

# “Playing with lives”

Heat risk at FIFA World Cup 2026





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## Abbreviations and Acronyms

<b>ACGIH</b>	American Conference of Governmental Industrial Hygienists
<b>FIFA</b>	Fédération Internationale de Football Association
<b>FIFPRO</b>	Fédération Internationale des Associations de Footballeurs Professionnels
<b>TISS</b>	Tata Institute of Social Sciences
<b>WBGT</b>	Wet Bulb Globe Temperature
<b>GLJ-ILRF</b>	Global Labour Justice-International Labour Rights Forum



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## Executive Summary

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When it's extremely hot, there comes a point when your body does not feel good. I even had a fever from staying in the sun for too long. I endured the heat for about five or six months before I reached my limit. That day I took my tools and just got home.

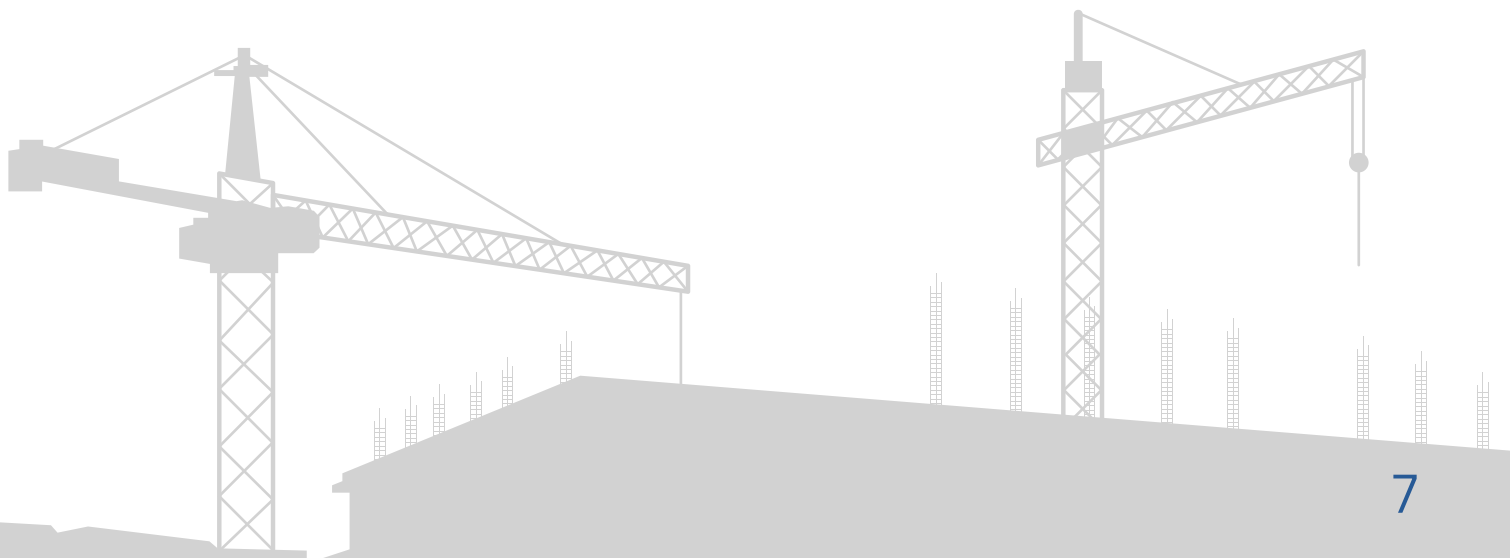
”

– OSCAR, AN ELECTRICIAN WORKING ON TEXAS HEALTH MANSFIELD STADIUM

Workers essential to the delivery of the FIFA World Cup 2026 are being exposed to exploitation and serious risks to their safety and health. Equidem’s research identifies four recurring abuses: structural discrimination and worker vulnerability; unaccountable labour supply chains; restrictions on worker voice and freedom of association; and exposure to predictable workplace harms, including extreme heat

Equidem calls on FIFA to take urgent action:

- Accept responsibility for all workers connected to the tournament and FIFA business operations.
- Guarantee freedom of association, collective bargaining, and worker-led monitoring and remedy systems.
- Address structural discrimination and worker vulnerability.
- Guarantee fair wages and decent working conditions.
- Adopt binding heat protections.



Wherever FIFA (Fédération Internationale de Football Association) has taken the World Cup, the world’s most watched sporting event,<sup>1</sup> there have been serious and systemic human rights abuses. No one has suffered these abuses more than the workers essential to the delivery and execution of the tournament. FIFA’s statutes and its own human rights policy impose binding obligations on the organisation to respect internationally recognised human rights across its operations, business relationships, and tournament supply chains. Yet with each tournament cycle, FIFA has failed to meet those obligations. The labour rights abuses that result are not accidents. They are foreseeable and predictable outcomes of a model that systematically places accountability at a distance from the workers who make the World Cup possible.

The labour rights risks associated with FIFA tournaments continue to recur despite years of warnings, evidence, and reform commitments. For more than five years, Equidem has investigated labour rights conditions linked to FIFA tournaments, bidding processes, and tournament supply chains. Our research has documented the experiences of migrant construction workers building World Cup infrastructure, hospitality workers serving tournament guests, security guards protecting tournament venues, and garment workers producing FIFA-branded merchandise. Across these investigations, a consistent pattern has emerged.

Labour rights abuses arise from structural features of FIFA’s tournament delivery model that repeatedly place workers at risk while diffusing accountability for preventing and remedying abuse. The findings presented in this briefing draw on a body of work spanning multiple FIFA tournament cycles. The report presents new evidence from FIFA World Cup 2026 operations in North America, including an occupational health and safety risk assessment conducted at Texas Health Mansfield Stadium, a designated FIFA Team Base Camp; and original heat-risk modelling across 16 FIFA 2026 Stadiums and 42 FIFA 2026 Base Camps, developed by Equidem in partnership with the Tata Institute of Social Sciences (TISS).

Further, it situates these findings within Equidem’s broader body of research on labour rights and FIFA tournament operations conducted between 2020 and 2026 (Table 1). Over this period, Equidem has investigated working conditions affecting migrant construction workers delivering World Cup infrastructure in Qatar; hospitality workers serving tournament guests across 32 FIFA World Cup hotels; security guards employed during FIFA World Cup 2022 operations; workers producing FIFA-branded apparel in Bangladesh; and migrant workers employed in sectors expected to contribute to delivery of the FIFA World Cup 2034 in Saudi Arabia. Together with Equidem’s ongoing case work and advocacy concerning labour rights abuses linked to FIFA tournaments,

<sup>1</sup>The FIFA Men’s World Cup is the single most-watched sporting event globally, with cumulative tournament audiences exceeding 5 billion people and over 1.5 billion concurrent viewers for the final match of the previous tournament in Qatar in 2022 alone. “2026 World Cup: The Most-Watched Sporting Event in History?”, Sports Illustrated, December 3rd, 2025, available online at: <https://www.si.com/soccer/2026-world-cup-the-most-watched-sporting-event-history> (accessed on June 19th, 2026).

these investigations trace the expansion of inquiry from stadium construction to hospitality, security, global supply chains, training facilities, and team base camps. The result is a multi-sector, multi-country evidence base that allows this briefing to assess not only individual labour rights violations, but recurring structural risks across the full labour footprint of FIFA tournaments.

Wherever FIFA takes the World Cup, the same structural conditions reproduce themselves and thousands of workers in the most vulnerable positions continue to bear the costs. FIFA has repeatedly failed to meet its binding human rights responsibilities, with severe and foreseeable consequences for workers' rights. The impacts are not accidents: they are predictable, they have been predicted, and FIFA has been warned, including through Equidem's own successive investigations, and has failed to act. Closing this accountability gap requires FIFA and its partners to embed enforceable human rights due diligence across tournament supply chains, guarantee workers' access to remedy, and establish independent monitoring with the power to compel corrective action. This report concludes with a set of recommendations for FIFA, host governments, sponsors, and broadcasters aimed at achieving these reforms.



## FIFA Accountability Project

To respond to this pattern of compulsive failure, Equidem is launching the FIFA Accountability Project. This report therefore marks the launch of Equidem's FIFA Accountability Project, a long-term initiative examining the full labour footprint of FIFA tournaments and the effectiveness of the mechanisms intended to safeguard workers' rights. The project's central premise is that meaningful accountability requires more than identifying abuses after they occur. It requires addressing the structural conditions that allow the same labour rights concerns to reappear across tournaments, sectors, and geographies. If FIFA is to avoid playing the same game across successive World Cup cycles, it must move beyond recognising labour rights risks and take meaningful action to address the systems that continue to reproduce them.

