



Annex

Complicity in International Crimes and Violations of International Law by the Israel Football Association

Sadaka the Ireland Palestine Alliance, and Al-Haq, a Palestinian NGO based in Ramallah in the West Bank, Palestine, warn that the determination of the Football Association of Ireland (FAI) to persevere with the scheduled UEFA fixtures between Ireland's men's national football team and the Israel's national team in Autumn 2026, may have legal implications, including through breaches of Irish criminal and company law.

It is our position, drawing from the legal reasoning and conclusions of the International Court of Justice (ICJ), as endorsed by the UN General Assembly, that the Israel Football Association given its integration with illegal Israeli settlements is responsible for the furtherance of Israeli state violations of international law, including violations pertaining to settlements, the prohibition of annexation, the prohibition of racial segregation and apartheid, and the prohibition of genocide.

It is our view that the FAI, as a member association of UEFA, which itself sits on the FIFA Council, should it proceed with the proposed fixtures, is liable to be complicit in, and have legal responsibility for, ongoing, documented, and escalating Israeli violations of international law. It is further our view that such responsibilities include duties owed by FAI directors, in line with the Principal Objectives of the Association, and under the Companies Act 2014.

Our organisations note with particular alarm the 18 June 2026 [statement](#) issued by the Palestine Football Association, asserting that: 'the PFA has not issued any statement endorsing, approving, or supporting the decision to proceed with the [Ireland v Israel] match. Any interpretation suggesting that the PFA has given its blessing to the fixture does not accurately reflect our position.'

1. Accountability of International Sporting Associations

The autonomy afforded to international sporting organisations, typically subject to minimal regulation despite their massive social, cultural, and economic impact does not mean that such organisations, their members, and their personnel, are immune from any responsibility or accountability for unlawful conduct.

As much was made clear by UN Experts, who, in October 2024, when urging that FIFA 'ensure implementation of its zero-tolerance policy against discriminatory conduct and racism when it comes to Israel and the occupied Palestinian territory' [stressed](#) that 'The autonomy and self-regulation in sport must not be detrimental to fundamental human rights' and that 'international

human rights law, which includes the right to self-determination, as well as the prohibition of racial discrimination and apartheid, applies to private international organisations, especially those that have global jurisdiction and mandates such as [FIFA]’.

The experts noted that FIFA’s tolerance of the integration of unlawful Israeli settlement teams and venues into the Israel FA, and racism towards the Palestinian people and players from Israeli clubs, amounts to recognising as legal the situation arising from the unlawful presence of Israel in the occupied Palestinian territory:

‘This is in stark violation of international law, as reiterated by the International Court of Justice in its [Advisory Opinion](#) of 19 July 2024, that stressed that the transfer of Israeli settlers to the West Bank, including East Jerusalem, and Israel’s maintenance of their presence, is in violation of the right to self-determination of the Palestinian people and Israel’s obligations under the Fourth Geneva Convention. Legally, this constitutes an act of aggression in violation of *jus ad bellum*. These are grave breaches of the Convention and amount to several crimes under the Rome Statute.’

Para 5.a of UN General Assembly resolution ES-10/24, which endorsed the 2024 Advisory Opinion of the International Court of Justice, on *Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem* (‘Palestine Advisory Opinion’) and which Ireland voted in favour of, calls upon all States, consistent with their obligations under international law:

‘To take steps to ensure that their nationals, *and companies and entities under their jurisdiction*, as well as their authorities, do not act in any way that would entail *recognition or provide aid or assistance in maintaining the situation created by Israel’s illegal presence* in the Occupied Palestinian Territory.’

Should the FAI itself fail to act appropriately, and persevere in its intention to fulfil fixtures with the Israel FA, and thereby be acting in such a way ‘that would entail recognition or provide aid or assistance in maintaining the situation created by Israel’s illegal presence in the Occupied Palestinian Territory’, the Irish state is obliged to take steps to ensure such actions are prevented and/or punished. **At the European Union level there is an increasing recognition that commercial entities within the EU should refrain from conduct providing support to Israeli settlements. The EU Council conclusions of 18/19 June 2026 for example [warned](#) of ‘the legal and reputational consequences for businesses participating in settlement construction, including the risk of serious breaches of international law’ and welcomed member states’ adoption of restrictive measures against settlers and organisations which support settlers.**

In September 2025, noting both the International Court of Justice’s Interim Order of 26 January 2024, reminding every country of their legal obligations to act against genocide, and the September 2025 [conclusion](#) of the UN Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem and Israel, that Israel is committing genocide, UN experts again [stressed](#) that ‘Private international organisations, such as international sports associations like FIFA and UEFA, are bound by international human rights law in accordance with the [UN](#)

[Guiding Principles on Business and Human Rights](#)’ and urged ‘[FIFA](#) to stop legitimising the situation arising from Israel’s [unlawful presence](#) in the Occupied Palestinian Territory’.

