

Brief in Support of Motion on Notice:

Vancouver to Provide Real Grass Not Artificial Turf for 2015 FIFA Women's World Cup

MOVER: Councillor Carr

SECONDER: Councillor Ball

This brief is presented to the Mayor and Councillors of the City of Vancouver in support of the Motion brought by Councillor Carr seeking to have the 2015 Women's World Cup games to be played in Vancouver on real grass, as opposed to artificial turf.

This brief is submitted on behalf of the elite women soccer players who will be participating in the FIFA Women's World Cup Canada 2015 by the lawyers representing those athletes in their challenge before the Human Rights Tribunal of Ontario to the decision to hold the tournament on artificial turf fields.

The decision to hold the tournament on artificial turf constitutes gender discrimination as detailed below.

The City of Vancouver will be highlighted as the tournament is played. The games played in Vancouver, most notably the final game, will be watched by millions around the world. Vancouver will be in the world's spotlight.

The elite women soccer players of the world urge the City of Vancouver to disassociate itself from this blatant discrimination and to take steps to ensure that the reputation of the City is not tarnished by being party to discriminatory conduct.

The Importance of Soccer Generally and the 2015 Women's World Cup in Particular

1. Soccer is the world's most popular sport. The FIFA World Cup is soccer's preeminent event. The women's World Cup is the largest women's sporting event in the world. More than 125 nations are participating in qualifying matches to secure one of 24 spots in next year's World Cup. Tatjana Haenni, FIFA's deputy director of women's football competitions, describes it as the "most important" international competition for women. According to Haenni, "the world will be watching." Canadian Soccer Association ("CSA") Secretary Montopoli likewise says, "[t]he FIFA Women's World Cup is a world-class competition that offers the best in football from around the globe. It is important that Canada produces a world-class stage for this competition." Tournament organizers have selected the slogan "To a Greater Goal" for the 2015 World Cup. CSA President Montalgiani has explained: "For sport, for women, for Canada: those are three qualities that highlight our ambitions in hosting a successful FIFA Women's World Cup...Our Official Slogan serves a dual purpose for the sport and for humanity. It represents the best of on-field performance and a unique victory for all, beginning with girls and women." ([The Globe and Mail](#), Aug. 17, 2013; [FIFA](#), Mar. 21, 2013; [Forbes](#), Sep. 14, 2014.)

The Critical Role of the Field of Play and the Risks Posed by Plastic Pitches

2. As one male international footballer has put it, “the most important thing in soccer is the field.” The outsized role of the field results from soccer’s unique attributes; compared with Canadian or American football, soccer players wear little in the way of protective clothing. In soccer, unlike baseball or rugby, there is sustained interaction between the ball and the playing surface. The role of the field in soccer is more analogous to the ice in hockey, and the artificial turf proposal for the women’s World Cup is akin to forcing elite female hockey players to compete and skate on soft, slushy ice, while the men play on a pristine rink – except that the soccer discrimination is arguably even more dangerous. In hockey, unlike soccer, the players wear extensive protective gear. ([Tampa Bay Times](#), Jul. 3, 2014.)
3. FIFA itself has long recognized the centrality of field conditions to the game of soccer. Publications such as FIFA Quality Concept for Football Turf, the FIFA Handbook of Field Requirements and the FIFA Handbook of Field Test Methods offer hundreds of pages of information and opinion about various aspects of soccer field playing surfaces.
4. FIFA has also recognized that field considerations with regard to elite soccer players, such as those who will participate in the women’s World Cup, differ from the perspective of non-elite players. The results of the 2013 survey of top female players were conclusive: a clear majority of the 190 athletes questioned believed that artificial turf altered and degraded competition. 77% of them agreed that all matches at a major tournament should be played on natural turf; only 8% disagreed. Furthermore, 80% of the athletes admitted they were less likely to attempt slide tackles on artificial turf than on grass.
5. Earlier this year, FIFA’s own magazine noted that “non-grass pitches are widely regarded as deeply problematic” and quoted an observation from a leading soccer reporter that the “clear view” of elite soccer players is that artificial turf fields are unacceptable. ([FIFA](#), Mar. 14, 2014.)
6. Elite players have refused to play on plastic pitches, including the specific ones currently proposed for next year’s World Cup. As FIFA Weekly reported: “International sides and prestigious visiting club teams like Manchester United routinely refuse to play on artificial surfaces, insisting on grass overlays.” FIFA admits that Vancouver’s BC Place – selected for the World Cup final – is “particularly controversial” and has detailed the refusal of multiple elite male players to participate in club matches at the site. ([FIFA](#), Mar. 14, 2014.)
7. Other publications have provided similar reports of male players boycotting artificial turf fields generally and CSA’s selected final’s field in particular. And players for the Canadian national teams – male and female, current and former – have repeatedly decried soccer on artificial turf and stated a strong preference for playing on grass. As CSA’s first official Ambassador to the World Cup, Kara Lang, has stated: “No soccer player prefers FieldTurf. It pales in comparison to a well-manicured grass pitch and takes some getting used to.” ([Canadian Soccer News](#), Aug. 25, 2013; [espnW](#), Jun. 6, 2013; [The Equalizer](#), Sep. 12, 2014; [The Province](#), Aug. 31, 2014; [The 11: Canada’s Online Soccer Magazine](#), Jul. 31, 2013; [World Soccer Talk](#), Aug. 13, 2014.)

