

Implementation Doping Tests Persebaya vs Mitra Kukar Match: Evaluating Anti-Doping Regulations in Indonesian Football

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Abstract

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Doping tests play a crucial role in ensuring fairness and integrity in football. The implementation of these tests in the Persebaya vs Mitra Kukar match raised several legal and regulatory concerns regarding compliance with national and international anti-doping frameworks. This study examines the enforcement of doping regulations in Indonesian football, particularly in relation to FIFA and WADA standards. Using a normative statute approach, this research analyzes legal inconsistencies, procedural challenges, and their impact on players, clubs, and the league. This study investigates the enforcement of anti-doping regulations in Indonesian football, with a focus on the Persebaya vs. Mitra Kukar match as a case study. Despite Indonesia's formal alignment with FIFA and WADA standards, the implementation of doping control faces significant legal, procedural, and institutional challenges. Factors such as poor coordination between regulatory bodies, insufficient infrastructure, and lack of education contribute to the inefficiency of anti-doping efforts. Using a normative statute and comparative legal approach, the research identifies gaps in the national anti-doping framework and proposes reforms to enhance compliance, transparency, and public trust. The study emphasizes the need for stronger enforcement, improved stakeholder collaboration, and regular education programs to uphold fair play and the integrity of Indonesian football. These measures are essential to ensuring the integrity of Indonesian football, maintaining fair competition, and preventing future controversies that could undermine public trust in the sport.

1. Introduction

Doping in football is a critical issue that poses a threat to the integrity of the sport and compromises fair competition. With the growing emphasis on athletes' performance and achievements, the use of banned substances to enhance performance has become a significant challenge for sports authorities worldwide.¹ Doping not only violates the ethical standards of fair play but also jeopardizes the health and well-being of athletes.² The role of doping tests is fundamental in ensuring that football matches are played on a level playing field, where every player competes under the same set of rules and regulations. The proper enforcement of these tests guarantees that players do not gain an unfair advantage through illicit means, safeguarding the integrity of the competition.

In Indonesia, the implementation of anti-doping measures has been a subject of debate, particularly with the growing focus on enhancing the quality and professionalism of the domestic football league. Although Indonesia is a member of international governing bodies like FIFA³ and the World Anti-Doping Agency (WADA), the effectiveness of anti-doping regulations in Indonesian football has been questioned. The case of the doping tests conducted during the Persebaya vs. Mitra Kukar match has brought to light various legal, procedural, and regulatory challenges surrounding the enforcement of anti-doping policies in the country. This incident has not only raised concerns about compliance with WADA's global standards but also highlighted inconsistencies in the application of these rules at the domestic level.

The inconsistency in applying anti-doping measures in Indonesia can be attributed to several factors, including lack of coordination between national and international regulatory bodies, insufficient training for officials overseeing doping control, and limited resources allocated for testing procedures. These factors result in discrepancies in the enforcement of anti-doping regulations, which can have far-reaching implications for

¹ Edirlei Soares de Lima, Bruno M. C. Silva, and Gabriel Teixeira Galam, "Adaptive Virtual Reality Horror Games Based on Machine Learning and Player Modeling," *Entertainment Computing* 43 (August 1, 2022): 100515, https://doi.org/10.1016/j.entcom.2022.100515.

² "(PDF) Validity and Reliability of an Eight Antennae Ultra-Wideband Local Positioning System to Measure Performance in an Indoor Environment," *ResearchGate*, February 5, 2025,

https://www.researchgate.net/publication/346017048_Validity_and_reliability_of_an_eight_antennae_ultrawideband_local_positioning_system_to_measure_performance_in_an_indoor_environment.

³ Zachary Calo, Kim Moloney, and Kamilla Swart, "Legal-Administrative Implications of International Sport for Public Administration," *Administrative Theory & Praxis*, October 1, 2024,

https://www.tandfonline.com/doi/abs/10.1080/10841806.2023.2282923.

players, clubs, and the integrity of the competition.⁴ Moreover, the ambiguity surrounding the implementation of anti-doping policies often leads to confusion and misinterpretation, making it challenging to maintain a transparent and fair system for all stakeholders involved.

