



## **BIDDING NATION MOROCCO**

# Human rights strategy in connection with the 2026 FIFA World Cup™

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**Royal Moroccan Football Federation**

February 2018

# Summary

<b><u>1. A HUMAN RIGHTS STRATEGY SPECIFIC TO THE FRMF AND BINDING ON STAKEHOLDERS</u></b>	<b>4</b>
<b>AN INTERNAL CONSULTATION TO IDENTIFY CHALLENGES AND RISKS RELATED TO HUMAN RIGHTS</b>	<b>6</b>
<b>CLOSE COLLABORATION WITH THE NATIONAL HUMAN RIGHTS COUNCIL (CNDH)</b>	<b>6</b>
<b>IN-DEPTH DIALOGUE WITH STAKEHOLDERS</b>	<b>6</b>
<b>SUPPORT FROM NGOS</b>	<b>8</b>
<b><u>2. MAPPING OF NEGATIVE IMPACTS</u></b>	<b>9</b>
<b>2.1. DISCRIMINATION</b>	<b>9</b>
2.1.1. CHILDREN	9
2.1.2. WOMEN	9
2.1.3. PERSONS WITH DISABILITIES (PWD)	10
2.1.4. MIGRANTS	10
2.1.5. VOLUNTEERS	11
<b>2.2. SECURITY OF PERSONS AND VIOLATIONS OF THEIR PHYSICAL INTEGRITY</b>	<b>11</b>
<b>2.3. FREEDOM OF EXPRESSION AND PEACEFUL ASSEMBLY</b>	<b>11</b>
<b>2.4. LABOUR LAW</b>	<b>12</b>
<b>2.5. VALUE CHAIN AND SUBCONTRACTING</b>	<b>12</b>
<b>2.6. RIGHT OF OWNERSHIP</b>	<b>12</b>
<b><u>3. ACTION PLAN FOR PREVENTING AND MITIGATING NEGATIVE IMPACTS ON HUMAN RIGHTS</u></b>	<b>14</b>
<b>3.1. DISCRIMINATION</b>	<b>14</b>
3.1.1. CHILDREN	15
3.1.2. WOMEN	16
3.1.3. PERSONS WITH DISABILITIES (PWD)	17
3.1.4. MIGRANTS	18
3.1.5. VOLUNTEERS	18
<b>3.2. SECURITY OF PERSONS</b>	<b>18</b>
<b>3.3. FREEDOM OF EXPRESSION AND PEACEFUL ASSEMBLY</b>	<b>19</b>
<b>3.4. LABOUR LAW</b>	<b>19</b>

<b>3.5. VALUE CHAIN AND SUBCONTRACTING</b>	<b>21</b>
<b>3.6. EXPROPRIATION AND FORCED EVICTIONS</b>	<b>22</b>
<b>4. REASONABLE DILIGENCE WITH REGARD TO HUMAN RIGHTS</b>	<b>22</b>
<b>4.1. ESTABLISHING A DIALOGUE WITH STAKEHOLDERS</b>	<b>24</b>
<b>4.2. ENCOURAGING THE EVENT'S OTHER STAKEHOLDERS TO OBSERVE INTERNATIONALLY RECOGNISED HUMAN RIGHTS</b>	<b>25</b>
<b>4.3. ENSURING THE MONITORING OF THE EFFECTIVENESS OF THE MEASURES INTENDED TO IDENTIFY AND COMBAT THE MAIN THREATS TO HUMAN RIGHTS</b>	<b>25</b>
<b>4.4. OBSERVING AND ASSISTING THE PROTECTION OF THE FREEDOM OF DEFENDERS OF HUMAN RIGHTS AND JOURNALISTS</b>	<b>26</b>
<b>4.5. ADOPTING AND OBSERVING INTERNATIONAL STANDARDS AND BEST PRACTICES IN ORDER TO MANAGE SOCIAL IMPACTS THROUGHOUT THE LIFECYCLE OF THE COMPETITION</b>	<b>27</b>
<b>4.6. COMMUNICATING TRANSPARENTLY REGARDING THE FULFILMENT OF ITS OBLIGATIONS IN TERMS OF OBSERVING ALL INTERNATIONALLY RECOGNISED HUMAN RIGHTS</b>	<b>27</b>
<b>4.7. SETTING UP AND COOPERATING WITH THE COMPLAINT MECHANISMS FOR PERSONS AND COMMUNITIES WHOSE HUMAN RIGHTS MAY BE IMPACTED BY ITS ACTIVITIES</b>	<b>28</b>
<b>4.8. ENSURING THAT APPROPRIATE AND EFFECTIVE MEASURES ARE IMPLEMENTED IN ORDER TO IDENTIFY AND RESPOND TO ALLEGED VIOLATIONS OF HUMAN RIGHTS BY THE FRMF'S BUSINESS PARTNERS FOR THE COMPETITION</b>	<b>29</b>
<b>APPENDIX 1: LETTERS OF SUPPORT</b>	<b>30</b>

# 1. A human rights strategy specific to the FRMF and binding on stakeholders

To ensure that the FIFA World Cup is an exemplary event from the viewpoint of human rights and in compliance with FIFA requirements, the Federation president signed, at the start of the candidacy phase, an explicit public commitment to complement and support the previously made commitment to Sustainable development and human rights expressed in section 22.

FEDERATION ROYALE  
MAROCAINE DE FOOTBALL



الجامعة الملكية  
المغربية لكرة القدم

## Commitment with regard to human rights

1. The FRMF undertakes to observe, in all aspects of its activities relating to the hosting and staging of the 2026 FIFA World Cup™, including legacy and post-event related activities, all internationally recognised human rights and, as a priority, the ones listed in the International Bill of Human Rights and the ILO Tripartite Declaration of Principles on multinational companies and social policy, while fully complying with the United Nations Guiding Principles on Business and Human Rights.

2. Given the nature of its activities, the FRMF will concentrate its attention and efforts on the following priority subjects:

-Labour law: The FRMF will strive to apply the most demanding international standards with regard to labour law, notably the eight ILO fundamental conventions on forced labour, child labour, non-discrimination, occupational health and safety, freedom of association and collective bargaining. The FRMF will strive to ensure that its economic partners comply with these standards, notably within its supply chain.

-Discrimination: In connection with its activities, the FRMF will work to combat all forms of discrimination, characterised by unfair and unfavourable treatment of certain individuals or groups of individuals on the basis of their origin, sex, age, handicap, sexual orientation or identity, or their political, religious or trade union affiliation.

The FRMF also undertakes to make every effort in order to promote diversity in football and to combat all forms of discrimination.

-Safety: The FRMF undertakes to work with government authorities and the relevant stakeholders in order to prevent and mitigate any risks relating to the security and fundamental rights of persons in connection with its activities, such as the right to peaceful assembly, respect for freedom of expression and privacy.

3. The FRMF will ensure that the existing internal policies and procedures are consistent with the content of this commitment, and will strive to integrate respect for human rights upstream of its management processes.

