

Bruno Chiomento
Chairman
Governance, Audit and Compliance Committee
Fédération Internationale de Football Association

Cc: Chris Mihm
Deputy Chairman

Re: Expert assessment of illegality of settlements in the Occupied Palestinian Territories

25 June 2025

Dear Mr Chiomento,

We, the undersigned legal practitioners and scholars with expertise in international law, history, and politics, are writing to you in your capacity as the Chairman of FIFA's Governance, Audit and Compliance Committee and in relation to your committee's examination of the Palestine Football Association's (PFA) ongoing complaint against the Israeli Football Association (IFA).

In March 2024 the PFA submitted a proposal requesting that the FIFA Congress discuss adopting sanctions against the IFA on three grounds, one of which was "the IFA's violation of the FIFA Statutes manifest in its continued inclusion of football teams located on the territory of another association (Palestine) in its national league." We understand that the PFA first complained to FIFA about IFA teams playing matches in occupied Palestinian territory in 2013, and that today seven or more Israeli teams play matches in the West Bank.

In October 2024, FIFA issued a [statement](#) which said that "The FIFA Governance, Audit and Compliance Committee (GAAC) will be entrusted with the mission to investigate – and subsequently advise the FIFA Council on – the participation in Israeli competitions of Israeli football teams allegedly based in the territory of Palestine." In May 2025, FIFA General Secretary Matthias Grafström told the FIFA Congress that the work of the Governance, Audit and Compliance Committee "remains ongoing" and that the Committee is "working diligently to conclude what is clearly a highly complex topic." Grafström said that as part of its analysis, the GACC "recently requested expert reporting including on topics of territoriality to support its work".

In that regard, we would like to provide the Committee with an expert assessment of the issue that the FIFA General Secretary called "territoriality" as it pertains to Israel and Palestine. In summary, Israel has militarily occupied Palestinian territory since 1967, and the settlements it has established on this territory are illegal under international law. These are unassailable facts.

Article 49 of the Fourth Geneva Convention states that "[T]he Occupying Power shall not deport or transfer parts of its own civilian population into the territory it occupies." In 1979, [United Nations Security Council Resolution 446](#) declared that Israeli settlements have no legal validity and constitute a serious obstruction to achieving a comprehensive, just and lasting peace in the

Middle East.” In 2016, [United Nations Security Council Resolution 2334](#) reiterated this position, describing the settlements as constituting “a flagrant violation under international law and a major obstacle to the achievement of the two-State solution.” Such Security Council resolutions, as well as the significant number of General Assembly resolutions on the matter, reflect the near-unanimous view of States that such settlements are unlawful.

In [2004](#), the International Court of Justice, also known as the World Court, pronounced on the unlawfulness of the establishment of the settlements in the Occupied Palestinian Territory, while in [2024](#) it declared Israel’s occupation of Gaza and the West Bank, including East Jerusalem, to be illegal in its entirety based on the settlement regime, annexation of territory and denial of self-determination. The Court noted in its 2024 opinion that the Oslo Accords “cannot be understood to detract from Israel’s obligations under the pertinent rules of international law applicable in the Occupied Palestinian Territory”, including international humanitarian law.

In light of the above, the Governance, Audit and Compliance Committee need not concern itself with the question of the legality of Israeli settlements, but simply the issue of whether Israeli teams continue to play football matches in settlements in the West Bank. If that is the case, as the PFA alleges and the IFA has never denied, then the IFA is *ipso facto* in violation of article 64 (2) of the FIFA Statutes, which states that “Member associations and their clubs may not play on the territory of another member association without the latter’s approval.”

We would appreciate it if you would share this letter with the other 12 members of the Governance, Audit and Compliance Committee.

The views and opinions expressed in this letter are those of the signatories and are not intended to reflect the official policy or position of their employers, or the organisations of which they are members or otherwise represent.

Dr Amina Adanan, School of Law and Criminology, Maynooth University;

Dr Rhiannon Bandiera, School of Law and Criminology, Maynooth University;

Professor Shane Darcy, Irish Centre for Human Rights, School of Law, University of Galway;

Dr Elliot Dolan-Evans, Monash University;

Professor Michelle Burgis-Kasthala, University of Edinburgh;

Professor James Cavallaro, University Network for Human Rights;

Professor John Dugard, Emeritus Professor of International Law;

Professor Michelle Farrell, School of Law and Social Justice, University of Liverpool;

Dr Markus Gunneflo, Lund University Faculty of Law;

Dr Shahd Hammouri, University of Kent;

Professor Christian Henderson, University of Sussex;

Professor Ardi Imseis, Professor of Law, Queen's University;

Dr Henry Jones, Law School, Durham University;

Professor Michael Lynk, Western University;

Professor Louise Mallinder, Queen's University Belfast;

Dr Marisa McVey, Queen's University Belfast;

Dr Lydia Morgan, University of Birmingham;

Dr Daragh Murray, Queen Mary University;

Dr Alice Panepinto, Queen's University Belfast;

Professor Ilan Pappé, University of Exeter;

Professor Nicola Pratt, University of Warwick;

Dr Jane Rooney, Associate Professor in International Law, Law School, Durham University;

Dr John Reynolds, School of Law & Criminology, Maynooth University, Ireland;

Professor William Schabas, Professor of international law, Middlesex University London;

Professor Martin Shaw, University of Sussex;

Dr Angela Sherwood, Queen Mary University;

Professor Alfred de Zayas, Geneva School of Diplomacy;

Professor David Whyte, School of Law, Queen Mary University London;

Dr Jessica Whyte, Associate Professor of Philosophy and Law, University of New South Wales.