8. One key reason the players overwhelmingly prefer grass is that artificial turf changes the way the game was meant to be played. The ball bounces and rolls differently. Moreover, the hard, abrasive artificial surface inhibits aggressive play. Fan-favorite slide tackles and diving headers (such as the Robin van Persie swan dive which was the signature moment of the 2014 men's World Cup), will be noticeably absent from a World Cup played on artificial turf. ([The Globe and Mail](#), Sep. 28, 2006.)
9. The players' perceptions about the drawbacks and risks of elite soccer on artificial turf are also well-founded. Turf exposes players to injuries that do not exist on natural grass, such as skin lesions, abrasions and lacerations. The pictures below show turf injuries suffered by professional women players. Sydney Leroux of the United States and Samantha Kerr of Australia reportedly suffered these injuries on FieldTurf, the same surface that will be used in four out of the six World Cup venues. Nadine Angerer of Germany also suffered an abrasion on a synthetic surface.

Artificial Turf Abrasions

Sydney Leroux
United States



April 14, 2013
Twitter: [@sydneyleroux](#)

Samantha Kerr
Australia



May 12, 2013
Twitter: [@samkerr1](#)

Nadine Angerer
Germany



January 24, 2014
Twitter: [@NAngerer](#)

10. In addition, artificial turf is uniquely vulnerable to degradation upon installation as a result of the effects of weathering, brushing and painting. CSA's site choice for the finals is particularly susceptible to such adverse effects as it is in use more than 200 days a year according to a report published in 2013. This type of use makes artificial turf an even more dangerous and difficult surface on which to play. ([PavCo.](#))

11. The most reliable scientific research indicates that there is a higher risk of serious injury to lower extremity joints on artificial turf than on natural grass. According to a 2013 article, “reliable biomechanical data suggest that both the torque and strain experienced by lower extremity joints generated by artificial surfaces may be more than those generated by natural grass fields.” In a 2010 study on playing surfaces and ACL strain, researchers also discovered that the “natural grass and cleat combination produced less strain in the ACL than any other combination.” Epidemiological research published in 2014, which surveyed 99 Major League Soccer players, found that 94% of the players believed third-generation artificial turf, i.e. FieldTurf, was more likely to increase the risk of injury when compared to natural grass. ([Journal of the American Academy of Orthopedic Surgeons](#), May 2013; [Journal of Biomechanical Engineering](#), Jan. 2010; [BMC Sports Science, Medicine and Rehabilitation](#), Mar. 2014.)
12. Research by the National Football League has corroborated these studies, finding that elite players were more susceptible to injuries on artificial turf – even on the newest artificial surfaces – than on grass. After evaluating over 3,000 knee and ankle sprains, the study found that these types of injuries were 22% more likely to occur on FieldTurf than on grass, a difference the authors called “statistically significant.” ([The American Journal of Sports Medicine](#), Oct. 2012.)

