



## **FIFA Clearing House:** the first 24 months

NOVEMBER 2024

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# **01** Foreword



#### Dear readers,

We are delighted to present the first edition of the FIFA Clearing House Report, coinciding with the 24-month anniversary of the FIFA Clearing House's entry into operation on 16 November 2022.

The Clearing House is an ambitious initiative established by FIFA with the aim of changing and shaping the international transfer system and the football regulatory landscape.

The first objective of the Clearing House is to make sure that clubs that contribute to the training and education of players in the early years of their careers are rewarded financially.

The advent of the Clearing House introduced a new system of automatic entitlement to replace the previous model, which involved direct payments between clubs and the submission of legal claims to FIFA, and under which most of the money (around 80%) was lost. The new system represents a huge improvement. A training club no longer has to track its former players to be aware of its entitlements: following the introduction of the electronic player passport review process, a player's exact career history is declared and the exact amounts to which a club is entitled are calculated. During these first two years, the first objective has been achieved, and the "lost" money has now been "found".

The second objective of the Clearing House is to process payments of training rewards, while promoting transparency and financial integrity among football clubs. For that purpose, an independent financial institution was created: FIFA Clearing House SAS (FCH), which is based in Paris, fully financed by FIFA and regulated by the French banking supervisory authority (Autorité de contrôle prudentiel et de résolution). Despite initial challenges, significant progress has been made: every month, hundreds of clubs complete the onboarding process, and payments totalling dozens of millions of USD are processed via FCH.

The first objective of the Clearing House is to make sure that clubs that contribute to the training and education of players in the early years of their careers are rewarded financially." This report provides a comprehensive insight into the first 24 months of the operations of the Clearing House. This includes a numerical breakdown, as we truly believe that "only what gets measured, gets done" and that improvement comes only when the reality is properly measured. The report also showcases best practice and the individual experiences of clubs and member associations, who are key players in the success of the Clearing House project.

There are still important challenges ahead and areas for improvement. FIFA and FCH have already begun working on the necessary measures and are fully committed to collaborating with football stakeholders to further improve this revolutionary initiative, bringing clear and transparent rules to the football transfer system and continuing to reinforce its integrity.

Yours faithfully,



**Emilio García Silvero** FIFA Chief Legal & Compliance Officer



**César Chaparro Yedro** FIFA Head of Player Registration & Transfer Data



# **02.** Executive summary

On 16 November 2022, the FIFA Clearing House officially got up and running following months (and years) of development and preparation.

Since that date, every single player transfer or registration that is eligible for training rewards (training compensation or the solidarity contribution) is automatically identified by the FIFA Transfer Matching System (TMS). An electronic player passport (EPP) is generated and is populated based on registration information provided by all member associations and other relevant documentation supplied by the clubs involved. The EPP review process finishes with a final determination and, where an entitlement exists, with an allocation statement listing the exact amounts due to the training clubs.

Since the Clearing House went live, more than 36,000 EPPs have been generated, recording the career history of more than 32,000 players worldwide. Many of these EPPs are discarded in the initial phase, primarily in cases where the required international dimension is absent. Nevertheless, a final determination has been reached for almost 10,000 EPPs, leading to the issuance of no fewer than 9,135 allocation statements detailing more than USD 350 million of entitlements for training clubs.

Once an allocation statement has been issued, the file is forwarded to the FIFA Clearing House entity in Paris (FCH), an independent and fully regulated financial institution, for further processing. All clubs involved must then pass a compliance assessment, in line with the regulatory obligations applicable to FCH.

This procedure consists of various steps. Before substantial due diligence can be performed on a club, some formalities are needed: each club must sign the FCH Terms and Conditions and submit basic information via a dedicated form. Data shows that not having completed these first two steps is why a substantial number of clubs initially failed the compliance assessment in the first few months of the FIFA Clearing House's operations.

Still, more than 1,600 clubs worldwide have successfully undergone the compliance assessment and have therefore been accredited by FCH. These clubs come from more than 100 associations and represent all levels of club football (spanning the professional and amateur games) and a vast variety of legal forms and structures.

Once the clubs have been accredited, FCH sends a payment notification to the new club and money can flow via FCH. To date, almost one and a half years since the first payments were processed in June 2023, around USD 156.6 million has been distributed in training rewards; this constitutes a striking increase for confirmed payments compared with any of the previous years recorded and tracked in TMS.

In line with FIFA's commitment to promoting transparency (see, for example, the <u>International Transfer Snapshot</u> and the <u>registration periods calendar</u>), detailed data for each association is made available online. When presenting the results in this report, Year I refers to the period between 16 November 2022 and 15 November 2023, while Year 2 covers the period between 16 November 2023 and 15 November 2024.

The FIFA Clearing House Regulations lay down strict sanctions in the event of non-compliance. These include a registration ban in the case of payment failures, or where the new club fails a second compliance assessment. However, it is very important for FIFA and FCH to distinguish between so -called collaborative and non-collaborative clubs; if a club has failed the compliance assessment for one allocation statement but then passes the assessment for another, it is considered collaborative. A similar approach was taken if a compliance failure was due to a technical error in the early months of FCH's operations. In such cases, the file was sent back to FCH without the need to initiate disciplinary proceedings against the relevant club. Essentially, this leaves FIFA disciplinary action reserved for clear cases of non-cooperation and/or manifest breaches of the regulations.

Major enhancements of FCH's systems, platform and processes are under way and the FIFA Clearing House 2.0 will be presented in 2025. The main goal of this important project is to simplify and improve the user experience and the onboarding and payment process, further streamlining the processing and execution of payments via FCH.

Barm





Over the past decade, the football industry has undergone several transformations on and off the pitch, including the unprecedented amounts that football clubs have spent on the transfer of professional players. However, for many years, this was not translating into a proportional increase in the distribution of training rewards (training compensation and solidarity contributions). In fact, there remained a large gap between the value of the rewards due and the amounts actually paid to training clubs.

Faced with this chronic issue, on 24 September 2018, the FIFA Football Stakeholders Committee recommended a first reform package for the transfer system, which included the creation of a clearing house to increase the transparency of the system, protect its integrity and reinforce solidarity mechanisms for training clubs. The proposal was approved by the FIFA Council on 26 October 2018 and received the support of several external stakeholders, such as the European Parliament<sup>1</sup> and former US Attorney General Loretta Lynch<sup>2</sup>.

Modernising the transfer system and the associated regulatory framework was one of the primary goals of FIFA's former blueprint, <u>The Vision 2020-2023</u>. One of the specific aims of the FIFA Clearing House was to reduce the aforementioned gap between the training rewards due and the amount actually paid to training clubs by centralising, processing and automating payments between clubs and replacing the traditional claims process with an automatically triggered entitlement based on a player's electronic player passport.<sup>3</sup> The second objective was to ensure that all clubs and member associations comply with international financial regulations by requiring them to pass a compliance assessment before their payments can be processed.

<sup>&</sup>lt;sup>1</sup> <u>European Parliament resolution</u> of 23 November 2021 on EU sports policy: assessment and possible ways forward.

<sup>&</sup>lt;sup>2</sup> Lynch expressed her support during a keynote address at the third <u>FIFA Compliance Summit</u>, held in 2020.

