

Date: تاریخ
No : 03/19/2021 شماره
Ref : 9939267 پیوست

فدراسیون فوتبال جمهوری اسلامی ایران
Islamic Republic of Iran Football Federation



Dato 'Windsor John

General Secretary
Asian Football Confederation

Subject:

Preliminary Competition
Joint FIFA World Cup Qatar 2022™
AFC Asian Cup China 2023 Qualifiers
Preliminary Joint Qualification Round 2: Centralized Matches of Group C

Dear Dato',

Thank you for your brief response letter of 16th March to our letters of 6th, 13th and 15th March.

While we dealt with your concerns, expressed in your letter of Friday, 5th March in great details and in a swift manner, your most brief explanation of 16th March was far short of convincing and void of any detailed information.

Our first letter of 6th March was ahead of the AFC's announcement of the appointment of eight countries to host the centralized Matches of Groups A to H. We were alarmed that Bahrain had been granted the hosting rights against the principles of Fair Play and all other criterion during these exceptional times. Hence, our swift response to your letter of 5th March. While that letter addressed all your concerns, it remained unanswered.

Instead, your office issued an advisory to all member associations requesting them to refrain from discussing the hosting subject prior to your announcement, if they were the appointed hosts. Little did you know that Bahraini and Iraqi fans had been discussing Bahrain's hosting of Group C centralized matches long before your announcement of Friday, 12th March?

We wish to address the following subjects upon which you so briefly dismissed and brushed aside our application to host the remaining eight Group C matches of the Joint FIFA World Cup Qatar 2022™ / AFC Asian Cup China 2023 Qualifiers, of which three of them are our rightful home games against Hong Kong, Bahrain and Iraq.

In your one-sentence answer to our three letters of 6th, 13th and 15th March, you have listed the following reasons to turn down our application, which we hereby quote verbatim:

- standards of the proposed stadiums/facilities
- risk assessment on logistical, commercial and financial arrangement for the Participating Member Associations
- as well as the national medical/Covid-19 pandemic status

I will respond point by point and add present undisputed factors that have not been taken into account when making a decision of such importance to protect the integrity of the competition as well as the health and wellbeing of all participants in the remaining eight Group C matches.

www.ffiri.ir international@ffiri.ir

Date: تاریخ

No : شماره

Ref : پیوست

فدراسیون فوتبال جمهوری اسلامی ایران

Islamic Republic of Iran Football Federation



The proposed stadiums in our application have all been the stage for domestic, continental and intercontinental competitions in the past, standards of which had been repeatedly approved by AFC and FIFA.

During the same stage of the joint FIFA World Cup/ AFC Asian Cup Qualifiers for Russia 2018 and UAE 2019 in 2015 and 2016, our proposed venues hosted not only IR Iran's four home matches against Guam, Turkmenistan, India and Oman, but also they hosted home matches of the national teams of Afghanistan and Iraq against Syria, Japan, Cambodia, Singapore, Chinese Taipei, Thailand and Vietnam.

During the FIFA dates window of 24-29 March, 2016, we staged five official qualifiers for eight national teams at three venues in Tehran, all attended by FIFA and AFC officials and representatives. You may view the complete list of matches we staged during the first round group stage of the joint FIFA World Cup Russia 2018™ / AFC Asian Cup UAE 2019 Qualifiers between 11 June 2015 and 29 March 2016 within this document.

As such we do not accept this item of **“standards of the proposed stadiums/facilities”** not being adequate as part of your decision making process.

Similar to the current stage of the FIFA World Cup Qatar 2022™ / AFC Asian Cup China 2023 Qualifiers, the commercial rights of those eleven matches, played between 11th June 2015 and 29th March 2016, involving fourteen Asian Football Confederation member associations, belonged to Afghanistan, IR Iran and Iraq football federations.

Including the three host nations, i.e. Afghanistan, IR Iran and Iraq, fourteen Asian national teams were involved. All matches were broadcast live in the home territory of all fourteen AFC national associations, Japan being one territory, and beyond.

