



MEMORANDUM

From: Claude Ramoni

To: Alexandr Martinov - FIDE

Date: 13 December 2025

Concerns: Participation of Russian and Belarusian teams in Chess Competitions

Dear Alexandr,

You informed us that the FIDE General Assembly will be required to vote on motions to allow the return to competition^S of teams from Russia and Belarus under the following conditions:

- For adult competitions, teams from Russia and Belarus shall compete as “neutrals”;
- For youth and junior competitions, teams from Russia and Belarus shall be authorised to compete under their country flag;
- For teams competing in para chess, the FIDE Council shall be entitled to decide on the flag under which Russian and Belarus teams will be competing based on the recommendation by the International Paralympic Committee (“IPC”).

You have requested our opinion as to whether such resolution would be compliant with the current IOC Recommendations.

A. Introduction

Initially, in response to the war in Ukraine, the IOC issued in February 2022 a recommendation to exclude all Russian and Belarusian athletes from international competitions. This recommendation was followed by the majority of the sporting community; at that time, the participation of Russian or Belarusian teams was not consistent with IOC position.

In three awards issued in July 2022 by the same panel of arbitrators from the CAS in cases relating to the sport of football¹, the CAS confirmed decisions issued by UEFA and FIFA excluding Russian teams and clubs from football competitions. The Panel held in such awards that UEFA and FIFA had demonstrated that high safety concerns were justifying the exclusion of Russian teams from international competitions and that such a ban was proportionate.

¹ CAS 2022/A/8708 Football Union of Russia v FIFA; CAS 2022/A/8709 Football Union of Russia v. UEFA & al.; CAS 2022/A/8865, 8866, 8867 & 8868 FC Zenith JSC, FC Sochi, PFC CSKA Moscow & FC Dynamo Moscow v UEFA.

The Panel specified that FIFA and UEFA were faced with “*extraordinary and unprecedented circumstances*”, namely the chronological proximity of the conflict and the associated risks, and that the CAS issued its decision by a majority decision. Moreover, in all three awards, the Panel insisted on the fact that it was cognisant that over time the circumstances that persuaded the majority of the Panel to confirm the ban on Russian teams would change. The Panel further insisted on the fact that the FIFA and UEFA decisions were “*temporary*” and expressed hope that “*circumstances develop in a way that the suspension can be properly lifted*”.

On 14 September 2022, the UN Special Rapporteur in the field of cultural rights and the UN Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance issued a letter to the IOC President Thomas Bach, raising notably the following concerns²:

We express serious concern, however, about the recommendation to ban Russian and Belarusian athletes and officials such as judges from international competitions, based solely on their nationality, as a matter of principle. This raises serious issues of non-discrimination. A number of international sports federations immediately followed the recommendation of the Executive Committee. While we acknowledge that the Executive Committee recommended that Russian and Belarusian athletes could be accepted under certain circumstances as neutral athletes or neutral teams, we remain concerned that this only applied in situations where the full restriction of their participation was not possible.

We also appreciate the objective sought by the Executive Committee to protect the integrity of global sports competitions and the safety of all the participants. We remind, however, that although such concerns may be legitimate objectives under international law to justify differential treatment, the least restrictive measures must always be sought and envisaged in the first instance.

On 3 May 2023, the UN Special Rapporteur in the field of cultural rights made the following statements in a document entitled “Q & A on the participation of Russian and Belarusian athletes in international sport competitions”³:

4. Why is the decision of the IOC to ban Russian and Belarusian athletes and officials from international competitions discriminatory and inconsistent with the IOC responsibility to respect human rights?

Non-discrimination constitutes a basic and general principle relating to the protection of human rights. It is enshrined in the Universal Declaration of Human Rights and virtually all core human rights treaties, including the International Covenant on Civil and Political Rights (article 2, paragraph 1) and the International Covenant on Economic, Social and Cultural Rights (article 2, paragraph 2).

² <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gld=27552>

³ <https://www.ohchr.org/sites/default/files/documents/issues/culturalrights/activities/SR-CulturalRights-QA-4May2023-en.pdf>

Human rights must be exercised without discrimination of any kind.

“Discrimination” constitutes any distinction, exclusion, restriction or preference or other differential treatment that is directly, or indirectly based on prohibited grounds of discrimination which has the intention or effect of nullifying or impairing the equal recognition, enjoyment or exercise of human rights.

Differential treatment based on prohibited grounds will be considered as discriminatory unless the justification for differentiation is reasonable and objective. This will include an assessment as to whether the aim and effects of the measures or omissions are legitimate, compatible with human rights standards and solely for the purpose of promoting the general welfare in a democratic society. In addition, there must be a clear and reasonable relationship of proportionality between the aim sought to be realised and the measures or omissions and their effects.

6. How does this apply to the ban against Russian and Belarusian athletes in sports competition?

A blanket ban based solely on nationality is the most restrictive measure, not the least restrictive measure, as required by international human rights law. It is disproportionate to the aim that it seeks to achieve. For this reason, it is contrary to international human rights law, both as restriction to cultural rights and even more so as a measure that creates direct discrimination.