This study aims to explore the enforcement of anti-doping regulations in Indonesian football by examining the legal and procedural obstacles that hinder their effective application. The research will delve into the role of key stakeholders, such as the Indonesian Football Association (PSSI), clubs, players, and anti-doping agencies, and how their interactions affect the implementation of doping tests. Additionally, the study will analyze the impact of these regulatory challenges on the public's perception of Indonesian football and the trust in its ability to maintain a fair competitive environment. The study will also assess the alignment of Indonesia's anti-doping policies with the standards set by FIFA⁵ and WADA, identifying gaps and areas for improvement.

One of the key findings of this study is the need for stricter enforcement mechanisms and better coordination between local and international bodies. By fostering collaboration between the PSSI, WADA, and other relevant stakeholders, it is possible to enhance the effectiveness of anti-doping policies and ensure that they are adhered to at every level of competition. Furthermore, increasing transparency in the doping control process is crucial in building public trust and credibility in Indonesian football. This can be achieved through clear communication of doping test results, transparent procedures, and greater accountability for any violations. Regular education and awareness programs for athletes, coaches, and officials on anti-doping regulations are also essential to foster a culture of compliance and responsibility.

Additionally, this study highlights the importance of strengthening sanctions for those who violate anti-doping rules. By implementing more severe penalties for offenders, the deterrent effect of anti-doping policies can be heightened, thereby discouraging athletes

⁴ Mathias Schubert, Felix Eing, and Thomas Könecke, "Perceptions of Professional Esports Players on Performance-Enhancing Substances," *Performance Enhancement & Health* 10, no. 4 (October 2022): 100236, https://doi.org/10.1016/j.peh.2022.100236.

⁵ "Doping No Contexto Do Futebol," *ResearchGate*, October 22, 2024, https://doi.org/10.5102/pic.n0.2021.8943.

from resorting to banned substances.⁶ This would not only enhance the integrity of football competitions but also promote the health and safety of players.

In conclusion, this research proposes several recommendations to improve the anti-doping framework in Indonesian football. These include revising and updating the regulatory framework to align more closely with FIFA and WADA standards, enhancing the enforcement mechanisms, improving coordination among key stakeholders, and increasing transparency and education on anti-doping issues.⁷ By implementing these measures, Indonesia can strengthen its commitment to maintaining the integrity of the sport, ensuring that football remains a fair and credible competition for all involved.

2. Research Methods

This study employs a normative statute approach, which focuses on analyzing legal norms, principles, and regulations related to doping tests in Indonesian football. The research is conducted through a doctrinal study by examining primary legal sources, such as Indonesian sports law, FIFA regulations, and the World Anti-Doping Agency (WADA) Code, as well as secondary legal materials, including academic journals, legal commentaries, and case studies.

The research method involves statutory, conceptual, and comparative approaches. The statutory approach analyzes relevant laws and regulations governing anti-doping policies in Indonesian football. The conceptual approach examines the legal principles underlying doping control and fair play in sports. The comparative approach contrasts Indonesia's anti-doping regulations with international standards to identify gaps and areas for improvement.

Data collection is conducted through library research, where legal documents, government reports, and case precedents are reviewed. The collected data is then analyzed qualitatively using systematic legal interpretation, ensuring coherence between national and international legal frameworks. This method allows for a comprehensive understanding of

⁶ "(PDF) Structural and Functional Interaction between International Law and Lex Sportiva and Technical Methods of Transforming Their Norms," *ResearchGate*, December 9, 2024, https://doi.org/10.24833/0869-0049-2022-3-100-118.

⁷ "CAS 2018/A/5546, José Paolo Guerrero v. Fédération Internationale de Football Association (FIFA), CAS 2018/A/5571, World Anti-Doping Agency (WADA) v. FIFA & José Paolo Guerrero, Award of 30 July 2018 (Operative Part of 14 May 2018)," in *ResearchGate*, 2024, https://doi.org/10.1007/15757_2022_36.

the legal challenges surrounding doping tests in the Persebaya vs Mitra Kukar match and provides recommendations for policy improvements.

