



Victor Montagliani  
President  
Confederation of North, Central America and Caribbean Association Football (Concacaf)  
161 NW 6th Street  
Suite #1100  
Miami, Florida  
United States

15 September 2025

Dear Mr Montagliani,

We are writing, as a coalition of 10 human rights and climate organisations, with regard to the sponsorship of your organisation and its competition by Saudi Aramco (Aramco).

The burning of fossil fuels, the primary driver of the climate crisis, is responsible for about two thirds of annual global greenhouse gas emissions. Oil and gas companies have a responsibility under the UN Guiding Principles on Business and Human Rights (UNGP) to address the human rights impacts of their operations. Such human rights impacts would include impacts on the human right to a clean, healthy, and sustainable environment. The Office of the High Commissioner for Human Rights has made clear that, “the baseline responsibility of all business enterprises is to respect all internationally recognized human rights, including in the context of climate change.”

Aramco is the world's biggest oil and gas company, responsible for an estimated 4.38% of global CO2 emissions in 2023, and has been warned by UN human rights experts about its undermining of international cooperation on reducing these emissions, “in the face of the existential threat to human rights posed by climate change”.

In 2024, Concacaf announced a multi-year partnership with Aramco to be the “Official Energy Partner”, granting sponsor rights to “the full ecosystem of Concacaf competitions” including the Concacaf Champions Cup and Nations League competitions.

Specifically, we are writing to draw your attention to a notable and important 2023 communication sent by a number of UN Special Rapporteurs and the UN Working Group on Business and Human Rights to Aramco, which constitutes an authoritative statement of business responsibility to respect human rights under international human rights law, raising serious concerns about the company's activities and which posed 10 questions, including details on the steps taken to ensure Aramco respects human rights in line with the UNGPs, as well as steps Aramco has taken to refrain

from engaging in or promoting public information campaigns based on inaccurate, misleading and unfounded assertions, among others. According to the [website of the UN Office of the High Commissioner for Human Rights](#), Aramco has not responded to this communication at the time of sending.

In this letter we set out our grave concerns that Concacaf, as a result of partnering with Aramco, may provide a platform for a company that, according to the UN Working Group on Business and Human Rights and UN Special Rapporteurs, is implicated in negative human rights impacts arising from global climate change, and that Concacaf risks condoning Aramco's alleged "greenwashing", as highlighted by the same UN human rights experts.

FairSquare plans to publish materials on your partnership with Aramco, and in this light we invite you to respond to these allegations, and we include a series of specific questions regarding your partnership. We are specifically inquiring as to whether Concacaf has taken or plans to take any action in respect of the UN Working Group's findings.

The [UN Secretary-General](#) in 2024 called on media and tech companies to "stop taking fossil fuel advertising", noting that "many in the fossil fuel industry have shamelessly greenwashed, even as they have sought to delay climate action – with lobbying, legal threats, and massive ad campaigns." [The 2022 IPCC report](#) highlights 'greenwashing' challenges and raises concerns about "corporate advertisement and brand-building strategies" that may aim to "appropriate climate-care sentiments."

#### **UN Special Rapporteur and Working Group on Business and Human Rights communications to Aramco**

In its June 2023 communication, published on its website in August 2023, the Working Group conveyed to Aramco the following serious concerns that had been raised with it by a source, about the impacts of Aramco's activities:

- "Through its historic emissions, it is alleged that Saudi Aramco has already significantly contributed to adverse climate change-related human rights impacts. The company's current exploitation of fossil fuels and proposed business plans will continue to cause adverse climate change-related human rights impacts."
- "Saudi Aramco's business strategy is currently increasing its fossil fuel production... diverging increasingly from internationally agreed climate targets, and progressively contributing to climate change-related human rights impacts, including by increasing global consumption of oil and gas."
- "... the ongoing business activities of Saudi Aramco undermine the ability of the Kingdom of Saudi Arabia to discharge its duties under international law and commitments in the context of the Paris Agreement."
- "these activities take place in the context of the Kingdom of Saudi Arabia's particular vulnerability to climate change. The Intergovernmental Panel on Climate Change's (IPCC) 1.5°C report found that the Gulf region's population and fragile ecosystems are highly vulnerable to the impacts of climate change, such as water stress, sea level rise affecting vast low coastal lands, and high temperature and humidity with future levels potentially beyond adaptive capacities."
- "[Aramco] presents misleading information, including the premise that sustainability is a core concern of its business strategy, through widespread marketing and advertising."
- Aramco employs "a marketing strategy which misrepresents the company's overall emissions and the carbon intensity of its crude oil production". This "greenwashing subverts the Paris Agreement in multiple ways, such as stimulating demand for fossil fuels, undermining public understanding of climate change, normalising fossil fuel activity, and reducing consumer actions to reduce emissions."

Offering Saudi Aramco 60 days to respond to these allegations, the UN Working Group expressed its concern regarding:

- “the adverse impacts on human rights caused by activities such as the exploitation of fossil fuels which contribute to climate change”;
- “how Saudi Aramco’s actions may contribute to undermining the Paris Agreement and international cooperation in the face of the existential threat to human rights posed by climate change”; and
- “the allegations of greenwashing, in view of the negative impacts that misinformation and disinformation on climate change can have on mitigation and adaptation efforts—as well as on the wider enjoyment of all human rights”.

At the time of writing, two years after this communication, Saudi Aramco has not responded to the Working Group’s concerns nor its 10 questions, according to the website of the UN Office of the High Commissioner for Human Rights.