<sup>&</sup>lt;sup>3</sup> As explained in the FIFA Clearing House go-live webinar in October 2022.

The Clearing House went live on 16 November 2022. Rewards for transfers or registrations of players that occurred before that date are still being processed and paid via the old claims system (including for instalments paid after 16 November 2022), while all rewards for transfers or registrations of players that have occurred since that date have been processed and paid via the Clearing House system.

The Clearing House project represents a landmark achievement in the football transfer system, underpinning FIFA's efforts to turn compliance into a key focus of the football ecosystem and guaranteeing that clubs that invest in training and educating young players are duly compensated.

This report will go into further detail about the objectives of and regulatory background to the Clearing House's introduction, as well as the procedure that entered into force on 16 November 2022, the results of the Clearing House's first two years of operation and the next steps.





Being awarded solidarity allowances through the FIFA Clearing House is a historic milestone for our humble provincial club, as this is the first time in our 106 years of existence that we have received such funds."



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## 04 Training rewards: a recap

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Cegid Clairefontaine

FIFA's essential role in the protection and development of football goes beyond organising international competitions and establishing regulations and provisions for the game. With a view to promoting football development and solidarity globally, FIFA has implemented two mechanisms to reward training clubs since 2001: training compensation and the solidarity contribution. These will be described in the following subsections and may arise from three events: a) the first registration of a player as a professional; b) an international transfer of a player; or c) a domestic transfer involving the payment of transfer compensation and with an international dimension.

#### 4.1 Training compensation

Firstly, article 20 of and Annexe 4 to the Regulations on the Status and Transfer of Players (RSTP) provide for the payment of training compensation to reward training clubs that have contributed to the development and education of a player between the calendar year of his 12<sup>th</sup> and 21<sup>st</sup> birthday if, before the end of the calendar year of his 23<sup>rd</sup> birthday, the player is registered as a professional for the first time or is transferred as a professional between clubs affiliated to two different associations.

As a general rule, for a player's first professional registration, training compensation is due to every club with which the player was previously registered as an amateur, provided that the training clubs are affiliated to a different association to the new club. In the case of an international transfer (whether during or at the end of the player's contract), only the player's most recent former club (i.e. the club from which the player has been transferred) will be entitled to training compensation, which is determined by the amount of time for which the player was effectively registered with that club.

Training compensation is calculated based on each member association's classification of its affiliated clubs into four categories according to their financial investment in training young players.<sup>4</sup> The calculation involves multiplying the amount corresponding to the training category of the new club by the number of calendar years spent at the training club (on a pro rata basis if the player was there for less than one year) between the player's 12<sup>th</sup> and 21<sup>st</sup> birthdays.<sup>5</sup>

<sup>&</sup>lt;sup>4</sup> <u>FIFA circular no. 1892</u> defines the categories into which each member association is requested to classify its clubs and the training costs on a confederation basis for each category of club for the year 2024.

<sup>&</sup>lt;sup>5</sup> For training periods during the calendar years of a player's 12<sup>th</sup> to 15<sup>th</sup> birthdays, the training compensation is always calculated based on the annual training costs of a category 4 club in the new club's confederation, in order to guarantee that training compensation for young players is set at reasonable levels.

Furthermore, the RSTP also determines exceptional scenarios in which training compensation is not due, namely when a player's contract is terminated without just cause by the former club, a player is transferred to a category 4 club, or a player reacquires amateur status when being transferred.<sup>6</sup> It should also be noted that training compensation does not yet apply to women's football, although there have been important developments in that regard, including most notably the FIFA Council's approval in December 2023 of guidelines and a regulatory framework for the introduction of training compensation in the women's game.

In addition, article 6 of Annexe 4 to the RSTP establishes special conditions for transfers between clubs affiliated to associations located within the territory of the European Union/European Economic Area. These special conditions include the general obligation for the former club to have offered the player a contract in order to be entitled to training compensation, as well as specific rules for the calculation of training compensation in relation to such transfers.

#### 4.2 Solidarity mechanism

Article 21 of and Annexe 5 to the RSTP regulate the solidarity mechanism, whereby an entitlement to a solidarity contribution is triggered when compensation is paid for the permanent or temporary transfer of a player, whether international or domestic with an international dimension.

Through this mechanism, up to 5% of the compensation paid for the transfer of the player is distributed to the training clubs with which the player was registered in the calendar years between their 12<sup>th</sup> and 23<sup>rd</sup> birthdays (calculated pro rata if the registration was for less than one year).<sup>7</sup>

The RSTP clearly states that any compensation paid within the scope of the transfer, except training compensation, is subject to a solidarity contribution. This therefore encompasses fixed transfer fees, contingent fees, sell-on fees and any other compensation agreed for the transfer of the player.

<sup>&</sup>lt;sup>6</sup> Cf. article 2 paragraph 2 of Annexe 4 to the RSTP (June 2024 edition).

<sup>&</sup>lt;sup>7</sup> The breakdown is as follows, per article 1 paragraph 1 of Annexe 5 to the RSTP (June 2024 edition): (i) calendar years from 12<sup>th</sup> to 15<sup>th</sup> birthday: 5% of 5% of any compensation (each year); (ii) calendar years from 16<sup>th</sup> to 23<sup>rd</sup> birthday: 10% of 5% of any compensation (each year).

Moreover, as also established in article l paragraph l of Annexe 5 to the RSTP, the new club must withhold 5% of the total transfer compensation to be paid to the former club in order to proceed with the payment of the solidarity contribution. As a general rule, the solidarity contribution is thus deducted from the compensation agreed between the two clubs and is then distributed, via FCH, to the clubs entitled to receive it.

Unlike training compensation, the solidarity mechanism is not subject to an age limit for the player. In other words, every time a professional player is transferred – internationally or nationally with an international dimension – and compensation is paid, regardless of the player's age at the time of the transfer, the training clubs that contributed to the player's development and education in the calendar years from their 12<sup>th</sup> to 23<sup>rd</sup> birthday will be entitled to a solidarity contribution.

The new club is always responsible for the payment of all training rewards due to training clubs via the FIFA Clearing House.<sup>8</sup>

#### 4.3 Changes in the training-reward system

While the substance of the rules described above has remained almost untouched, the process of identifying training-reward entitlements and distributing the relevant funds has changed dramatically since the Clearing House went live in November 2022.

Previously, training clubs carried the burden of identifying training-reward triggers and lodging claims if they did not receive the training rewards that they were owed by the new club. This posed great difficulties for clubs – especially those with limited resources – due to the challenge of tracking transfers and registrations of players around the world.

Since the advent of the Clearing House, training-reward triggers are automatically identified by the integrated systems<sup>9</sup> and processed through the electronic player passport (EPP) procedure and, after due diligence has been conducted, the amounts are directly distributed to the training clubs, guaranteeing that they receive their fair share for the education and training of players.

<sup>&</sup>lt;sup>8</sup> Cf. article 13.3 of the FIFA Clearing House Regulations (October 2022 edition).

