FIFA CLEARING HOUSE

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THE 11 GOALS



FIFA

What is the objective of the Clearing House?



On 26 October 2018, the FIFA Council endorsed the **first reform package of the transfer system** recommended by the FIFA Football Stakeholders Committee, which included:



Creation of a clearing house to process transfers with the aim of protecting the integrity of football and avoiding fraudulent conduct

FIFA



Mandatory introduction by all MAs of an electronic player registration system and an electronic transfer system at national level

THE OBJECTIVE

The objective of the FIFA Clearing House (FCH) is to **centralise**, **process and automate payments between clubs**, in a first step related to **training rewards payments** (training compensation and solidarity contribution), with the vision to potentially expand to agent fees and transfer fees in the future.

Why do we need a FIFA Clearing House?

- To cover the gap between training rewards due and actually paid (only one fifth of those).
 - With the FCH, FIFA has shifted from a claims system to automatic entitlement.
- To promote integrity and financial transparency, by conducting a risk and compliance due diligence on clubs and transactions before any payments are processed, assessing adequacy to anti-money laundering and other financial regulation.



367.4M

LAST YEAR



- FIFA Clearing House licence to operate as a payment institution: granted by ACPR (French authorities) on 23 September 2022
- FIFA Clearing House Regulations approved by the FIFA Council on 22 October 2022

Go-live of the FIFA Clearing House on **16 November 2022:**

- Transfers or registrations of players having occurred before 16 November 2022 are processed and paid via the "old" claims system (including if instalments are paid after that date)
- Transfer or registrations of players occurring as of 16 November 2022 are processed and paid via the Clearing House system
- Communication and education: webinars with all MAs, clubs and main stakeholders; launch of the website: explanatory notes, FAQ, videos; helpdesk, FCH newsletter, TMS proof of payment communication; academic papers
- > 24,000+ EPPs generated until now; thousands of EPP and Allocation Statements determinations issued and sent to parties, USD million 120 sent to FCH; more than USD 35 million payments processed already

CLEARING HOUSE

Three - step process



Identification of training reward trigger

• Review of Electronic Player Passport

Evaluation of requests and determination

Clearing House



Identification of training reward trigger

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What happens when an EPP is created ?

When a potential training rewards trigger is identified, all MAs' electronic player registration systems that are integrated with FIFA Connect ID and that have registration data for this player will automatically send this data to populate the provisional EPP.

In this example, MA no. 2, MA no. 3 and MA no. 211 are providing information automatically.



Electronic player passport (EPP) process

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OVERVIEW

The EPP review process

1. PROVISIONAL EPP

2. REVIEW BY MAS & CLUBS

3. VALIDATION BY FIFA

Goal is for MAs to confirm their participation

- Ten days inspection period
- EPP generated automatically
- MAs may request to be added to the EPP review process
- Assessment by FIFA and release for review (after inspection)

Goal is for MAs to confirm registration information and clubs to provide documentation

- Review process for ten days
- MAs review and request amendments to registration information
- New, former and training clubs provide relevant documentation

Goal is for the FIFA general secretariat to assess and validate the information provided

- Evaluation of requests and determination by the FIFA general secretariat
- Possible request by FIFA to clubs and MAs on additional information/ documentation
- Referral of complex cases to DRC for decision

4. FINAL EPP AND ALLOCATION STATEMENT

Goal is to make the determinations of entitlement and payments related to the training reward trigger

 Final EPP and Allocation Statement communicated to participating parties OVERVIEW

Status of an EPP in TMS



Amendment of registration information in EPP

Participating MAs can request amendment of registration information in EPP review process

Registration information is gathered from NRSs through FIFA Connect interface when an EPP is generated. During the **review phase (review and completion status),** MAs may request to amend:

- Registration dates
- Training category
- Status (Professional/amateur)
- Type of registration (permanent/loan)

To request these amendments, evidence must be provided (proof of registration, employment contract or ITC).