**Table 1: Building the Evidence Base—Equidem's FIFA Labour Rights Investigations**

Research Period	Publication / Intervention	Workers and Sectors Examined	Key Contribution to the FIFA Accountability Project
2020-22	If We Complain, We Are Fired (2022)	Equidem conducted in-depth interviews with 60 migrant workers employed across FIFA World Cup Qatar 2022 stadium construction projects.	Documented nationality-based discrimination, barriers to labour mobility, wage theft, excessive working hours, occupational safety concerns, and retaliation for raising complaints. Established early evidence that labour rights risks were rooted in structural features of tournament labour markets rather than isolated employer misconduct.
2022-23	Stark Security Case Work and Advocacy	Case work involving security guards employed during FIFA World Cup Qatar 2022 operations. Findings were documented through direct worker engagement and subsequently covered by Reuters, The Guardian, The Telegraph, Sports Illustrated, The Athletic, Arab News, and other outlets.	Demonstrated how workers could contribute directly to tournament delivery while facing retaliation, arbitrary termination, detention, deportation, and barriers to remedy after raising concerns regarding unpaid wages and working conditions.
2021-23	We Work Like Robots (2023)	Interviews with 60 hospitality workers employed across 32 FIFA World Cup Qatar 2022 hotels, representing workplaces employing approximately 9,000–10,000 workers.	Demonstrated that labour rights risks extended beyond construction into hospitality operations. Documented nationality-based wage discrimination, excessive working hours, production pressure, barriers to worker voice, and unequal treatment across hotel workforces.

Research Period	Publication / Intervention	Workers and Sectors Examined	Key Contribution to the FIFA Accountability Project
2022-23	FIFA Apparel Supply Chains in Bangladesh (2023)	Interviews with 60 garment workers producing FIFA-branded apparel, supported by factory-level investigation and document review.	Extended the analysis beyond tournament host countries into FIFA procurement supply chains. Documented gender discrimination, wage theft, excessive production targets, barriers to promotion, sexual harassment, and occupational health and safety concerns affecting women workers producing FIFA merchandise.
2023-24	Saudi Arabia and the Fast-Tracked FIFA World Cup 2034 Bid (2024)	Interviews with 74 migrant workers employed across sectors expected to contribute to FIFA World Cup 2034 delivery.	Identified nationality-based discrimination, workforce hierarchies, barriers to worker organising, and labour market structures that heighten vulnerability to abuse. Demonstrated that FIFA was entering another high-risk labour market despite lessons from Qatar.
2025-26	FIFA 2026 Worker Heat Stress Dashboard (Equidem-TISS)	Occupational heat-risk modelling covering 16 FIFA 2026 stadiums, 42 FIFA 2026 team base camps, and more than 358,000 hourly climate observations.	Demonstrated that one of the defining labour rights concerns associated with Qatar—occupational heat exposure—remains a foreseeable and measurable risk across FIFA 2026 operations. Introduced labour footprint mapping as a tool for proactive accountability.

Research Period	Publication / Intervention	Workers and Sectors Examined	Key Contribution to the FIFA Accountability Project
2025-26	Texas Health Mansfield Stadium Labour Rights and OHS Risk Assessment	Worker interviews, site-level labour rights analysis, and occupational heat-risk assessment conducted at a designated FIFA 2026 Team Base Camp.	Extended investigation beyond flagship stadium construction to FIFA-linked training facilities and base camps. Examined labour rights, subcontracting structures, worker protections, healthcare access, heat exposure, and accountability gaps within FIFA 2026 preparations.
2020-26	Launch of Equidem FIFA Accountability Project	Construction, hospitality, security, procurement supply chains, training facilities, and team base camps across multiple FIFA tournament cycles.	Reveals recurring patterns of structural discrimination, fragmented labour supply chains, restrictions on worker voice, and exposure to workplace harms across FIFA tournaments, sectors, and geographies.

Taken together, this evidence provides a unique longitudinal perspective on how labour rights risks emerge and recur across FIFA tournaments, sectors, and geographies. Across this body of work, Equidem has repeatedly documented four recurring labour rights concerns: structural discrimination and worker vulnerability; unaccountable labour supply chains; restrictions on worker voice and freedom of association; and exposure to predictable workplace harms. Further, this report advances a different approach to FIFA accountability. Much of the public debate surrounding labour rights in

mega-sporting events has focused on individual scandals, individual employers, or individual tournament sites. Equidem's FIFA Accountability Project instead examines FIFA's labour footprint as a system. It asks whether the same labour rights risks reappear across tournament cycles, sectors, countries, and employment relationships, and whether FIFA's accountability systems are capable of reaching the full workforce required to deliver modern tournaments. By tracing labour rights conditions across construction, hospitality, security, procurement supply chains, training facilities, and team base camps, the

project seeks to identify not only labour rights violations but the structural conditions that reproduce them.



The first is structural discrimination and worker vulnerability. Across successive tournaments, workers most exposed to exploitation are migrants, racialised minorities, undocumented workers, or workers recruited from economically marginalised communities. While the legal frameworks differ across countries, these workers occupy positions of heightened vulnerability and face greater barriers to asserting their rights.

The second is unaccountable labour supply chains. FIFA tournaments depend on complex networks of contractors, subcontractors, labour suppliers, staffing agencies, and service providers. These fragmented employment arrangements create distance between FIFA and the workers who make tournaments possible, allowing responsibility for labour conditions to become diffused across multiple actors and making effective oversight more difficult.

The third is restrictions on worker voice and freedom of association. Across tournaments, workers have reported barriers to organising, collective bargaining, reporting abuse, and accessing remedy. Whether through retaliation, immigration-related fears, restrictions on freedom of association, or ineffective grievance mechanisms, workers often face significant obstacles to exercising the rights that should protect them from exploitation.

The fourth is exposure to predictable workplace harms. Workers remain exposed to foreseeable risks associated with excessive working hours, wage insecurity, unsafe working conditions, inadequate social protections, and occupational health and safety failures. Among the most significant of these risks is extreme heat. Through heat-risk modelling developed with the Tata Institute of Social Sciences and worker interviews conducted at Texas Health Mansfield Stadium, a designated FIFA World Cup 2026 Team Base Camp, Equidem identifies significant risks associated with heat exposure, production pressure, and inadequate worker protections. These findings demonstrate that one of the defining labour rights concerns of the Qatar World Cup remains highly relevant to tournament operations today. As laid out in this briefing, these risks expose workers to predictable workplace

workplace harm including the impacts of extreme heat and cold and occupational health and safety hazards accelerated by production pressure.

The most visible risk documented by Equidem’s FIFA 2026 research is occupational heat exposure. Equidem’s heat stress dashboard, developed with the Tata Institute of Social Sciences, models Wet Bulb Globe Temperature (WBGT) across FIFA 2026 stadiums and team base camps. Wet-bulb temperature—a measure combining heat and humidity—offers a globally accepted threshold for human survivability. Above 30°C (86°F), the body begins to undergo hyperthermia; at 32.1°C (89.78°F), all continuous labour must cease to avoid fatal health risks.<sup>2</sup> FIFPRO (Fédération Internationale des Associations de Footballeurs Professionnels) guidelines additionally recommend mandatory cooling breaks when WBGT exceeds 26°C (78.8°F) and postponement or suspension of matches when WBGT exceeds 28°C.<sup>3</sup>

Taken together, these recurring concerns reveal a broader accountability challenge. Public scrutiny often focuses on stadium construction and match-day operations, yet the World Cup depends on a far larger workforce employed across training facilities, team base camps, hotels, security services, transport systems, procurement supply chains, and other tournament-related operations. Equidem refers to this wider workforce as FIFA’s labour footprint. Many of these workers remain distant from the systems intended to protect them. As FIFA’s tournaments continue to expand in scale and complexity, so too does the labour footprint required to deliver them.

The dashboard shows that from 2024-2026, FIFA venue construction and renovation work coincided with hundreds of work hours under dangerous heat exposure measured by WBGT heat levels. The top risk venues included:

- New York Jersey Stadium, recording 36.4°C
- Mansfield, TX recording 35.6°C.
- Philadelphia Stadium, recording 35.2°C
- Hardrock Stadium recording 32.8°C.

<sup>2</sup>Jacklitsch B, Williams WJ, Musolin K, Coca A, Kim J-H, Turner N. Criteria for a Recommended Standard: Occupational Exposure to Heat and Hot Environments. Cincinnati, OH: US Department of Health and Human Services, Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health (NIOSH), DHHS Publication No. 2016-106, 2016. Available at: <https://www.cdc.gov/niosh/docs/2016-106/>. See also ISO 7243:2017, Hot Environments — Estimation of the Heat Stress on Working Man, Based on the WBGT Index (Geneva: International Organization for Standardization, 2017). WBGT thresholds for work/rest schedules are also published by the American Conference of Governmental Industrial Hygienists (ACGIH) as Threshold Limit Values (TLVs) for heat stress.

<sup>3</sup>FIFPRO, 'Eleven Tips for Dealing with Hot Conditions in Professional Football,' <https://fifpro.org/en/supporting-players/health-and-performance/extreme-weather-and-climate-change/eleven-tips-for-dealing-with-hot-conditions-in-professional-football>. See also FIFPRO Medical Director Dr Vincent Gouttebauge, quoted in ESPN, 'FIFPRO: US Summer Temps a Concern for 2026 World Cup,' June 2025, [https://global.ESPN.com/football/story/\\_/id/45619017/fifpro-us-summer-temps-concern-2026-world-cup](https://global.ESPN.com/football/story/_/id/45619017/fifpro-us-summer-temps-concern-2026-world-cup). FIFA’s own threshold for postponement is 32°C WBGT — a gap that health and climate scientists have described as “impossible to justify.” See World Weather Attribution, 'Climate Change Big Player at FIFA World Cup 2026,' May 2026, <https://www.worldweatherattribution.org/climate-change-big-player-at-fifa-world-cup-2026/>.

