

Complaint on misleading promotion by FIFA and other organisers of the World Cup in Qatar, branding it as a "carbon neutral" World Cup

This complaint is submitted by:

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The complaint is directed at FIFA, of which the headquarters is located at FIFA Strasse 20, P.O Box 8044 Zürich, Switzerland.

Introduction

FIFA and the other organisers of the men's football World Cup in Qatar call this World Cup carbon neutral in communications directed at consumers and ticket holders around the world, including in the Netherlands. They do this on social media and on its own website, on which supporters can buy tickets for matches.

FIFA cannot prove this environmental claim, even if we follow their reasoning of calculating emissions which can be 'compensated'; in reality, a carbon neutral World Cup is not possible.

Therefore FIFA misleads Dutch consumers and tickets holders and is in violation of article 2 and 3 of the Milieu Reclame Code (environmental advertising code, which forms part of the Dutch Advertising Code)¹.

Targeted advertising

FIFA's website:

- FIFA, "Climate Pledge for the FWC", available at: https://www.fifa.com/social-impact/sustainability/climate-pledge?cid=nl_FWC2022ClimateAction_220610_en&s_uid=139790163&deliveryName=DM3899 (last consulted on 30 October 2022).
- FIFA, "What is climate change?", available at: <https://www.fifa.com/social-impact/sustainability/climate-pledge/what-is-climate-change> (last consulted on 30 October 2022).

Further promotional content on social media:

- Road to 2022, "The first carbon-neutral World Cup in history! QA" (5 June 2022) available at: <https://www.facebook.com/watch/?v=1329139284278200> (last consulted on 30 October 2022).
- Road to 2022, "Stadium 974" (5 June 2022) available at: <https://www.facebook.com/watch/?v=392350569576390> (last consulted on 30 October 2022).
- Road to 2022, Carbon Neutral World Cup (8 October 2021) available at: <https://www.facebook.com/watch/?v=374611184366781> (last consulted on 30 October 2022).
- Road to 2022 (@roadto2022en), "And the answer is... First Carbon Neutral FIFA World Cup!" (8 October 2021) available at: <https://mobile.twitter.com/roadto2022en/status/1446503517989097492> (last consulted on 30 October 2022).
- Road to 2022, FIFA World Cup Qatar 2022™ will be carbon neutral (13 June 2020) available at: <https://www.facebook.com/watch/?ref=saved&v=620435001888392> (last consulted on 30 October 2022).
- Road to 2022, "Carbon Neutral World Cup: Preparing for the first ever carbon-neutral World Cup..." (23 April 2021) available at: <https://www.facebook.com/Road-to-2022-114196666974856/videos/1452034338495817/> (last consulted on 30 October 2022).

Complaint

FIFA² is one of the three organisers of the 2022 World Cup, which will take place in Qatar from 20 November to 18 December, together with the Supreme Committee for Delivery & Legacy (a Qatari entity), and FIFA World Cup Qatar 2022 LLC (Q22), a joint venture between FIFA and Qatar.³

¹ See <https://www.reclamecode.nl/nrc/milieu-reclame-code-mrc/> (last consulted on 2 November 2022).

² FIFA is an association under Swiss law, registered in the Commercial Register of the Canton of Zurich.

³ FIFA, "FIFA World Cup Qatar 2022 LLC" (14 May 2019), available at: <https://www.fifa.com/news/fifa-world-cup-qatar-2022-llc> (last consulted on 30 October 2022).

Among the three partners, FIFA is described as follows: “FIFA, world football’s governing body, is the owner of the FIFA World Cup and the ultimate decision-making authority for the tournament, setting the technical requirements, coordinating the delivery of the competition and managing the key tournament stakeholders.”⁴ FIFA has 211 affiliated football associations, including the Dutch KNVB.

The World Cup organisers have heavily promoted the upcoming 2022 FIFA Qatar World Cup as “fully carbon-neutral” on social networks,⁵ as well as in various sustainability-related documents and posts on FIFA’s website.⁶



Carbon Neutral FIFA World Cup™

CARBON NEUTRAL FIFA WORLD CUP™

When Qatar was awarded the right to stage the first FIFA World Cup™ in the Middle East and Arab world, it not only committed to organising an amazing tournament - but also a mega-event delivered in a sustainable manner.