UEFA, and its member associations, including the FAI, are no less obliged to refrain from contributing to Israel’s violations of international law. In the first instance such obligation requires that so long as the Israel FA is complicit in Israel’s violations including illegal settlement, apartheid, and genocide, other associations must refrain from recognising them as a legitimate association and cease all proposed fixtures.

2. FIFA’s Political Erasure of Palestine

As you are aware, since 2013 the Palestinian Football Association has sought, and [continues](#) to seek, by way of due procedure, sanctions against the Israel FA for its violations of the FIFA Statutes. **Unlike the Israel FA, the Palestinian association is not a UEFA member.** These violations include the inclusion of settler football clubs based in illegal settlements in the Occupied Palestinian Territory (OPT) participating in the domestic Israeli league. They also include, Israel’s discriminatory policies and practices, including restrictions on freedom of movement which have severely impacted Palestinian football, entrenching Israel’s apartheid regime.

These two claims pertain to the Israel FA’s ongoing violations of FIFA Statutes, notably Article 72.2 that ‘Member associations and their clubs may not play on the territory of another member association without the latter’s approval’, and prohibited discrimination under Article 4.1.

In 2017 a FIFA Monitoring Committee published its report (the Sexwale Report) providing several options to the FIFA Council, ranging from no action to suspending the Israel FA. The FIFA Council choose to take no action.

There has been significant support for the Palestine FA position, including for example from [Human Rights Watch](#), and [Amnesty International](#). In June 2025, FairSquare provided FIFA’s Governance Audit and Compliance Committee with a [legal opinion](#) endorsed by many leading international legal experts and scholars and affirming the illegality of Israeli settlements, and the requirement for appropriate FIFA action.

In March 2026, following lengthy rounds of negotiations and hearings, FIFA issued a decision indicating not ignorance of, but rather a wholesale rejection of international law, a decision which is glaringly in breach of FIFA’s own Statutes.

FIFA, in response to the Palestine FA’s claims, issued a [decision](#) which stated that ‘the final legal status of the West Bank remains an unresolved and highly complex matter under public international law’, and therefore, that it would ‘take no action’. FIFA, and **consequently the pyramid of regional and national associations affiliated with FIFA and replicating its conduct**, is taking direct political action which has the effect of perpetuating Israel’s ongoing violations of international law. **We note in this regard an expert [legal opinion](#) by Prof Andreas Zimmermann, Member of the Permanent Court of Arbitration, from April 2017, that:**

‘There is obviously an important inherent value in keeping politics out of sports. Yet, any decision by FIFA not to follow the international community’s recognition of the West Bank and East Jerusalem as occupied Palestinian territory, and to disregard the illegality of the Israeli settlements under international law, would itself be quintessentially political and would contribute to the continued violation of international law. By not taking action, it would be FIFA that would take a political decision.’

In its *Palestine* Advisory Opinion of 19 July 2024, the International Court of Justice— the authoritative body responsible for the interpretation and application of public international law—affirmed that Israel’s presence in the OPT is, in and of itself, illegal as a violation of the international law of self-determination and the international law on the use of force, including a violation of the prohibition of the purported acquisition of territory. The Court affirmed that such illegal presence, including military and settlements, must be ended as rapidly as possible by way of unconditional and rapid withdrawal from all of the occupied territory. The only possible reading of this legal authority with regards the application of FIFA Statutes Article 72.2 is that the territory relevant to the Palestine FA is inclusive of the territory on which illegal settlements have been built, and maintained, and are being expanded, with the consequent obligation that the Israel FA is precluded from having its teams play there absent the valid approval of the Palestine FA.

Since 1975, the UN Committee for the International Convention on the Elimination of Racial Discrimination, has been clear that there is an [obligation](#) on all States Parties to condemn apartheid, including by preventing sporting engagements, which, as in the present instance, have the effect of supporting, sustaining or encouraging apartheid regimes. Such responsibility is now engaged since the ICJ has concluded that Israel’s legislation and measures impose and serve to maintain a near-complete separation in the West Bank and East Jerusalem between the settler and Palestinian communities, and therefore that Israel’s actions constitute a breach of Article 3 of the International Convention for the Elimination of Racial Discrimination which prohibits racial segregation and apartheid.

The genocidal killing of Palestinian footballers in Gaza continues. Announcing the killing of Palestinian footballer Suleiman al-Obeid in August 2025, when Israeli forces attacked civilians waiting for humanitarian aid, the Palestine FA [reported](#) that by that stage the number of footballers ‘killed or who died from starvation has reached 421, including 103 children’. Today, the Palestinian FA describes, ‘We have lost more than a thousand athletes over the past three years, and our facilities and infrastructure have been subjected to widespread destruction, in one of the most difficult periods Palestinian football has ever endured’.