<sup>&</sup>lt;sup>9</sup> Before completing a transfer, clubs can make use of the online <u>calculator</u> provided by FIFA to get an idea of the training rewards to which they may be entitled or which they may be obliged to pay. The results produced by this tool are non-binding and their accuracy depends on the information included, while the exact entitlements are dealt with on a case-by-case basis in the context of each EPP.

A high-level comparison between the two systems is provided in Table 1, with the main differences indicated in bold. The results of the shift from the old claims system to the new EPP process can be observed in Figure 1.

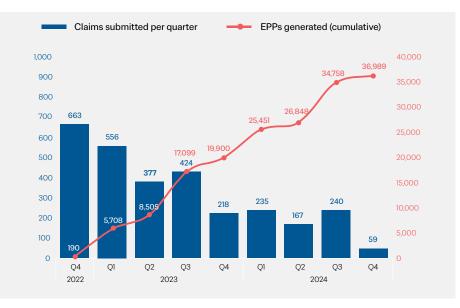
Claims for training rewards	FIFA Clearing House
<b>Training clubs become aware</b> of training-reward trigger	Training-reward trigger <b>automatically identified by FIFA</b> (Transfer Matching System (TMS)/ domestic electronic systems)
<b>Training clubs lodge claim in</b> <b>TMS</b> within two years and 30 days of registration/due payment(s)	Creation of EPP and review <b>process executed immediately</b> after training-reward trigger is declared – <b>no claim needed</b>
Payments of solidarity contribution triggered from registration with new club and instalment dates	Payments of solidarity contribution triggered from upload of proof of payment of transfer compensation
<b>Claim</b> managed by FIFA general secretariat	<b>EPP review process</b> managed by FIFA general secretariat
<b>Proposal</b> by FIFA general secretariat or <b>decision</b> by Dispute Resolution Chamber of FIFA Football Tribunal	<b>Determination</b> by FIFA general secretariat; <b>decision</b> by Dispute Resolution Chamber of FIFA Football Tribunal <b>only in cases of</b> <b>factual or legal complexity</b>
Club-to-club payments	Payments through FIFA Clearing House after successful compliance assessment

Table 1. Differences between the old claims system and the new Clearing House system



The FIFA Clearing House has truly been a great step forward, as it has made things much easier for small clubs like ours. In the past, following a transfer, we had to contact the new clubs. They would always offer us figures that were lower than what we'd calculated ourselves. Now, the distribution is fair and equitable."

Javier Sánchez-Porro, President, CA Gimnástico Don Benito, Spain



#### Figure 1: Claims submitted per quarter and cumulative number of EPPs generated



FIFA Clearing House: the first 24 months

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It used to be very difficult for us to receive our training compensation or solidarity contributions. But now, through the FIFA Clearing House, everything is clear and transparent. Everything is communicated, and it shows you how much you are entitled to. That money is going to help us produce more players for our community."

Ibrahim Dawuda, President, Tamale Zaytuna FC, Ghana





# **05.** FIFA Clearing House entity

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The establishment of FIFA Clearing House SAS (FCH) as a regulated entity was a key step for the Clearing House project. FCH is in charge of the compliance assessment and of processing payments between clubs.

The FCH entity is a FIFA subsidiary that was established in France as a simplified joint-stock company.<sup>10</sup> It received a licence to operate as a payment service provider from the French banking supervisory authority, the Autorité de contrôle prudentiel et de résolution (ACPR), on 23 September 2022.

It is important to highlight FIFA's decision to create a separate and independent entity based in the European Union. Having a newly created and regulated entity allowed the operational procedures to be tailored to the needs and risks of the football sector, instead of relying on an existing payment institution focused on other industry types. A variety of factors led to FCH being based in France. These include the fact that the vast majority of payments for the transfer of players are made between European clubs.<sup>11</sup> Moreover, the European Union has one of the world's most transparent and robust financial regulatory systems, which is recognised internationally, and France itself was already home to a FIFA office – the Member Associations Division hub in Paris, opened as part of FIFA's commitment to making football truly global.

In terms of the organisational structure, FCH is composed of a Management Board and a Supervisory Board. The Management Board is responsible for managing the day-to-day operations and consists of the independent Chief Executive Officer (CEO) and Deputy CEO. The Supervisory Board, comprising five members (two appointed by FIFA and three independent, including the Chairperson), is responsible for overseeing the Management Board. The remainder of the structure is divided into three lines of defence, as is common at financial institutions, with various degrees of monitoring and oversight. The services described in sections 6.3 and 6.4 are provided free of charge to clubs and member associations.

As a payment institution licensed in France and supervised by the ACPR, FCH is bound by French provisions on confidentiality and professional secrecy.<sup>12</sup>

<sup>&</sup>lt;sup>10</sup> "Société par actions simplifiée (SAS)" in French. This legal structure is provided for under articles L227-1 to L227-20 of the French Commercial Code.

<sup>&</sup>lt;sup>11</sup> This was particularly the case pre-Brexit.

<sup>&</sup>lt;sup>12</sup> Article L522-19 of the French Monetary and Financial Code states that "any person who, in any capacity whatsoever, participates in the management of a payment institution or who is employed by a payment institution is bound by professional secrecy". Accordingly, information relating to FCH customers is collected in the context of compliance with regulatory obligations and is not disclosed to third parties in any way whatsoever – under penalty of incurring the sanctions provided for in article 226-13 of the French Penal Code. Consequently, the information and documents collected in the context of FCH activities are treated as confidential, including vis-à-vis FIFA.







The FIFA Clearing House process consists of four subprocesses: the integration of domestic systems, the electronic player passport (EPP) review, the compliance assessment and payment execution via the FIFA Clearing House entity (FCH). This process, which is explained in more detail in the following subsections, was incorporated into FIFA's regulatory framework with the approval by the FIFA Council of the <u>FIFA Clearing House Regulations</u> on 22 October 2022.

## 6.1 Integration of domestic systems and provision of registration information

The effectiveness and efficiency of the new training-reward system rely on the implementation of integrated electronic systems by all member associations, enabling information to be automatically exchanged between them and FIFA. This is considered a cornerstone of the new system, given the need for the member associations to provide reliable and accurate information that makes it possible to identify training-reward triggers, the training clubs involved in a player's career and the amounts owed to each of them.

#### 6.1.1 Process

For FIFA to be able to create an EPP, every member association must:

- ensure that the FIFA Transfer Matching System (TMS) is used for all international transfers;
- implement an electronic player registration system, whether a proprietary or third-party solution or the system offered by FIFA (FIFA Connect Platform);
- implement an electronic domestic transfer system, whether a proprietary or third-party solution or the system offered by FIFA (DTMS); and
- integrate those electronic systems with the FIFA Connect ID Service.

These requirements were communicated to the member associations via circular nos 1654 and 1679. Their implementation allows training-reward triggers to be identified and all relevant information and data regarding players' history to be gathered for the purposes of the EPP. In most cases, the process took around two years of preparation (before the Clearing House went live). 21

#### 6.1.2 Results

To date, 202 out of the 2ll member associations (95.7%) have integrated their systems with the FIFA Connect ID Service. The two most widespread player registration systems are the FIFA Connect Platform (used by 118 member associations) and COMET (used by 37). The most used system for processing domestic transfers is DTMS (62 member associations), followed by COMET with 34 associations.