**Table 2: Equidem FIFA Accountability Project Framework**

Accountability Dimension	Associated Risks Documented in Equidem Research
Structural Discrimination and Worker Vulnerability	Nationality-based and racial discrimination; recruitment-related debt bondage; tied employment arrangements; barriers to labour mobility; unequal pay and working conditions; exploitation of migrant, undocumented, and economically marginalised workers.
Unaccountable Labour Supply Chains	Extensive reliance on contractors, subcontractors, and other labour intermediaries; fragmented responsibility for labour conditions; weak oversight; limited transparency; barriers to remedy; accountability gaps across supply chains and tournament operations.
Restrictions on Worker Voice and Freedom of Association	Retaliation for complaints; barriers to organising and collective bargaining; fear of dismissal, deportation, detention, or blacklisting; ineffective grievance mechanisms; restrictions on worker participation in monitoring and remedy processes.
Exposure to Predictable Workplace Harms	Excessive working hours; wage theft and income insecurity; unsafe working conditions; inadequate health and safety protections; exposure to silica dust and other occupational hazards; extreme heat exposure; inadequate access to healthcare and social protections.



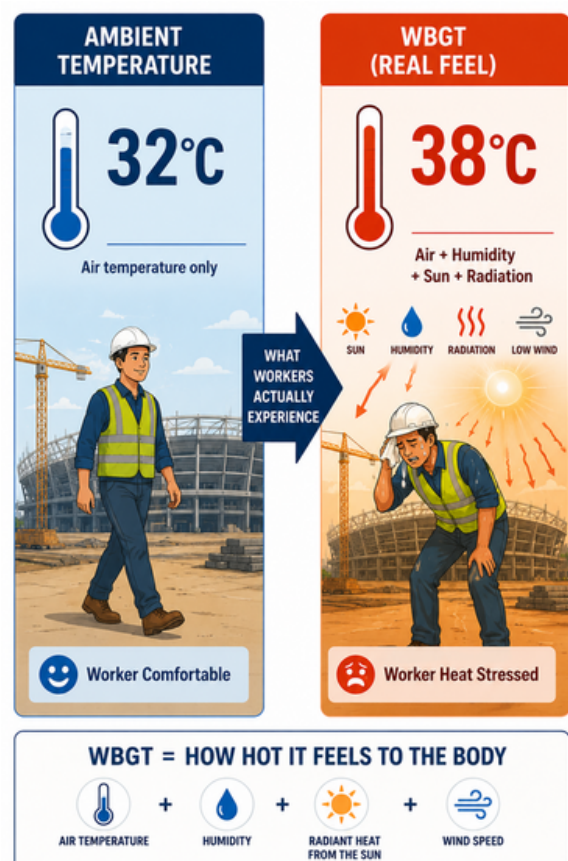
## Methodology

This briefing combines original occupational health, climate-risk, and a labour rights risk assessment conducted in relation to FIFA World Cup 2026 infrastructure with analysis from Equidem's previous investigations into FIFA World Cup Qatar 2022 stadium construction, FIFA-linked hospitality operations, FIFA apparel supply chains, Saudi Arabia's successful bid for the FIFA World Cup 2034, and case work involving security guards employed during the Qatar tournament.

The new research conducted for this briefing has two components. First, Equidem partnered with the Tata Institute of Social Sciences to develop a FIFA 2026 Worker Heat Stress Dashboard examining occupational heat exposure across all 16 FIFA World Cup 2026 host stadiums and one designated training facility.

The project models and visualises Wet Bulb Globe Temperature (WBGT), the internationally recognised occupational heat stress index that integrates temperature, humidity, solar radiation, and wind into a single worker-safety metric. The analysis draws upon more than 358,000 hourly records covering the 2024–2026 construction period and uses climate data from ERA5 reanalysis datasets and NASA POWER. The modelling applies the Liljegren et al. (2008) heat stress methodology and identifies dangerous heat exposure windows, compares risk across venues, and assesses worker exposure during active construction and renovation periods.

The methodology incorporates two key adaptations for this study context: surface albedo values were adjusted to reflect the absorptive properties of grass and concrete surfaces typical of stadium construction sites; and since solar radiation data provided by ERA5 at an hourly time step is recorded as the mean within that particular time interval rather than an instant value, the geometry of the sun was determined using the midpoint of each time interval, and the irradiance was constrained to its maximum possible value under clear skies to avoid any physically unrealistic globe temperatures resulting from solar geometry anomalies. The dashboard analyses heat stress through three complementary lenses: extreme-event analysis, stadium-level comparisons, and temporal comparisons across the construction period.



Second, Equidem conducted a focused labour rights and occupational health and safety risk assessment at Texas Health Mansfield Stadium in Mansfield, Texas, which has been designated as the official pre-tournament base camp for the Czechia national team during FIFA World Cup 2026. The site was selected because it was the only identified FIFA 2026 stadium or team base camp facility involving substantial ground-up construction rather than renovation of an existing venue. This made it particularly relevant for assessing labour rights risks associated with construction activity linked to FIFA World Cup 2026 preparations.

The assessment combines worker interviews, occupational health and safety analysis, and heat-risk modelling to examine labour conditions associated with construction and renovation activity at a FIFA-linked facility. The research examined employment arrangements, subcontracting structures, wages and hours, occupational health and safety protections, heat exposure, access to healthcare, access to grievance mechanisms, and workers' ability to raise concerns without fear of retaliation. The briefing situates these findings within Equidem's wider body of research on labour rights and FIFA tournament operations. This includes investigations into the experiences of migrant workers employed on FIFA World Cup Qatar 2022 stadium construction projects; hospitality workers serving tournament guests during the FIFA World Cup Qatar 2022; workers producing FIFA-

branded apparel in Bangladesh; and migrant workers employed in sectors expected to contribute to the delivery of the FIFA World Cup 2034 in Saudi Arabia. The briefing also draws on Equidem's case work involving security guards employed by Stark Security during the FIFA World Cup Qatar 2022, including workers who alleged wage theft, arbitrary termination, detention, deportation, and retaliation after raising concerns regarding unpaid wages and working conditions.

Taken together, Equidem's FIFA-related research has involved interviews with workers across multiple sectors and tournament cycles. This includes interviews with 60 migrant workers employed across all eight FIFA World Cup Qatar 2022 stadiums, supplemented by wider outreach involving 982 workers; interviews with 60 hospitality workers employed across 32 hotels serving FIFA World Cup guests in Qatar; interviews with 54 workers employed in four factories producing FIFA-branded apparel in Bangladesh; interviews with 42 migrant workers across construction, maintenance, hospitality, and security sectors in Saudi Arabia; and interviews with workers employed on FIFA World Cup 2026-related construction activity in North America. These investigations are further supported by Equidem's case work involving Stark Security guards employed during the Qatar World Cup and an extensive review of documentary evidence, media reporting, legal frameworks, and international labour standards.

Across these investigations, Equidem has adopted worker-centred research methods designed to document both individual labour rights violations and the structural conditions that enable them. Interviews have focused on recruitment practices, migration for employment, employment contracts, wages and hours, occupational health and safety, discrimination, freedom of association, grievance mechanisms, access to remedy, and the role of contractors, subcontractors, labour suppliers, staffing agencies, and other labour intermediaries. Where possible, worker testimony has been assessed against documentary evidence, legal and policy frameworks, public records, company statements, media reporting, and international labour and human rights standards.

Given the significant risks workers may face when reporting labour rights abuses, Equidem applies strict duty-of-care procedures across all investigations. Participation in interviews is voluntary and based on informed consent. Interviews are conducted in locations and under conditions designed to protect confidentiality and minimise risks of retaliation. Names and identifying details have been withheld or altered where necessary to protect workers' safety. Many workers interviewed across Equidem's FIFA-related investigations requested anonymity due to concerns regarding dismissal, blacklisting, deportation, detention, or other forms of retaliation by employers or state authorities.

This briefing is not intended to provide an exhaustive account of all labour rights risks associated with FIFA tournaments. Rather, it identifies recurring patterns across Equidem's investigations and assesses whether FIFA's existing human rights and accountability systems are capable of reaching the full labour footprint of its tournaments.



## Mapping FIFA's Labour Footprint

Traditional assessments of labour rights risks associated with mega-sporting events have focused primarily on flagship stadium construction projects. Equidem's FIFA Accountability Project adopts a broader approach. The project conceptualises tournament delivery as a labour footprint extending across multiple sectors, worksites, and employment relationships. This includes workers employed on stadium construction and renovation projects, training facilities and team base camps, hospitality operations, security services, logistics, transport, merchandise production, and other commercial activities linked to tournament delivery.