From: https://www.fifa.com/social-impact/sustainability/climate-pledge?cid=nl_FWC2022ClimateAction_220610_en&s_uid=139790163&deliveryName=DM3899

This website has a commercial function. A link to purchase “tickets” is available on the top right-hand corner, including on the pages addressing the sustainability and carbon-neutrality of the World

⁴ FIFA World Cup Qatar 2022™, *Greenhouse Gas Accounting Report* (June 2021) available at: <https://digitalhub.fifa.com/m/283d8622accb9efe/original/ocv9xna0lkvdshw30idr-pdf.pdf> (last consulted on 30 October 2022) p. 11.

⁵ See i.a. @roadto2022en; @FIFAWorldCup on Twitter; “Road to 2022” is the “Official account for Qatar’s FIFA World Cup 2022™ delivery and legacy organisation” available at: <https://www.facebook.com/Road-to-2022-114196666974856/> (last consulted on 30 October 2022); “FIFA World Cup” is “The official home of the FIFA World Cup”, available at: <https://www.facebook.com/fifaworldcup> (last consulted on 30 October 2022).

⁶ See i.a. FIFA, “Sustainability”, available at: <https://www.fifa.com/social-impact/sustainability> (last consulted on 30 October 2022); FIFA, “What is climate change?”, available at: <https://www.fifa.com/social-impact/sustainability/climate-pledge/what-is-climate-change> (last consulted on 30 October 2022); FIFA World Cup Qatar 2022™, *Sustainability policy* (unknown publication date) available at: <https://www.qatar2022.qa/en/about/sustainability> (last consulted on 30 October 2022); FIFA World Cup Qatar 2022™, *Sustainability strategy* (October 2020) p. 10, available at: <https://digitalhub.fifa.com/m/5adbe651c67c78a3/original/o2zbd8acyiooxyn0dwuk-pdf.pdf> (last consulted on 30 October 2022).

Cup. As FIFA puts it: “Tickets for all FIFA tournaments are sold to fans directly and exclusively via FIFA.com.”⁷

FIFA has also recently launched a “climate pledge” targeting ticket holders.⁸ Fans who purchased a ticket are invited by email⁹ to pledge for the climate. After clicking, a message appears to inform the customer that “FIFA has offset your emissions of 0.9 tonnes of CO₂.” Those pledging for climate enter a free draw, out of which 50 winners will receive a voucher worth QAR 900 (nine hundred Qatari Riyals) to be redeemed at any official ‘FIFA Store’ branded retail store in the State of Qatar,¹⁰ about 248 EUR. This is inherently commercial as well: the prize is associated with the sale of a ticket and the outcome will attract traffic to FIFA-branded stores.

This makes it a clear advertisement, and according to Article 1 of the Milieu Reclame Code the Milieu Reclame Code applies here.

The climate pledge is formulated in broad terms and requests fans to make efforts to reduce their carbon footprint in their daily life, such as flying less and eating more plant-based food.¹¹ FIFA expects that “over one million spectators will attend the tournament’s 64 matches, and the competition will reach a global in-home television audience of over 3 billion people.”¹² The KNVB expects about 3000 fans at every match of the Dutch teams¹³ and millions of people in the Netherlands will follow the World Cup. Therefore, the claims made by FIFA are addressed at Dutch consumers as well. In different campaigns¹⁴, FIFA and her partners work with international celebrities such as former professional footballers David Beckham,¹⁵ Tim Cahill and Ronald de Boer,¹⁶ to promote the carbon-neutrality of the World Cup.

⁷ FIFA, “Ticketing”, available at: <https://www.fifa.com/about-fifa/organisation/contact-fifa/ticketing> (last consulted on 30 October 2022).

⁸ FIFA, *Climate Pledge for the FWC*, available at: https://www.fifa.com/social-impact/sustainability/climate-pledge?cid=nl_FWC2022ClimateAction_220610_en&s_uid=139790163&deliveryName=DM3899 (last consulted on 30 October 2022).