4. The FRMF undertakes to display continuous and reasonable diligence in order to identify, prevent, mitigate and report regarding risks of negative impacts on human rights, in connection with its activities.

5. The FRMF undertakes to implement or take part in legitimate and appropriate processes intended to remedy any negative impacts on human rights, when it has caused or contributed to such impacts.

6. This commitment applies to all FRMF employees, commercial partners and other parties linked it through its activities, products and services, and it represents a minimum standard that everyone must observe.

7. The FRMF will see to it that this commitment is accessible to the public and disseminated to all of its employees and commercial partners.

Fédération Royale Marocaine  
de Football  
Fouzi LEKJAA  
Président

## **An internal consultation to identify challenges and risks related to human rights**

To identify the potential negative impacts on human rights related to the organisation of the 2026 FIFA World Cup™, the FRMF held six internal meetings and mobilised its legal and human resources departments. The FRMF teams prepared a detailed mapping of all current disputes while studying and identifying the nature thereof, to determine an efficient action and prevention policy.

The FRMF also assessed its own internal policies and commitments in collaboration with the relevant services, while devoting special attention to their follow-up and/or effective implementation so as to identify situations in which these commitments could potentially not be respected and, as relevant, to determine the best means for addressing this. A code of ethics and conduct was created, defining the basic principles and significant values in terms of behaviour and conduct within the FRMF, as well as relative to external stakeholders on the following points: duties, unwarranted benefits, protection of personal rights, integrity of matches and competitions.

## **Close collaboration with the National Human Rights Council (CNDH)**

The FRMF began a collaboration with the National Human Rights Council (CNDH), the existence and independence of which are recognised in the 2011 Constitution. The CNDH holds international “status A” accreditation, in compliance with the Paris Principles. The FRMF also relied on reports coming from other sources, including the United Nations (UN) and the International Labour Organisation (ILO).

As required by FIFA, an independent study on the human rights situation in Morocco provides the final part of this work.

With the help of the CNDH, the FRMF selected organisations from civil society and institutions in order to be included in the dialogue process with stakeholders. It held more than seven meetings with the CNDH teams in order to identify the best practices that should be adopted, and to prevent potential negative impacts from the event.

## **In-depth dialogue with stakeholders**

To consider the expectations of stakeholders, the FRMF set up a sustainable development and human rights Committee that included several organisations from civil society, institutions and groups of individuals, selected in compliance with the provisions of the

AA1000 AS standard. This committee was consulted in order to provide its expectations as well as solutions on subjects relating to human rights.

The committee members included:

- Mr. Moulay Hafid ELALAMY, Minister of Industry, Trade, Investment and the Digital economy, Chairman of the Bid Committee and representative of the government;
- Mr. Fouzi Lekjaa, President of the FRMF;
- Mr. Rachid Talbi El Alami, Minister of Youth and Sports;
- Mrs. Nezha El Ouafi, Secretary of State for sustainable development within the Ministry of Energy, Mines and the Sustainable Development;
- Mr. Driss Yazami, President of the National Human Rights Council (CNDH);
- Mr. Nizar Baraka, President of the Economic, Social and Environmental Council (CESE);
- Mr. Said BELKHAYAT, Vice-president of the Mohammed VI Sports Champions Foundation;
- Mr. Abderrahim Ksiri, Coordinator of the Moroccan Alliance for Climate and Sustainable Development;
- Mrs. Ihssane Merouani, representative of the Mohammed VI Foundation for Environmental Protection;
- Mr. Mohamed Boudra, President of the National Association of Community Council Presidents;
- Mr. Kamal Lahbib, coordinator of the Moroccan Coalition for Climate Justice;
- M. Abd Almjid Makni, GS of the Collective for the Promotion of the Rights of Persons with Disabilities;
- Mr. Jamal El Amrani, President of Junior Chamber International Morocco;
- Miss Yousra Madani, coordinator of WWF Morocco;
- Mr. Hicham El Amrani, CEO of the Bid Committee.

The FRMF will also prepare, in collaboration with civil society and independent institutions such as the CESE (Economic, Social and Environmental Council) and the CNDH, a mapping of the stakeholders that is as exhaustive and representative as possible, in order to broaden this committee and/or to create other more specific ones, notably involving the representatives of potential victims, in keeping with the progress of the organisation of the 2026 FIFA World Cup™.

## **Support from NGOs**

After this consultation work, the FRMF received written support (cf. Appendix 1) from four organisations wishing to help ensure that the 2026 FIFA World Cup™ is an opportunity for progress regarding human rights within Moroccan society.

- International Youth Chamber;
- Collective for the promotion of the rights of persons with disabilities in Morocco;
- Mohammed VI Sports Champions Foundation;
- Moroccan Association of Community Council Presidents.

## **2. Mapping of negative impacts**

To prioritize its actions with regard to preventing and dealing with negative impacts, the FRMF identified the human rights and stakeholders most likely to be impacted by the activities related to the organisation and hosting of the 2026 FIFA World Cup™.

### **2.1. Discrimination**

After consultations, internally, with civil society associations and with the CNDH, and after examining UN reports, the FRMF identified the potential discrimination risks.

These identified risks involving people, in particular people in the most vulnerable categories, could arise throughout the lifecycle of the competition, whether these risks relate to the construction of the infrastructures, the progress of the competition itself, or even the post-event period.

#### **2.1.1. Children**

##### **Risk of sexual exploitation of minors and paedophilia**

The fact of holding the competition implies a massive influx of tourists and travellers, thereby creating potential risks of human trafficking and, more specifically, sexual exploitation of children and/or acts of paedophilia as in other international events anywhere else in the world. Morocco has implemented several measures to mitigate the risks of sexual exploitation of children especially in cities with high influx of tourists

##### **Economic exploitation**

Morocco has implemented many measures intended to protect the rights of children (notably adoption of the law on working conditions and the employment of domestic workers<sup>1</sup>). Potential risks of economic exploitation of children may nevertheless persist, and the vigilance in this regard will have to continue.

Finally, risks of discrimination based on living standards also exist regarding children participation in sports.

#### **2.1.2. Women**

Morocco has made considerable efforts with regard to equality of the sexes, notably via the

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<sup>1</sup> Law n° 19-12 published in O.G. n° 6493 of 22 August 2016.

enactment of the new family code (Moudawana). Nevertheless, cases of discrimination against women persist and could be exacerbated by the organisation and hosting of the event.

### **Risks of violence**

There is a risk directly, linked to this kind of event, that fans or other actors could display sexist behaviour towards women.

### **Access to the labour market**

In terms of employment, women may still be subject to discrimination to the extent that their participation rate in the labour market currently remains low.

### **2.1.3. Persons with disabilities (PWD)**

Morocco has undertaken significant efforts to protect and promote the rights of PWD. These efforts have also extended to the realm of professional sports where 7 Moroccan athletes have won medals in the last Paralympic games in 2016. However, PWD may still be faced with problems of stigmatisation and marginalisation, as well as the relative paucity of inclusive education (including access to sports education) and access to employment.