This approach reflects changes in the organisation of work itself. As labour becomes increasingly outsourced, subcontracted, and fragmented across complex supply chains, accountability systems focused on direct employment relationships risk overlooking significant portions of the workforce.

Mapping the labour footprint therefore serves both an investigative and accountability function, helping identify workers who contribute to tournament delivery but remain outside traditional monitoring systems.



### 1. Promises on paper

#### FIFA's Expanding Human Rights Commitments

Over the past decade, FIFA has adopted an increasingly sophisticated framework of policies, standards, and governance mechanisms intended to address labour and human rights risks associated with tournament delivery. The central question is whether these commitments are capable of translating into effective protection for the full workforce that makes FIFA tournaments possible.

A significant shift occurred in 2016 when FIFA amended Article 3 of its Statutes to commit the organisation to respecting all internationally recognised human rights and promoting the protection of those rights. In the same year, FIFA announced that human rights requirements would be incorporated into the bidding process for the FIFA World Cup 2026 for the first time in the tournament's history.<sup>4</sup>

<sup>4</sup> FIFA Council, FIFA Council Agrees on Four-Phase Bidding Process for the 2026 FIFA World Cup, 10 May 2016. Also FIFA Statutes, Article 3 (2016 revision).

In 2017, FIFA adopted its Human Rights Policy, committing the organisation to identify, prevent, mitigate, and account for adverse human rights impacts linked to FIFA activities, business relationships, and tournament operations. Importantly, these commitments are not limited to FIFA employees. Drawing upon the United Nations Guiding Principles on Business and Human Rights, FIFA's policy recognises responsibilities arising through relationships with host governments, local organising entities, contractors, subcontractors, suppliers, and other business partners.<sup>5</sup>

Labour rights have become an increasingly prominent component of these commitments. FIFA has recognised risks relating to discrimination, migrant worker exploitation, recruitment practices, wages and working conditions, occupational health and safety, freedom of association, collective bargaining, and access to remedy. These commitments have subsequently been incorporated into tournament bidding and hosting requirements. The successful United 2026 bid, for example, committed to ensuring that cities, stadiums, and employers would implement labour rights protections and that workers "of any status" would be able to raise concerns regarding their employment.<sup>6</sup>

FIFA's independent Human Rights Advisory Board, whose mandate was not renewed after March 2021,<sup>7</sup> further recommended that FIFA include labour rights requirements within stadium agreements, promote responsible recruitment and employment practices throughout tournament supply chains, and require contractors and subcontractors to provide fair wages through written employment contracts.<sup>8</sup> These recommendations reflected growing recognition that labour rights risks associated with FIFA tournaments often arise through complex contracting arrangements rather than direct employment relationships alone.

Taken together, these developments represent a significant evolution in FIFA's approach to labour and human rights. FIFA has moved from treating labour rights primarily as a host government responsibility to recognising that labour rights risks may arise throughout tournament operations and business relationships. The challenge, however, lies in translating these commitments into effective protection for workers across increasingly complex tournament operations and business relationships. This question is explored further in the following section.

<sup>5</sup> FIFA, Human Rights Policy (Zurich: FIFA, May 2017), p. 1. Available at: <https://digitalhub.fifa.com/m/1a876c66a3f0498d/original/kr05dgyhwr1uhqy2lh6r-pdf>.

<sup>6</sup> United 2026, Proposal for a United Human Rights Strategy, 2018, p. 43 ("Workers of any status should be able to raise issues related to their employment").

<sup>7</sup> "FIFA Human Rights Advisory Board provides closing report", FIFA.com, March 23, 2021, available online at: <https://inside.fifa.com/organisation/committees/news/fifa-human-rights-advisory-board-provides-closing-report> (accessed on June 15, 2026).

<sup>8</sup> "FIFA Human Rights Advisory Board provides closing report", FIFA.com, March 23, 2021, available online at: <https://inside.fifa.com/organisation/committees/news/fifa-human-rights-advisory-board-provides-closing-report> (accessed on June 15, 2026).

## The Scope of Accountability

The breadth of FIFA's commitments raises an important practical question: who falls within the scope of FIFA's accountability systems? In principle, FIFA's human rights commitments extend beyond direct employment relationships and acknowledge that labour rights risks may arise across the broader systems required to deliver a tournament.

The practical significance of this commitment has grown as FIFA tournaments have expanded in scale and complexity. Modern World Cups depend upon a workforce that extends far beyond stadium construction sites. Tournament delivery relies upon workers employed at training facilities and team base camps, hotels and hospitality services, transport systems, security operations, logistics networks, procurement supply chains, and a wide range of contracted and subcontracted services.

At the same time, labour markets themselves are changing. Around the world, work is increasingly organised through subcontracting chains, labour suppliers, temporary staffing arrangements, outsourced service providers, franchise systems, and other forms of indirect employment. Workers may contribute directly to tournament delivery while remaining several contractual layers removed from FIFA, host governments, venue operators, or principal contractors.

These developments raise important questions regarding the scope of labour rights accountability in the context of mega-sporting events. If human rights commitments are intended to apply across FIFA's activities, business relationships, and tournament operations, how can they be implemented in ways that meaningfully reach workers employed through increasingly diverse sectors, workplaces, and hiring relationships? What mechanisms are required to identify labour rights risks, ensure worker participation, and provide access to remedy across complex labour supply chains?

These questions become increasingly important as FIFA tournaments continue to expand and as growing portions of the workforce operate through indirect, outsourced, temporary, or subcontracted employment arrangements. They form the basis of Equidem's FIFA Accountability Project, which begins from the premise that the effectiveness of FIFA's human rights commitments cannot be assessed solely through policies, standards, or individual cases. Rather, it requires examining whether accountability systems are capable of reaching the full labour footprint of FIFA tournaments, including workers employed through diverse sectors, workplaces, and hiring relationships. The chapters that follow apply this framework to evidence gathered

across multiple FIFA tournament cycles, focusing on four recurring dimensions of labour rights risk: structural discrimination and worker vulnerability; labour supply chains and accountability; worker voice and freedom of association; and exposure to predictable workplace harms.

## 2. Repeated warnings—the labour rights risk FIFA already knew

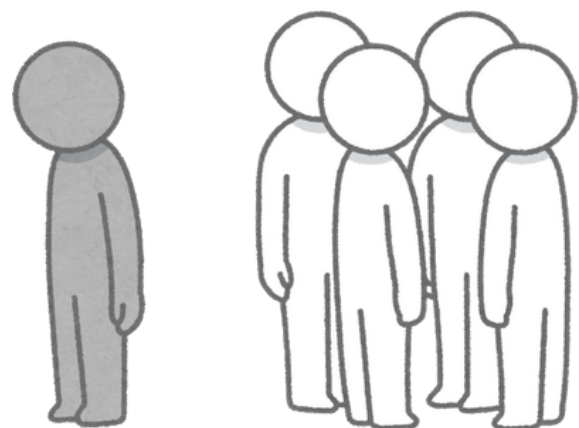
### Structural discrimination and labour market exploitation

Equidem has repeatedly warned FIFA that labour rights risks across tournament operations are shaped by structural discrimination. Across construction, hospitality, apparel production, Equidem research has conclusively shown that workers facing the greatest risk are positioned at the bottom of racialised, gendered, and nationality-based labour markets.

In Qatar, Equidem documented nationality-based discrimination in both stadium construction and World Cup-linked hospitality. In *If We Complain, We Are Fired*, 28 of 60 construction workers reported nationality-based discrimination. Workers described hierarchies in which Qatari nationals, Western workers, and Arabic-speaking workers received better wages, assignments, promotion opportunities, accommodation, rest facilities, and medical access than migrant workers from South Asia and East Africa.

Work Like Robots, Equidem and GLJ-ILRF confirmed nationality-based wage discrimination across all 32 hotels investigated, covering an estimated 9,000–10,000 hospitality workers. Hotel workers reported that wages, promotions, and job categories were shaped by nationality rather than skill, experience, or job requirements.

Equidem identified similar risks in Saudi Arabia at the time of FIFA’s consideration of the country’s bid for the 2034 World Cup. In *Broken Promises*, 42% of migrant workers interviewed reported nationality-based discrimination at work. Workers described higher salaries for Saudi and Arab workers, unequal treatment in access to food, water, restrooms, and supervision, and workplace hierarchies reinforced by workforce nationalisation policies that reserved higher positions for Saudi nationals. FIFA was not entering an unknown context. It was moving towards another World Cup in a labour market where migrant workers face legal, de facto, and structural discrimination despite being essential to the economy.



Equidem’s research on FIFA-linked apparel supply chains in Bangladesh shows that discrimination is also gendered. Women workers producing FIFA-branded apparel were concentrated in subordinate production roles, including machine operator, checker, and helper positions, while being supervised largely by male managers. They reported poverty wages, discretionary raises, barriers to promotion, sexual harassment, illegal denial of childcare and maternity protections, threats of termination for pregnancy, and abuse linked to production targets. These findings show how gendered labour market segmentation can make women workers both essential to FIFA supply chains and disproportionately exposed to exploitation.