⁹ “Fans who have already had their tickets confirmed are being invited via email to pledge to reduce their own carbon emissions and earn a chance to win a voucher for a memorable souvenir to take home from Qatar” in FIFA, “FIFA World Cup Qatar 2022™ tickets back on sale next week” (July 2022) available at: <https://www.fifa.com/fifaplus/en/articles/snap-up-fifa-world-cup-qatar-2022-tm-tickets-next-week-on-a-first-come-first> (last consulted on 30 October 2022).

¹⁰ FIFA, *Climate Action Pledges Prizes* (31 May 2022) available at: https://digitalhub.fifa.com/m/59ac7e34913ac549/original/Climate_pledge_prizes.pdf (last consulted on 30 October 2022).

¹¹ FIFA, *Climate Pledge for the FWC* (n 4).

¹² FIFA, “Profile of the FIFA World Cup 2022™”, available at: <https://publications.fifa.com/en/sustainability-report/sustainability-at-the-fifa-world-cup/profile-of-the-fifa-world-cup-qatar-2022/> (last consulted on 30 October 2022).


¹³ KNVB, WK 2022 in Qatar: <https://www.knvb.nl/info/66553/wk-2022-qatar> (last opened on 30 October 2022).

¹⁴ FIFA has also promoted via sponsored ads on facebook its sponsor Hyundai’s “Goal of the Century” campaign, which invites fans to make daily climate-related efforts to access rewards related to the World Cup. See i.a. <https://www.facebook.com/watch/?v=333811678919844> (last consulted on 30 October 2022).

¹⁵ Road to 2022, “Stadium 974” (5 June 2022) available at: <https://www.facebook.com/watch/?v=392350569576390> (last consulted on 30 October 2022).

¹⁶ Road to 2022, The first carbon-neutral World Cup in history! (5 June 2022) available at: <https://www.facebook.com/watch/?v=1329139284278200> (last consulted on 30 October 2022).

Watch Startpagina Live Series Verkennen Video's zoeken



Ronald de Boer

The first carbon-neutral World Cup in history!

Vind ik leuk · Opmerking plaatsen · Delen · 230 · 10 opmerkingen · 5,1 d. weergaven

From: <https://www.facebook.com/Road-to-2022-114196666974856/videos/1329139284278200/>

FIFA's climate pledge webpage provides information on the carbon-neutrality of the World Cup and the way it will be reached, predominantly through offsetting of fans' travel emissions. The same page includes links to FIFA's climate strategy (which includes carbon-neutral claims) and a detail of FIFA's calculation of emissions to be offset.¹⁷

Yet, many of the statements related to the carbon-neutrality of the 2022 Qatar World Cup on the climate pledge webpage and those to which it refers to, including "what is climate change", are wrong and likely to mislead consumers in the Netherlands. By misleading consumers and not convincingly substantiating their claims, FIFA violates article 2 and 3 of the Milieu Reclame Code.

Several expert and media reports have indeed established that the carbon-neutrality claims made by FIFA in regards to the World Cup in Qatar lacked integrity, and relied upon deeply flawed carbon accounting calculations and questionable offsetting mechanisms.¹⁸

The claim firstly overlooks an essential feature of carbon-neutrality: the actual reduction of emissions associated with the World Cup prior to any plans of 'compensating' the remaining unabatable emissions. FIFA has not credibly demonstrated that it has done everything it can to reduce its own emissions. There is no publicly available detailed analysis of what the potential mitigation actions are and which ones have been implemented versus ignored.¹⁹ This failure dates back to the attribution of the event to Qatar. By deciding to allocate the World Cup to a country with very little football infrastructure in place, FIFA decided to forgo options that would have needed much fewer infrastructure developments and hence fewer emissions. Another option that FIFA did not explore is targeting the ticket sale to local consumers, so as to reduce the emissions caused by fan travel.

¹⁷FIFA, *Climate Pledge for the FWC* (n 7).

¹⁸ See i.a. Carbon Market Watch, *Poor tackling: Yellow card for 2022 FIFA World Cup's Carbon Neutrality Claim* (May 2022), available at: <https://carbonmarketwatch.org/publications/poor-tackling-yellow-card-for-2022-fifa-world-cups-carbon-neutrality-claim/> (last consulted on 30 October 2022); SourceMaterial with Bloomberg, "Qatar World Cup relying on flawed carbon offsets" (31 May 2022) available at: <https://www.source-material.org/blog/qatar-world-cup-relying-on-flawed-carbon-offsets> (last consulted on 30 October 2022).