Juniors OÖ FC Free-text club ÖFB, Austria FIFA ID: 9K7QU29	10/02/2021	11/08/2021	Professional	On loan	21 - 21
Status: Active Training category: 4					DEDIT REGISTRATION
Document uploads					REMOVE REGISTRATION
B Waiver - blank page - waiver.pdf					CHALLENGE WAIVER
Gamba Osaka JFA, Japan FIFA ID: 1008ZN98 Status: Active Training category: 2	01/02/2019	25/07/2019	Professional	Permanent	19 - 19
Document uploads					





Submission of waivers of training rewards

New club must provide waivers of training rewards in the EPP review process

During the review phase (review and completion status), the new club of the player may upload waivers provided by the training club.

- A waiver must be valid, clear and unequivocal between the new club and the concerned training club(s).
- FIFA general secretariat will review the waiver and may reject it, if it determines that the waiver is not valid.
- The training club in question may review the waiver and challenge its validity in the EPP review process.
- The FIFA general secretariat will inform the training club or its MA (if the training clubs does not participate in TMS) about new waivers uploaded in the EPP with a message.

In accordance with FCHRs, the obligation to pay training rewards is always on the new club (not valid to pass to former club or 50/50, in strict application of RSTP)

The right to receive is for the training clubs for the time the player was registered with them, even in cases where the player was loaned (loan jurisprudence).

In cases of both SC and TC, TC due to the former club is deemed included in the transfer fee unless explicitly excluded in the transfer agreement (jurisprudence and considered by the EPP system).



EPP-2830				8	Review		
Electronic player passp	ort (EPP) genera	ated on 05/04/2022			tional transfer		
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UPLOAD WAIVER

Review of waivers of training rewards

Training club challenges a waiver provided by the new club

EPP-3283				Review	
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				PZPN, Poland	
FIFA ID: 18X8ZB8	IRV MESSAG	ES NOTES			
PIFA ID: 18X8258 PASSPORT HISTO	IRY MESSAGI Start of registration	ES NOTES		Nature of registration	Age of player
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PASSPORT HISTO Slub Legia Warszawa Spółka Akcyjna PZPN, Poland	Start of registration	End of registration	Level	Nature of registration	
PASSPORT HISTO	Start of registration	End of registration	Level	Nature of registration	
PASSPORT HISTO Slub Legia Warszawa Spółka Akcyjna PZPN, Poland	Start of registration	End of registration	Level	Nature of registration	
PASSPORT HISTO Club Legia Warszawa Spółka Akcyjna PZPN, Poland FIFA ID: 10K9AJH Status: Active	Start of registration	End of registration	Level	Nature of registration	

Upload waiver challenge

Waiver provided by Club name Association, Country FIFA club ID

FC St Gallen SFV/ASF, Switzerland 1448Z2A

Waiver refers to

Club name Association, Country FIFA club ID Type Status Age of player Training category Registration starts Registration ends Level Nature of registration Legia Warszawa Spółka Akcyjna PZPN, Poland 10K9AJH Club Active 21 - 21 Training Category 3 25/08/2022 09/10/2022

Professional

Permanent

Upload challenge of the waiver above

Document	upl	oac
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PDF only, in any language

Waiver challenge

Drop files to attach or click to browse

SAVE

FIFA[®]

Submission of contract offer

Former club provides contract offer for entitlement to TC (only EU/EEA)

EPP-2923	0			Review	
Electronic player pa	assport (EPP) generated (on 19/05/2022		Until 18/06/2022	registration
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PASSPORT	HISTORY	MESSAGES	NOTES		
Club	Start of registration	End of registration	Level	Nature of registration	Age of player
NK Vrapče HNS, Croatia FIFA ID: 107TYBG Status: Active Training category: 4	07/09/2005	24/01/2018	Amateur	Permanent	2 - 15
+ ADD REGISTR	ATION				 EDIT REGISTRATION UPLOAD CONTRACT OFFER
					UPLOAD EXEMPTION OF CONTRACT OFFER