10. What could be legitimate criteria for banning individual athletes from sports competitions?

In her discussions with the IOC, the Special Rapporteur proposed that if all mitigating measures fail and decision is taken to ban individual athletes, the following criteria apply:

- Any ban or restrictions should apply to all athletes regardless of nationality / national origin (as well as on any prohibited grounds under international law). No restriction should be applied to any athlete that is not applied to all.

On 28 March 2023, further to the opinion of the UN Special Rapporteurs, and as athletes from Russia and Belarus were taking part as neutrals in numerous competitions without incidents, the IOC shifted away from its initial recommendation to impose a blanket ban and recommended that Russian and Belarusian athletes be admitted as “Individual Neutral Athletes”.

The IOC explains this change of opinion for the following reasons⁴:

Firstly, the most important thing that has changed since February 2022 is that participation of neutral athletes with Russian and Belarusian passports in competitions and international competitions has already been implemented and works. This is happening almost every day in a number of sports. It is most prominently evident in tennis, but also in cycling, table tennis, ice hockey, handball, football and in other leagues in the United States, in Europe and elsewhere on other continents. There have been no security incidents in any of those competitions, or none that the IOC is aware of.

Moreover, the governments on whose territory the competitions are taking place are issuing visas with very few exceptions. In other countries they are even issuing working permits where it is necessary, for these players and athletes.

Second, the other major thing that changed was [the letter the IOC received from two Special Rapporteurs from the United Nations Human Rights Council](#), who advised that a blanket ban on Russian and Belarusian athletes would be discriminatory and a flagrant violation of human rights.

⁴ <https://www.olympics.com/ioc/media/q-a-on-solidarity-with-ukraine-sanctions-against-russia-and-belarus-and-the-status-of-athletes-from-these-countries>

The IOC confirmed this position in the "Principles Relating to the Implementation of the Participation for Individual Athletes and their Support Personnel with a Russian or Belarusian Passport" for both the Olympic Games Paris 2024 and Winter Olympic Games Milano Cortina 2026. Russian and Belarusian athletes are eligible as individual neutral athletes, provided that they fulfil specific eligibility criteria.

On 27 September 2025, the IPC General Assembly voted to lift the partial suspension of the National Paralympic Committees of Belarus and Russia, thereby reinstating their full membership rights and privileges. This decision allows para-athletes from Russia and Belarus, to compete under the same conditions as all other para-athletes, including the right to compete under their national flag and/or as representatives of their national team at the Paralympic Games and in paralympic competitions, subject to their qualification in accordance with the rules of the relevant international federations⁵.

On 11 December 2025, the IOC published on its website the following resolutions taken at the Olympic Summit⁶:

The Summit also reaffirmed that athletes have a fundamental right to access sport across the world, and to compete free from political interference or pressure from governmental organisations. As role models in society, athletes have at the same time a responsibility and an obligation to respect, uphold and promote the Olympic values, before, during and after competition.

In light of the discussion around the principles, the Summit supported the IOC EB's recommendation that youth athletes with a Russian or Belarusian passport should no longer be restricted in their access to international youth competitions, in both individual and team sports. The definition of youth competitions and the application of these recommendations depends for this purpose on the regulations of each International Federation (IF). The Summit participants committed to take these discussions back to their organisations for their consideration. It was recognised that implementation by the stakeholders will take time.

B. The CAS Awards published in 2025

In the second semester of 2025, the CAS published the following awards / decisions with respect to the eligibility of Russian and Belarusian athletes to compete:

1. On 26 September 2025, the CAS issued the grounds for an award rendered on 4 June 2024 in a case opposing the Table Tennis Federation of Russia v European Table Tennis Union (CAS 2022/A/8856).

⁵ <https://www.paralympic.org/news/ipc-members-vote-not-maintain-npc-belarus-and-npc-russia-s-partial-suspensions>

⁶ <https://www.olympics.com/ioc/news/olympic-summit-reaffirms-athletes-fundamental-rights-to-access-sport-without-political-interference>

In this case, the CAS Panel ruled that a decision suspending Russian athletes was discriminatory, and that the burden was on the international federation to establish whether such discriminatory measure was nevertheless acceptable for being “necessary, reasonable and proportionate”. The Panel held in this case that the preservation of the safety and integrity of competitions was a “legitimate objective”, but that a full ban of athletes was disproportionate, and unlawful.

2. On 31 October 2025, the CAS issued another award in the case of the Russian luge federation and some of its affiliated athletes against the International Luge Federation.

Even though the grounds for this decision have not been published by the CAS yet, the Panel explained in the press release issued together with the award that “the overall exclusion of Russian athletes was not a proportionate measure to achieve the only purpose sought by FIL (i.e. preserve safe racing conditions), since additional measures could be found to conciliate safety with the participation of Russian athletes”. The Panel then ordered that Russian athletes satisfying the Individual Neutral Athletes’ criteria be allowed to compete.