¹⁹ See FIFA, 2022 World Cup™, *Bid Evaluation Report: Qatar*, pp. 4, 8 and 11, available at: <https://digitalhub.fifa.com/m/3041e390c9c0afea/original/fd4w8qgexnrxmquwsb7h-pdf.pdf> (last consulted on 30 October 2022). The report already mentioned the carbon-neutrality of the World Cup. Yet, it contained no critical appraisal of the likelihood of such a pledge to materialise. Environmental and climate risks were not listed as operational risks in FIFA's assessment report of Qatar's bid.

Second, many issues have been identified in the methodology used in the GHG accounting report,²⁰ which measures the total carbon footprint of the event and which is summarised on FIFA's climate pledge webpage. This report, commissioned by FIFA to South Pole, a consultancy firm, concludes that the World Cup is expected to generate a total of 3.63 million tonnes of CO₂e emissions.²¹ However, Carbon Market Watch, a not-for-profit association, found that most of the GHG emissions associated with the construction of the six permanent stadiums were excluded from the scope of the tournament footprint.²² While another FIFA report estimates the full lifespan of the stadium to 60 years,²³ the GHG accounting report only accounts for around 70 days-worth of the emissions associated with the construction.²⁴ Emissions related to the operationalisation are only taken into account until 25 June 2023, the end of the "post-tournament phase."²⁵

The accounting is based on the very questionable assumption that the stadiums were necessary in Qatar, and that they will be used efficiently for future events. Qatar only had one stadium so far and probably did not need eight, as the Sustainability Director at Supreme Committee for Delivery & Legacy noted in the video featuring David Beckham.²⁶ Carbon Market Watch estimates that the emissions associated with the infrastructures are under-estimated by a factor of eight.²⁷ This breaches article 3 of the Milieu Reclame Code, with regards to the substantiation of the environmental claim.

FIFA's climate pledge webpage further promotes "[t]he Most Compact Tournament in History: Qatar 2022 will be the most compact FIFA World Cup in history, with all the stadiums and other FIFA World Cup venues close together. This will greatly reduce carbon emissions caused by transport but teams, officials and fans during the tournament."²⁸ The idea is that the Qatari territory being relatively small, no internal flights will be needed for teams and ticket-holders to attend the World Cup. Yet, this statement is invalidated by several Gulf regional airlines advertising day shuttle flights between Dubai, United Arab Emirates, and Muscat, Oman for fans to attend their World Cup matches.²⁹ Considering that no FIFA sustainability document mentions these shuttle flights, it can reasonably be stated that these have not been properly taken into account into FIFA's calculation of its attendees flight emissions,³⁰ which therefore invalidates the total amount of

²⁰ FIFA World Cup Qatar 2022™, *Greenhouse Gas Accounting Report* (n 3).

²¹ Ibid, p. 23.

²² Carbon Market Watch (n 17) pp. 10-11.

²³ FIFA World Cup Qatar 2022™, *Greenhouse Gas Emission Analysis of a Demountable FIFA World Cup™ Stadium* (November 2021) p. 10, available at: <https://digitalhub.fifa.com/m/e40827d2c0eadec/original/Greenhouse-Gas-Emission-Analysis-of-a-Demountable-FIFA-World-Cup-Stadium.pdf> (last consulted on 30 October 2022).

²⁴ FIFA World Cup Qatar 2022™, *Greenhouse Gas Accounting Report* (n 3) p. 8.

²⁵ FIFA World Cup Qatar 2022™, *Greenhouse Gas Accounting Report* (June 2021) p. 6; Carbon Market Watch, *Poor tackling: Yellow card for 2022 FIFA World Cup's Carbon Neutrality Claim* (May 2022) p. 16.

²⁶ Road to 2022, "Stadium 974" (n 15): "Our World Cup was going to be the first fully carbon-neutral tournament. Waste is very important for us too, 90% of the tournament waste is being reused and recycled as well. It is very important for us because after the tournament, *we won't be needing eight stadiums.*" (emphasis added).

²⁷ Carbon Market Watch (n 17) pp. 2;10.

²⁸ FIFA, *Climate Pledge for the FWC* (n 7).