Similarly and as per item 4 of the “Encl - 2) WCQ22 ACQ23 PR2 - General Bidding Information” document, “all commercial rights of the Competition (except for the broadcasting rights within the PMAs' countries) belong to the Host Member Association.”

Therefore, neither the Asian Football Confederation, nor your Commercial Partners need to be concerned about breaching international sanctions as you have no interest in any of the 160 matches of this round of the FIFA World Cup Qatar 2022™ / AFC Asian Cup China 2023 Qualifiers group stage. The rights belong to Group C hosts, which in principle should be our federation, like all other seven hosts of Groups A, B, D, E, F, G and H.

In brief, and as per the undisputed facts of our fellow AFC national teams' numerous visits to our country the **“risk assessment on logistical, commercial and financial arrangement for the Participating Member Associations”** is nonexistent and therefore we do not accept this item of your explanation either.

www.ffiri.ir international@ffiri.ir

Date: تاریخ:

No : شماره:

Ref : پیوست:

فدراسیون فوتبال جمهوری اسلامی ایران

Islamic Republic of Iran Football Federation



Afghanistan, Iran and Iraq 11 Official Joint FIFA World Cup / AFC Asian Cup Home Matches in Iran in 2015 & 2016 Involving 14 AFC Member Associations

Dates & Matches	Group	Stadium / City	Attendance
11 June 2015			
Afghanistan 0, Syria 6	E	Samen / Mashhad	7,647
3 Sept. 2015			
Iran 6, Guam 0	D	Azadi / Tehran	11,232
Iraq 6, Chinese Taipei 0	F	Pas / Tehran	4,200
8 Sept. 2015			
Afghanistan 0, Japan 6	E	Azadi / Tehran	8,650
12 November 2015			
Afghanistan 3, Cambodia 0	E	Takhti / Tehran	2,585
Iran 3, Turkmenistan 1	D	Azadi / Tehran	35,800
24 March 2016			
Iraq 2, Thailand 2	F	Pas / Tehran	4,000
Iran 4, India 0	D	Azadi / Tehran	29,160
29 March 2016			
Afghanistan 2, Singapore 1	E	Takhti / Tehran	24,500
Iran 2, Oman 0	D	Azadi / Tehran	33,850
Iraq 1, Vietnam 0	F	Pas / Tehran	2,160

IR Iran played Cambodia on Thursday, 10th October 2019 at Tehran's Azadi Stadium under the same sanction regime as the existing ones on Iran. The risk for Cambodia's visit to Iran vis-à-vis any logistical, commercial and financial arrangement was non-existent. This will be the exact same non-existent risk for

www.ffiri.ir international@ffiri.ir

Date: تاریخ:

No : شماره:

Ref : پیوست:

فدراسیون فوتبال جمهوری اسلامی ایران

Islamic Republic of Iran Football Federation



the national teams of Bahrain, Cambodia, Honk Kong and Iraq, should the remaining Group C matches be, rightfully, held in Tehran in June 2021.

The third item of your brief explanation of dismissal of our application to host the remaining eight joint FIFA World Cup Qatar 2022™ and AFC Asian Cup China 2023 Group C qualifiers deals with the all-important “national medical/Covid-19 pandemic status” amongst the bidding nations.

As you can see from the table below the Kingdom of Bahrain has the highest rate of “infected individuals” for every 1-million persons of their population amongst all Asian nations. Bahrain is ranked 14th amongst 219 nations globally when it comes to this category.

As per the table below, IR Iran is ranked lower than four of the eight appointed hosts and above four other appointed hosts in the “infection rate” category in proportion to the country’s population. This places Iran in mid-table of Asian countries with risks of population infection for every 1-million, but far lower than Bahrain.