The risks identified by the FRMF, as part of organising and hosting the World Cup (including the legacy-related activities), have to do primarily with the accessibility and mobility of PWD (travel needs of PRM, airport, reception areas, orientation and support), as well as access to information for these people depending on their disability (visual, auditory).

### **2.1.4. Migrants**

#### **Economic exploitation and access to rights**

Whether refugees, asylum claimants or, even more so, people in an irregular situation, migrants can encounter difficulties when it comes to accessing their rights such as the right to education, health, housing and decent work.

Moreover, access to the employment market theoretically remains limited for a certain number of aliens, given the existence of the national preference rule regarding employment in Morocco, whereby aliens are not authorised to hold a job that could be performed by a Moroccan citizen. In practice, situations of work exploitation and discrimination can still be observed, with the employment of migrant workers in an irregular situation who perform an activity without being declared.

Very committed to this matter, Morocco implemented a new migration policy in 2013, that calls for the socio-economic integration of the migrants within its territory. This policy is an

extension of the principles contained in the Kingdom's Constitution, notably its article 30 that provides migrants with the same rights as Moroccans, including the right to vote in local elections.

In 2014, the Moroccan government adopted its national immigration and asylum strategy that includes 27 specific objectives, 11 programmes and 81 actions. Within this framework, the Kingdom launched two campaigns for the regularisation of migrants, during which 85% of regularisation requests were accepted, leading to the regularisation of 27,000 migrants and the enrolment of 7,300 children in school. The Moroccan immigration and asylum strategy also allows migrants to have full and entire access to public services and employment.

### **Access to rights**

Whether refugees, asylum claimants or, even more so, people in an irregular situation, migrants can encounter difficulties with regard to accessing their most basic rights such as the right to education, health, housing and decent work.

#### **2.1.5. Volunteers**

The FRMF also identified discrimination risks in the selection of volunteers, primarily as a result of the lack of an accurate legal framework governing the case of volunteers.

There is also the potential for risks of exploitation at work, that could involve degrading tasks and/or violations of physical integrity.

## **2.2. Security of persons and violations of their physical integrity**

The FRMF identified risks, common to major sports events worldwide, of violations of the security and physical integrity of persons (poor treatment) relative to the hosting of the event. These risks could, in particular, be linked to disproportionate use of force towards violent fans, and are likely to be greater in places of deprivation of liberty, particularly during custody periods.

## **2.3. Freedom of expression and peaceful assembly**

Freedom of expression is a constitutional right in Morocco. Nevertheless, The FRMF identified risks of potential negative impacts on freedom of expression and peaceful assembly in certain situations for this type of events, notably as a result of the need to maintain order.

## **2.4. Labour law**

Labour rights and safety and security in construction sites has been a major focus of the Moroccan government during the large infrastructure projects in the last few years. However, Risks of violations of basic labour rights – as internationally recognised by the ILO – exist throughout the lifecycle of the World Cup (preparation, conduct of the event and legacy). These risks notably relate to the construction of new infrastructures (stadiums, training sites, etc.). They involve the following subjects:

- Health and safety of workers during building projects;
- Working conditions;
- Discrimination when hiring and at work locations;
- Freedom of trade union representation;
- Right to strike;
- Child labour.

## **2.5. Value chain and subcontracting**

Morocco has a long tradition of working with international leaders in engineering and construction for its infrastructure investments which ensures a high level of exigence in Human rights and labour issues. The FRMF has however also identified potential risks of negative impacts on human rights related to activities surrounding the organisation, hosting and legacy of the World Cup in terms of its value chain that will be mitigated throughout the organization. These risks extend to:

- The sourcing of construction equipment;
- The production of products manufactured in certain foreign countries where basic labour rights are not always respected (working times, wages, workplace safety, employment insecurity, freedom of trade union representation and the right to collective bargaining);
- The involvement of child labour in the supply chain.

## **2.6. Right of ownership**

After consulting with stakeholders, the FRMF identified risks of potential negative impacts in terms of property rights, notably related to potential expropriations, forced evictions and the relocation of expropriated persons. However, all the parcels on which the main sites will be

built – notably stadiums and training sites – are already owned by the public authorities. As such, the expropriation risks are low.

### **3. Action plan for preventing and mitigating negative impacts on human rights**

The preliminary assessment of recognised or potential negative impacts on human rights related to the organisation, hosting and legacy of the 2026 FIFA Football World Cup™, as detailed above, enabled the FRMF to identify implementation measures in order to prevent and mitigate such risks, or to repair them, if necessary.

Before itemizing these measures, it should be noted that the implementation of the National action plan on democracy and human rights 2018-2021 (PANDDH<sup>2</sup>)<sup>3</sup> will make a significant contribution to mitigating and preventing a good number of the risks identified with regard to human rights

Indeed, the PANDDH already anticipates a component relating to business and human rights (PAN), prepared on the basis of the United Nations guiding principles on business and human rights. The acceleration of its adoption will therefore constitute major progress for Morocco in this regard. It will also make a contribution to the country's efforts with regard to supporting the Agenda 2030 for Sustainable Development, in particular relative to the objectives intended to promote shared and sustainable economic growth as well as decent work for all.

#### **3.1. Discrimination**

In order to combat all forms of discriminations and more specifically discrimination towards women, children and the most vulnerable groups (people with disabilities, migrants, etc.), the FRMF undertakes to expand the existing sustainable development and human rights committee to include associations or groups representing these people or communities that are not already members, in order to obtain their recommendations.

In order to combat discrimination against these employees (particularly discrimination related to gender, age or disability), the FRMF undertakes to prepare detailed and exhaustive commitments in favour of non-discrimination that will be included in its internal procedures and codes, and also to encourage promotion of the CGEM<sup>4</sup> CSR label.

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<sup>2</sup> The PANDDH was adopted by the Government council and announced on 13 December 2017 in the presence of the Head of government and of the Minister of state responsible for human rights

<sup>3</sup> The adoption of which was announced by the Council of Ministers in December 2017.

<sup>4</sup> Confédération Générale des Entreprises du Maroc

The FRMF will initiate, participate and encourage sensitisation and training operations to combat discrimination, while working with government authorities, associations defending persons / groups that have been the victim of discrimination, and the CNDH, notably through its INFDH (National Human Rights Training Institute). These sensitisation and training seminars will be intended for the broadest possible audience, public agents and all persons in contact with these vulnerable categories.

To add to its reflection and to better prepare, implement and assess its actions, the FRMF will regularly consult the mega-sports events (MSE) human rights platform<sup>5</sup>.

Finally, regarding risks of discrimination during matches, the FRMF plans to work closely with the competent authorities and FIFA to implement a specific surveillance system (video-surveillance cameras, private and public security agents) to prevent, detect and handle, as quickly as possible, any discriminatory behaviour (racist, sexist, ...) in the stadiums.