On average, 76.0% of any given player's training period is accounted for by a valid registration at a club in one of the 2ll FIFA member associations.<sup>13</sup> The remainder (24.0%) consists of either gaps between two registrations or the time between the start of the official training period (l January in the year of the player's l2<sup>th</sup> birthday) and the player's first registration. In fact, if the time before the player's first registration is disregarded, the average share of the training period that is accounted for by a valid registration rises to 85%, meaning that the information on player registration is largely complete. Indeed, most of the remaining gaps between registrations are to be expected, as they typically occur between two seasons, i.e. towards the middle or the end of the year for most associations (see graph below).

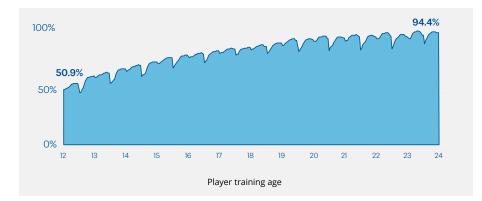


Figure 2: Share of approved EPPs with a valid registration at a given player training age

The EPP review process significantly improves the quality of registration information: the share of 76.0% of the training period that is covered by registration information would drop to just 40.7% if only data automatically provided by member associations (i.e. before the formal EPP review process) were considered. The quality of EPPs has also improved over time, as shown in Figure 3.

<sup>&</sup>lt;sup>13</sup> Among the EPPs approved at the end of the review process.

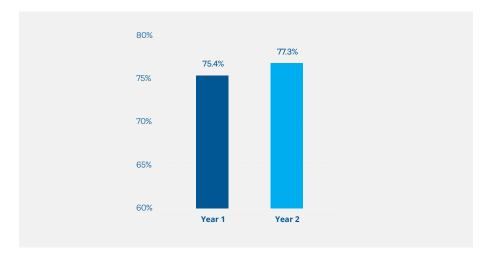
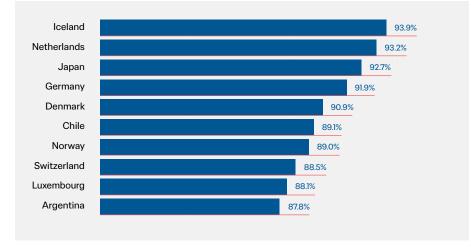


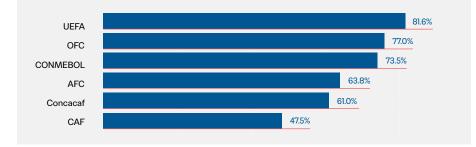
Figure 3: Average percentage of training period with valid registrations per approved EPP

Assuming that the responsibility for gaps between registrations is shared equally between the two associations that register the player before and after the gap, we can compute how much of the training period for which an association is responsible is in fact covered by valid registrations at that association. Among associations involved in at least 50 EPPs, Iceland has the highest average coverage per EPP: players are validly registered for 93.9% of the time for which it is responsible. Japan is the sole representative from the AFC in the top ten, which includes two associations from CONMEBOL (Chile and Argentina) and seven from UEFA (Iceland, the Netherlands, Germany, Denmark, Norway, Switzerland and Luxembourg), as shown in Figure 4. At confederation level, associations from UEFA have the highest average coverage with 81.6%, followed by those from the OFC with 77.0% (Figure 5).



**Figure 4:** Top ten associations by average coverage per approved EPP (excluding associations involved in fewer than 50 EPPs)

#### Figure 5: Average coverage per approved EPP, by confederation of the responsible association





#### It's a very exciting project to work with. Although the first year was challenging, now it's working, and it will get even better year after year."

**Kristian Skjennum,** Player Registration and TMS Manager, Norwegian Football Association

#### 6.2 Electronic player passport

Whenever an international or domestic transfer with fees or a first professional registration is declared by a member association, a provisional EPP is automatically generated.

#### 6.2.1 Process

In the initial phase, any interested member association or club (the latter through its member association) can request participation in the process. During this phase, the parties inspect the player's registration information, propose amendments and provide additional documentation, such as waivers and contract offers.

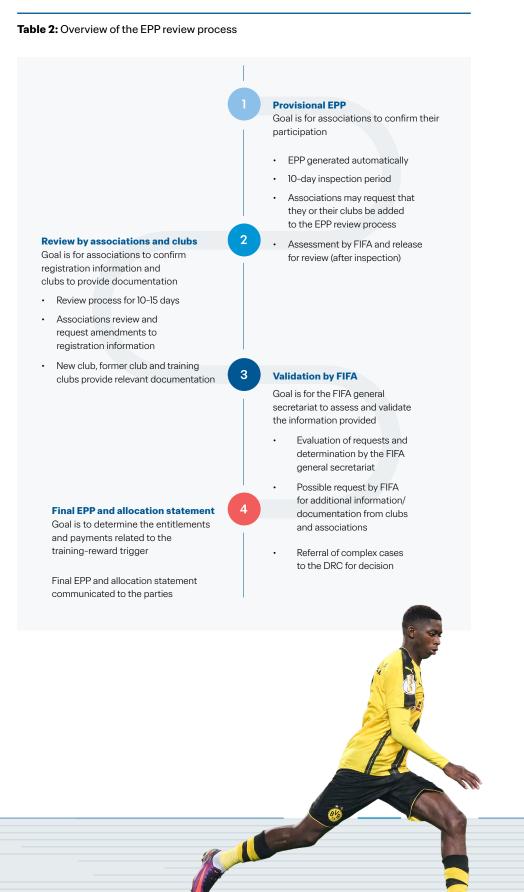
Afterwards, the FIFA general secretariat assesses all the details provided and, if needed, requests clarifications and additional information before the final validation. In cases of legal or factual complexity, the Dispute Resolution Chamber (DRC) of the FIFA Football Tribunal is responsible for deciding on the final EPP.

Lastly, following the validation of the EPP by the FIFA general secretariat or the DRC, a final version of the EPP is sent to the parties and, if applicable, an allocation statement is automatically generated, including information on the clubs entitled to training rewards and the amount due to each of them. The allocation statement is then submitted to the relevant parties and FCH for further processing.

It is worth noting that, for training compensation, the determination is issued in a single allocation statement at the same time as the EPP determination, while for the solidarity contribution, there may be multiple allocation statements at different times, as they are automatically generated when the various proofs of payment related to a transfer are uploaded in TMS.

All of these electronic player passports and allocation statements are very beneficial to us. For the first time, we can easily track the many players trained by the club, and that is a game changer."

Juan Pedro Sáenz, Administrative Director, Montevideo City Torque, Uruguay



In the first two years of the system's operation, two elements have prompted the most scrutiny and queries from clubs and member associations. They are as follows:

a) **Waivers**: During the EPP process, new clubs can submit waivers of training rewards, which must be uploaded within the designated phase (EPP review, stage 2 of Table 2) and time frame. This is a very important step and warrants detailed consideration here. A waiver must be valid, clear and unequivocal and must be agreed between the new club and the training club(s) concerned, not third parties. The FIFA general secretariat will review the waiver and may reject it if it determines that the waiver is not valid. In the event of prima facie validity, the training club in question (or its member association if the club does not participate in TMS) will have the opportunity to review it and challenge its validity.

b) **Proof of payment**: Every time a payment from the new club to the former club is due, the proof of payment needs to be submitted in TMS within 30 days. Where the solidarity contribution is applicable, every proof of payment uploaded will trigger an allocation statement and the payment process by FCH.