²⁹ Qatar Airways, "Qatar Airways Partners with flydubai, Kuwait Airways, Oman Air, and Saudia to Bring Football Fans Match Day Shuttle Flights for the FIFA World Cup Qatar 2022™" (26 May 2022) available at: <https://www.qatarairways.com/en/press-releases/2022/May/Match-Day-Shuttle-Flights.html> (last consulted on 30 October 2022); Qatar Airways, "Travel to Qatar with the Match Day Shuttle", available at: <https://www.qatarairways.com/en/match-day-shuttle.html> (last consulted on 30 October 2022); Fast Company Middle East, "Oman Air to offer '48 Match-Day Shuttle' flights during FIFA World Cup" (12 August 2022) available at ; <https://www.fastcompany.com/news/oman-air-to-offer-48-match-day-shuttle-flights-during-fifa-world-cup/> (last consulted on 30 October 2022); Jazeera Airways, "World Cup Shuttle Flights", available at: <https://www.jazeeraairways.com/en-kw/plan/book/world-cup-shuttle-flights> (last consulted on 30 October 2022).

³⁰ A spokesperson for the World Cup organizer has recognised: "our greenhouse gas footprint included a proportion of fans traveling from the GCC region to attend matches (...) After the tournament, we will update the carbon footprint based on actual data."

emissions so far associated with the World Cup, and to be 'compensated'. This is a breach of article 3 of the Milieu Reclame Code, the substantiation of the environmental claim.

Third, the claim of a fully carbon-neutral world cup heavily relies on offsetting the remaining emissions. The accounting exercise, which is so far biased, will result in a global figure of GHG emissions to be compensated (so far estimated to be 3.63 million tonnes of CO₂e). Generally speaking, it is problematic to claim that emissions can ever be 'compensated'. By advertising this World Cup as carbon-neutral, FIFA tries to make ticket-holders and other fans believe that attending an event like this has no impact on the environment. This is incorrect. The Reclame Code Commissie has found carbon neutrality claims based on offsetting to be misleading multiple times³¹³².

Specifically on emissions from flying, Carbon Market Watch stated the following: “compensating emissions from air travel is not a viable way of dealing with the sector’s climate impact in the long run. Encouraging this practice today by claiming that conventional air travel can be done in a “carbon neutral” way, sends the wrong signal to the public. Consumers, in this case mostly football fans, will have the impression that they can continue flying around the globe without a net impact on the climate, which is not true.”³³

Besides the fact that carbon offsets can never 'compensate' actual emissions, the practical details of how FIFA intends to proceed to offset the World Cup’s emissions are also concerning.

Half of the currently estimated emissions should be offset through the purchase of carbon credits from the Global Carbon Council (GCC).³⁴ GCC is a standard which registers projects and issues carbon credits that can be sold by these projects. GCC has so far approved three projects in Turkey and Serbia, all in the renewable energy sector (as are most of the 545 other projects pending approval),³⁵ and two of these have already received credits.³⁶ All GCC credits issued to date to these projects have been purchased by the World Cup organisers.³⁷ Yet, most international standards no longer certify and register this kind of project,³⁸ as they do not meet an essential criterion for the

Alexander Cornwell, “Qatar's green own goal as World Cup fans set to jet in from Dubai”, *Reuters* (7 September 2022) available at: <https://www.reuters.com/business/sustainable-business/qatars-green-own-goal-world-cup-fans-set-jet-dubai-2022-09-07/> (last consulted on 30 October 2022).

³¹ The Reclame Code Commissie earlier concluded about Shell's campaign "Make the difference. Drive CO₂-neutral": "the average consumer will understand 'neutralising' to mean that a certain effect is annulled by an opposing force or effect" (our translation). <https://www.reclamecode.nl/uitspraken/resultaten/vervoer-2021-00190/304997/> (last consulted on 30 October 2022). Other relevant decisions are those in cases regarding KLM and Chiquita:

- KLM: <https://www.reclamecode.nl/uitspraken/resultaten/vervoer-2021-00190/304997/> (last consulted on 30 October 2022);
- Chiquita: <https://www.reclamecode.nl/uitspraken/chiquita/voeding-en-drank-2022-00296/383414/> (last consulted on 30 October 2022).