### **3.1.1. Children**

The new law on the reorganisation of the National Human Rights Council (CNDH)<sup>6</sup> provides the latter with prerogatives relative to the National complaint and recourse mechanism involving the violation of children rights.

To prevent and mitigate risks of sexual and economic exploitation of children, the FRMF will carry out sensitisation operations and establish partnerships with associations or institutions dedicated to protecting the rights of children, notably ones that focus on work and sexual exploitation / violence, such as the National observatory of the rights of the child, INSAF<sup>7</sup> and AMANE<sup>8</sup>

Moreover, on the topic of child labour and working in collaboration with associations, civil society and the CNDH, the FRMF will make every effort to identify sites and suppliers / service providers / subcontractors with a substantial risk of incidents related to child labour.

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<sup>5</sup> The MSE Platform is a multipartite group with broad support (states, intergovernmental organisations, civil society...), the aim of which is to raise awareness, share information and best practices and offer solutions as well as an area for discussing questions related to human rights in connection with the organisation of sports events.

<sup>6</sup> Draft law n°76-15 approved on 13 February 2018 by the Parliament and that will take effect in the coming months, as of its validation by the Constitutional council.

<sup>7</sup> INSAF: a non-profit association founded in 1999 and recognised as a public interest foundation, INSAF works to create a society that guarantees respect for the rights of every woman and child, within a dignified and responsible environment.

<sup>8</sup> AMANE: the Association Meilleur Avenir pour Nos Enfants works to combat sexual violence against children

The FRMF will regularly consult the MSE platform, particularly the white paper on the rights of children in connection with sporting events<sup>9</sup>, in order to reflect the relevant examples of best practices and experience feedback.

The FRMF intends to create a “Sports for young people” committee in order to involve them in the reflection and definition of actions that will be carried out in order to mitigate discrimination based on living standards, and access to sporting activities.

Finally, the FRMF will rely on non-judicial recourse mechanisms to deal with complaints linked to violations of the rights of children (such as the procedures implemented by the CNDH in this regard).

### **3.1.2. Women**

The various legislative initiatives and government measures adopted (or in the process of adoption) will contribute to establishing gender equality in public policies, and thereby to reduce the risks of violence and discrimination against women.

For example :

- The February 2018 adoption of law n°103-13 relative to combating violence against women. The upcoming set-up of the APALD (Authority for parity and efforts against discrimination), will help prevent and/or mitigate the risks of violence against women, and facilitate the efforts to combat discrimination regarding their access to the labour market;
- The application of gender budgeting (GB<sup>10</sup>) and the February 2013 creation of the GB Centre of Excellence (with assistance from the United Nations), which constitutes a platform for partnership, sharing and knowledge exchanges in this regard;
- The June 2013 adoption of a Government Plan for equality with the prospect of parity (PGE) constitutes a common framework of actions for convergence of the initiatives adopted to integrate the rights of women within political policies (development of mechanisms for caring for women who have been victim of violence, and launch an integrated programme to raise awareness in this regard , etc.).

In all its activities linked to the organisation of the 2026 FIFA World Cup<sup>TM</sup>, the FRMF will encourage equality between men and women and work to raise the awareness of all

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<sup>9</sup> <https://www.ihrb.org/megasportingevents/resource-view/white-paper-4.1-childrens-rights>

<sup>10</sup> Gender budgeting is an approach to budgeting that includes the gender dimension within the budget process. This means "a gender-based assessment of budgets incorporating a gender perspective at all levels of the budgetary process and restructuring revenues and expenditures to promote gender equality." (Council of Europe, 2005)

stakeholders about discrimination directed against women, in collaboration with specialised defence associations. The FRMF will notably target parity when recruiting the 20,000 volunteers associated with the competition organisation, as well as for the volunteers mobilised in the Host Cities as part of their fan reception programmes.

The FRMF also plans to sign agreements with the Ministry of the Family, Solidarity, Equality and Social Development in order to promote the access of women to positions of responsibility, in both the public and private sectors.

### **3.1.3. Persons with disabilities (PWD)**

The adoption of new laws and new public policies intended to strengthen the rights of PWD will help to contribute to preventing and mitigating the risks of negative impacts on these people (as identified in the impact report).

Amongst these provisions :

- Framework law 97/13 on the protection and promotion of the rights of persons with disabilities;
- The adoption of the reorganisation of the National Human Rights Council (CNDH)<sup>11</sup>, that provides the latter with prerogatives relative to the National mechanism for the protection and promotion of the rights of persons with disabilities.

The FRMF will strive to promote diversity and accessibility, notably through easier access for PWD to the stadiums and all of the event's official locations (Fan Fests™, etc.), and by signing partnerships with associations and representatives of civil society in charge of defending the rights of PWD, in order to develop inclusive sports programmes / projects.

The FRMF will also encourage all stakeholders to sign collective agreements for the appropriate integration of disabled workers.

The 2026 FIFA World Cup™ will also leave a positive legacy by helping to improve the access and accessibility conditions of event venues for persons with disabilities. A system dedicated to improving accessibility and signage intended for handicapped persons will be deployed on all event sites in the 12 host cities. These arrangements will remain after the 2026 FIFA World Cup™ and will be extended to other cities in the Kingdom.

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<sup>11</sup> Draft law n°76-15 approved on 13 February 2018 by the Parliament and that will take effect in the coming months, as of its validation by the Constitutional council.

### **3.1.4. Migrants**

The implementation of the reforms currently being undertaken as part of the new immigration and asylum policy will contribute to preventing and mitigating the risks of negative impacts on migrant populations.

The FRMF will prepare a mapping, working with associations and civil society involved in this regard, with companies, suppliers and the managers of sites identified as including a substantial risk of incidents linked to irregular employment and the illegal exploitation of migrants.

### **3.1.5. Volunteers**

The FRMF will undertake sensitization, promotion and training measures in order to raise the awareness of stakeholders with regard to respecting the rights of volunteers.

The FRMF will not be recruiting underage volunteers and will encourage all stakeholders having recourse to volunteers – notably the host cities – to adopt the same principle.

Also, to promote volunteer commitment and guarantee the rights of volunteers, the FRMF will work closely with the competent government authorities in order to finalise and ensure adoption of the draft law on the status of volunteers, announced by the Government as part of the national dialogue of 13 March 2013 and already anticipated for the organisation of the 2026 FIFA World Cup™ (cf. Government Legal Statement).

Finally, the FRMF will arrange and encourage stakeholders having recourse to volunteers to obtain insurance in order to cover risks incurred in case of accidents or illness related to their activities.

## **3.2. Security of persons**

To mitigate the security-related risks, the FRMF plans to carry out additional training cycles, in collaboration with the CNDH, for law enforcement and private security agents, regarding human rights in the context of their activities.