Aramco should be at the forefront of efforts to transition Saudi Arabia’s economy away from fossil fuel dependence, to a sustainable economy that can fulfil the development needs of its people over the long term, a stated aspiration of the Saudi Arabian government’s Vision 2030. Saudi Arabia has a stated commitment toward fossil fuel phase out in the context of the Paris agreement and the COP28 key outcome that called on countries to start “transitioning away from fossil fuels”. Instead, as the UN communication flags, the company is accused of undermining the country’s plans to transition its economy.

We note that Aramco’s latest annual report, published in March 2025, makes clear that, “Aramco intends to maintain its position as the world’s largest crude oil company by production volume. Its reserves, operational capabilities, and spare capacity allow it to increase production in response to demand. Aramco expects global demand for crude oil will continue to increase for many years to come. Aramco believes there is a need for industrywide investment to meet this demand, and that new oil discoveries and developments will be needed to offset the natural decline in production from currently producing fields.” In 2024 Aramco’s CEO said that “we should abandon the fantasy of phasing out oil and gas”.

As there is no opportunity for political participation in Saudi Arabia, the country’s citizens have no meaningful ability to contribute to decisions about Aramco’s activities or the transitioning of the economy. Aramco operates within a state lacking an independent judiciary and there are no legal avenues for Saudi citizens to provide critical feedback to government officials or hold them accountable for failed policies, mismanagement, or corruption. The lack of basic freedoms and rights in Saudi Arabia, paired with the government’s refusal to allow the existence of an independent civil society capable of monitoring and challenging government action, makes it impossible for Saudi citizens to seek information on or involvement in Aramco decision-making.

We also note that Saudi Aramco received a further communication from several UN Special Procedures mandate holders in February 2025. This communication raised “alleged reiterated and widespread suppression of local activists, human rights defenders, and journalists” during peaceful protests held from 23 to 28 April 2023 in the villages of Barsu, Ratnagiri district, in the state of Maharashtra in India, against the planned construction of a refinery and petrochemicals complex. The project is a joint venture formed by three Indian national oil firms which have signed a Memorandum of Understanding with Saudi Arabian Oil Company Saudi Aramco, according to the communication. According to the communication, local residents had raised concerns that the project risked damaging local ecosystems and undermining their social, economic and cultural rights.

We further note that Aramco is a critical source of finance for Saudi Arabia’s Public Investment Fund (PIF), which according to research by Human Rights Watch, has facilitated serious human rights violations linked to the crown

prince through companies it owns and controls, such as the 2018 murder of Saudi journalist Jamal Khashoggi, and rights violations linked to some of the PIF's megaprojects, including the NEOM region and the Jeddah Central Project.

We have written to Aramco setting out these concerns and at the time of writing they have not responded.

### **Concacaf's "Bigger Game"**

We note that Concacaf promotes its social impact strategy Concacaf's Bigger Game, which it describes as "a manifestation of our commitment to harnessing the power of football across the region to improve the communities in which we play". This strategy is built on three pillars, the third being "sustainable solutions [and] growth and health", which includes "disaster relief" and "reimagining our footprint".

In light of the concerns raised by the UN Working Group on Business and Human Rights about Aramco, Concacaf's partnership with the company appears to run contrary to Concacaf's pledge to improve the communities in which you play. This is particularly significant given that a large number of the Concacaf members represent countries, including in the Caribbean region, which are acutely vulnerable to the effects of climate change and the related risk of natural disasters.

### **Our concerns regarding Concacaf's partnership with Aramco**

In this above context, we are concerned that:

- By accepting the sponsorship of Aramco, Concacaf provides a platform for a company committed to expanding crude oil production and resisting the commitment to transition away from fossil fuels as agreed in COP28.
- Through its partnership with Aramco, Concacaf risks condoning Aramco's alleged "greenwashing" as highlighted by the UN Working Group on Business and Human Rights
- The partnership with Aramco risks Concacaf contributing to the undermining of international agreements on climate change and its resultant human rights impacts, disregarding their responsibilities under the UN Guiding Principles on Business and Human Rights (UNGPs).
- The apparent failure by Concacaf to take any actions in response to Aramco's actions, as set out in the communication by the UN Working Group on Business and Human Rights, raises concerns about the importance that Concacaf attaches to their public statements regarding sustainability, the climate and the environment.

### **Request for a response and for relevant information**

FairSquare is producing a public report on organisers of sporting events who have sponsorship partnerships with Aramco, including Concacaf. We invite you to respond to the concerns listed above and what processes you have in place to assess your ongoing partnership with Aramco. We would also like to request information relevant to your ongoing partnership:

1. Did Concacaf undertake due diligence into Aramco's activities and its role in contributing towards global CO2 emissions before adopting them as a sponsor and main partner?
2. Did Concacaf consider the potential risks of being partnered with Aramco?
3. Is there a process in place to monitor and assess the partnership between Concacaf and Aramco with the possibility of ending the partnership, if the company is judged to be engaged in "greenwashing" as highlighted by the UN Working Group on Business and Human Rights and/or to be contributing to negative human rights impacts?

4. Does Concacaf agree with the concerns of the UN Working Group on Business and Human Rights as expressed in their 2023 communication to Aramco?
5. Did Concacaf raise concerns with Aramco about the 2023 communication of the UN Working Group on Business and Human Rights, and/or encourage Aramco to respond to the communication?

We would appreciate your engagement on this critical matter. We invite you to provide us with any information on this matter within 2 weeks of the date on this letter. Any responses or comments you provide will be reflected in future reporting by FairSquare as appropriate. Please note that we may, at our discretion, publish your response, in whole or in part.

We would of course be happy to meet and discuss these concerns with you.

Yours sincerely,

ALQST for Human Rights  
Badvertising  
European Saudi Organisation for Human Rights  
FairSquare  
Fossil Free Football  
Green Runners  
Human Rights Watch  
Middle East Democracy Center  
MENA Rights Group  
The Next Test