Worldometers.info COVID-19 Statistics based on data, Compiled by John Hopkins University

	Global Ranking for Population Infection	Total Cases per 1-million Population	Total Number of COVID-19 Cases
Bahrain	14	75,954	132,369
Iran	91	20,806	1,763,313
	Lowest Ranked Hosts		
Saudi Arabia	116	10,885	383,106
Japan	143	3,555	448,688
Korea Republic	156	1,888	96,849
China	210	63	90,066

Population Density

Despite the great efforts that the health authorities in the Kingdom of Bahrain have made to contain COVID-19 virus, what they cannot fight is the population density of their nation that I wish to illustrate below in comparison to that of IR Iran.

	Area	Total Population	Population Density
Bahrain	780 km ²	1,569,446	1,831 / km ²
Iran	1,648,195 km ²	83,183,741	48 / km ²

www.ffiri.ir international@ffiri.ir

Date: تاریخ
No : شماره
Ref : پیوست

فدراسیون فوتبال جمهوری اسلامی ایران

Islamic Republic of Iran Football Federation



5,000 Organized Games since Resumption of Football in Iran

In total, there has been over 5,000 organized football and futsal matches at all levels, age groups for both men and women across our vast country since we resumed organized football on Wednesday, 24th June 2020. We followed FIFA's COVID-19 "Return to Football International Match Protocol" to provide the safest possible environment for footballers, officials, administrators and all involved.

When it comes to resuming football at all levels of the game, I wish to point out that IR Iran was the first country amongst our immediate neighbors in the Middle East that resumed its interrupted 2019-20 professional domestic season on Wednesday, 24th June. We had nine rounds of matches (plus one postponed tie) for a total of 73 games to determine our Persian Gulf Premier League champions on Thursday, 20th August.

The sixteen teams of our Professional League hail from twelve cities in eight provinces of a country the size of Iran that is 12.6 times larger than England and 4.6 times larger than Germany. Despite the huge size of our country and geographical spread of the sixteen Persian Gulf Premier League clubs, we concluded those 73 remaining matches of the 2019-20 season in the space of 57 days.

We also staged the remaining four matches of our FA Cup competition to rightfully nominate our four representatives to the 2021 AFC Champions League season.

Four Iranian clubs then headed to Qatar to participate in the reformatted 2020 AFC Champions League. The delegation of our four clubs all arrived without a positive COVID-19 case and they remained so throughout the competition in Qatar. That indeed is a testament of how seriously we took FIFA's COVID-19 "Return to Football International Match Protocol" and implemented them into our own domestic competition.

We had planned to adopt those same strict COVID-19 protocols for our remaining three home matches against Hong Kong, Bahrain and Iraq, similar to those implemented in the 2020 AFC Champions League West that four Iranian clubs were involved between 14th September and 3rd October 2020.

With the state of the art FIFA Medical Centre of Excellence, located at the heart of Azadi Sports Complex, the health and well-being of players, coaches and all involved with the centralized eight-match Group C competition in Tehran, would be well looked after.

The FIFA Medical Centre of Excellence is located within IF-MARC; Iran Football Medical Assessment and Research Center at Tehran's Azadi Sports Complex. It is within walking distance of four training pitches and of course within extremely close proximity to the grand Azadi Stadium as well.

Medically speaking, our federation offers the best facilities, second only after Qatar's Aspetar Sports Injury Hospital facilities.

www.ffiri.ir international@ffiri.ir

Date: تاریخ
 No : شماره
 Ref : پیوست

فدراسیون فوتبال جمهوری اسلامی ایران

Islamic Republic of Iran Football Federation



	Matches to conclude 2019-20 Season	Period to Conclude 2019-20 Season	# of Days to Conclude 2019-20 Season
Bahrain	35 Matches	7 August - 19 October	73 days
Iran	73 Matches	24 June - 20 August	57 Days

2019-20 Domestic Football Time Table in Iran and its Middle Eastern Neighbors during COVID-19

	A	B	C	D	E	F
Bahrain	13 March	7	35	8 August	19 October	8 December
Iran	28 February	9	73	28 June	20 August	6 November
Iraq (*)	10 March	33	330 Plus	---	---	25 October
Kuwait	15 February	4	20	20 August	30 August	21 Jan. 2021
Oman	13 March	3	21	23 October	1 November	17 December
Qatar	7 March	5	30	27 July	21 August	3 September
Saudi Arabia	13 March	8	56	4 August	9 September	17 October
U.A.E. (*)	14 March	7	49	---	---	16 October