Document upload - contract offer and delivery confirmation

Club name	NK Vrapče
Association, Country	HNS, Croatia
FIFA club ID	107TYBG
Туре	Club
Status	Active
Age of player	2 - 15

Document upload

Contract offer		Delivery confirmation	
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SAVE

CLOSE

EPP determination & Allocation Statement

A comparison between these two important documents

Only one per trigger event (IT, DT or FPR)

EPP DETERMINATION

 FIFA decision as to any entitlement to Training Compensation or Solidarity Contribution

ALLOCATION STATEMENT (AS)

- For Training Compensation, only one AS generated at the same time as EPP determination
- For Solidarity Contribution, there can be multiple AS. Each one is generated when the relevant proof of payment is uploaded in TMS.

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Proof of payments

- Every time a payment from the new club to the previous club is due, the information needs to be declared to FIFA within **30 days** (article 12.1 RSTP: fairly "old" provision with "new" relevance)
- Every proof of payment uploaded will trigger, if applicable, the Allocation Statement and the payment process by the FCH
- This applies to both international and domestic transfers that include a transfer compensation
 - The proof of payment must be declared using the same method as the relevant transfer declaration / instruction
- Clubs and MAs must be diligent in timely uploading the proof and FIFA Compliance is proactively monitoring the status of each transfer, to protect the interests of training clubs.

- The proof of payment shall in principle show a payment of 95% of the agreed transfer fee, following Annexe 5 RSTP and article 11 FCHR
- The new club retains 5% of the transfer fee. The EPP/CH process assigns the due SC to the entitled parties
- If less than 5% was assigned, the new club pays the balance to the former club as part of the transfer fee: recent TMS Communication on proof of payments

APPROACH:

The system considers any amount declared in the proof of payment **always as 95%.**

Highlights FIFA Clearing House

- Very good performance of TMS system: total **18,747** EPPs generated in 11 months of operations
- Increased participation of clubs and MAs: overall quality of the information in EPPs from initial 39% to current **71,5%**
- 200 MAs are integrated to FIFA Connect ID (11 are not)
- 153 MAs have participated in at least one EPP; 54 MAs have participated in more than 100 EPPs
- 122 MAs have declared the trigger in at least one EPP; 49 MAs have declared over 100 triggers
- Most common trigger is FPR (43.4%), followed by international transfers (32.1%) and lastly domestic transfers (24.5%)

- More than 50% EPPs are discarded in the initial stages; when filtered out, 77.3% of "valid" EPPs are international transfers
- 5,421 EPP decisions passed, 2,824 AS, USD million 120 allocated to date
- 82% of EPPs are solved in less than 120 days
- 4,000+ clubs sent to FCH for assessment
- An average AS has one new club, 3 training clubs and USD
 36.4k
- High % of cases being escalated for failure in T&Cs and CIFs;
 USD million 35 already paid out by FCH

FCH: some stories

The first training rewards payment

processed through the FCH was performed on 8 June 2023 to SC Malesherbois (French amateur club – 7th division). The amateur club received more than its annual budget in training rewards (SC EUR 160K).

The **highest training rewards entitlements** for a single EPP amounts to 1.3M for SC and 550k for TC.

High numbers of stakeholders across regions are involved.

- There have been increasing cross-confederation EPPs involving entitlements.
- It is not uncommon to see cases involving up to 5 MAs (such as EPP-17321, with 5 big UEFA MAs: BEL; FRA; ENG; GER; NED).
- Some Allocation Statements have included up to 10 training clubs from 3 different member associations (AS-34).

The Clearing House project affects grassroots women's football too:

- 347 EPPs generated for women's football.
- Out of the 71 EPPs approved, 38 involve compensation, more than triple the cases recorded in 2018-2022.
- Two EPPs have already generated 2 AS each.