**Table 3. Structural Discrimination and Labour Market Exploitation Across FIFA Tournament Operations.**

Labour Market Hierarchy	Evidence from Equidem Research	Labour Rights Consequences
Nationality-based labour market segmentation	In <i>If We Complain, We Are Fired</i> , 28 of 60 construction workers reported nationality-based discrimination. Workers described hierarchies in which Qatari nationals, Western workers, and Arabic-speaking workers received better wages, assignments, accommodation, medical access, and promotion opportunities than workers from South Asia and East Africa. In <i>We Work Like Robots</i> , nationality-based wage discrimination was documented across all 32 World Cup-linked hotels investigated.	Unequal pay for equivalent work; unequal access to promotions and benefits; concentration of migrant workers in lower-status and higher-risk jobs; reduced bargaining power.
Migration status as a source of labour market vulnerability	In Qatar and Saudi Arabia, migrant workers occupied positions characterised by dependence on employers and exclusion from higher-status roles. In <i>Broken Promises</i> , 42% of workers interviewed reported nationality-based discrimination and described workplace hierarchies favouring Saudi nationals and Arab workers.	Increased vulnerability to exploitation; barriers to advancement; unequal treatment in access to workplace resources and protections; heightened dependence on employers.
Workforce nationalisation and occupational hierarchy	Equidem documented labour market structures in Saudi Arabia in which workforce nationalisation policies reserved many higher-status occupations for Saudi nationals while migrant workers remained concentrated in lower-paid and more precarious work.	Systematic concentration of migrant workers in lower-paid positions; unequal access to advancement and leadership roles; reinforcement of structural labour market inequalities.

Labour Market Hierarchy	Evidence from Equidem Research	Labour Rights Consequences
Gendered labour market segmentation	In Bangladesh, women producing FIFA-branded apparel were concentrated in subordinate production roles, including machine operators, checkers, and helpers, while supervisory and managerial positions remained disproportionately male.	Lower wages, barriers to promotion, sexual harassment, denial of maternity protections, pregnancy-related discrimination, and heightened exposure to production pressure.
Structural discrimination as a labour market system	Across construction, hospitality, apparel production, and sectors expected to contribute to FIFA World Cup 2034 delivery, Equidem repeatedly documented labour markets structured around nationality, migration status, race, and gender.	Labour rights risks become concentrated among workers with the least power, lowest status, and weakest access to protection, remedy, and advancement.

**Unaccountable labour supply chains**

A second recurring warning emerging from Equidem's research concerns the organisation of tournament work through increasingly complex labour supply chains. FIFA's human rights commitments recognise responsibilities arising through tournament operations, business relationships, contractors, suppliers, and other commercial partners. Yet the delivery model underpinning modern World Cups moves in the opposite direction. As tournaments expand in scale and complexity, the work required to deliver them is increasingly performed through unaccountable contractors,

subcontractors, labour suppliers, recruitment agencies, hotel operators, security firms, manufacturers, and other intermediaries. These arrangements provide FIFA and tournament operators with flexibility, allowing labour to be rapidly expanded, contracted, and redeployed across sectors as tournament needs change. At the same time, they create distance between workers and the institutions that ultimately benefit from their labour. The result is a recurring accountability challenge: economic power remains concentrated while responsibility for labour conditions becomes fragmented across multiple actors.

Equidem exposed these dynamics in FIFA World Cup Qatar 2022 construction projects. Workers interviewed in *If We Complain, We Are Fired* were overwhelmingly employed through layers of contractors and subcontractors responsible for recruitment, accommodation, wages, transportation, and site management. Workers told Equidem investigators that it was unclear who held responsibility for addressing labour rights violations, while employers were able to shift responsibility across multiple entities operating within the same labour supply chain. The results were significant barriers to accountability and remedy.

Workers on FIFA World Cup Qatar 2022 construction projects also raised concerns regarding the effectiveness of monitoring and inspection systems operating within these subcontracting structures. Workers told Equidem investigators that inspections were announced in advance, that worksites were temporarily cleaned or reorganised before visits, and that workers were coached on how to respond to inspectors. These accounts suggested that existing formal oversight mechanisms do not successfully penetrate the realities of complex labour supply chains, creating a gap between reported compliance and workers' experiences.

Equidem also identified unaccountable labour supply chains in World Cup-linked hospitality operations. In *We Work Like Robots*, Equidem and GLJ-ILRF examined labour conditions across 32 hotels connected to FIFA

World Cup Qatar 2022 operations. Tournament hospitality depended on a workforce that could be rapidly expanded before the World Cup and reduced once demand subsided. Hotels recruited workers through international recruitment channels, labour suppliers, and outsourced employment arrangements, enabling operators to scale labour requirements in response to tournament demand while limiting long-term employment obligations. Responsibility for recruitment, employment conditions, accommodation, and workforce management was distributed across multiple entities operating within the same labour supply chain. These arrangements illustrate how FIFA's tournament model leverages flexible labour systems that enable workers to be mobilised for the commercial demands of the tournament while simultaneously placing accountability for labour conditions at increasing distance from the institutions that profit most directly from the event. Equidem's investigation into FIFA-linked apparel production in Bangladesh demonstrates that accountability challenges become even more pronounced as tournament labour extends beyond host countries and into global commercial supply chains. FIFA did not contract directly with the workers producing tournament merchandise. Instead, FIFA licensed the production of FIFA-branded apparel to Sportsmaster, which in turn sourced production from Sonnet Textile Industries Ltd. in Bangladesh. Through this model, workers

workers producing FIFA merchandise remained multiple contractual layers removed from FIFA despite contributing directly to the tournament's commercial success.

The investigation found that FIFA and Sportsmaster relied on social auditing and factory inspection systems intended to monitor labour conditions at supplier facilities. However, workers described inspection processes that were limited in scope and highly predictable. Factories were reportedly informed in advance of inspections, workers were instructed on how to respond to auditors, and compliance efforts focused on areas likely to be reviewed during site visits. Oversight remained concentrated at the Tier 1 supplier level, while worker testimony revealed labour rights concerns that persisted despite repeated monitoring processes.

The findings raised broader questions regarding the effectiveness of accountability systems that rely primarily on contractual oversight and periodic audits rather than continuous worker engagement and independent verification.

Further, the Bangladesh investigation highlighted a broader challenge for FIFA's human rights framework. As labour moves further away from tournament venues and deeper into global supply chains, responsibility for labour conditions becomes increasingly mediated through licensees, suppliers, auditors, and other commercial actors.

The result is an accountability model in which the workers most distant from FIFA are often those least visible to its oversight systems.

Notably, Equidem raised warnings that these structural concerns are rampant in Saudi Arabia during FIFA's consideration of the country's successful 2034 World Cup bid. Workers described recruitment and employment systems involving labour suppliers, outsourcing arrangements, and multiple intermediary actors that often obscured responsibility for recruitment fees, employment conditions, and workplace protections.

These findings suggested that sectors expected to support FIFA World Cup 2034 delivery would continue to rely heavily on labour systems characterised by fragmented accountability and extensive intermediary control. In this respect, FIFA was not entering a new labour environment but another tournament context in which responsibility for labour conditions was likely to be distributed across complex commercial relationships.

**Table 4. Structural Features of Unaccountable Labour Supply Chains Identified in Equidem Research**

Structural Feature	Evidence from Equidem Research	Accountability Consequence
Fragmented responsibility	Construction contractors and subcontractors in Qatar; labour suppliers and outsourced hospitality workers; Sportsmaster–Sonnet apparel supply chains; labour intermediaries in Saudi Arabia	Workers struggle to identify who is responsible for labour conditions and remedy.
Flexible labour deployment	Rapid recruitment and contraction of hospitality workforces; reliance on temporary and outsourced labour; tournament-driven workforce expansion and reduction	Labour can be scaled to meet tournament demand while risks are shifted onto workers.
Distance from FIFA	Workers employed through multiple contractual layers between FIFA and the workplace	Accountability becomes increasingly attenuated as labour moves further from FIFA's direct operations.
Weak oversight and monitoring	Staged inspections reported by construction workers; predictable audits in Bangladesh; Tier 1-focused monitoring systems	Formal compliance systems fail to capture workers' lived experience and labour rights violations.

## **Restrictions on worker voice, freedom of association and access to remedy**

A third recurring warning emerging from Equidem's research concerns restrictions on worker voice, freedom of association, and access to remedy. Across FIFA tournament operations, workers repeatedly reported barriers to raising concerns, organising collectively, negotiating improvements to working conditions, and securing remedy when rights were violated. While these restrictions took different forms across jurisdictions and sectors, a consistent pattern emerged: workers facing the greatest labour rights risks frequently occupied positions where speaking out carried significant personal, economic, or legal consequences.