Israel’s genocidal violence, fueled by Israeli settlers working with the Israeli state to attack Palestinian civilians, is expanding also across the West Bank, including East Jerusalem. As [observed](#) by UN experts in March 2026, Israel’s ‘genocide continues in Gaza and spills into the West Bank’. The UN experts stressed that Israel’s genocidal acts ‘must be understood in their totality: the ethnic cleansing of Palestine, by whatever means, whatever the cost and whatever crimes it takes’. The May 2026 [Report](#) of the UN’s Office of the High Commissioner for Human Rights warned that: ‘Considered together, Israeli Government’s measures and steps

across Gaza and the West Bank reflected a concerted and accelerating practice of undermining the fabric of Palestinian life while consolidating the annexation.’

3. FIFA’s MOU with Board of Peace, an Agreement for International Crimes

It is our view that Palestinian self-determination is further [breached](#) by the establishment of the so-called ‘Board of Peace’, controlled by Donald Trump, and aimed at entrenching the fragmentation of the Palestinian people through the isolation of Gaza and, placing them under a revised form of foreign occupation. While the legal validity of the establishment and function of the ‘Board of Peace’ has been widely challenged, it is remarkable that the only entity with which the Board has agreed a Memorandum of Understanding with regards its intended administration of the Gaza Strip is FIFA, an [MoU](#) which on the face of it includes the intention to dispose of Palestinian land and property unlawfully as football pitches. Notably the appropriation and pillage of property in occupied territory are international crimes incurring individual criminal accountability, which may be prosecuted under the Rome Statute of the International Criminal Court, and domestically in countries like Ireland, under the principle of complementarity.

4. Liability of Board of Directors

In particular, FIFA remains in violation of its own Statutes, not least by making the overtly political decision to support Israel’s illegal occupation and annexation by refusing to accept the ICJ’s affirmation that Israel does not have sovereign title to, or authority to be present in, the OPT, i.e., the West Bank, including East Jerusalem, and the Gaza Strip. FIFA is further liable to held in breach also under international law as an entity providing material support to Israel’s violations, and it can be expected that as much will be affirmed by the CAS.

By fulfilling UEFA’s proposed fixture against the Israel FA, the FAI and its board of directors, who are responsible under Article 5 of the UEFA Statute are placing themselves at risk of significant legal and reputational consequences. Fulfilling such a fixture would be to contribute to breaches of FIFA and UEFA Statutes, and would constitute contributing to the maintenance of the illegal settlements and to apartheid and an expanding genocide.

At the national level FAI board members are subject to the Companies Act 2014, which requires they act in good faith in the interests of the company, act honestly and responsibly, and act in accordance with the company’s constitution.

As provided for in the FAI Governance [Handbook](#) 2026, the Principal Objects of the FAI includes taking ‘all such steps as may be deemed necessary or advisable for preventing infringements of any of the laws of the Game of Football’ and to regulate the game taking into consideration the principle of fair play and humanitarian values of the Game of Football (3.1.2). They further include the Objects of promoting compliance with FIFA and UEFA Statutes (3.2.2), and to govern and supervise all forms of international football matches played throughout Ireland, in accordance with the FIFA Statutes and UEFA Statutes (3.2.8).

The Principles of the Association include respecting internationally recognised human rights and to promote the protection of these rights (5.1.2) and to remain neutral in matters of politics (5.1.4).

Recalling that company directors must comply with the company's constitution and exercise their powers only for the purposes for which they were conferred, and which are allowed by law, we caution that in the light of the preceding analysis, fulfilling the Israel FA fixture would be in breach of the Principles and Objectives of the FAI. Approving fulfilment of the fixture would risk complicity in international crimes, both on the part of the association and its directors, who may be liable for breaches of national law, including under the International Criminal Court Act 2026:

- Breach of FIFA and UEFA statutes on the basis of recognising the Israel FA's unlawful presence in illegal Israeli settlements on Palestinian territory;
- Breach of political neutrality by endorsing FIFA's political decision to deny the existence of the Palestine FA's territory, a territorial status which has been authoritatively affirmed by the ICJ;
- Complicity in Israeli crimes of apartheid and genocide, as recognised by the ICJ, such complicity constituting particularly egregious violations of human rights, again as recognised by the ICJ, including the rights of non-discrimination, to self-determination, and to protection from genocide;
- Apartheid and genocide, as well as settlement related crimes including the war crime of transfer of civilians into occupied territory, are criminal offences in Ireland under the International Criminal Court Act 2006, and the aiding and abetting, or a contribution in any other way, including by supporting the Israel FA's settlement presence, may constitute a domestic criminal offence under the Statute.

Our organisations warn that the potential cost in terms of lost income or points deducted is dramatically less to bear than the political, reputational, and criminal damage liable to arise from failing to disassociate itself from Israel's apartheid and genocide.