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IMPLEMENTATION DOPING TESTS PERSEBAYA VS MITRA KUKAR MATCH: EVALUATING ANTI-DOPING REGULATIONS IN INDONESIAN FOOTBALL

Christian Felix Lumbanraja[1], Rafi Satrya Arvitto[2]

[12]Universitas Negeri Surabaya, Indonesia
christianlumbanraja.22098@mhs.unesa.ac.id

ABSTRACT

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.

Keywords : *Anti-doping Regulations; Doping tests; FIFA; Indonesian Football*

1. Introduction

Doping remains one of the most significant challenges to the integrity of professional sports, including football. The use of prohibited substances and methods to enhance athletic performance undermines the principles of fair competition, sportsmanship, and equal treatment among athletes. Beyond its impact on competitive fairness, doping also poses serious risks to athletes' physical and psychological health. Consequently, anti-doping regulations have become an essential component of modern sports governance, serving not only as instruments to prevent unfair competitive advantages but also as mechanisms to protect athletes and preserve public confidence in sporting competitions.[1]

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1 Fédération Internationale de Football Association (FIFA), "Anti-Doping," FIFA, accessed November 5, 2026, https://inside.fifa.com/en/legal/anti-doping

At the international level, the fight against doping is primarily governed by the World Anti-Doping Code (WADC), developed by the World Anti-Doping Agency (WADA). The Code establishes a harmonised framework for anti-doping policies, rules, and procedures applicable to sports organisations and public authorities worldwide.[2] In football, the Fédération Internationale de Football Association (FIFA) adopts anti-doping regulations based on the WADA Code to ensure consistency in doping control procedures and the enforcement of anti-doping rule violations. These regulations establish obligations for players, national football associations, and other relevant stakeholders, including compliance with testing procedures, sample collection requirements, and applicable sanctions.[3]

Indonesia has also established a national legal framework for combating doping in sports. Its commitment is reflected in the ratification of the International Convention Against Doping in Sport through Presidential Regulation Number 101 of 2007.[4] Furthermore, Law Number 11 of 2022 concerning Sports provides the national legal foundation for the organisation and development of sports in Indonesia, including the promotion of sports integrity and the protection of athletes. The implementation of anti-doping policies is supported by the Indonesia Anti-Doping Organization (IADO), formerly known as the Indonesian Anti-Doping Agency (LADI), which is responsible for carrying out national anti-doping functions in accordance with applicable international standards.[5]

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2 World Anti-Doping Agency (WADA), World Anti-Doping Code 2021 (Montreal: World Anti-Doping Agency, 2021), https://www.wada-ama.org/en/resources/world-anti-doping-program/2021-world-anti-doping-code.

3 Fédération Internationale de Football Association (FIFA), FIFA Anti-Doping Regulations: 2021 Edition (Zurich: FIFA, 2021), effective January 1, 2021, https://inside.fifa.com/en/legal/anti-doping/regulations-2021

4 Republic of Indonesia, Presidential Regulation Number 101 of 2007 concerning the Ratification of the International Convention Against Doping in Sport (Peraturan Presiden Republik Indonesia Nomor 101 Tahun 2007 tentang Pengesahan International Convention Against Doping in Sport)

5 Republic of Indonesia, Law Number 11 of 2022 concerning Sports (Undang-Undang Nomor 11 Tahun 2022 tentang Keolahragaan); Indonesia Anti-Doping Organization (IADO), IADO Rules 2024 (Jakarta: IADO, 2024), https://iado.id/h/wp-content/uploads/2024/01/IADO-Rules-ver2024.pdf

Despite the existence of these national and international regulatory frameworks, the implementation of anti-doping measures in Indonesian football continues to raise questions concerning institutional coordination, procedural compliance, and the effectiveness of enforcement. One issue that deserves particular legal examination concerns the implementation of doping tests during the Persebaya vs. Mitra Kukar football match. This case provides a relevant context for examining how anti-doping regulations are implemented within domestic football competitions and whether the procedures adopted are consistent with the applicable national regulations and international anti-doping standards. In particular, the testing process must be assessed against the requirements concerning athlete notification, sample collection, documentation, sample security, and the responsibilities of the competent anti-doping authorities.[6]

The legal complexity of anti-doping enforcement in Indonesia also concerns the relationship between international sports regulations and national institutional arrangements. Although FIFA and WADA establish internationally recognised standards, their effective implementation requires cooperation between national football governing bodies, anti-doping organisations, competition organisers, clubs, and athletes. The absence of effective coordination, adequate institutional capacity, and consistent procedural supervision may create difficulties in ensuring that doping control procedures are conducted transparently and in accordance with established standards. Therefore, the existence of anti-doping regulations alone is insufficient unless accompanied by effective implementation, institutional accountability, and appropriate legal enforcement mechanisms.

This study aims to examine the implementation of anti-doping regulations in Indonesian football, particularly in relation to the doping tests conducted during the Persebaya vs. Mitra Kukar match. It focuses on the legal framework governing anti-doping control, the respective responsibilities of relevant institutions, and the procedural challenges arising from the implementation of doping tests in domestic football competitions. Furthermore, this study analyses the extent to which Indonesia's anti-

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6 World Anti-Doping Agency (WADA), International Standard for Testing and Investigations (Montreal: World Anti-Doping Agency, 2023), available through the Indonesia Anti-Doping Organization, https://iado.id/h/index.php/id/sumber/regulasi-anti-doping/

doping framework is consistent with the standards established by FIFA and WADA. Through this examination, the research seeks to identify potential regulatory and institutional gaps and formulate recommendations for strengthening anti-doping governance in Indonesian football.