## **Restrictions on freedom of association and independent worker representation**

Across Equidem's investigations of FIFA's labour footprint, restrictions on freedom of association and independent worker representation emerged as a recurring structural risk factor for labour exploitation. While labour rights violations often appear as discrete problems—wage theft, discrimination, unsafe working conditions, excessive working hours, recruitment abuses, or retaliation—workers are rarely able

to address these issues effectively through individual action alone. While labour rights violations often appear as discrete problems—wage theft, discrimination, unsafe working conditions, excessive working hours, recruitment abuses, or retaliation—workers are rarely able to address these issues effectively through individual action alone. Freedom of association and collective bargaining are therefore widely recognised as enabling rights because they create the conditions through which workers can advance, defend, and enforce all other labour rights.

Equidem's findings in Qatar and Saudi Arabia demonstrate how restrictions on collective worker voice can increase workers' vulnerability to abuse. During preparations for FIFA World Cup Qatar 2022, migrant workers described labour rights reforms that expanded access to grievance mechanisms and workplace participation initiatives, but independent trade unions and freedom of association remained unavailable to migrant workers. Equidem repeatedly argued that reforms would remain incomplete until workers were able to exercise their right to independent collective representation. Similarly, in Saudi Arabia, Equidem documented a labour market in which trade unions do not operate in practice and worker committees are restricted to Saudi nationals in larger enterprises, excluding the migrant workers who comprise much of the workforce expected to deliver FIFA World Cup 2034 infrastructure and services.

Workers nonetheless described organising informally and engaging in collective action to recover unpaid wages and challenge exploitation, underscoring both the demand for collective representation and its importance in addressing systemic labour rights concerns.

These findings are particularly significant in the context of a broader global weakening of freedom of association. Across many labour markets, legal restrictions, anti-union discrimination, barriers to collective bargaining, and the fragmentation of work through subcontracting and labour migration systems have weakened workers' capacity to organise collectively. In highly migrant-dependent labour markets such as Qatar and Saudi Arabia, these dynamics are compounded by immigration systems that increase the costs of worker organising and amplify employer power.

Equidem's wider body of work also demonstrates that freedom of association functions as a protective factor against labour exploitation. Research across global supply chains has shown that where workers are able to organise collectively, bargain with employers, and build independent representative institutions, they are better able to secure improvements in wages, working conditions, health and safety protections, grievance mechanisms, and protection from discrimination. The denial of freedom of association

therefore does more than restrict a single right; it removes one of the most effective mechanisms available to workers for preventing and remedying abuse.



FIFA is not a passive observer in relation to these risks. Through its bidding processes, host agreements, and human rights requirements, FIFA possesses significant leverage to shape the labour rights environment surrounding tournament delivery. Equidem repeatedly called on FIFA to support recognition of freedom of association and independent worker representation in Qatar and raised concerns regarding restrictions on worker organising during the Saudi Arabia bidding process.

As a condition of hosting the world's largest sporting event, FIFA should require meaningful protections for freedom of association and collective bargaining, helping to establish fairer rules of engagement between workers, employers, and the state. The failure to do so to date has left one of the most important safeguards against labour exploitation largely absent from FIFA's approach to tournament-related labour rights risks.

## Fear of retaliation

Across construction, hospitality, apparel production, and other sectors linked to FIFA tournaments, workers repeatedly described fears associated with raising concerns regarding labour rights violations. In *If We Complain, We Are Fired*, construction workers on FIFA World Cup Qatar 2022 stadiums reported concerns that complaints regarding wages, working conditions, safety issues, or discrimination could result in dismissal or other forms of retaliation. Similar concerns emerged in *We Work Like Robots*, where hospitality workers employed by FIFA hospitality partners described reluctance to challenge excessive working hours, discrimination, or poor working conditions due to fears of negative employment consequences. Women workers producing FIFA-branded apparel in Bangladesh likewise reported workplace cultures in which challenging abusive practices could jeopardise future employment opportunities. Across these sectors, retaliation functioned as a powerful mechanism discouraging workers from exercising rights that formally existed on paper.



## Detention, deportation, and blacklisting

Across Equidem's investigations, restrictions on worker voice frequently operated through the interaction of labour systems and migration systems. Workers feared not only losing their jobs, but also losing legal status, being forced to leave the country, losing future employment opportunities, or being excluded from labour markets altogether. In this way, labour discipline was reinforced by employers and broader migration governance systems that increased the costs of speaking out.

These dynamics appeared repeatedly across FIFA-linked sectors. In *If We Complain, We Are Fired*, migrant construction workers delivering FIFA World Cup Qatar 2022 infrastructure described reluctance to report wage theft, unsafe working conditions, discrimination, excessive working hours, and other abuses because complaints could result in dismissal and repatriation. Workers frequently linked their silence to economic obligations owed to family members dependent on remittances and to debts incurred through recruitment and migration – a form of recruitment related debt bondage. For many, losing employment meant jeopardising the entire economic rationale for migration.

Similar concerns emerged in *We Work Like Robots*, where hospitality workers serving World Cup guests described workplace environments in which workers tolerated excessive working hours, discrimination, and poor working conditions because termination could result in immediate loss of livelihood and the need to leave the country. Equidem identified comparable structural risks in Saudi Arabia during FIFA's consideration of the country's successful 2034 World Cup bid.



Equidem's engagement on the Stark Security cases, however, represent the most visible manifestation of these dynamics. Security guards employed directly in support of FIFA World Cup Qatar 2022 operations reported termination, detention, deportation, and blacklisting after raising concerns regarding unpaid wages and working conditions. This cluster of cases highlight not only the severity of retaliation workers face, but also that even though workers may formally possess rights, grievance mechanisms may formally exist, and labour standards may be formally recognised, the practical costs of exercising those rights can remain prohibitively high.

Taken together, these findings demonstrate how labour systems and migration systems interact to discipline workers and suppress worker voice. Across construction, hospitality, security, and sectors expected to contribute to future FIFA tournaments, workers positioned at the intersection of precarious employment and precarious migration status faced risks extending beyond the workplace. Where speaking out may jeopardise employment, residence, future job prospects, or freedom itself, silence becomes a rational strategy for survival.

**Barriers to effective remedy and accountability**

A final recurring concern across Equidem's investigations relates to workers' ability to access effective remedy when rights are violated. While FIFA, governments, employers, brands, and other stakeholders frequently pointed to grievance mechanisms, auditing systems, labour inspections, and compliance programmes as evidence of accountability, Equidem's research repeatedly identified a gap between the existence of formal accountability mechanisms and workers' ability to secure meaningful outcomes through them.



In Qatar, migrant construction workers and hospitality workers described uncertainty regarding available complaint channels, limited confidence that complaints would be acted upon, and concerns that raising grievances could expose workers to retaliation, dismissal, or other adverse consequences. These concerns were reinforced by labour migration systems that increased workers' dependence on employers and raised the practical costs of reporting abuse. As a result, mechanisms intended to identify and remedy labour rights violations often struggled to function as trusted pathways through which workers could safely raise concerns.

The Stark Security cases further exposed the limitations of formal accountability systems. Security guards directly involved in FIFA World Cup Qatar 2022 operations raised concerns regarding unpaid wages and working conditions through available channels, yet workers reported retaliation including termination, detention, deportation, and blacklisting. These cases highlighted a fundamental challenge: accountability mechanisms are only effective when workers can access them without fear and when complaints result in meaningful protection and remedy. Equidem identified related concerns in global supply chains producing FIFA-licensed apparel in Bangladesh. Workers frequently described



auditing and compliance systems that appeared disconnected from their day-to-day realities. Audits often focused on visible factory conditions, documentation, and production processes while failing to capture excessive workloads, discriminatory treatment, retaliation, or barriers to worker voice. In some cases, workers reported adverse consequences after speaking with buyers or investigators. These findings suggest that accountability systems centred primarily on inspections and audits may struggle to identify labour rights violations when workers themselves are not meaningfully involved in monitoring and enforcement. Taken together, these findings point to a broader structural challenge in FIFA's labour footprint. Across tournament infrastructure, hospitality services, security operations, and global supply chains, accountability

mechanisms have frequently prioritised procedural compliance over effective remedy. The existence of grievance mechanisms, audits, or monitoring systems does not in itself ensure protection for workers. Effective accountability requires systems that workers trust, protections against retaliation, meaningful worker participation in oversight processes, and credible pathways to remedy when rights violations occur. Without these elements, accountability risks becoming a process for documenting abuse rather than preventing it.

**Table 5. Restrictions on Worker Voice, Freedom of Association, and Access to Remedy**

Structural Feature	Evidence from Equidem Research	Accountability Consequence
Retaliation for complaints	Qatar construction, Qatar hospitality, Bangladesh apparel, Saudi Arabia	Workers avoid reporting abuse because complaints may trigger dismissal or punishment.
Labour control through migration control	Qatar construction and hospitality; Stark Security; Saudi risk analysis	Speaking out may risk repatriation, detention, deportation, blacklisting, or loss of legal status.
Legal limits on independent worker representation	Qatar and Saudi Arabia	Workers cannot collectively challenge systemic wage theft, discrimination, unsafe work, or recruitment abuse.
Weak grievance systems	Qatar construction, hospitality, Stark Security	Rights exist on paper but are difficult or dangerous to exercise.
Audit-based accountability without worker power	Qatar construction and Bangladesh apparel	Inspections and audits miss abuses when workers cannot speak freely.
Gendered barriers to remedy	Bangladesh apparel	Women workers face harassment, pregnancy discrimination, and retaliation without trusted routes to remedy.