CSA, FIFA, the World Cup and Natural Grass

13. In light of artificial turf’s actual and perceived safety risks, it is no surprise that CSA and FIFA have ensured that *men’s* World Cup tournament games are consistently played on grass. Notably, and despite an outcry from fans in certain cities across Canada, CSA elected to have all of the Canadian men’s team’s home World Cup qualifying matches for the 2014 World Cup played on grass. According to published reports, the artificial turf at BC Place and Commonwealth Stadium was the “dealbreaker” leading CSA to forego Canadian men’s games in Vancouver and Edmonton. Nevertheless, CSA has selected both of these very sites to host the actual tournament matches for the women’s World Cup. ([New York Times](#), Feb. 4, 2012.)
14. CSA General Secretary Montopoli’s own comments explaining the decision to give the men exclusively grass surfaces are direct and material evidence of gender discrimination. According to a published account, Montopoli stated: “On the men’s side, if we’re talking World Cup qualification matches, then you have to look at the surface that you’re playing on... It has to be grass... I think the other part is our coaching staff and players prefer grass. There’s a preference for that.” ([Canadian Soccer News](#), Jan. 30, 2012.)
15. As for FIFA, it ensured that the just-completed 2014 World Cup in Brazil was staged on grass fields, as was every men’s World Cup since the first World Cup in 1930. FIFA has similarly ensured that the men will play on grass fields for years to come, regardless of any logistical challenges. The 2018 men’s World Cup, in Russia, will be played on grass, despite Russia’s cold and challenging climate. Likewise, the 2022 men’s World Cup, in Qatar, will feature grass surfaces, even though Qatar is a desert country with extreme

drought conditions, where temperatures routinely exceed 110 degrees in the summer. ([FIFA](#); [FIFA](#).)

16. The 1994 men's World Cup exemplifies the lengths to which host countries and FIFA have gone to ensure the men play soccer's premier event on grass. For that event, FIFA installed a real grass field over the artificial turf of the Pontiac Silverdome in Detroit. FIFA spent over \$2 million dollars on the effort. The Meadowlands laid down 5,400 tons of soil over its AstroTurf to hold a grass overlay. Now, twenty years later, the cost for similar grass fields are relatively inexpensive, with one expert calling the job for Canada "laughably easy." ([New York Times](#), Jun. 5, 1994; [New York Times](#), Aug. 21, 2014.)

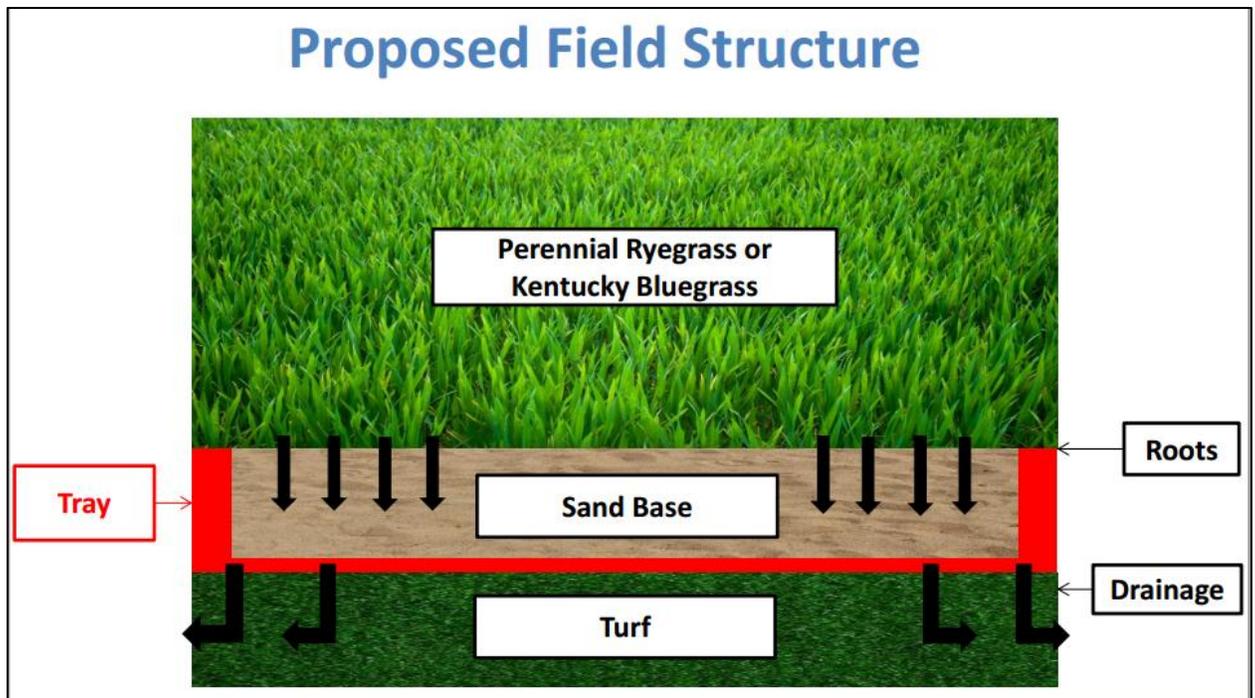
CSA's Past History of Gender Discrimination and Role in the Current Code Violations