3. Doping Tests in Indonesian Football: Challenges and Implementation

Doping tests serve as a fundamental mechanism to ensure fair play and maintain the integrity of sports. In Indonesian football, the implementation of these tests remains a complex issue due to limited resources, inconsistent enforcement, and lack of awareness among stakeholders. The Persebaya vs Mitra Kukar match brought to light several concerns regarding the effectiveness of doping control measures, particularly in terms of procedural transparency, sample collection, and result management.

One major challenge is the inconsistent application of doping tests across different competitions. While FIFA mandates strict anti-doping measures, their enforcement in Indonesia is often fragmented, leading to uncertainty in sanctioning players and clubs. Additionally, logistical constraints, including inadequate testing facilities and trained personnel, further hinder the smooth execution of doping control programs.

Another pressing issue is the lack of transparency in the doping control process. In many cases, athletes and clubs are not adequately informed about the procedures involved, leading to confusion and disputes over test results. The absence of a clear and standardized protocol for handling test samples, result announcements, and appeals has raised concerns among stakeholders. The controversy surrounding the Persebaya vs Mitra Kukar match demonstrates the urgent need for a more structured and accountable doping control system.

The Persebaya vs Mitra Kukar match has sparked significant controversy, shedding light on the broader issue of doping control in Indonesian football. Allegations and suspicions surrounding the use of performance-enhancing substances have raised questions about the effectiveness of the current anti-doping framework. This incident underscores the necessity for a more structured and accountable doping control system to uphold the integrity of the sport.

Doping control is a fundamental aspect of modern sports, ensuring fair competition and protecting athletes' health. The World Anti-Doping Agency (WADA) sets international standards for drug testing, yet the implementation of these regulations varies significantly across different countries and leagues. In Indonesian football, inconsistent enforcement of anti-doping policies has led to concerns about transparency and accountability.

The match between Persebaya and Mitra Kukar was marred by allegations of dopingrelated irregularities. Reports suggest that some players may have been subjected to inadequate testing procedures, raising doubts about the credibility of the results. Additionally, the lack of clear communication from regulatory bodies has fueled public distrust and speculation.

One of the major weaknesses in Indonesia's doping control system is the inconsistency in testing protocols. Unlike in well-regulated leagues, where players undergo routine and random testing, Indonesian football has faced issues with the frequency and transparency of drug testing. The absence of standardized procedures creates loopholes that can be exploited.

To ensure fairness, all football clubs should adhere to standardized drug-testing protocols. Random testing should be conducted throughout the season, not just before or after highprofile matches. The use of biological passports, which track athletes' physiological markers over time, could also help detect irregularities.

A truly independent body should be established to oversee doping control in Indonesian football. This entity should operate separately from the Indonesian Football Association (PSSI) and club management to prevent conflicts of interest. Transparency in sample collection, testing, and result dissemination must be prioritized.

A clear and strict enforcement mechanism must be established to ensure that doping violations are met with appropriate sanctions. A tiered penalty system, including suspensions, fines, and bans, should be implemented to deter future infractions. Additionally, all rulings should be publicly accessible to promote transparency and accountability. The Indonesian Football Association (PSSI) must take a proactive role in implementing comprehensive anti-doping policies. This includes working with international bodies to ensure compliance with global standards. Clubs must educate their players on the risks and consequences of doping. Implementing internal monitoring systems and encouraging a culture of clean sportsmanship will further support anti-doping efforts. The media plays a crucial role in holding regulatory bodies accountable. Increased coverage of doping-related issues and investigative reporting can help pressure authorities to implement necessary reforms. Additionally, educating the public about the importance of anti-doping measures fosters a collective effort to uphold fair play in football.

The controversy surrounding the Persebaya vs Mitra Kukar match serves as a wake-up call for Indonesian football to reform its doping control system. Without a structured and accountable anti-doping framework, the integrity of the sport remains at risk. By implementing standardized testing protocols, establishing independent oversight bodies, improving infrastructure, and enforcing strict sanctions, Indonesia can ensure a fairer and more transparent football environment. Moving forward, all stakeholders must collaborate to strengthen anti-doping efforts and restore public trust in the sport.