The proof of payment should show the payment of 95% of the agreed transfer fee, per Annexe 5 to the Regulations on the Status and Transfer of Players and article 11 of the FIFA Clearing House Regulations, with the new club retaining 5% of the transfer fee. When the EPP/FCH process assigns the relevant solidarity contribution to the entitled parties, if less than 5% of the transfer fee is assigned, the new club pays the balance to the former club as part of the transfer fee, as stated in the <u>TMS communication on proof of payment.</u>





#### 6.2.2 Results

Since 16 November 2022, 36,989 EPPs have been generated. These have covered the registration history of 32,389 different players, as in some cases, the same player has been involved in several transactions, thus giving rise to multiple EPPs.

The figures below show the breakdown of the EPPs generated by the type of trigger and training rewards. As many EPPs relating to first professional registrations and domestic transfers are discarded during the initial phase of the review process due to the lack of an international dimension, the distribution of EPPs by the type of training rewards shifts when the discarded EPPs are excluded from the analysis (see Figures 6 and 7).

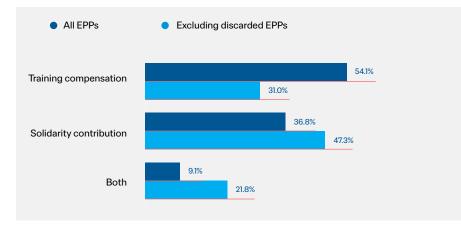


Figure 6: Number of EPPs generated per year, by trigger type



The FIFA Clearing House system is very innovative. What makes it remarkable, in my opinion, is that communication with other clubs has improved significantly. Also, the system notifies us about transfers that we wouldn't have been aware of in the past."

Teppei Oikawa, Manager of Football Operations, Vissel Kobe, Japan

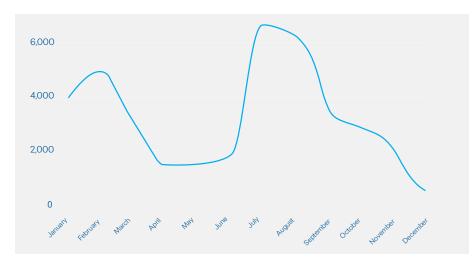


#### Figure 7: Share of EPPs by type of training rewards

Of the 36,989 EPPs that have been generated, 31,539 (85.3%) have been closed. Of the 5,450 open cases, more than 97% were triggered during or later than the 2024 mid-year transfer window. On average, the process is completed within two months (60.9 days). More than 75% of cases are resolved within 120 days, although in exceptional cases, the process may last longer.<sup>14</sup>

As is the case for international transfers, the generation of EPPs across the year exhibits strong seasonality, with two distinct peaks: the first towards the beginning of the year in January and early February and the second, larger one following the mid-year transfer window from late June until early September.

<sup>14</sup> Typical causes of delays are incorrectly declared transactions, member associations not having club IDs (albeit this is a rarity) and the referral of cases to the DRC of the FIFA Football Tribunal.



#### Figure 8: Number of EPPs generated per month

A total of 9,835 EPPs have been approved to date, leading to more than 9,000 allocation statements, with an average of 3.3 training clubs per allocation statement. In one example, a player had been registered with 11 clubs in six different countries (Congo, Morocco, Tunisia, Qatar, Switzerland and Belgium). With many clubs appearing on multiple allocation statements, a total of 5,531 unique clubs were entitled to training rewards. Under the old system, each of those clubs would have had to ask for its money individually or lodge a claim with FIFA. However, thanks to the new system, clubs no longer need to track the subsequent careers of the players whom they train, nor spend time or money on claims.

Allocation statements with total entitlements of USD 354.6 million have been sent to FCH so far for further processing (USD 93.1 million in 2023 and USD 261.5 million in 2024); this is more than triple the amount compared to any previous year (see Figure 9). This number is expected to increase even further in future years: many of the transfers completed in the past 24 months still have outstanding instalments that will continue to trigger training rewards in the future. These amounts will come on top of the training rewards that will be paid for transfers completed in the coming years.



Figure 9: Training rewards (USD) declared in TMS under the old system and sent to FCH under the new system

Only 69 EPPs have been appealed to the Court of Arbitration for Sport by one of the parties: 36 of those cases have been closed and the other 33 are ongoing. This represents less than 0.2% of the potential number of claims (given that more than 54,000 appellants were eligible to contest the 9,835 EPP decisions, as new clubs can challenge the entitlements and training clubs can challenge the amounts awarded). A large majority of those appeals relate to waivers that were added after the EPP review process had already concluded.

The advent of the FIFA Clearing House has also brought important benefits to women's football and the entitlement of solidarity contribution to training clubs. As a result, 689 EPPs (out of the total of 36,989 EPPs generated) related to women's football, leading to a total of 168 allocation statements and USD 271,500 sent to FCH for further processing.

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The experience with the FIFA Clearing House has been a good learning process and a positive development. It's the right approach to financial control of international transfers and it is benefiting women's football, including in our case."

**Andreas Gründler,** Head of Football Operations and Administration, FC Nordsjælland, Denmark

#### 6.3 Compliance assessment and onboarding

#### 6.3.1 Process

Once generated and notified to the parties, the allocation statement is sent to FCH for further processing. When the allocation statement is received by FCH (as shown in step l of the diagram below), prior to the payments being processed, a compliance assessment is conducted to ensure that all relevant parties adhere to French, European and international law, regulations and guidelines, particularly in relation to sanctions, anti-money laundering, terrorism financing, anti-bribery and corruption.

During the compliance assessment, the clubs and member associations are asked to provide information on their organisational structure, ownership and sources of funding, among other things (step 2). Once that information has been provided, an analysis of each club's legal structure, representatives and ownership is performed. Depending on the results of the compliance assessment, FCH may approve the club as a client. If a party fails a compliance assessment, sanctions are imposed, as described in article 17 of the FIFA Clearing House Regulations and section 7 below.

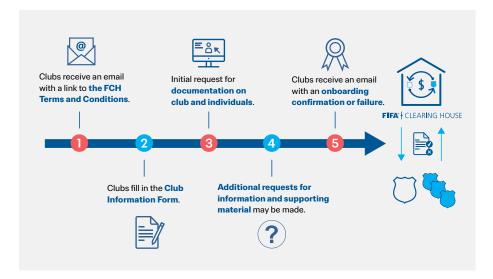


Figure 10: Overview of the Clearing House process and parties involved

Finally, once the parties have passed the compliance assessment, FCH collects funds from the new club (step 3) and distributes the relevant amounts to each training club (step 4). Finally, FCH reports statistics to FIFA (step 5), together with information on any breaches of the FIFA Clearing House Regulations, such as compliance and payment failures.