17. CSA's decision to subject the women participating in the World Cup to a second-class surface appears to be part of a consistent pattern and practice of discrimination within CSA regarding gender equality. CSA has been a male-dominated organization throughout its history. Of the current board, only 3 of the 13 members are women.
18. In 2010, CSA's treatment of the Canadian women's national team players resulted in the players retaining legal counsel and considering an action in the Court of Arbitration for Sport. At the center of the Canadian women's concerns was CSA's discriminatory treatment of the female players in terms of compensation in comparison to the men's national team. ([Toronto Star](#), Feb. 9, 2011.)
19. CSA had the power to submit its bid to host the women's World Cup 2015 on the basis that games would be played on grass. Instead it chose to submit a bid featuring second-rate artificial turf. CSA's decision constitutes discrimination on the basis of gender.
20. CSA officials have also revealed that one of its principal goals in hosting the women's World Cup is to enhance Canada's odds of obtaining the 2026 men's World Cup or, as CSA President Montagliani publicly describes it, "the *big* World Cup." (emphasis added) Earlier this year, CSA General Secretary Montopoli declared: "After we've completed 2015 we will have hosted every FIFA competition there is of international standard except for the men's World Cup, so obviously that would be the one we would want to see if we can secure for Canada." ([Global News](#), Jul. 15, 2014.)

Installing Premier Temporary Grass Fields That Are Proven To Work And Affordable Is Easy.

21. It is technically possible to avoid this blatant gender discrimination without excessive costs.
22. First, it would involve covering the artificial surface with custom-molded trays, protecting the existing plastic pitch and allowing for proper drainage. Second, it would require filling the trays with a sand and organic base, and laying grass on top. This will allow grass to take root and let water drain through.

23. Several companies and experts have offered to discount their time and materials to make a solution as inexpensive as possible. Businesses and individuals could step up to defray costs through charitable donations. And, of course, the Canadian Soccer Association and FIFA clearly have the financial wherewithal to fund this solution.
24. The “modular” tray system for grass was used successfully at the 1994 men’s World Cup and 1999 women’s World Cup. Trays with a sand base and rooted-in grass can be produced within a few months. The sand base will provide for drainage which in turn protects the field in case of rain. The resulting temporary grass fields should mirror the performance quality of the world’s best permanent grass pitches.
25. Using grass farms in Canada would sidestep agricultural barriers to importing sod into Canada. Two major grass farms in Canada can service all 6 World Cup sites. Eagle Lake Turf Farm, which is experienced in providing premier sports fields, can service the following World Cup sites: Edmonton, Winnipeg, and Vancouver. Zander Farms, which is experienced in providing premier sports fields, can service the following World Cup sites: Montreal, Ottawa, and Moncton.
26. While the financing of the plan can vary based on vendor discounts and the extent of charitable donations, a reasonable expense estimate is between \$300,000-500,000 per venue, which includes the cost of the trays, grass, grass protection and labor. Much of this cost can benefit Canadian vendors, including Canadian grass producers and grass experts.



27.