

**- By Special Messenger -**

To

- 1) **Mr. Gianni Infantino**  
President, FIFA
- 2) **Ms. Fatma Samba Diouf Sambara**  
Secretary-General, FIFA
- 3) **Mr. Shaikh Salman Bin Ebrahim Al Khalifa**  
Chairman, Development Committee, FIFA

Date: 27 October, 2022

**Subject: Bangladesh Football Federation's plan to build training facility on protected forest land in Cox's Bazar, Bangladesh**

**Dear Sir/Madam,**

Greetings!

We are writing to you as a collection of environmental, land justice and legal aid organisations and concerned citizens of Bangladesh.

As you may be aware, the Bangladesh Football Federation (BFF) has recently announced its plans to establish a new residential training facility in the Ramu upazila of Cox's Bazar District, in South-East Bangladesh on 20 acres of hilly forest land. It has been reported that FIFA is providing funding for this project with at least 3.6 million USD being invested. While we welcome the investment into the development of football in Bangladesh, we would also like to raise concerns about this project and its compliance both with national laws and FIFA's own policies and pledges around environmental sustainability and climate action.

The 20 acre plot of land was designated as "reserve forest" by the Government of Bangladesh under The Forest Act, 1927 and also as a "Ecologically Critical Area" (ECA) where any sort of man-made intervention remains strictly prohibited. This forest is rich and unique in biodiversity and constitutes the natural habitat for the endangered Asian Elephant.

As FIFA committed funds to BFF for a residential training facility, BFF approached the Government for land; following which the Ministry of Environment, Forests and Climate Change (MoEFCC) delisted the 20 acres of forest land from its category as "reserve forest" and attempted to hand over the same to BFF for this construction. As reported in the media, with reference to

the Sports Minister, that although four different locations were shown to BFF, this forest land was chosen without any considerations to the environmental sanctity of the area. As the news of purported conversion of forest land broke, environmental groups have started staging protests and have approached the government to cancel the allocation. It is to be noted here that the MoEFCC has decided in favour of allocating this forest land, ignoring the valid and lawful objections of its own Forest Department. It is also to be noted that following protests from the environmental groups, the Sports Minister and BFF have expressed willingness to consider alternative sites.

Bangladesh has drastically lost forest area in recent years, and the area of Cox's Bazar has seen thousands of acres of forest degraded through illegal grabbing, unplanned developments and the Rohingya refugee crisis against which the Supreme Court of Bangladesh has passed numerous repeated orders and judgments preventing any further conversion and degradation of forest land. This project, if carried out in its current iteration, will not only be violative of the nation's laws and the Supreme Court's orders and judgments, but will result in the felling of up to 30,000 trees and pose a further threat to the habitat of the endangered Asian Elephant.

FIFA has in recent years reiterated at various platforms its commitment to environmental sustainability and taking action against the climate crisis. FIFA signed an MoU with the UN Framework Convention on Climate Change (UNFCCC) in 2016, becoming the first sports organisation to pledge carbon neutrality by 2050. At CoP24 in Poland, FIFA signed the UNFCCC Sports for Climate Action Framework, committing to reduce carbon emissions by 45% by 2030. Furthermore, according to FIFA's Climate Strategy, published in 2021, Goal 3 was listed as "Ensure climate-resilient football development". While these are all extremely laudable pledges, such action as investing millions of dollars for BFF to raze forest land, directly contradicts FIFA's stated goals.

Bangladesh is one of the most vulnerable countries to the adverse effects of climate change, and the Government of Bangladesh has been at the forefront of calling for climate action globally. At CoP 26 in Glasgow, Bangladesh became one of the signatories to the Glasgow Leaders' Declaration on Forests and Land Use, stating its commitment to forest protection, afforestation and forest expansion by 2030. Investing in a project that directly goes against these pledges, is to wilfully enable the Government of Bangladesh to fail in its international obligations on environmental sustainability and climate action at a time when increasing forest cover is an essential strategy for achieving net zero worldwide.

As stated before, we are not against investment in the development of football in Bangladesh and rather welcome it. Football is the global game, and sport has an incredible power to uplift and unify people. However, we cannot simply stand by and have this at the cost of valuable forest land, which would impact the ecology and biodiversity of that region, especially when there are other, more suitable government lands in the same region that would not require cutting down tens of thousands of trees and destroying acres of forest. We hope FIFA will do its best to persuade BFF to find an alternative site for its training centre and that FIFA will take a proactive role in the environmental oversight of the projects of its member associations.

We are happy to discuss this matter in greater detail and provide resources to FIFA to better

understand the context from which we are speaking. We are attaching some reports published in leading newspapers of the country that outline some of our concerns. Please do not hesitate to contact us for further clarification and discussion.

Kind regards,



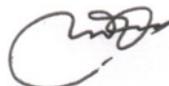
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