The onboarding process and accompanying compliance assessment can also be divided into five steps:

Figure 11: Overview of the onboarding and compliance assessment process



All requirements, an overview and guidelines document, the FCH Terms and Conditions, and answers to frequently asked questions on the onboarding and payment processes can be found on the <u>FCH website</u>, which includes an <u>explanatory video on the onboarding process</u>.

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Now, we have the certainty that, through FCH, we'll receive the funds we're owed. We just need to complete the required steps."

Fausto González, lawyer, Deportivo Saprissa, Costa Rica

Mandatory documents to be submitted in the club accreditation process relate to the club, its legal representative(s) and its ultimate beneficial owner(s) (UBO(s)) or shareholders. They include the following, among others:<sup>15</sup>

- For the club: a certified copy of the trade register certificate, certificate of incorporation or equivalent<sup>16</sup>; the articles of association or equivalent; a bank account certificate or bank statement; financial statements from the latest financial year; and company organisational charts including ownership percentages
- For the legal representative(s): a copy of a valid passport or ID duly certified through a reliable and acceptable third party, such as a notary, a lawyer or the national post office
- **For UBO(s):** an extract from the UBO register or official document with required information on UBO(s)<sup>17</sup>

## Compliance assessment and onboarding: challenges and lessons learned

The first few months of FCH's operations were certainly challenging, as the system and the processes were new for all stakeholders. Despite a substantial communication campaign, many clubs perceived the onboarding process to be too complex. A large number of onboarding failures happened for technical reasons, due to unfamiliarity with the new system or because of a lack of "buy-in" from the users. As soon as those issues had been identified, FCH and FIFA immediately engaged with all relevant actors to understand their pain points and address them with both short-term and systematic solutions. Although not all the existing challenges have been fully resolved, major improvements have already been rolled out, and more are in the pipeline. The entire FCH team remain fully committed to providing all necessary support to all the participants in the compliance assessment and onboarding process.

One of the major criticisms was that the **onboarding process was overly complicated or burdensome**. It is clear that the introduction of such a process may be challenging for many, and FIFA does not shy away from tackling such problems. Many measures have been introduced to ease the process: the requests for onboarding documents are now tailored to the jurisdiction and legal form of the clubs concerned; after the Club Information Form has been completed once, the club is asked to submit updates for future transactions; submitted documents can be used for multiple allocation statements; and a customer

<sup>&</sup>lt;sup>15</sup> This list is indicative, subject to country-specific requirements and to possible modifications to the legal or regulatory requirements or the FCH policies or procedures. For certain documents, if not issued in English, French or Spanish, a translation into one of those language must be provided alongside the original.

<sup>&</sup>lt;sup>16</sup> Must be under three months old.

<sup>&</sup>lt;sup>17</sup> Mentioning the person's name, surname, date and place of birth (e.g. annual report, shareholder register); in the absence of this, a copy of a valid passport or ID can be provided.

care centre has been put in place to proactively support clubs in the onboarding process. The positive results of all these efforts are plain to see: to date, 1,665 clubs from more than 100 associations all around the world have been successfully onboarded, and they come from all levels of club football (from the top professional divisions down to the smallest amateur leagues).

Another criticism relates to the **financial investment required by the onboarding process**: a club that is entitled to USD 100–200 in training rewards may have to spend more than that on collecting, certifying and/or translating documents. These costs may be difficult to understand at first sight. However, the compliance assessment remains a necessary step towards ensuring the financial integrity of the football industry, which is one of the main objectives of the entire Clearing House project. More importantly, there are many cases in which the value of the training rewards to which a club is entitled is low for a first transaction, but soon after, much higher sums become payable, sometimes hundreds of thousands of USD. If the compliance process has already been completed, it significantly facilitates the collection of those sums for future transactions. In other words, successfully going through the compliance assessment may seem like a considerable investment at first, but it may yield major financial benefits shortly thereafter.

The last major point of criticism was that the entire process **took too long**, **with clubs having to wait for an extended period to receive payment**. This was certainly true in the early months, due to many of the factors previously mentioned. However, given that more and more clubs have been onboarded by FCH, the processing times have already been significantly reduced. In some cases, payments are now being fully executed only two or three weeks after the issuance of the allocation statement. In addition, a client help desk has been put in place to respond to the numerous queries from clubs and to further speed up the onboarding process. However, one aspect remains fundamental, and it explains many of the delays that have been experienced: payments cannot flow until the new club in a transaction has passed the compliance assessment. Even if training clubs have been accredited, the successful onboarding of the new club remains key. FIFA is endeavouring to accelerate the onboarding of new clubs to the greatest extent possible and will continue to impose appropriate sanctions wherever the failure of the compliance assessment is due to a lack of collaboration from the new club.

FIFA is grateful for all the feedback and criticism received and constantly strives to further improve its processes for the benefit of all its stakeholders.



We help other, smaller clubs to go through the assessment procedure. It's key for football's development to have such a process. The FIFA Clearing House is making things better in football."

Davor Radić, Head of the Legal Department, GNK Dinamo Zagreb, Croatia

#### 6.3.2 Results

In the first 24 months of FCH's operations, the compliance assessment process has been initiated in a total of 37,102 instances, involving 6,037 different clubs in the context of 9,135 allocation statements. Each instance equates to the compliance assessment process for one club for a given allocation statement.

In total, 4,494 clubs have completed the compliance assessment process, with 1,665 of these clubs having been approved in at least one instance. France is the association with the highest number of clubs that have been approved, followed by England and Germany. Brazil and Argentina are the only non-UEFA member associations in the top ten. In relative terms, clubs from the Netherlands lead the list, with 70.1% of the assessed Dutch clubs accepted at least once.

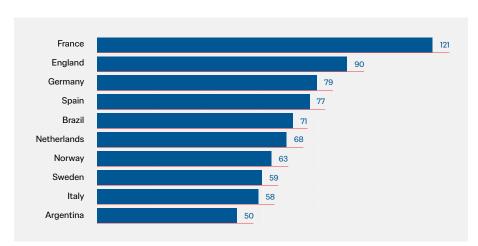
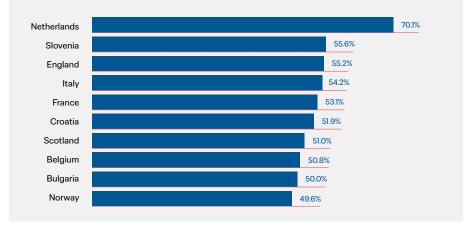


Figure 12: Top ten associations by number of clubs approved at least once



**Figure 13:** Top ten associations by club acceptance rate (excluding associations with fewer than 20 assessed clubs)

The overall acceptance rate per association also exhibits a strong correlation with other national-level indicators, such as the World Bank's Regulatory Quality rank. As shown in the graph on the next page, clubs in countries that rank high for Regulatory Quality tend to have a higher acceptance rate in the Clearing House compliance assessment process.

It was complicated at the start. We had quite a few documents to process, but someone explained it to me on the phone and walked us through every stage of the process properly. We authenticated all the documents in good time and received a very significant amount for our club."