³² The Dutch consumer authority (Autoriteit Consument en Markt) concludes that many consumers have a hard time understanding claims about CO₂-compensation. See: <https://www.acm.nl/nl/publicaties/consumenten-vinden-claims-over-co2-compensatie-onduidelijk> (last consulted on 1 November).

³³ Carbon Market Watch, *Poor tackling* (n 16) p. 19.

³⁴ FIFA, “Offsetting Remaining GHG emissions”, available at: <https://publications.fifa.com/en/sustainability-report/environmental-pillar/greenhouse-gas-emissions/programme-for-ghg-reduction-and-offsetting-by-attendees/> (last consulted on 30 October 2022).

³⁵ Global Carbon Council, “Submitted projects”, available at: https://projects.globalcarboncouncil.com/pages/submitted_projects (last consulted on 30 October 2022).

³⁶ Global Carbon Council, “Approved projects”, available at: https://projects.globalcarboncouncil.com/pages/approved_projects (last consulted on 30 October 2022).

³⁷ Global Carbon Council, Public view - holdings, available at: <https://products.markit.com/br-reg/public/public-view/#/holding> (last consulted on 30 October 2022).

³⁸ SourceMaterial with Bloomberg, “Qatar World Cup relying on flawed carbon offsets” (n 17).

credits to be considered of sufficient integrity: additionality.³⁹ Additionality requires that the reduction of emissions that is being credited would not have happened, had it not been for the financing of the projects through the carbon market. Projects in the sector of renewable energy are already profitable in most countries and the sale of credits is therefore highly unlikely to make a meaningful difference to the project's viability.⁴⁰ Moreover, these do not permanently remove carbon from the atmosphere but rather avoid emissions in comparison with those that fossil fuel plants may emit, which is another aspect that limits the quality of the credits they generate.⁴¹

In general, CO₂-emissions can never be cancelled or 'compensated'. And on top of that, the offsetting mechanism fronted by FIFA, the Global Carbon Council (GCC), obviously fails to meet some of the basic standards applicable to carbon markets.

As FIFA itself admits, this report is preliminary and the actual figures will be updated after the event.⁴² There is still a chance that they are to be corrected, but this would require substantial improvements to the methodology used to account for the emissions. Even if this were to be the case, FIFA's claim is premature and presented in absolute terms, without respecting the substantiation required by Article 3 of the Milieu Reclame Code. Knowing the true extent of the World Cup's environmental impact is extremely difficult, if not impossible. So claiming carbon neutrality before the World Cup even begins is impossible as well. These claims are directly targeting fans and ticket-holders, and used as a basis for commercial reward.

It is crucial that FIFA immediately stops this greenwashing campaign and abstains from claiming "carbon-neutrality" of its events in the future without a level of substantiation that would match the highest standards of integrity. Carbon-neutral claims fulfill a marketing function. They have a strong impact on brand perceptions,⁴³ which therefore extends beyond the World Cup. FIFA is likely to continue using these claims in their advertisements during and after the World Cup, as well as for future tournaments, and it is important to investigate their green claims at this timely moment.

³⁹ *The Oxford Principles for Net Zero Aligned Carbon Offsetting*, Principle 1, p. 5, available at: <https://www.smithschool.ox.ac.uk/sites/default/files/2022-01/Oxford-Offsetting-Principles-2020.pdf> (last consulted on 30 October 2022) ; See also Wim Carton et al., "Net Zero, Carbon Removal and the Limitations of Carbon Offsetting", CCSN Position Paper 2022:1, p. 5, available at: <https://cssn.org/wp-content/uploads/2022/06/Net-Zero-and-Carbon-Offsetting-Position-Paper.pdf> (last consulted on 30 October 2022).

⁴⁰ Carbon Market Watch, *Poor tackling* (n 17) p. 20.

⁴¹ Carton et al. (n 37) p. 5.

⁴² FIFA World Cup Qatar 2022™, *Greenhouse Gas Accounting Report* (n 3) p. 11.

⁴³ ASA and JIGSAW Research, *Climate change and the environment - consumer understanding of environmental claims* (20 octobre 2022) available at: <https://www.asa.org.uk/resource/climate-change-and-the-environment-consumer-understanding-of-environmental-claims.html> (last consulted on 30 October 2022).