3.1. Regulatory Framework of Anti-Doping Policies in Indonesia

Indonesian football follows the national anti-doping regulations set by the Indonesia Anti-Doping Organization (IADO) in accordance with the World Anti-Doping Code (WADA) and FIFA's Anti-Doping Regulations. However, discrepancies between national enforcement and international standards create legal ambiguity. FIFA emphasizes strict liability, meaning athletes are responsible for any prohibited substance found in their bodies, regardless of intent. This principle is sometimes difficult to apply in Indonesia due to weak institutional coordination and a lack of clear procedural guidelines for local leagues.

Moreover, sanctions for doping violations vary, raising concerns about due process and fairness. While FIFA and WADA impose standardized penalties, the enforcement in Indonesia often depends on the discretion of football authorities, which may lead to inconsistencies in punishment. The Persebaya vs Mitra Kukar case exemplifies these regulatory gaps, as questions arose regarding procedural compliance and legal accountability. In some cases, players who test positive for banned substances receive lenient sanctions, while others face harsh penalties, creating a sense of injustice among athletes and clubs. The inconsistency in punishment also undermines the credibility of the anti-doping system and may discourage compliance among players and teams.

The Persebaya vs Mitra Kukar case exemplifies these regulatory gaps, as questions arose regarding procedural compliance and legal accountability. The lack of clear guidelines on the appeals process and the role of independent bodies in reviewing doping cases has further complicated the situation. The ambiguity in existing regulations makes it difficult for players and clubs to navigate the legal aspects of doping allegations, leading to prolonged disputes and potential reputational damage.

3.2. FIFA's Anti-Doping Regulations and Their Application in Indonesia

FIFA's anti-doping framework aligns with WADA's strict liability approach and mandates thorough testing procedures in all FIFA-sanctioned events. It includes random and targeted testing, therapeutic use exemptions (TUEs) for medical conditions, and a structured appeals process for accused players. However, Indonesia faces challenges in fully adopting FIFA's model due to budgetary constraints, lack of independent oversight, and limited testing frequency in domestic competitions. Another issue is the education and awareness among players and coaching staff. Many Indonesian footballers lack sufficient knowledge about prohibited substances, which increases the risk of unintentional doping violations. Unlike European leagues that invest in continuous anti-doping education, Indonesian football still struggles with comprehensive outreach programs to ensure compliance, leaving many players unaware of the substances that could result in violations. This lack of structured education increases the risk of unintentional doping cases, as athletes may unknowingly consume prohibited substances through supplements or medication. Additionally, the absence of regular workshops and awareness campaigns further widens the knowledge gap between Indonesian players and their international counterparts, making it essential for football authorities to prioritize anti-doping education as part of a long-term strategy to uphold fair play and integrity in the sport.

The absence of independent oversight in doping investigations is another major concern.

In many cases, doping allegations in Indonesia are handled internally by football authorities, raising concerns about potential bias and conflicts of interest. Unlike international systems where independent anti-doping agencies oversee the process, Indonesia still relies heavily on football governing bodies to manage doping-related disputes, which can lead to lack of transparency and accountability.

3.3. Strengthening Indonesia's Anti-Doping Policies: A Way Forward

To address these challenges, Indonesia must reinforce its anti-doping policies by:

- Enhancing legal certainty through clearer national regulations aligned with FIFA and WADA standards. This includes developing detailed procedural guidelines for doping tests, result management, and the appeals process to ensure consistency and fairness..
- Improving coordination between IADO, PSSI (Indonesian Football Federation), and international bodies to ensure uniform enforcement. Better collaboration with WADA⁸ and FIFA⁹ could help strengthen Indonesia's anti-doping infrastructure.
- Investing in testing facilities and training anti-doping officers to improve procedural efficiency. Establishing more advanced laboratories and equipping personnel with proper knowledge and tools can help minimize errors and delays in the doping control process.
- Expanding educational campaigns for players, coaches, and club officials to raise awareness about doping risks. Implementing mandatory anti-doping workshops and integrating doping awareness into player development programs can help prevent inadvertent violations.
- Strengthening sanctions and enforcement mechanisms to deter future violations while ensuring fairness in the appeal process. This includes standardizing penalties for doping offenses and ensuring that all accused athletes receive due process in their hearings

⁸ "The Wada Test | Request PDF," *ResearchGate*, February 6, 2025, https://doi.org/10.1097/WCO.0b013e328328f32e.