Boubakar Coulibaly, President, AAS Sarcelles, France

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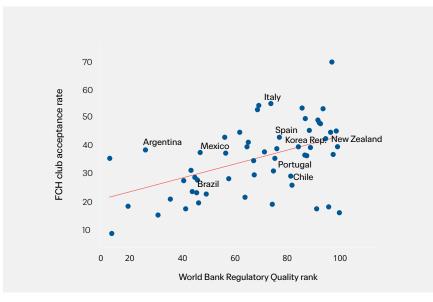
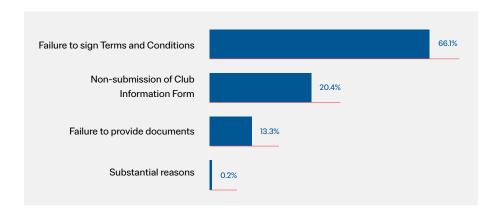


Figure 14: Countries by World Bank Regulatory Quality rank and FCH club acceptance rate

Out of the total of 37,102 instances, more than 22,000 have already been completed, with an overall acceptance rate of 58.9%. This rate increased from 52.8% in Year 1 to 61.0% during Year 2.

As shown in the graph below, the leading reason for clubs not passing the compliance assessment process is a failure to sign the FCH Terms and Conditions, with 66.1% of the rejections falling into this category. A mere 0.2% of the rejections were for substantial reasons, for instance due to a club's corporate structure or ownership not meeting the requirements.



### Figure 15: Distribution of the reasons for club rejections (in % of rejected instances)

### 6.4 Payments

### 6.4.1 Process

After the aforementioned five steps have been completed in a satisfactory manner by the new club and at least one training club, FCH issues a payment notification to the new club confirming the training rewards due. The new club must pay the requested amount within 30 days. Once FCH has received payment from the new club and compliance clearance has been obtained, the funds are sent to the approved bank account(s) of the training club(s).

A club that fails a compliance assessment or does not make a due payment is reported to the FIFA administration. Depending on the situation, and in accordance with the FIFA Clearing House Regulations, the FIFA Disciplinary Committee may sanction the club, with sanctions ranging from a reprimand or fine to the imposition of a registration ban.

### 6.4.2 Results

In the 24 months since the introduction of the FIFA Clearing House on 16 November 2022, a total of USD 156.6 million<sup>18</sup> has been processed via the FCH to more than 1,000 training clubs around the world, showing a striking increase of more than 200% in 2024 compared to any of the previous years.<sup>19</sup>

<sup>&</sup>lt;sup>19</sup> Of this total, USD 124.9 million has already been received by the training clubs, while for the remaining USD 31.7 million, payment notifications have been issued and the payment process is being finalised. In the remainder of this report, all training-reward figures refer to the sum of both of these amounts (for the sake of simplicity, reference is made to amounts paid).



With FCH, we are not concerned about paying the wrong person or sending money to the wrong bank account. That was also a problem for us, because we sometimes have to pay solidarity contributions to clubs in other continents."

**Cristina González García and Sander Mesman,** financial controllers, AFC Ajax, the Netherlands

<sup>&</sup>lt;sup>18</sup> From 3,139 underlying allocation statements.

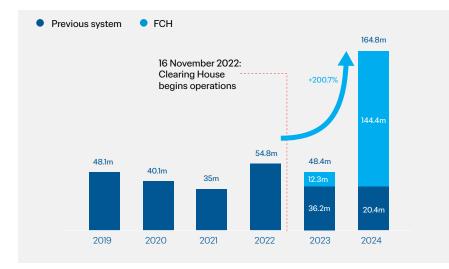
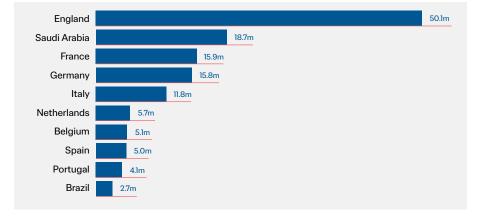


Figure 16: Value of training-reward proofs of payment uploaded for transfers under the old system and training rewards paid via FCH (USD)

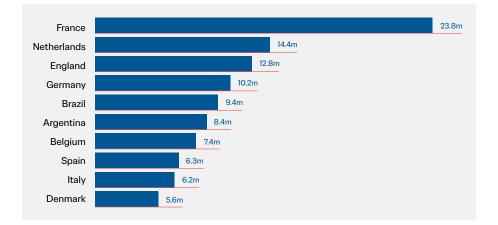
Clubs from England lead the way in terms of training rewards paid, with a total of USD 50.1 million. They are followed by Saudi Arabia (USD 18.7 million) and France (USD 15.9 million). Apart from Saudi Arabia from the AFC and Brazil from CONMEBOL, the top ten is an all-European affair.





### Figure 17: Top ten associations by training rewards paid

The top association in terms of training rewards received by clubs via FCH is France, with USD 23.8 million, followed by the Netherlands and England, whose clubs have received USD 14.4 million and USD 12.8 million respectively. Brazil and Argentina from CONMEBOL are the only non-European representatives among the top ten.



#### Figure 18: Top ten associations by training rewards received

In terms of net training rewards received through FCH (received minus paid), Dutch clubs head up the standings, followed by their counterparts from France and Argentina. Clubs from England are by far the biggest net contributors, with a total of USD 37.3 million net paid in training rewards.

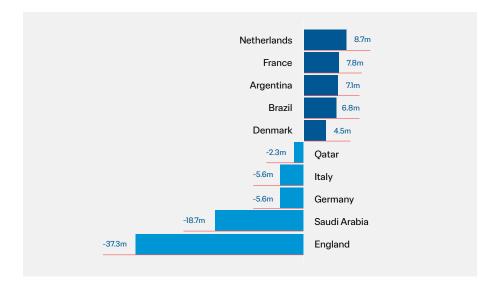


Figure 19: Top five associations in terms of net training rewards received and contributed (USD)

Category 1 clubs account for the largest proportion of the training rewards paid through FCH.<sup>20</sup> While these clubs are likewise the biggest recipients of training rewards in absolute terms, it is evident that a strong redistribution effect is also at play, as highlighted by the red bars in Figure 20. They show all training rewards paid by new clubs of a higher training category than the recipients. On the other hand, the light blue bars show training-reward amounts paid by clubs of a lower category than the training clubs that received the rewards. Of the USD 14.3 million paid by category 3 clubs to training clubs in category 1, USD 12.3 million has come from clubs from Saudi Arabia alone, followed by clubs from Qatar and the United Arab Emirates.

More than a third (37.3%) of the total amount in training rewards (USD 156.6 million) paid out so far has changed hands between category l clubs. Training rewards paid by clubs with a higher training category than the recipient training clubs have made up 37.4% of all training-reward payments, clearly showcasing the redistribution effect. When disregarding the training rewards paid by clubs from Saudi Arabia, the United Arab Emirates and Qatar, this share rises to 41.8% of the total.

<sup>&</sup>lt;sup>20</sup> For the purposes of training compensation, category 1 is the highest category and category 4 the lowest.

