of public spaces due to Fan Fests, road closures, security operations, and other exogenous demands on public spaces.
- Infringement on the right of communities to have a voice in the process of staging and hosting the FWWC27 due to bypassing normal democratic processes through easing of regulations, heightened policing and fast-tracked contracting.
- Risks towards children from acts of violence, intimidation, sexual harassment, human trafficking, labour violations, and homelessness increase with mega-sporting events like FWW27. While the legal frameworks of BNG are strong regarding the protection of children, this risk must still be considered due to the high vulnerability of children.
- Health pandemic risks to all involved—players, spectators, officials, workers, local communities—due to a resurgence of COVID-19 or outbreak of another new virus.

Recommendations

- Engage with national and local governments to create a health pandemic preparedness plan and train relevant experts on how to implement the plan.
- Work with relevant authorities to ensure essential services and affordable housing to vulnerable households will be protected during the competition.
- Host public meetings to solicit input from communities and maintain public transparency with regard to proposed actions to ensure timely feedback from the communities impacted.
- Work with local authorities to conduct scenario-based training around catastrophic occurrences like terrorist attacks.
- Ensure proper child safeguarding policies are followed. Conduct spot checks to see if proper procedures are being followed to protect children throughout the staging and hosting of the FWWC27.

Appendix 1 – Key legal documents

- UN Guiding Principles on Business and Human Rights
- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- International Bill of Rights (UDHR; International Covenant on Economic, Social and Cultural Rights; International Covenant on Civil and Political Rights)
- UN Declaration of Human Rights
- International Covenant on Economic, Social and Cultural Rights
 - Optional Protocol to the International Covenant on Economic, Social and Cultural Rights
- International Covenant on Civil and Political Rights
 - Optional Protocol to the International Covenant on Civil and Political Rights
 - Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty
- International Convention on the Elimination of All Forms of Racial Discrimination
- Convention on the Elimination of All Forms of Discrimination against Women
 - Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women
- Convention on the Rights of the Child
 - Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography
 - Optional Protocol to the Convention on the Rights of the Child on the involvement of children in armed conflict
 - The Core International Human Rights Treaties Optional Protocol to the Convention on the Rights of the Child on a communications procedure
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
 - Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families
- Convention on the Rights of Persons with Disabilities
 - Optional Protocol to the Convention on the Rights of Persons with Disabilities
- International Convention for the Protection of All Persons from Enforced Disappearance



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