



# Evaluation of Guadalajara's Human Rights Stakeholder Engagement Submission to FIFA

01/07/2022



# 1. Background

As part of the host city and stadia selection process for the FIFA World Cup 2026, FIFA required all 22 candidate cities to conduct human rights stakeholder engagement and produce a report outlining the stakeholder engagement process, its results, and the city's human rights plans in relation to the competition.<sup>1</sup> Prior to this, all candidate cities submitted Host City Human Rights Declarations in which they committed to respect, protect, and fulfill human rights in all activities associated with the hosting of the FWC 2026, and to support FIFA in implementing their operations in accordance with the UN Guiding Principles on Business and Human Rights and FIFA's own human rights commitment. The candidate city human rights stakeholder engagement process took place between September 2019 and December 2021.

FIFA commissioned the business and human rights consultancy firm Ergon Associates to conduct an independent evaluation of all candidate city human rights reports. The evaluations were also informed by one-on-one calls with each city bid team and local stakeholders invited by the city to attend the call. The independent evaluation included a detailed assessment that allowed FIFA to make comparisons and consider human rights due diligence as a criterion in the selection process. On 16 June 2022, FIFA named the 16 host cities and stadia for the FWC 2026.

This report includes the independent evaluation's qualitative findings for Guadalajara. It includes information in the five main areas of assessment, i.e. stakeholder engagement, risk assessment, mitigation measures, opportunities, and remedy.

FIFA greatly appreciates the contribution of all national and city-level stakeholders who have supported FIFA and the candidate cities during the host city selection process. FIFA looks forward to further and enhanced engagement in the next phase of human rights due diligence for FWC 2026.

---

<sup>1</sup> Due to Vancouver's late entry as a candidate city, Vancouver completed a customized process and submission. For more information, please see the summary report published on FIFA.com.

## 2. Summary of findings

Assessment area	Evaluation summary
 <p>Stakeholder engagement</p>	<p>Guadalajara’s stakeholder engagement section included information on how consultation took place, including accessibility considerations. An array of stakeholders was consulted, both at local, federal and international levels, in similarity with the other two Mexican cities. Notably, Guadalajara went further to engage with workers’ rights’ representatives. The city’s submission includes plans for further engagement, including a Human Rights Expert Advisory Body that will continuously assess risks, opportunities and mitigation plans. The city’s submission could have been strengthened by greater detail on topics discussed and outcomes derived from stakeholder meetings, and expanding external stakeholder presence during the human rights call.</p>
 <p>Risk assessment</p>	<p>Guadalajara’s submission contains a detailed explanation of risks, with some information on the process undergone to assess them, including through stakeholder input. The submission highlights how risks may change and how stakeholders will be engaged to assess these shifts. The submission could have been strengthened by including the city’s understanding of the importance of mitigation measures to affect human rights impacts.</p>
 <p>Mitigation measures</p>	<p>Guadalajara’s submission includes information on existing measures and some planned measures, with an understanding that these may need to change overtime. The submission could have been strengthened by indicating clear milestones and timeframes for implementing mitigation measures, and from stakeholder input on the adequacy of these measures and their role in their delivery.</p>
 <p>Opportunities</p>	<p>Guadalajara’s submission identifies several legacy opportunities and measures for their delivery. More information on stakeholders’ potential role in their implementation would have strengthened the city’s submission.</p>
 <p>Remedy</p>	<p>The city’s submission identifies existing mechanisms for submitting complaints and accessing remedy, and plans for specific mechanisms around the hosting of the tournament. Further information on stakeholder engagement and involvement regarding access to remedy could have favored the submission.</p>

### 3. Methodology

In September 2020 FIFA shared guidance on the required stakeholder engagement process with the candidate cities bidding to host matches at the men's FIFA World Cup 2026™. FIFA also provided a city-specific baseline briefings on potential issues to be discussed with stakeholders. As part of the next steps, each candidate city was asked to respond to a standard set of questions raised by FIFA, providing as much detail and evidence as possible. Candidate host cities submitted their initial report to FIFA in June 2021.

In November and December 2021, each city participated in a separate meeting with FIFA officials and Ergon to present their human rights report. These meetings also gave the cities the opportunity to address open questions and receive feedback. Based on this discussion, cities were invited to submit additional information to supplement their original report in form of an Addendum. The final documentation was submitted to FIFA and published on the cities' websites at the end of 2021.

All submitted information and presentations were assessed by Ergon. FIFA utilized Ergon's assessment to make human rights-related determinations in the bidding process.