In case of recourse to private security companies as part of its logistics chain, the FRMF will include, within contracts, the international standards regarding security and human rights.

Moreover, regarding risks specifically related to periods of custody, these risks will be significantly mitigated by the upcoming adoption of draft laws for the Criminal Code and Code of Criminal Procedure, that call for the audio-visual recording of the hearings of

accused parties taken into custody, the requirement for the accused to undergo medical examination as well as the presence of their lawyers during hearings.

Finally, the adoption by both houses of the draft law on the reorganisation of the CNDH (National Human Rights Council)<sup>12</sup>, which provides the latter with prerogatives relative to the National mechanism for the prevention of torture (MNP), will also contribute to the mitigation and prevention of risks of negative impacts on the security and physical integrity of persons. Indeed, in compliance with the provisions of this draft law (articles 13 and 15) and of the optional protocol of the convention against torture and other cruel, inhuman or degrading treatment or punishment (OPCAT<sup>13</sup>), the CNDH will regularly visit all locations used for the deprivation of liberty. The MNP may also issue recommendations based on these visits to improve the situation of persons deprived of liberty, and for the adoption of structural reforms needed in this regard.

### **3.3. Freedom of expression and peaceful assembly**

To reduce the risks of violations of the freedom of expression and peaceful assembly, as well as the excessive usage of force by public security agents to re-establish order during certain festive and sporting events, the FRMF is planning to carry out promotion and awareness-raising activities relative to respect of internationally recognised human rights.

The FRMF will also encourage and contribute to the implementation, by the relevant government authorities, of efficient mediation mechanisms between demonstrators and public authorities, in order to establish a constructive dialogue, to prevent possible escalation of conflicts, and to find peaceful dispute settlement methods.

The FRMF will also encourage government authorities to adopt a code of conduct for the agents in charge of applying the law. It will recall the basic principles that will ensure that these agents respect and protect human dignity and the basic rights of people.

### **3.4. Labour law**

To prevent and/or mitigate the risks of negative impacts on basic labour rights, as identified in the impact report, the FRMF will endeavour to undertake the following measures:

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<sup>12</sup> Draft law n°76-15 approved on 13 February 2018 by the Parliament and that will take effect in the coming months, as of its validation by the Constitutional council.

<sup>13</sup> Morocco ratified the OPCAT on 24 November 2014

- observe and impose the highest international standards regarding labour law, most notably the provisions contained in the ILO's eight fundamental conventions. Regarding building works for the stadiums and other infrastructures, the FRMF will ensure that the competent authorities comply with the relevant internationally recognised standards, notably the ones relating to safety as stipulated in the construction contracts of the International Federation of Consulting Engineers (FIDIC) and in the ILO code on health and safety conditions in the construction sector. The FRMF will endeavour to ensure observance of these standards throughout its supply chain and in all relations with its partners;
- complete a mapping, and then favour socially responsible companies, notably ones having obtained the CSR Label from the CGEM and/or the "CSR top performers" trophy awarded by Vigeo Eiris, or that have adopted the ISO 26000 standard, or that have undertaken certification initiatives such as HQE™ 14 certification);
- complete a mapping of the sites, companies and suppliers where basic labour rights (freedom of trade union associations, collective bargaining, decent working conditions...) may not be respected, thereby limiting the business relations with these parties;
- raise the awareness of companies involved in the construction regarding the importance of protecting worker rights, particularly about health and safety, access to health care and fair compensation in case of workplace accidents;
- encourage the companies involved in the construction to provide health and safety training for their personnel
- set up inspection commissions on building sites considered to be "at risk" (working conditions, health and safety, overtime hours, non-declared workers, child labour, discrimination, ...)
- impose internal audits regarding social dialogue and health and safety standards, as well as occasional external audits;
- sign a collective agreement on social dialogue with the trade union organisations;
- organise inspections of the various units to ensure that employees are familiar with the applicable legal texts and their implementation;
- provide employees with the conditions needed to elect personnel representatives and to guarantee their independence;

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<sup>14</sup> Representing a voluntary initiative intended to obtain a sustainable building or territory, in accordance with sustainable development principles; the main sector concerned by this initiative is the construction sector.

- provide personnel representatives with financial means, training and communication materials (intranet, sign panels, brochures) enabling them to exercise their rights and to keep the employees informed;
- carry out awareness-raising and training actions for the Federation's managers;
- implement internal alarm systems (in order to receive and handle complaints from employees), as well as disciplinary sanctions in case of abuses relative to human rights;
- work in close collaboration with labour inspectors, trade unions and the Ministry of employment, while involving them in the Sustainable development and human rights committee, and while consulting with them and obtaining their opinions whenever necessary.

### **3.5. Value chain and subcontracting**

To combat the risks of violations of internationally recognised human rights within its value chain, the FRMF will:

- reiterate its human rights commitments in its contracts with service providers, suppliers and subcontractors, at least the ones relating to decent wages, the abolition of child labour and forced labour, health and safety measures, and non-discrimination;
- implement support programmes to assist its main subcontractors / service providers / suppliers to implement best practices with regard to matters relating to human rights, notably in social matters;
- carry out (in partnership with other companies using the same service providers / suppliers / subcontractors) social and environmental audits of its supply chain;
- use its relations with the various stakeholders to stop or mitigate any negative impacts;
- consider suspending or interrupting relations with commercial partners, subcontractors or suppliers that do not observe internationally recognised human rights, when its influence is insufficient to reduce or mitigate serious negative impacts on human rights;
- favour short circuits and the recourse to fair trade for the manufacturing of "goodies";
- attempt to promote, with project managers, a direct employment policy for the workers involved in the constructions of the sites needed for the World Cup, in order to reduce the excessive recourse to subcontractors and the associated risks for workers (irregular employment, working conditions, health and safety...);

- encourage all companies involved in works related to the 2026 FIFA World Cup™ to observe and ensure compliance with international standards, particularly relating to labour law;
- regularly consult the MSE platform, particularly the white paper relative to matters of procurements relating to sporting events, and that provides examples of best practices and useful advice in this regard.

The FRMF will ensure that the event's main stakeholders – notably the authorities in charge of the construction of the main sites – adopt the same principles.

The FRMF will ensure the external dissemination of information, particularly when concerns are expressed by concerned actors, while officially indicating how it deals with these concerns.

It will further deploy every effort to ensure that victims of violations of human rights related to its activities have access to effective recourse mechanisms (judicial and/or non-judicial, State and or non-State).

### **3.6. Expropriation and forced evictions**

As stated in the impact study, virtually all the parcels needed for the construction of the event's main sites – stadiums and training sites – are public lands.

In any event, the FRMF will promote respect for internationally recognised human rights with the public authorities in case of expropriations or forced evictions as part of the acquisition of parcels. The FRMF will encourage a genuine process of prior and informed free consent of the population groups affected by its projects / activities (expropriations, construction...).