### 3. Persistent risks—FIFA World Cup 2026 and the limits of reform

Chapter 2 identified three recurring labour rights risks that Equidem has repeatedly documented across FIFA tournament cycles: structural discrimination and labour market exploitation; unaccountable labour supply chains; and restrictions on worker voice, freedom of association, and access to remedy. FIFA World Cup 2026 now provides a test of whether FIFA’s human rights reforms are capable of addressing these risks in practice.

FIFA World Cup 2026 is the first tournament awarded after human rights requirements were formally incorporated into the bidding process. The United 2026 bid committed to setting a new standard for labour rights and to ensuring that workers “of any status” could raise concerns related to their employment. This commitment was significant because the tournament is being delivered across labour markets marked by subcontracting, low-wage service work, racialised labour segmentation, migration-related insecurity, and uneven enforcement of labour standards. The question, therefore, is not whether FIFA has made stronger commitments. The question is whether those commitments are reaching the workers whose labour makes the tournament possible.

#### Texas Health Mansfield Stadium as a Site of Investigation

Equidem’s FIFA 2026 research includes a focused labour rights and occupational health and safety assessment at Texas Health Mansfield Stadium in Mansfield, Texas. The site has been designated as the official pre-tournament base camp for the Czechia national team during the FIFA World Cup 2026. Its significance lies not only in its formal connection to the tournament, but in the type of work being performed there.



Unlike many FIFA 2026 venues, which rely primarily on existing stadium infrastructure, Texas Health Mansfield Stadium involved substantial new construction and preparation linked to tournament use. This made the site an important case for examining how FIFA-linked construction risks appear in the North American context. It also demonstrates why FIFA’s labour footprint cannot be limited to match stadiums alone. Team base camps, training facilities, renovation sites, hospitality operations, and other tournament-linked facilities are all part of the workforce required to deliver the World Cup.

Equidem's interviews with workers at Mansfield identified indicators of serious labour and occupational safety risks, including long working hours, intense production pressure, unpaid weather-related shutdowns, heat exposure, exposure to silica dust and other hazardous materials, lack of employer-funded health insurance, and concerns about retaliation for refusing work or requesting leave.

### **Structural Discrimination and Labour Market Insecurity**

The specific legal framework in North America differs significantly from Qatar and Saudi Arabia. However, the Mansfield evidence shows that FIFA-linked work continues to rely on workers positioned in insecure labour markets. Workers interviewed by Equidem included migrant and racialised workers employed through construction trades and contracting arrangements marked by economic insecurity, limited benefits, and vulnerability to job loss.

Several workers described immigration-related fear as part of their daily lives. One worker reported remaining alert while driving or moving through public space because of concerns regarding immigration enforcement. A tile fixer employed by a contractor at Mansfield Stadium and Texas AT&T Stadium reported remaining constantly alert to immigration-related risks:

**"I stay alert to my surroundings and pay attention to what is happening around me, whether I am driving or going about my daily activities. I watch for anything unusual or suspicious and remain aware of the broader political climate and concerns about immigration enforcement."**

In these accounts, migration status and racialised insecurity can shape workers' ability to feel safe, raise concerns, or assert rights even in a country with formal labour protections.

This risk is not confined to construction. As FIFA 2026 opened, stadium and hospitality workers in the United States publicly raised concerns about low pay, job security, immigration enforcement, and worker safety. At SoFi Stadium in Los Angeles, approximately 2,000 food and beverage workers represented by UNITE HERE Local 11<sup>9</sup> authorised strike action before reaching a tentative agreement. The agreement included wage gains, protections related to subcontracting and automation, and a contractual right to strike if immigration enforcement threatened worker safety during World Cup matches.

This development illustrates a central point of this briefing. Immigration enforcement is not separate from labour rights. For workers whose communities are targeted or chilled by immigration enforcement, the presence or threat of enforcement can shape whether workers feel safe reporting abuse, organising collectively, or remaining at work.

### **Fragmented Accountability in FIFA 2026 Operations**

Equidem's Mansfield research also points to the continued use of fragmented employment arrangements. Workers identified multiple employers and subcontracted relationships across trades including electrical work, masonry, turf installation, waterproofing, painting, excavation, and other construction functions. These arrangements are familiar from Equidem's earlier FIFA research. They allow work to be delivered rapidly across multiple sites while making responsibility for wages, safety, benefits, and remedies harder to locate.

At Mansfield, workers described conditions that suggest the risks of this model. Some reported not receiving written contracts or clear information about wages and terms at the start of employment. An electrician employed through a contractor at Mansfield Stadium explained:

"I know I filled out an application and then got a regular job interview. That was it. I don't know if it's somebody like the head of the contracting company or who signs the contracts, but I don't sign. I have only worked here for nine months. I only did an interview and then they said you're hired. So, I never got a contract.... Payment-wise, I did not know how much they would give me."

Others reported a "no work, no pay" model under which weather-related shutdowns immediately translated into lost income. Workers also described unpaid lunch breaks, long working weeks up to 75 hours a week, and pressure to work faster to meet construction deadlines.

These conditions emerged in a FIFA-linked workplace where accountability was mediated through contractors and subcontractors. This is precisely the structural pattern Equidem documented in Qatar construction, Qatar hospitality, FIFA-linked apparel production, and Saudi Arabia's projected tournament labour market. FIFA's commitments expand in principle, but the workforce remains organised through relationships that diffuse responsibility in practice.

Recent events in Mexico further reinforce this concern. In March 2025, the Building and Wood Workers' International publicly accused FIFA of blocking access to inspect labour conditions at Estadio Azteca, one of the tournament's flagship venues.<sup>10</sup> BWI argued that independent inspection was necessary to verify whether labour commitments were being implemented. The dispute was significant because it concerned not only one stadium, but the right of workers and unions to scrutinise FIFA's labour rights claims. Accountability requires access. Without access, oversight remains dependent on what FIFA and its partners choose to disclose.

### **Freedom of association, worker voice and the risk of silence**

The Mansfield findings also demonstrate that restrictions on worker voice do not require formal prohibitions on organising. Unlike Qatar and Saudi Arabia, workers in Texas possess legal rights to organise, join unions, and engage in collective action. However, these rights operate within a labour market characterised by extensive subcontracting, low union density, immigration-related insecurity, and a right-to-work legal framework

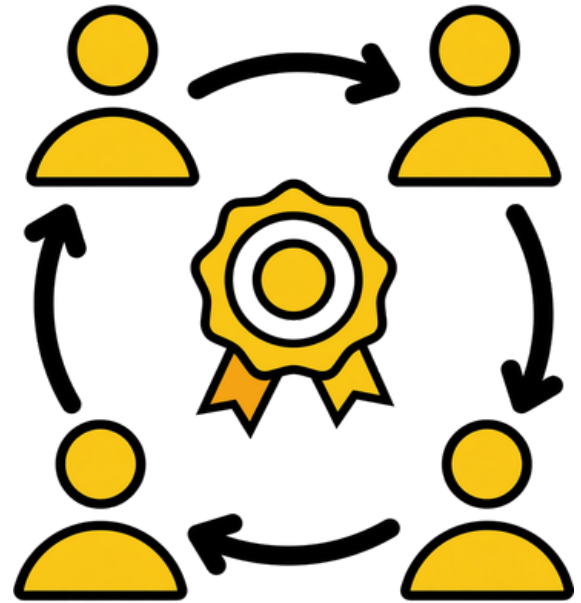
that has historically weakened collective bargaining institutions and reduced union power. Workers interviewed by Equidem described concerns that refusing additional work, requesting leave, or challenging working conditions could result in disciplinary action or dismissal. One mason described working weeks without a day off and feeling unable to request leave because he feared losing his job. Other workers reported pressure to continue working despite fatigue, heat exposure, and restrictions on bathroom breaks. These accounts suggest that formal labour rights do not automatically translate into meaningful worker voice when workers remain economically dependent on employers and contractors for continued employment.

The significance of these findings extends beyond individual workplaces. Across much of the construction sector in Texas, labour is organised through subcontracting chains and temporary employment arrangements that can make collective organising more difficult and diffuse responsibility across multiple employers. For migrant workers, concerns regarding immigration enforcement may further increase the perceived costs of speaking out or participating in workplace organising.

<sup>10</sup>UNITE HERE Local 11, 'Breaking News: Days Before World Cup, SoFi Stadium Workers Win Historic Contract — and Reserve the Right to Strike if ICE Threatens Safety,' press release, 9 June 2026, <https://www.unitehere11.org/breaking-news-days-before-world-cup-sofi-stadium-workers-win-historic-contract-and-reserve-the-right-to-strike-if-ice-threatens-safety/>.

In this respect, the constraints on worker voice documented at Mansfield differ from those identified in Qatar and Saudi Arabia but produce a familiar outcome: workers may possess rights in principle while facing substantial practical barriers to exercising them.