## 4. Guadalajara findings

### 4.1 Stakeholder engagement



#### Stakeholder engagement summary

Guadalajara's submission described the process carried out to engage with stakeholders, including bilateral virtual meetings. The city also undertook efforts to make the process more accessible, by holding meetings virtually and translating FIFA materials to Spanish. The submission includes a summary of information collected from stakeholder engagement, and highlights stakeholder input regarding the importance of the engagement process for connecting stakeholders and prompting interaction for the implementation of measures related to human rights and the tournament. Guadalajara's stakeholder engagement to date is detailed as including local and federal authorities, including on aspects related to procurement and children's rights, local football entities, journalists and academia, UNICEF, VISIT MEXICO and Centre for Sport and Human Rights. Guadalajara has moved further on stakeholder engagement, and has consulted with organized labor representatives from the local chapter of the Centro de Reflexion y Accion Laboral. The submission is accompanied by letters of support from government bodies, private entities and the Jalisco Human Rights Commission. The city's submission includes plans for further engagement throughout the process, with a plan to establish a Human Rights Expert Advisory Body that will continuously assess risks, opportunities and appropriateness of mitigation strategies. Whilst there is evidence of stakeholder engagement with a variety of groups, the city's submission could have been strengthened by providing further detail on topics covered during engagement and the outcomes derived from these meetings.

It is important to note that much of Guadalajara's submission is the same as those produced for the other Mexican candidate cities, Mexico City and Monterrey, with the city's submission stating that a unified approach has been adopted to tackle human rights risks posed by tournament hosting. Stakeholders at the federal and international level have been consulted for all cities.

Guadalajara's dedicated human rights call with Ergon and FIFA included input from external stakeholders, and the city's submission highlights that the final report was shared with stakeholders for comment. Nonetheless, Guadalajara's submission could have been strengthened by allowing for additional external voices to be heard during the dedicated human rights call with Ergon and FIFA.

### 4.2 Risk assessment



#### Risk assessment summary

The city's final submission contains a detailed explanation of risks and how they may be linked to hosting the tournament, and contains some information on the process undergone to identify and assess them, including through stakeholder input. The submission goes beyond prescribed substantive risks to list risks related to the environment, accessibility, labor, health and personal data and privacy protection and including additional rightsholders such as supply chain workers.

The city's submission also highlights how risks may change and how stakeholders will be engaged to assess these shifts. Whilst the city acknowledges the need for a continuous assessment of risk, the submission could have been strengthened by an explicit explanation on if and how the city understands the likelihood of impacts changing if additional measures were not to be adopted by the city.

## 4.3 Mitigation measures



### Mitigation measures summary

Guadalajara's submission includes information on existing measures to address all areas of identified risk, and planned measures to address some areas of risk, including for the protection of journalists and human rights defenders, women's rights, LGBTQI+ rights, safety and security, freedom of assembly, combatting sex trafficking, environmental rights, accessibility, labor rights, personal data and privacy rights, and the right to health. In this regard, the submission could have been strengthened with further information on planned measures regarding land rights, property and housing rights. The submission could have also been improved by including stakeholder input on the adequacy of these existing or planned measures.

In addition, while the submission notably mentions that a specialized body will be created (Mesa Especializada de Derechos Humanos y el Mundial) to continuously assess risk and identify and adapt mitigation measures, the submission could have been strengthened to include further detail on concrete steps to be taken within a set timeframe, and to explain specifically which roles would stakeholders play in the implementation of mitigation measures, including information on how often engagement would take place and how it would be made accessible to a variety of representatives.

## 4.4 Opportunities



### Identified opportunities summary

The city's submission includes a description of the positive opportunities that may derive from hosting the tournament, including the promotion of health and access to football for women and girls, the protection of the environment, and a legacy of respect for workers' rights in the supply chain. The submission also highlights opportunities for raising awareness on children's welfare, sex trafficking and exploitation and inequalities, particularly discrimination against LGBTQ individuals and persons with disabilities. The submission also describes existing and new measures for the implementation of these opportunities, providing information on how stakeholders will be involved in the roll out of some of these measures.

The three Mexican cities presented united opportunities for a positive human rights legacy.

## 4.5 Remedy



### Complaints and remedy

The city's submission includes information on mechanisms available to submit complaints and facilitate access to remedy, indicating plans to create a 'remedy tree', in collaboration with stakeholders, that will provide information to participants on steps needed to submit a human rights complaint and the process leading to remedy. The submission also notably highlights a plan for encouraging the development of an app that would allow attendees to seek emergency support in case of a human rights violation. These mechanisms would include special considerations for women to submit concerns. Nonetheless, the city's submission could have been favored by greater detail on how stakeholders would be engaged to facilitate access to remedy.

Guadalajara's submission includes indicates the city is committed to ensuring that re-dress and remedy mechanisms exist for any specific human rights issues that may arise in the context of the 2026 FIFA World Cup™.

## Annex: Reviewed submission materials

- Reporte Derechos Humanos comité organizador de la candidatura de Guadalajara, [https://fmf.mx/docs/Reportes/Guadalajara Committed to Human Rights.pdf](https://fmf.mx/docs/Reportes/Guadalajara%20Committed%20to%20Human%20Rights.pdf)
- Addendum on page 90 of Report above.
- Presentation from Guadalajara team to FIFA on 10 December 2021, presentation on page 48 of Report above.