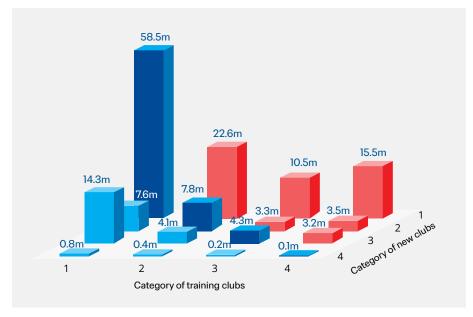


Figure 20: Training rewards (USD) by training category of the new and training clubs



*The training compensation related to Moisés Caicedo being delivered by FCH was a dream.* 

Our objective is to use these funds to build infrastructure, namely a training ground and a medical clinic, plus a gym."

Lenín Bolaños, President, CD Espoli, Ecuador

# **07.** Disputes and sanctions

As explained above, with the implementation of the Clearing House project, the claims system for training rewards has been substituted by the electronic player passport (EPP) review process for transfers and registrations of players that have occurred since 16 November 2022.

However, in very exceptional cases, clubs are still able to lodge claims to request the payment of training rewards. As established in article 18.2 of the FIFA Clearing House Regulations, a club that did not participate in the EPP review process and considers itself entitled to receive training rewards may lodge a new claim, provided that certain requirements are met.

Furthermore, clubs and member associations play a pivotal role in the new system by providing reliable, accurate and complete information on the registration and transfer of players. In this respect, articles 17.3 and 17.4 of the FIFA Clearing House Regulations state that if a member association fails to provide correct information, to integrate its system with the FIFA Connect Interface or to declare a training-reward trigger, it will be sanctioned with a fine or even the obligation to pay restitution to the training club.

Likewise, clubs may also be subject to sanctions. Articles 17.5 and 17.6 of the FIFA Clearing House Regulations establish that a club that fails to upload proof of payment of transfer compensation in a timely manner or to pay the amount set out in an allocation statement may be sanctioned by the FIFA Disciplinary Committee or may be subject to a fine and a ban on registering new players, respectively.

Finally, to ensure compliance with financial regulations and promote the integrity and transparency of the system, articles 17.7 and 17.8 of the FIFA Clearing House Regulations also lay down sanctions for member associations and clubs that fail a first and second compliance assessment. The possible sanctions range from a reprimand to a fine and/or a registration ban, depending on the status of the club for a specific transaction.

### **08.** Developments and what's next

The establishment of the FIFA Clearing House followed close consultation with football stakeholders. Since the system went live in November 2022, FIFA and the Clearing House entity (FCH) have sought feedback on what does and does not work, which good practices should be replicated and which mistakes should be avoided.

Two global webinars have been held (in October 2022 and June 2023) for all member associations and clubs. On top of that, on-demand meetings or webinars have been conducted with around 60 member associations and their clubs, and FIFA Clearing House representatives have participated in conferences organised by the confederations, the European Club Association, the World Leagues Association, etc.

During the months of August and September 2024, an in-depth analysis of the member associations' participation in the EPP review process was carried out, identifying Il clusters that shared similar situations and behaviours impacting the quality of the data provided during the process. Based on the specific needs of each cluster, seminars were organised with 54 member associations, and educational material was created and shared with all 211, with the aim of improving their understanding and internal processes and ultimately increasing the quality of EPP data. The Clearing House project has also been the subject of numerous publications in sports and academic journals.

Other educational and support measures have also been implemented. The <u>Clearing</u> <u>House website</u> and the dedicated section on the <u>FIFA Legal site</u> provide highly useful information. Explanatory notes, guidelines and the answers to frequently asked questions have been issued alongside the FIFA Clearing House Regulations. Three of the latest FIFA Transfer Matching System (TMS) communications refer to proofs of payment related to the Clearing House.<sup>21</sup>



<sup>21</sup>"Declaration of payments of transfer compensation" (January 2023), "Obligation to upload the proof of payments" (July 2023), "Potential wrongly generated allocation statements" (April 2024). neitrei

The feedback gathered has been acted upon. As a result, important advances have been made since the Clearing House went live (see the dedicated section entitled "Compliance assessment and onboarding: challenges and lessons learned" above).

TMS has been updated to reflect improvements in the EPP review process, striking the balance between automation and the right of the parties to be heard. For 2025, slight changes to the FIFA Clearing House Regulations are planned and, most importantly, a full upgrade of the FCH platform and systems is under way, with the improved versions expected to go live by mid-2025. A secure portal will facilitate clubs' onboarding, enable them to monitor their transactions and enhance their ability to consult the status of their cases.

While 2023 was the inaugural year and 2024 has seen the consolidation of the project, 2025 will take the FIFA Clearing House to the next level, streamlining the processing of payments and making them more secure and compliant.

The FIFA Clearing House is an important and ambitious initiative. It was brave of FIFA and FCH to put it in place in a short space of time. There are aspects to improve, but we appreciate FIFA and FCH's openness to further enhancing the system."

Jérôme Perlemuter, General Secretary, World Leagues Association



## **09** Methodology

All data provided in this report, as well as on the FIFA Clearing House Report website, relates exclusively to electronic player passports (EPPs) and allocation statements concerning professional football players within the scope of 11-a-side football. The numbers that feature in this report have been rounded. All data is based on individual transaction data provided directly by football clubs and associations in the FIFA Transfer Matching System (TMS).

### **Reporting period**

FIFA Clearing House data has been analysed for the period between 16 November 2022 and 15 November 2024 inclusive.

### **Training-reward amounts**

FIFA Clearing House data has been analysed for the period between 16 November 2022 and 15 November 2024 inclusive.

### **Training period**

The training period for a given EPP lasts from 1 January in the year of the player's 12<sup>th</sup> birthday until either 31 December in the year of the player's 23<sup>rd</sup> birthday or the day when the EPP was triggered, whichever comes first.

### **Player training age**

A player's training age is the theoretical age of a player assuming a date of birth of 1 January in the year of their true date of birth. Every player thus has a player training age of 12 years throughout the first year of their training period, 13 years in the second year and so forth.

### **Registration gap**

If parts of a player's training period are not covered by a valid registration, such periods are considered registration gaps. A registration gap can be either between two registrations or between the beginning of the training period and the first registration within the training period.

### **Responsibility for registrations and gaps**

For the purposes of this report, each member association has been considered responsible for the duration of all registrations of a player at one of its clubs, as well as for registration gaps that precede or follow a registration at one of its clubs. If a registration gap lies between two registrations with two different associations, both associations have been assigned responsibility for the gap in equal parts.

### **Disclaimer**

In the event of any contradiction between this report and the actual text of the relevant regulations, the latter always prevails. Equally, this report cannot alter any existing jurisprudence of the competent decision-making bodies and is without prejudice to any decision that these bodies might be called upon to pass in the future. The information contained in this report is based on data provided directly by football stakeholders in the TMS and on the FIFA Clearing House platform. FIFA assumes no responsibility for the accuracy, completeness and reliability of this information. Due to the nature of the databases, the presence of pending cases, the potential cancellation of transfers and data corrections, numbers may differ from one report to another. In the event of any contradiction between this report and other FIFA publications, the most recent always prevails. All information contained herein is exclusively owned by FIFA, except where stated otherwise.