3. On 2 December 2025, the CAS issued two awards upholding appeals by the Russian and Belarusian ski associations and some of their affiliated athletes against an extension of the blanket ban imposed by the International Ski and Snowboard Federation against athletes with a Russian and Belarusian passport. The CAS press release explains:

Both Panels found that the FIS Statutes protect individuals from discrimination and require the FIS to be politically neutral (Art. 5.2). Consequently, the appeals were partially upheld on the basis that the FIS decision is a blanket exclusion of athletes due to nationality, regardless of whether athletes would meet AIN eligibility criteria.

It must be noted that in those awards, para-athletes were authorised to compete in para-ski competitions without any restriction, under the same conditions as athletes from other nationalities.

C. What about teams?

With respect to team sports, the IOC has indicated in its recommendation of 2023 that “teams of athletes with a Russian or Belarusian passport cannot be considered”. In both Principles for participation of Russian athletes at the Olympic Games Paris 2024 and at the Winter Olympic Games Milano Cortina 2026, the IOC has indicated that “Teams of athletes with a Russian or Belarusian passport cannot take part in the Olympic Games”.

However, in its publication of 11 December 2025, the IOC no longer makes a distinction between individual and team sports for youth athletes:

In light of the discussion around the principles, the Summit supported the IOC EB's recommendation that youth athletes with a Russian or Belarusian passport should no longer be restricted in their access to international youth competitions, in both individual and team sports. The definition of youth competitions and the application of these recommendations depends for this purpose on the regulations of each International Federation (IF). The Summit

Similarly, the IOC has never provided any guidance as to how to define a "Team" in its Recommendation.

Actually, whilst teams from Russia and the Belarus remain fully banned in several team sports, such as football, ice hockey, etc. teams composed of Russian and Belarusian athletes regularly compete in numerous sports, including, amongst others:

- Rowing, where athletes are accepted in pair events, and four-rowers competitions.
- Canoe, where pairs are accepted, with a Russian pair achieving a fourth place at the Olympic Games Paris 2024.
- Tennis, where pairs of Russian and Belarusian athletes are allowed to compete, including at the Olympic Games Paris 2024 where a Russian pair got the silver medal.
- Table Tennis, where pairs of athletes are competing regularly in ITTF competitions.
- Figure Skating, where Russian and Belarusian pairs / couples are eligible to compete in Figure Skating, including at the Winter Olympic Games Milano Cortina 2026.
- World Aquatics, where neutral teams consisting of athletes from Russia and the Belarus competed in numerous disciplines at the 2025 World Aquatics Championships, including relay in swimming, duet and team events in artistic swimming or duet in diving.
- Fencing, with neutral teams having competed at the 2025 World Fencing Championships
- Gymnastics, with teams having taken part in the 2025 World Artistic Gymnastics Championships and the 2025 Trampoline Gymnastics World Championships
- Equestrian sports where teams of Russian and Belarusian athletes will be allowed to compete as neutrals as of 1 January 2026.
- Paraspports as there is no longer any restriction on teams affiliated with the Russian and Belarusian Paralympic Committees, at least for the disciplines managed by the IPC.

The above shows that many Olympic and Paralympic sports actually accept neutral teams consisting of Russian and Belarusian athletes.

Moreover, the UN Special Rapporteurs did not make any distinction between Russian and Belarusian individual athletes and athletes competing in team.

The Panel in the Table Tennis case mentioned above (CAS 2022/A/8856) did not make a distinction between individual athletes and teams as §194 b of the Awards reads:

- b. **The decision that Russian teams, athletes and officials will not be invited or allowed to participate in events hosted by ETTU until further notice is set aside as unlawful.**

In our opinion, the test to be made by an international federation such as FIDE, in view of the CAS awards issued in 2025 and the need to comply with the principles of non-discrimination and of proportionality is whether, under the current circumstances, a ban on Russian and Belarusian team in Chess would be proportionate or whether less restrictive measures (such as competing under a neutral banner) may reach the same goal.

D. Conclusions

In view of the above, we are of the opinion that the proposed resolution by FIDE for its General Assembly is fully consistent with the IOC and IPC latest position and recommendation, as well as with the practice of numerous sport federations.

We assume that the FIDE has performed an assessment of the risks posed by the return of players with a Russian and Belarusian passport as neutrals in its team competitions. At least, to our knowledge, the participation of neutral teams consisting of Russian and Belarus athletes in numerous sports, including Chess, did not cause any major disturbance that could justify a continuation of a blanket ban. In the opposite, in view of the recent shift in the CAS jurisprudence, there may be a risk in case of a legal challenge that a decision refusing to accept Russian and Belarusian teams at Chess competitions as neutrals be deemed discriminatory and disproportionate.

Done in Lausanne, on 13 December 2025

Claude RAMONI