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Subject: Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites

We refer to your letter dated 21 October 2022, seeking feedback from the Supreme Committee for Delivery & Legacy (SC) on research and investigations conducted by Equidem into working conditions for migrant construction workers employed on FIFA World Cup 2022 stadiums in Qatar between September 2020 and October 2022.

Timing

Despite your investigation taking place over the last two years, your letter dated 21 October was your first contact with the SC, the organization responsible for delivery of the required national infrastructure, planning and operations for the FIFA World Cup Qatar 2022. Moreover, to the best of our knowledge, no contact has been made with any other governmental organization of Qatar about the matters that you have raised. Only now, at this late stage, with what appears to be a final report, have you sought to contact us about matters which could have been properly and contemporaneously investigated.

This belies the apparent motive for your report: to publish a highly critical document at a time where FIFA World Cup Qatar 2022 work is almost coming to a close, where the allegations contained in the report can no longer be properly investigated and acted upon, very shortly before the start of the event itself. That timing is quite clearly not coincidental.

Workers' Welfare Programme

As you are well aware, since construction began on FIFA World Cup Qatar 2022 infrastructure in 2014, the SC's commitment to ensuring the health, safety and dignity of all workers employed on our projects has remained steadfast.





You are also aware that SC workers are protected by the SC's Workers' Welfare Standards (WWS) which have ensured decent working and living conditions for workers. The WWS are designed to protect their health, safety and welfare, and to ensure they are treated with the utmost dignity and respect. Most critically, the WWS are embedded in our tendering process, including pre-mobilization process for sub-contractors, and are contractually binding.

Our due diligence begins at the tendering stage, and since 2016, 25% of contractors have failed pre-tender inspections, ensuring that substandard contractors are eliminated at the earliest possible stage of the process. All approved contractors, upon deployment, are also subjected to on-going due diligence through a robust four-tier audit system. This involves self-audits by contractors and quarterly audits by the SC's Workers' Welfare & Labour Rights Department (WWD), followed by independent audits by an external monitor, appointed by the SC. Additionally, contractors are also subjected to unannounced inspections by the SC as well as inspections by the Ministry of Labour (MoL).

The SC has covered over 85,000 hours of audits and inspections across construction sites to monitor compliance with the WWS and where non-compliances are identified, we work closely with the contractor to ensure immediate rectification. If major or persistent non-compliances continue to be reported, we utilise enforcement measures that has resulted in 453 contractor violations being reported to MoL, with 50 contractors blocked by MoL from being deployed; demobilization of 73 contractors from SC projects; as well as the placement of 273 contractors on a watch list and blacklisting of 7 contractors.

In addition to our due diligence, we have also focused on empowering workers to share concerns or feedback on any welfare matters. The SC established a three-tier grievance mechanism early on to support workers' voices and provide them a safe platform to share grievances. These include the Workers' Welfare Forums (WWF) that allow workers to share their concerns with elected representatives (note: representatives are required to be elected where a contractor has more than 100 workers), without any fear of retaliation. We also introduced a dedicated anonymous workers' grievance hotline for workers to report issues directly to the Workers' Welfare team. To date, 1,207 cases have been lodged of which 96% have been resolved.

Charging recruitment fees is illegal by international law and Qatar Labour Law and prohibited by the WWS. In order to tackle this challenge, the SC introduced the recruitment fees reimbursement programme as a remedy for workers who were charged illegal recruitment fees in their home countries, shifting the burden of proof from worker to employer. 266 contractors have voluntarily signed up to the





programme and have so far reimbursed QAR 84.7M to 49,286 SC and non-SC workers.

Workers' health and safety also continues to be a top priority for the SC. We have introduced a range of measures such as nutrition programme, comprehensive medical screenings, electronic medical records system, training and upskilling, mental health and cardiac pathways that have revolutionized healthcare for workers on our programme. We have also addressed heat stress by establishing robust mitigation measures early on across all our sites, which includes deployment of revolutionary cooling suits to protect workers against heat stress during summer. Our health and safety standards are on par with, if not better than, many construction projects in Europe and North America – a fact the global trade union Building and Wood Workers' International (BWI) recognizes and have publicly attested to.

Workers' safety remained a top priority throughout the [COVID-19 pandemic](#). All workers received free masks, sanitizers and health checks. Our comprehensive medical screenings and electronic medical records system enabled us to identify high-risk workers and provide them tailored treatment plans for their healthcare management. All these workers continued to receive their salaries along with free food and accommodation. The SC carried out several periodic inspections to ensure that Qatar's Ministry of Public Health (MOPH) guidelines with respect to COVID (i.e. masks, social distancing, testing etc.) are being adhered on the sites. We also ensured that WWF continued online to raise awareness on COVID-19 regulations and also introduced a mental health awareness campaign to support workers. Over 810 WWF were conducted online during the pandemic.

The Equidem Report

While we appreciate the time, energy and resources committed to investigating the working conditions of migrant workers on FIFA projects, it is of great concern to the SC that the report is rife with serious inaccuracies. These inaccuracies undermine the status of the report as a whole and raise questions about the veracity of your sources. For example, Salini Impregilo Group has never worked on the Khalifa International Stadium. During the Covid-19 pandemic, there was no country-wide lockdown and contractors were taking additional measures in line with MOPH requirements to protect workers. This fact would have been available to Equidem from a review of publicly available material.