⁹ "Doping in eSports: Need for a Techno Legal Synchrony," *ResearchGate*, December 9, 2024, https://doi.org/10.1007/s40318-023-00236-7.

• Establishing an independent anti-doping body to oversee doping investigations and adjudication. A neutral organization would help eliminate bias and increase trust in the doping control system.

The Persebaya vs Mitra Kukar case serves as a crucial lesson for Indonesian football authorities. By implementing these measures, Indonesia can align more closely with FIFA's anti-doping policies, ensuring integrity and fair competition in domestic and international matches. Strengthening the regulatory framework will not only improve Indonesia's credibility in global football but also protect athletes from unfair treatment and safeguard the sport's integrity for future generations. By addressing these issues, Indonesian football can align more closely with FIFA's anti-doping policies, ensuring integrity and fair competition in domestic and international matches.

4. Conclusion

The implementation of doping tests in Indonesian football, particularly in the Persebaya vs Mitra Kukar match, highlights significant legal and regulatory challenges. While Indonesia adheres to FIFA and WADA anti-doping frameworks, inconsistencies in enforcement, inadequate testing facilities, and a lack of structured educational programs hinder effective doping control. The principle of strict liability remains difficult to apply due to procedural ambiguities and weak institutional coordination.

Unlike European leagues that invest in continuous anti-doping education, Indonesian football still struggles with comprehensive outreach programs to ensure compliance, leading to a higher risk of unintentional doping violations. To strengthen anti-doping policies, Indonesia must enhance legal certainty, improve coordination between governing bodies, invest in better testing infrastructure, and prioritize athlete education. By addressing these issues, Indonesian football can align more closely with global anti-doping standards, ensuring fair competition and maintaining the integrity of the sport.

References

Calo, Zachary, Kim Moloney, and Kamilla Swart. "Legal-Administrative Implications of International Sport for Public Administration." *Administrative Theory & Praxis*, October 1, 2024.

https://www.tandfonline.com/doi/abs/10.1080/10841806.2023.2282923.

"CAS 2018/A/5546, José Paolo Guerrero v. Fédération Internationale de Football Association (FIFA), CAS 2018/A/5571, World Anti-Doping Agency (WADA) v. FIFA & José Paolo Guerrero, Award of 30 July 2018 (Operative Part of 14 May 2018)." In *ResearchGate*, 2024. https://doi.org/10.1007/15757_2022_36.

- "Doping in eSports: Need for a Techno Legal Synchrony." *ResearchGate*, December 9, 2024. https://doi.org/10.1007/s40318-023-00236-7.
- "Doping No Contexto Do Futebol." *ResearchGate*, October 22, 2024. https://doi.org/10.5102/pic.n0.2021.8943.
- Lima, Edirlei Soares de, Bruno M. C. Silva, and Gabriel Teixeira Galam. "Adaptive Virtual Reality Horror Games Based on Machine Learning and Player Modeling." *Entertainment Computing* 43 (August 1, 2022): 100515. https://doi.org/10.1016/j.entcom.2022.100515.
- "(PDF) Structural and Functional Interaction between International Law and Lex Sportiva and Technical Methods of Transforming Their Norms." *ResearchGate*, December 9, 2024. https://doi.org/10.24833/0869-0049-2022-3-100-118.
- "(PDF) Validity and Reliability of an Eight Antennae Ultra-Wideband Local Positioning System to Measure Performance in an Indoor Environment." *ResearchGate*, February 5, 2025.

https://www.researchgate.net/publication/346017048_Validity_and_reliabilit y_of_an_eight_antennae_ultra-

wideband_local_positioning_system_to_measure_performance_in_an_indoor_e nvironment.

- Schubert, Mathias, Felix Eing, and Thomas Könecke. "Perceptions of Professional Esports Players on Performance-Enhancing Substances." *Performance Enhancement & Health* 10, no. 4 (October 2022): 100236. https://doi.org/10.1016/j.peh.2022.100236.
- "The Wada Test | Request PDF." *ResearchGate*, February 6, 2025. https://doi.org/10.1097/WCO.0b013e328328f32e.