## **4. Reasonable diligence with regard to human rights**

To confirm its commitment to respecting all internationally recognised human rights as part of its policies and organisational procedures, as well as in its business relations, the FRMF intends:

- to allocate specific resources for the integration of the principles of respect for human rights in its internal procedures and policies;
- to involve its directors throughout the integration process to encourage the establishment of a culture that respects human rights within the FRMF;

- to include requirements relative to compliance with human rights in all its operational and functional units, to designate one or more manager(s)/official(s) within its legal and/or Sustainable development department, who will be dedicated to the concrete implementation of measures relating to respect of human rights;
- to set up working groups on specific issues (discrimination, integration of provisions relating to human rights within contracts...);
- to offer, notably with the help of the CNDH and its National human rights training institute, training and awareness-raising activities relating to human rights and intended for its directors and employees, and those of the main stakeholders;
- to develop indicators to measure the efficiency of the training provided to directors and employees;
- to disseminate best practices within all the organisation's units;
- to integrate the consideration of human rights as part of recruiting and employee assessments;
- to take incentive measures that include criteria regarding compliance with human rights as part of the performance objectives of employees;
- to initiate dissuasive measures by sanctioning behaviour that is contrary to human rights (individual actions or collective decisions);
- to involve the main stakeholders within the Sustainable development and human rights committee, to maintain a dialogue and a regular commitment.

The FRMF will encourage the event's main stakeholders to adopt these various principles.

**In its business relations, the FRMF anticipates:**

Regarding its relations with external stakeholders (suppliers, subcontractors, possible commercial partners, etc.), the FRMF plans to introduce contractual provisions to impose compliance with human rights.

In compliance with United Nations Guiding Principle n°19 on business and human rights, when the FRMF could potentially contribute to a negative impact, it will endeavour to mitigate the impacts thereof, when it has an efficient direct or indirect action lever.

In all cases, the FRMF will assess the importance of its relationship with the entity in question, the degree of influence that it can have on this relationship, the severity of the violation and the fact of knowing if the interruption of this relationship will have harmful consequences on human rights.

The FRMF will also set up a continuous reasonable diligence process to identify, prevent, mitigate and report on how it plans to handle its impacts on human rights, throughout the competition cycle.

#### **4.1. Establishing a dialogue with stakeholders**

To identify and select stakeholders to be included in the dialogue, the FRMF consulted with several entities having recognised experience in the fields of the environment and human rights (CESE, CNDH, associations, etc.).

In February 2018, the FRMF set up a Sustainable development and human rights committee that includes ministerial representatives, athletes, civil society associations (notably ones representing persons or groups of persons who could be negatively impacted, such as persons with disabilities, children and youths, etc.), national institutions for the promotion and protection of human rights and good governance (CNDH, CESE, ...). Its main mission is to prepare opinions and recommendations and to clarify the decisions regarding environmental and social stakes relative to the organisation and running of the 2026 World Cup.

This committee will be extended to new stakeholders such as the representatives of the main trade unions and associations of employers, associations protecting the rights of children and women, representatives of judges and lawyers, etc., in keeping with the progress of the event's organisation and in case of the identification of new negative impacts.

The FRMF plans that this Committee will meet regularly, with the first meeting having been held on 12 February 2018.

To specifically promote the participation of children and young people, and the consideration of their opinions, particularly with regard to access to sport, the FRMF plans to work with the CNDH as part of the national and regional discussions that it has carried out since 2016, in compliance with the UNICEF Child and youth participation resource guide.

To strengthen the dialogue with stakeholders and the communities potentially and/or affected by the activities related to organising and hosting the competition (including after the FIFA World Cup), the FRMF plans to set up an online dialogue system and an operational complaint mechanism that will enable the stakeholders to raise their concerns.

At all times, the FRMF will favour dialogue as the method for resolving difficulties encountered in this regard.

Finally, the FRMF will take part in international platforms and forums intended to discuss and share best practices in the field of sports (Mega-sporting events platform, for example) to benefit from the experience and recommendations of certain stakeholders.

#### **4.2. Encouraging the event's other stakeholders to observe internationally recognised human rights**

During the first meeting of the Sustainable development and human rights committee, and with the recommendations of the National Human Rights Council, the FRMF undertook to encourage and work with the government to accelerate the preparation and adoption of a national action plan on business and human rights, that would comply with the United Nations guiding principles on business and human rights.

Moreover, the FRMF will encourage the relevant government authorities to implement efficient complaint mechanisms (judicial and non-judicial) to prevent and mitigate any negative impacts on human rights.

In its relations with partners involved in organising the competition, the FRMF will strive to introduce contractual provisions requiring them to observe internationally recognised human rights.

The FRMF will carry out awareness-raising operations with all third parties (Host Cities, managers of stadiums and training sites, hotel operators, airport authorities, etc.) on the need to adopt and apply internationally recognised human rights, while also setting up efficient complaint mechanisms.

Finally, the FRMF plans to publish information brochures for tourists coming to Morocco to attend the Cup, that will describe local specifics, customs and habits within the country, as well as key points to be taken into consideration during their stay.

#### **4.3. Ensuring the monitoring of the effectiveness of the measures intended to identify and combat the main threats to human rights**

To ensure that the policies undertaken efficiently respond to the negative impacts on human rights, relevant performance monitoring and tracking will be used. To this end, the FRMF plans to:

- hold regular meetings of the Sustainable development and human rights committee, as well as the other stakeholder committees created about specific topics (Discrimination committee, Occupational health and safety committee...);

- work closely with relevant local associations (e.g. association defending the rights of children, women or people with disabilities...), to obtain ground-level information;
- set up complaint mechanisms on the operational level, to gather the opinions of stakeholders on the efficiency of the responses that it provides with regard to human rights;
- work closely with the non-judicial recourse mechanisms (CNDH, PCN, Mediator institution, APALD - Authority for parity and efforts against discrimination);
- include the monitoring process for human rights together with the other existing processes (environmental performance, health and safety, etc.);
- use the indicators relative to human rights as part of the Global Reporting Initiative (GRI), notably the ones relating to reasonable diligence in terms of non-discrimination (G4-HR3), freedom of trade union representation and the right to collective bargaining (G4-HR4), child labour (G4-HR5), security-related practices (G4-HR7) as well as mechanisms for resolving grievances relating to human rights (G4-HR12), etc.;
- update the mapping of risks and stakeholders, if some of them are overlooked or under-evaluated.

#### **4.4. Observing and assisting the protection of the freedom of defenders of human rights and journalists**

To respect the fundamental rights of the defenders of human rights and journalists, the FRMF will formally undertake to respect and not interfere with their work, particularly when the latter point out negative impacts related to its own activities.

In case of a threat to the freedom of defenders of human rights and journalists, the FRMF will use its relations with the various stakeholders to guarantee their protection and the application of the law.

The FRMF will promote (relying on the expertise of actors with experience in the field of complaint mechanisms: CNDH, PCN, Morocco's Mediator institution...) the set-up of a non-judicial complaint mechanism that will be specifically created in order to hear complaints and grievances related to the organisation, hosting and legacy of the 2026 Cup, including any raised by defenders of human rights and journalists.