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Distribution of training rewards through FIFA Clearing House FIFA

FIFA & FIFA Clearing House SAS



FIFA

- Responsible for definition, implementation and enforcement of the FIFA Clearing House Regulations
- Integration of TMS with all MA national registration and domestic transfer systems
- Management of the EPP process from trigger to generation of an EPP determination and Allocation Statement
- Oversight of the FIFA Clearing House SAS
- Escalation to FIFA Disciplinary for possible sanctions

FIFA CLEARING HOUSE SAS

- Separate legal entity but full subsidiary of FIFA.
- Regulated payment institution authorised by the 'Autorité de Contrôle Prudentiel et de Résolution' (ACPR)
- Based in Paris, France
- Responsible for processing the payments defined in each Allocation Statement
- To perform transactions on behalf of clubs, the FCH must conduct due diligence on its clients (clubs and MAs), following international legislation and AML-CTF regulations in France.



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OnboardingCompliance &
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Overview of interactions between FIFA and FCH

- 1. Communication of Allocation Statement by FIFA to FCH for payments processing
- 2. Compliance assessment of all parties involved performed by FCH
- 3. New club sends payment to FCH
- 4. FCH distributes the funds to the relevant training clubs
- 5. Reporting to FIFA on data and statistics, as well as infringements of the FCH Regulations, **for FIFA to sanction non-compliant clubs and MAs**



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OVERVIEW OF ONBOARDING

A 5 steps process



FCH: document collection

LIST OF DOCUMENTS TO SUBMIT

MANDATORY INFORMATION

CLUB

- Trade register certificate or certificate of incorporation or equivalent
- Articles of association or Memorandum or equivalent (*)
- **Bank statement** (latest bank statement)
- Latest Financial Statements (latest fiscal year) (*)
- Organizational charts (*)

MANDATORY INFORMATION

LEGAL REPRESENTATIVE

Copy of valid Passport or ID

For countries outside the EEA, this document must be certified through a reliable and acceptable third party: notary, lawyer, national post office, official passport chips certificate, etc.

MANDATORY INFORMATION

UBO(s)

Extract of the UBO register

If unavailable (for countries outside the EU) any official document mentioning name, surname, date and place of birth (e.g. annual report, shareholder register) or a copy of valid Passport or ID.

(*) For those documents, in addition to the original copy please provide a translation in one of the three FIFA official languages (English, Spanish and French) if not originally issued in those languages

Compliance assessment

- The FCH is a licensed payment service provider. As such it is required to abide by relevant EU and French legislation, particularly regarding anti-money-laundering (AML) laws.
- The compliance assessment will be performed on all parties to a transaction.
- No money will be requested or paid until the relevant parties have passed the compliance assessment.
- Compliance assessments are performed on a transactional basis, i.e. each transaction is treated individually and a compliance pass or fail for one transaction does not mean the club will pass or fail the compliance assessment for a different transaction.

Three parts to the compliance assessment



Articles 15 - 16 FCHR



OVERVIEW

Payment process

Processing payments through the FCH platform



Overall process and status



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Conclusions & challenges

Overall

Good performance of the EPP system & examples of how initial FCH objectives are achieved

Waivers

High % of cases with waivers as a reason for lack of distribution of training rewards in the past

Change in mindset already observed but still work to be done

- Clubs and MAs getting used to TMS & FCH new processes and platforms
- Practice aligned with CH objectives (e.g. 5% deducted from transfer fees, responsibility to pay not ceded)
- TMS compliance issues identified in an automatic way (e.g. upload of proof of payment, club categorization by MAs)

Potential risks & challenges

- Compliance assessment may slow down payment processing: reputational and operational risks
- Initial challenges with FCH IT systems, requirements and notifications

Strike the right balances

- New role of FIFA administration as initiators, "coaches" of the parties and decision body
- EPP (and FCH) process efficient/complete, automation/parties' right to be heard & regulatory obligations
- MA & clubs education vs. potential sanctions

For any questions or further information, please do not hesitate to contact:

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Or visit our websites:

www.fifaclearinghouse.org fifa.com/legal/football-regulatory/clearing-house



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Questions?