Further, it also appears that some of the alleged violations have been repeated more than once across the report or use the same workers' example more than once.





With regard to specific findings you have outlined, we would like to highlight the following, which we would expect to be included alongside the relevant allegation in any published document.

1. The SC has ensured that all workers on the SC programme were paid their salaries in full during the COVID-19 pandemic.
2. All work-related fatalities on the SC programme have been reported in our [annual reports](#). We encourage you to refer to our annual reports for details.
3. The SC has a tested and effective grievance mechanism which all workers on our programme have access to and are encouraged to use. We recommend that you encourage any workers facing challenges to reach out to the SC via the WWF or the Grievance hotline for remediation of issues. In fact our WWF model has been used by the MoL for the development and roll out of Joint Committees across the country.
4. Your findings also outline issues related to NOCs. However, based on official statistics released by the UN's International Labour Organization, a total of 242,870 workers in Qatar were able to switch jobs between October 2020 and 2021 following the introduction of historic labour reform.

Furthermore, your findings do not provide any insight into the methodology of the study, or the number of workers who may be facing challenges, or even the number of workers interviewed and how many are blue collar versus white collar. This context is critical to lending any credibility to the findings and presenting a genuine authentic picture of the situation on the ground.

Conclusion

We understand there is always room for improvement. We are the first to recognize this and our systems have at times been exploited by bad faith contractors, and when these instances are found through our thorough due diligence mechanisms, appropriate remedial and punitive actions are taken.

Your report presents a completely unbalanced picture of the significant progress versus the inevitable challenges that remain. It is unfortunate that workers who may have reached out to your organisation with issues, may still - unbeknownst to us - be facing challenges two years later as a result of you only sharing information with us now at this very belated stage. We have always been transparent about our challenges and progress throughout our journey, and maintain an open dialogue with all our stakeholders.





While we are supportive of the sharing of information which can help improve the work that we undertake in Qatar, the SC will not stand for the publication of false and unsubstantiated allegations, or the publication of a one-sided narrative seemingly calculated to damage the organisation's reputation prior to the FIFA World Cup 2022.

We trust the above information addresses the queries raised in your letter.

Our legal rights are fully reserved.

Supreme Committee for Delivery & Legacy



Statement on behalf of the Supreme Committee for Delivery & Legacy (SC)

The report *If We Complain, We Are Fired* is littered with inaccuracies and misrepresentations, undermining the SC's commitment to ensuring the health, safety, and dignity of workers on FIFA World Cup Qatar 2022™ projects.

Since introducing the Workers' Welfare Standards in 2014, our efforts have resulted in significant improvements in accommodation standards, health and safety regulations, grievance mechanisms, healthcare provisions, and reimbursement of illegal recruitment fees to workers.

We are committed to delivering the legacy we promised. A legacy that improves lives and lays the foundation for fair, sustainable, and lasting labour reforms.

The allegation that two workers "fell to their deaths" at Lusail Stadium is categorically false and has been presented entirely without evidence – much like the majority of the report.

Given the reporting and site procedures in place for worker safety, it would be practically impossible to cover up or fail to properly disclose a work-related-fatality. Not only would there be hospital records, but word would quickly spread among workers on site and to the numerous media and human rights organisations that have taken a close interest in the subject of work-related injuries and fatalities in Qatar over many years. It is simply inconceivable that news of these purported fatalities should have come to the attention of Equidem and no other media or human rights organisation (including those such as the International Labour Organisation having far greater resources at their disposal than Equidem).

All work-related deaths are pro-actively reported in the Supreme Committee's Annual Reports. Unfortunately we have suffered three work-related fatalities and 37 non-work-related deaths since 2014. These allegations contradict an undeniable commitment to transparency on this issue by the SC.

The SC investigates all non-work-related deaths and work-related fatalities in line with our Incident Investigation Procedure to identify contributory factors and establish how they could have been prevented. This process involves evidence collection and analysis and witness interviews to establish the facts of the incident. This is standard SC procedure that goes further than what is required, where the legal responsibility to investigate the underlying causes of death in the case of non-work-related deaths lies with the relevant local authorities.

Our commitment to publicly disclose non-work-related deaths goes beyond the requirements of the UK's Health and Safety Executive Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR), which the SC has adopted as its benchmark. RIDDOR defines and provides classification for how to document work-related and non-work-related incidents. We firmly reject any accusation of under-reporting work-related fatalities or non-work-related deaths on our sites.

The SC is transparent about the challenges and progress, accepting constructive criticism, and maintaining dialogue with key stakeholders. The report, released very shortly before the start of the World Cup, is an egregious attempt to undermine and damage the SC's reputation. If needed, the SC will not hesitate to escalate matters if the report is published or reproduced without properly and fairly representing the truth and presenting corroborative evidence.

In line with this commitment, the SC has implemented health and safety standards that are on par with if not better than, many construction projects in Europe and North America – a fact the global trade union Building and Wood Workers' International (BWI) recognizes and have publicly attested to [here](#).

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