A: Date the 2019-20 season Stopped due to COVID-19

B: Number of Weeks Remaining in the 2019-20 season

C: Total Number of Games Remaining in the 2019-20 season

D: Date of League Resumption

E: Date of League Conclusion

F: Date of 2020-21 season start

(*) Iraq and U.A.E. did not complete 2019-20 season schedule.

www.ffiri.ir international@ffiri.ir

Date: تاریخ
No : شماره
Ref : پیوست



	Number of Clubs in Top Leagues
Bahrain	10
Iran	16
Iraq	20
Kuwait	10
Oman	14
Qatar	12
Saudi Arabia	16
United Arab Emirates	14

Challenges faced by Bahrain Football Authorities

The 10-team Bahrain Premier League resumed its 2019-20 interrupted season on Friday, 7th August 2020. The seven rounds of matches that featured 35 matches took 73 days to complete while unlike Iran, the ten clubs in Bahrain did not have any domestic travel whatsoever.

As you will see from the detailed information we extracted from the official John Hopkins University statistics (Appendix-1), COVID-19 cases started doubling on 3 September in Bahrain, four weeks after their domestic league's restart.

That drastic increase in the number of infected individuals in their country seems to have led to the Bahrain Premier League being stopped midway through week 16 on 14th September. The league resumed fifteen days later on 29th September 2020.

With no FIFA date and no national team programme in place, it is safe to assume that the league interruption midway through its week 16 was related to the sharp increase in COVID-19 cases in Bahrain.

All nations around the world have faced unprecedented challenges in the last twelve months. However, our brothers and sisters in Bahrain are amongst those whose infection risks are the highest in Asia and amongst the top 14 in the world in proportion to the size of their population.

Bahrain is a densely populated country with 1,831 persons living in every square kilometer (km²) in a country with an area of 780 km². The Kingdom of Bahrain is 38 times denser than IR Iran. The geography of Bahrain makes it extremely challenging to contain an outbreak, if one occurs at any point in time, without a complete lockdown.

Date: تاریخ:

No : شماره:

Ref : پیوست:

فدراسیون فوتبال جمهوری اسلامی ایران

Islamic Republic of Iran Football Federation



Taking into account the above and the apparent 15-day interruption to the Bahrain Premier League in September after they had resumed the balance of their 2019-20 fixtures in August, begs the question what if an outbreak of COVID-19 or any of its variants did occur between 31 May and 15 June when five Asian national teams - as it stands now - are due to be in Bahrain?

Four days ahead of AFC's virtual meeting with its member associations to discuss how the remainder of the qualifiers would be organized, Bahrain had set a daily record of 896 infected individuals on Friday, 12th February. A month later and on Friday, 12th March, the day AFC officially announced the eight hosts, Bahrain recorded 744 cases, the highest numbers in March up to 16th March.

Unlike Bahrain's 10-team domestic Premier League, the Joint FIFA World Cup Qatar 2022™ / AFC Asian Cup China 2023 Group C Qualifiers cannot come to a halt midway through its revised centralized format as there is no such flexibility whatsoever so far as international players are concerned.

Resumption of Bahrain Premier League 2019-20 Season

Bahrain	Number of Matches	COVID-19 Cases
Premier League Week 12		
7 August	3	418
8 August	2	322
Premier League Week 13		
13 August	2	462
14 August	3	326
Premier League Week 14		
19 August	1	369
20 August	2	353
2 September	1	367
5 September	1	676
Premier League Week 15		
7 September	1	661

www.ffiri.ir international@ffiri.ir

آدرس: تهران، خیابان شیخ بهایی شمالی، کوچه دوازده متری سوم، پلاک ۴ کدپستی: ۱۹۹۵۸-۷۳۷۸۱ تلفن: ۰۲۱-۸۸۲۱۳۳۰۶-۷ نمابر: ۰۲۱-۸۸۲۱۳۳۰۲
Address: No.4, 3rd 12-meter St., North Sheikh Bahayi Ave, 19958-73781 Tehran, Iran Tel: +98-21-88213308 Fax: +98-21-88053605