Recent labour disputes connected to FIFA World Cup 2026 demonstrate both the importance of worker organisation and the consequences when workers possess collective power. At SoFi Stadium in Los Angeles, food and beverage workers represented by UNITE HERE Local 11 successfully used the leverage created by the tournament to negotiate wage increases, stronger protections against subcontracting and automation, and contractual protections related to immigration enforcement. The contrast is instructive. Where workers possess effective collective representation, they are better positioned to identify risks, negotiate protections, and secure enforceable commitments. Where worker voice is fragmented or weakened, accountability depends far more heavily on employers, regulators, and voluntary compliance systems.



The Mansfield findings therefore reinforce a broader conclusion emerging across Equidem's FIFA research. Freedom of association is not merely one labour right among many. It is a protective factor that shapes workers' ability to address discrimination, challenge unsafe working conditions, secure remedy, and influence the terms under which tournament labour is organised.



#### 4. Predictable Workplace Harms: Heat, Hazards, and Production Pressure

The most visible risk documented by Equidem's FIFA 2026 research is occupational heat exposure.

Equidem's heat stress dashboard, developed with the Tata Institute of Social Sciences, models Wet Bulb Globe Temperature across FIFA 2026 stadiums and team base camps. The dashboard shows that from 2024-2026, FIFA venue construction and renovation work coincided with hundreds of work hours under dangerous heat exposure measured by WBGT heat levels. The top risk venues, measured by WBGT, included New York/New Jersey Stadium (36.4°C/97.52°F); Mansfield, TX (35.6°C/96.08°F); Philadelphia Stadium (35.2°C/95.36 °F); and Hard Rock Stadium (32.8°C/91.04°F).

At Texas Health Mansfield Stadium, the dashboard recorded peak daily WBGT values exceeding 40°C (104°F) during active construction windows, placing the site in a high or extreme risk category. Workers' testimony confirmed the significance of this modelling. Workers described triple-digit temperatures, exhaustion while working underground, heat severe enough to require self-managed cooling strategies, and reliance on water, shade, and informal breaks rather than clearly enforceable heat protocols.

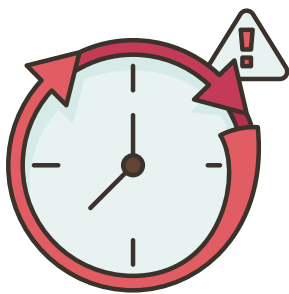
This can be substantiated by the data dashboard revealing that in Mansfield Stadium 23 percent of days had at least one hour exceeding the 28 degree Celsius (82.4°F) WBGT temperature, a total of 793 hours exceeding, the work limit threshold according to ACGIH for moderate continuous work, which is a conservative threshold, considering that construction work falls under the heavy workload category which according to ACGIH has a threshold of 25 degree celsius (77°F) WBGT temperature and 39% of days in construction period crossed that threshold. They also described exposure to extreme cold. A leadman employed by a contractor at Mansfield Stadium described his working conditions:

**"It gets up to 110, 115 degrees (43.3°C,46.11°C) but it feels like 120 degrees (48.89°C). We have to drink a lot of water. In the winter, we can go inside the car. We work whenever we can. In the extreme cold, we get our hands frozen, feet frozen."**



Heat exposure, moreover, interacts with production pressure. A turf grass worker employed by a contractor at Mansfield Stadium described having to work quickly in summer heat because the cement could dry, leaving workers without time to eat:

**“During the summer heat, you have to be faster at work because the cement might dry up. We have to work really hard, really fast. Because of that, we don’t get a chance to eat.”**



A mason described increased hours because the employer wanted to finish brickwork quickly. These accounts show how occupational heat risk is shaped by deadlines, subcontracting, production pressure, and whether workers have enough power to stop work, slow down, or demand protections.

Workers also reported exposure to silica dust, sheetrock dust, glue, insulation, fiberglass particles, and excavation risks. An electrician employed by a contractor at Mansfield Stadium said:

**“I’m working hard, sacrificing myself, and mistreating my body in construction. There are many dangerous things, like silica, the dust from the concrete itself, all of that, in the long or short term, leads to cancer and thousands of other diseases. Even putting in insulation is very toxic and dangerous. It gives itching. And then they don’t see it, they don’t value that. Little by little, exposure each day, you will be in deep trouble.”**

A mechanic employed by a contractor at Mansfield Stadium said:

**“The dust of sheetrock is bad for health. I also deal with glue with chemicals as well. The inhalation of fiberglass particles can cause cancer. We use masks. But some people don’t do it.”**

Several workers said health insurance was technically available but required worker payment, leaving the cost of protection effectively shifted onto workers themselves. Most significantly, the workplace harms documented during Equidem’s occupational health and safety risk assessment at Mansfield were foreseeable, measurable, and preventable.

## 5. Closing the accountability gap

### The data gap

A significant challenge encountered during Equidem's FIFA 2026 research was the absence of publicly available information regarding the workers involved in tournament-related construction and renovation activities. Information regarding contractors, subcontractors, workforce size, workforce composition, occupational injuries, heat protection, and other indicators was often incomplete, unavailable, or difficult to verify.

This lack of transparency is itself an accountability concern. FIFA's human rights framework depends upon the identification, prevention, mitigation, and remediation of labour rights risks. Yet labour risks cannot be effectively assessed where the workforce itself remains invisible. The challenge is compounded by FIFA's reliance on contractors and subcontractors. Although FIFA's Human Rights Policy recognises responsibilities arising through business relationships, labour conditions are frequently managed through intermediary actors operating several contractual layers removed from FIFA itself. As a result, information concerning workers often becomes fragmented across multiple entities, limiting public scrutiny and independent oversight.

The dispute between FIFA and the Building and Wood Workers' International regarding access to inspect labour conditions at Estadio Azteca illustrates the significance of this issue. Independent labour monitoring depends upon access to workers, worksites, and employment information. Where access is restricted, accountability becomes dependent on voluntary disclosure by tournament operators and contractors.



The FIFA Accountability Project therefore identifies transparency regarding the labour footprint itself as a prerequisite for meaningful accountability. Before labour rights risks can be prevented or remedied, the workers exposed to those risks must first be visible.

## The limits of reform without enforceable accountability

The evidence from FIFA World Cup 2026 demonstrates the limits of reform without enforceable accountability. FIFA and United 2026 made significant commitments on paper. But the early evidence from Mansfield, labour disputes in host cities, the Azteca inspection dispute, and heat-risk modelling across tournament venues suggests that known risks remain embedded in tournament delivery.



The risks documented in North America are not identical to those documented in Qatar or Saudi Arabia. They arise under different legal systems and through different labour market institutions. But the underlying pattern is familiar. Workers in lower-wage, racialised, migrant, temporary, subcontracted, and insecure jobs are asked to carry the pressures of tournament delivery. Responsibility for their conditions is distributed across contractors, employers, venue operators, public agencies, and FIFA-linked entities.

This is the core accountability challenge facing FIFA 2026. Reform cannot be measured by the existence of policies alone. It must be measured by whether workers can safely exercise rights, whether contractors and subcontractors are transparent, whether heat and safety risks are monitored before harm occurs, whether unions and worker organisations have access to worksites, and whether all workers connected to the tournament can secure remedy when rights are violated.

FIFA 2026 therefore confirms the central premise of Equidem's FIFA Accountability Project: meaningful accountability requires visibility across the full labour footprint of the tournament. Without disclosure of contractors, subcontractors, suppliers, staffing agencies, and service providers, FIFA cannot credibly claim to know whether its commitments are being implemented. Without worker participation and independent monitoring, it cannot verify whether protections exist in practice. Without enforceable standards, it cannot ensure that predictable harms are prevented.

## Recommendations

### Equidem calls on FIFA to take urgent action:

**Accept responsibility for all workers connected to the tournament and FIFA business operations.** No worker should be excluded from protection because they are employed through a contractor, subcontractor, staffing agency, supplier or service provider. FIFA's human rights responsibilities extend across the full workforce that makes the tournament possible.

**Guarantee fair wages and decent working conditions.** All workers should receive living wages, overtime pay, paid sick leave, predictable schedules, healthcare access, written contracts, paid breaks, protection from wage theft and full payment during weather-related shutdowns.

**Adopt and enforce binding heat protections.** FIFA should carry out and publish heat-risk mapping across all World Cup-related worksites and implement enforceable protections including stop-work thresholds, paid rest breaks, water, shade, cooling measures and medical support.

**Guarantee freedom of association, collective bargaining, and worker-led monitoring and remedy systems.** All contractors and tournament partners should respect union access, worker organising and collective bargaining rights. Workers and their organisations must play a central role in monitoring labour conditions, identifying abuses and ensuring access to remedy.

**Address structural discrimination and worker vulnerability.** FIFA's human rights due diligence should explicitly assess how race, nationality, migration status, recruitment systems, tied employment arrangements and immigration enforcement shape workers' ability to exercise their rights. Special protections should be established for workers who face heightened risks of retaliation, discrimination, deportation, detention, blacklisting or exclusion from remedy.



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