The FRMF will encourage and facilitate the access of defenders of human rights and journalists, whose rights have been violated, to other avenues of judicial and non-judicial recourse such as the courts, the National Human Rights Council (CNDH), the Moroccan contact point of the OECD (PCN), the Kingdom's Mediator institution...

#### **4.5. Adopting and observing international standards and best practices in order to manage social impacts throughout the lifecycle of the Competition**

The FRMF will comply with the internationally recognised standards relating to safety, notably the ones stipulated in the construction contracts of the International Federation of Consulting Engineers (FIDIC) and in the ILO code on health and safety conditions in the construction sector.

The FRMF will also rely on the Environmental and social sustainability performance standards of the international finance company for the identification of risks and impacts to avoid, mitigate and manage risks and impacts, such as to carry out its activities in a sustainable manner.

#### **4.6. Communicating transparently regarding the fulfilment of its obligations in terms of observing all internationally recognised human rights**

For efficient communication on the overall implemented initiative and on the actions for handling any identified risks involving human rights, the FRMF will:

- communicate regarding its actions with stakeholders that have raised grievances and the public with the greatest possible transparency (personal interviews, consultations with involved actors, online dialogue...);
- include provisions relating to the observance of human rights in its internal procedures and policies as well as in its contracts with various partners (public authorities, commercial partners...);
- consult and discuss with stakeholders, notably during meetings held by the various committees (FIFA World Cup Steering committee, Sustainable development and human rights committee, Discrimination committee...);
- report on the impact assessments prepared for specific projects, as well as on the types of incidents encountered or complaints received internally, by means of mechanisms set up on the operational level, and regarding how it has responded to them;
- report on the types of identified incidents and complaints received via other non-judicial recourse mechanisms (CNDH, PCN, APALD, Mediator institution...) and with regard to how it has responded to them;

- produce documents presented during the General Meeting or accessible on its intranet site (official public reports), when the communication thereof involves employees or civil society.

#### **4.7. Setting up and cooperating with the complaint mechanisms for persons and communities whose human rights may be impacted by its activities**

In compliance with point n°29 of the United Nations guiding principles on business and human rights (UNGP), the FRMF must set up, for individuals and communities that could be negatively impacted by its activities relating to the World Cup, even if it is not the direct cause thereof, complaint mechanisms on the operational level, and/or participate in them. They must make it possible to receive complaints and grievances as early as possible, even before the negative impact has occurred and/or while its effects are limited.

To this end, the FRMF plans to:

- regularly analyse the nature and characteristics of any complaints, to identify systematic problems related to its activities and to adapt its practices accordingly;
- promote (awareness-raising, training) and foster collective bargaining and the role of trade unions for the settlement of disputes linked to labour law;
- facilitate access to the non-judicial recourse possibilities (CNDH, PCN, Kingdom's Mediator institution, APALD...);
- ensure that the implemented recourse mechanisms or the ones in which it participates meet the efficiency criteria defined in article 31 of the UNGP, namely:
  - **Legitimacy:** the FRMF will clearly establish each party's responsibilities within the mechanism and train the persons in charge in terms of how to analyse and respond to any complaint; the aim is to encourage trust from the people for whom the mechanism is intended;
  - **Accessibility:** the FRMF will communicate to all actors concerned by this mechanism, and will assist people experiencing difficulties with regard to accessing it; the FRMF will also provide all of its employees with documents (brochure, intranet..) explaining the conditions for accessing these mechanisms;
  - **Predictability:** the FRMF will provide clear and accessible information regarding the beneficiaries of the mechanism, the admissibility conditions for complaints, the steps and time limits for their handling (brochures, publications on the FRMF Internet site);
  - **Equity:** the FRMF will ensure that aggrieved parties have reasonable access to information sources and to the expertise needed to initiate the complaint procedure. As such, when relevant, it will consider the lack of financial means of the plaintiffs and

attempt to correct this imbalance by providing them with the necessary information and legal assistance;

- **Transparency:** to build confidence in the mechanism, the FRMF will endeavour to communicate regularly with stakeholders regarding the outcome of their complaint, it will ensure the confidentiality of the discussion and establish a clear separation between the people making and implementing the decision, and the plaintiff and his/her immediate hierarchical superiors;
- **Compatibility with human rights:** the outcome of the complaints and remedies must be compatible with internationally recognised human rights;
- **Sources of on-going learning:** the FRMF will endeavour to derive lessons to improve the mechanism and to prevent future complaints (regular analysis of the frequency, characteristics and causes of the complaints).
- **Basis of participation and dialogue:** the FRMF will target consensus and solution(s) obtained through dialogue with the plaintiffs, notably by consulting the parties or groups of actors about their design.

#### **4.8. Ensuring that appropriate and effective measures are implemented in order to identify and respond to alleged violations of human rights by the FRMF's business partners for the Competition**

The actions of the FRMF will have two facets:

- Usage and application of GRI reporting standards (G4-HR10, G4-HR11) relative to the assessment of the observance of human rights by suppliers;
- Sensitisation of the stakeholders regarding the need to participate in the existing complaint mechanisms (operational mechanisms of the FRMF, CNDH, PCN, APALD, Mediator institution, labour inspectors etc.).

## Appendix 1: Letters of support



التحالف من أجل النهوض بحقوق  
الأشخاص في وضعية إعاقة  
Collectif pour la Promotion des droits  
des personnes en situation de Handicap

A l'attention de Monsieur Moulay Hafid Elalamy  
Président du Comité de candidature Maroc 2026

**Objet : Soutien à la candidature marocaine à la Coupe du Monde de football FIFA 2026**

Rabat, le 22 Février 2018

Monsieur le Président,

La Coupe du Monde de la FIFA constitue sans conteste la compétition footballistique la plus importante de la planète. Rassemblant des dizaines de nationalités, de cultures, des joueurs et leurs supporters issus de tous les continents, la Coupe du Monde de football FIFA 2026 sera une fête populaire sans précédent, où l'amitié entre les nations sera célébrée.

Nous partageons avec vous la conviction que le Maroc exposera au monde le meilleur du football en 2026, en s'appuyant notamment sur l'hospitalité et la passion des Marocains, sur la qualité des nouvelles infrastructures à édifier, ainsi que sur les valeurs de tolérance et d'universalité que le football véhicule. La Coupe du Monde sera l'occasion de mettre en avant l'amélioration des conditions de vie des personnes en situation de handicap au Maroc, d'identifier les points d'amélioration possibles et de proposer des solutions nouvelles tout au long de la phase de préparation.

Cette vision s'accompagne d'une volonté ferme de construire pour nos concitoyens en situation de handicap un héritage durable et inclusif qui mobilisera toutes les forces vives de la Nation.