Date: تاریخ
No : شماره
Ref : پیوست

فدراسیون فوتبال جمهوری اسلامی ایران
Islamic Republic of Iran Football Federation



8 September	2	702
9 September	2	672
Premier League Week 16		
13 September	1	721
14 September	2	658
29 September (*)	2	574
Premier League Week 17		
2 October	2	429
3 October	3	507
Premier League Week 18		
7 October	3	456
19 October	2	322

(*) 15-Day interruption midway through Week 16.

Was this due to steady spike in COVID-19 cases between 5th and 14th September as per the table above?
Please see more detailed daily records in Appendix-1 and Appendix-2.

FAIR PLAY for Seven, but not for Iran

And last, but not least, you did not even mention in your brief letter of 6th March, is the spirit of Fair Play that has been completely disregarded when appointing the hosts for the eight reigning matches of Group C.

All seeded teams played one match at home against the lowest seeded team in their group and three away games. Based on the principle of Fair Play, all seeded teams should have been chosen as hosts for the reformatted centralized competition for the last four rounds of matches in their respective group. That indeed largely did occur apart from groups headed by Australia and Iran. The case of Australia was a clear cut one as their government would not waive the required 14-day quarantine for visiting teams upon their arrival in Australia.

As reported in the 20Four.ae web site (<https://20four.com/626505>), an AFC source was quoted as saying that Kuwait was awarded the hosting rights of Group B, and not Jordan, in the spirit of Fair Play as Jordan had played host to Kuwait in the first leg of their group fixtures.

www.ffiri.ir international@ffiri.ir

Date: تاریخ:

No : شماره:

Ref : پیوست:

فدراسیون فوتبال جمهوری اسلامی ایران

Islamic Republic of Iran Football Federation



Iran were the first three-time AFC Asian Cup champions. Iran along with Iraq were the first two Asian nations that reached the FIFA World Youth Championship in Tunisia in 1977. Iran and Korea Republic have taken part in a record ten of the fourteen AFC Asian Cup tournaments, more than any other Asian nation. The Iranian Football Federation was one of the fourteen founding members of the Asian Football Confederation in 1954 along with the likes of Japan and Korea Republic. Iran has been at the front and center of Asian football for the last one hundred years. We have represented Asia with pride on the world stage. Football matters to our nation, whose passion for the game is unrivalled anywhere in the world. We deserve to be treated with respect and equal to others.

Conclusion

We cannot support the AFC's decision in awarding our direct opponent the hosting rights of the last eight matches of Group C. The reasons you have listed without any explanation whatsoever, in your brief response of 16th March, do not apply to our application and can very easily be used to turn down the application of Bahrain Football Association to host Group C's centralized matches in June.

The football public in Iran are rightly outraged and are demanding that we should take all actions necessary and available to us to have the AFC reverse their decision to prove their ethical neutrality in matters of football governance in our continent.

We are confident that the AFC has always conducted its business of running football in our vast continent in a fair manner. There is no doubt that the overwhelming pieces of evidence and undisputed facts within this dossier will lead you to revisit your decision and award the hosting rights of the remaining matches of the Joint FIFA World Cup Qatar 2022™ / AFC Asian Cup China 2023 Group C Qualifier to our federation.

In the meantime, we reserve the rights to take all necessary actions at our disposal until we reach a satisfactory resolution to this subject and regain the hosting rights of the remaining matches of our national team qualifiers.

Kind regards,

Mansour Ghanbarzadeh
Acting General Secretary



c.c.:

- AFC Executive Committee Members
- AFC Competition Committee
- AFC Member Associations
- Office of the FIFA General Secretary
- FIFA Council Members
- Organizing Committee for FIFA Competitions
- FIFA Governance Committee and Review Committee

www.ffiri.ir international@ffiri.ir