C'est en ce sens que le Collectif pour la Promotion des Droits des Personnes en Situation de Handicap s'engage aux côtés de la Fédération Royale Marocaine de Football, du Comité de candidature et des autorités politiques nationales et locales en soutenant pleinement la candidature Maroc 2026.

Veuillez agréer, Monsieur le Président, mes salutations les meilleures.

**Abdelmajid Makni**

Secrétaire Général

Collectif pour la Promotion des Droits

des Personnes en Situation de Handicap au Maroc

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Hosted by : Centre Salmia de Rééducation - Quartier Andalous Rue2 Salmia 2 - Casablanca

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 Zimbabwe



Jeune Chambre Internationale Morocco

Casablanca le Lundi 19 Février 2018

E-mail : [Morocco@jci.cc](mailto:Morocco@jci.cc)

Tél : 0668 516 518

A l'attention de Monsieur Moulay Hafid Elalamy

Président du Comité de candidature Maroc 2026

**Objet : Soutien à la candidature marocaine à la Coupe du Monde de football FIFA 2026**

Monsieur le président,

C'est avec un immense enthousiasme que nous avons accueilli la nouvelle de la candidature du Maroc à la Coupe du Monde de football FIFA 2026. C'est l'occasion d'une mobilisation générale des acteurs associatifs qui œuvrent au cœur de la société marocaine. La Jeune Chambre Internationale du Maroc (JCI Morocco) souhaite s'associer à la ferveur du peuple marocain pour accueillir cette manifestation majeure au niveau mondial.

Plus largement, la Coupe du Monde de la FIFA constitue pour l'ensemble des acteurs non étatiques un point de convergence des énergies pour promouvoir un événement solidaire et inclusif. Nous aurons à cœur de participer à la préparation et au déroulement de cette compétition, qui sera un levier de développement socioéconomique des territoires et régions marocaines.

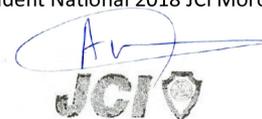
Nous partageons avec vous cette vision qui s'accompagne d'une volonté ferme de construire pour nos jeunes concitoyens un héritage durable et inclusif. Le Maroc pourra bénéficier de l'accueil de l'événement en matière de cohésion sociale, de progrès technologique, de transport, d'infrastructures sportives, ouvrant la porte à un futur prometteur pour la jeunesse marocaine et la jeunesse africaine en général. Ces changements positifs devront profiter au plus grand nombre, tout en conservant à l'esprit l'importance de la jeunesse dans la construction d'un avenir meilleur.

C'est en ce sens que la Jeune Chambre Internationale du Maroc s'engage aux côtés de la Fédération Royale Marocaine de Football, du Comité de candidature et des autorités politiques nationales et locales en soutenant pleinement la candidature Maroc 2026.

Veillez agréer, Monsieur le Président, mes salutations les meilleures.

Jamal EL AMRANI

Président National 2018 JCI Morocco



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 Worldwide Federation of Young Leaders and Entrepreneurs  
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Association Marocaine des Présidents des Conseils Communaux (AMPCC)

**A l'attention de Monsieur Moulay Hafid Elalamy  
Président du Comité de candidature Maroc 2026**

**Objet : Soutien à la candidature marocaine à la Coupe du Monde de football FIFA 2026**

**Monsieur le Président,**

C'est avec un immense enthousiasme que nous avons accueilli la nouvelle de la candidature du Maroc à la Coupe du Monde de football FIFA 2026. C'est l'occasion d'une mobilisation générale des acteurs associatifs qui œuvrent au cœur de la société marocaine. L'Association Marocaine des Présidents des Conseils Communaux AMPCC souhaite s'associer à la ferveur du peuple marocain pour accueillir cette manifestation majeure au niveau mondial.

Plus largement, la Coupe du Monde de la FIFA constitue pour l'ensemble des acteurs non étatiques un point de convergence des énergies pour promouvoir un événement solidaire et inclusif. Nous aurons à cœur de participer à la préparation et au déroulement de cette compétition, qui sera un levier de développement socioéconomique des territoires et régions marocaines.

Nous partageons avec vous cette vision qui s'accompagne d'une volonté ferme de construire pour nos jeunes concitoyens un héritage durable et inclusif. Le Maroc pourra bénéficier de l'accueil de l'événement en matière de cohésion sociale, de progrès technologique, de transport, d'infrastructures sportives, ouvrant la porte à un futur prometteur pour la jeunesse marocaine et la jeunesse africaine en général. Ces changements positifs devront profiter au plus grand nombre, tout en conservant à l'esprit l'importance de l'inclusion des territoires dans la construction d'un avenir meilleur.

C'est en ce sens que l'Association Marocaine des Présidents des Conseils Communaux AMPCC s'engage aux côtés de la Fédération Royale Marocaine de Football, du Comité de candidature et des autorités politiques nationales et locales en soutenant pleinement la candidature Maroc 2026.

Veillez agréer, Monsieur le Président, mes salutations les meilleures.



زنگة صفرو، رقم 1 حسان - الرباط - الهاتف: 05 37 20 59 09 - الفاكس: 05 37 20 59 03  
البريد الإلكتروني: association.ampcc@gmail.com



A l'attention de Monsieur Moulay Hafid Elalamy  
Président du Comité de candidature Maroc 2026

**Objet : Soutien à la candidature marocaine à la Coupe du Monde de football  
FIFA 2026**

Rabat, le 19 Février 2018

Monsieur,

C'est avec un immense enthousiasme que nous avons accueilli la nouvelle de la candidature du Maroc à la Coupe du Monde de football FIFA 2026. C'est l'occasion d'une mobilisation générale des acteurs associatifs qui œuvrent au cœur de la société marocaine. La Fondation Mohammed VI des Champions Sportifs souhaite s'associer à la ferveur du peuple marocain pour accueillir cette manifestation majeure au niveau mondial.

Plus largement, la Coupe du Monde de la FIFA constitue pour l'ensemble des acteurs non étatiques un point de convergence des énergies pour promouvoir un événement solidaire et inclusif. Nous aurons à cœur de participer à la préparation et au déroulement de cette compétition, qui sera un levier de développement socioéconomique des territoires et régions marocaines.

Nous sommes persuadés que la Coupe du Monde permettra d'accélérer les projets d'amélioration des conditions de vie des Marocains, de renforcement de la croissance économique du pays et de développement de la pratique du sport dans l'ensemble de la société marocaine.

La jeunesse bénéficiera à plus long terme de l'accueil de cet événement en matière d'infrastructures sportives de proximité à travers l'édification de nouveaux terrains d'entraînements et de leurs installations annexes.

La Fondation Mohamed VI des Champions Sportifs s'engage donc aux côtés de la Fédération Royale Marocaine de Football, du Comité de candidature en soutenant les efforts entrepris dans le cadre de la candidature Maroc 2026.

Veillez agréer, Monsieur le Président, mes salutations les meilleures.

Le président

Moncef Belkhayat