Ultimately, effective anti-doping enforcement requires more than the adoption of formal regulations. It demands consistent testing procedures, institutional coordination, transparent results management, adequate education for athletes and supporting personnel, and the protection of procedural rights. Strengthening these elements is essential to ensuring that Indonesian football adheres to internationally recognised anti-doping standards while maintaining fairness, accountability, and the credibility of sporting competitions.

2. Methods

This study employs normative legal research to examine the legal framework governing doping tests in Indonesian football, particularly in the Persebaya vs. Mitra Kukar match. It applies three approaches: the statute approach, the conceptual approach, and the comparative approach. The statute approach examines relevant national and international regulations, including Law Number 11 of 2022 concerning Sports, Presidential Regulation Number 101 of 2007, the World Anti-Doping Code, and FIFA Anti-Doping Regulations.[7] The conceptual approach analyses the principles of sports integrity, fair competition, legal certainty, and athlete protection, while the comparative approach assesses the compatibility of Indonesian regulations with WADA and FIFA standards.[8] This research uses primary legal materials, including legislation, international conventions, and anti-doping regulations, as well as secondary legal materials comprising scholarly books, journal articles, and legal commentaries. Relevant official documents concerning the match are used as supporting materials. Data are collected through library research and analysed qualitatively using legal interpretation and

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7 Republic of Indonesia, Law Number 11 of 2022 concerning Sports; Presidential Regulation Number 101 of 2007 concerning the Ratification of the International Convention Against Doping in Sport; World Anti-Doping Agency, World Anti-Doping Code 2021 (Montreal: WADA, 2021); FIFA, FIFA Anti-Doping Regulations: 2021 Edition (Zurich: FIFA, 2021).

8 Peter Mahmud Marzuki, Penelitian Hukum, revised ed. (Jakarta: Kencana, 2021).

doctrinal analysis to evaluate regulatory compliance and institutional responsibilities in the implementation of doping tests.[9]

3. Result and Discussion

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 a lack of awareness among stakeholders. The Persebaya vs. Mitra Kukar match brought to light concerns regarding the effectiveness of doping control measures, particularly procedural transparency, sample collection, and results management.[10] One major challenge is the inconsistent application of doping tests across different competitions. FIFA establishes anti-doping requirements for football, while national anti-doping organisations and football associations are responsible for implementing applicable rules within their respective jurisdictions.[11] However, differences in institutional capacity and enforcement may create challenges in ensuring consistent implementation. Logistical constraints, including the availability of testing facilities and qualified personnel, may also affect the effectiveness of doping control programmes.[12] Another pressing issue is transparency in the doping control process. Athletes must be informed of their rights and responsibilities when notified of testing, while sample collection, storage, transportation, and documentation must follow established procedures.[13] The absence of proper communication and procedural safeguards may lead to disputes concerning the handling and validity of test results. Accordingly, the Persebaya vs. Mitra Kukar incident highlights

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9 World Anti-Doping Agency, International Standard for Testing and Investigations (Montreal: WADA, 2021).

10 Indonesia Anti-Doping Organization (IADO), "Athletes', Athlete Support Personnel's, and Other Groups' Rights and Responsibilities," IADO official website

11 WADA, International Standard for Testing and Investigations (ISTI) (effective January 1, 2023), Official standard and explanation. Dokumen ini menetapkan standar mengenai perencanaan tes, pemberitahuan atlet, pengambilan sampel, keamanan sampel, dokumentasi, dan transportasi.

12 Fédération Internationale de Football Association (FIFA), "Doping Controls," FIFA official website. FIFA menjelaskan prosedur pemberitahuan atlet, pengambilan sampel, hak dan kewajiban atlet, serta pengiriman sampel ke laboratorium terakreditasi WADA.

13 The Football Association, "The Drug Testing Process," The FA official website. The FA explains the use of the Athlete Biological Passport as part of its football anti-doping programme.

the importance of a structured and accountable doping control system.[2] The controversy surrounding the Persebaya vs. Mitra Kukar match also raises broader questions about the effectiveness of Indonesia's anti-doping framework. Allegations concerning possible irregularities in doping control require careful examination against applicable national and international standards. Such an examination is necessary to determine whether the procedures complied with established requirements and whether the responsible institutions fulfilled their legal obligations.[2] Doping control is an essential component of modern sports governance, as it protects athletes' health and promotes fair competition. WADA establishes international standards governing testing, sample collection, and results management, which are implemented by anti-doping organisations and relevant sports governing bodies.[6] In football, FIFA's anti-doping framework is aligned with the WADA Code.[7] Nevertheless, effective implementation requires coordination between international organisations, national anti-doping bodies, and sports federations. One of the weaknesses that may undermine Indonesia's doping control system is inconsistency in testing procedures. International anti-doping standards provide for both in-competition and out-of-competition testing, including random and targeted testing.[8] The absence of consistent implementation and adequate procedural supervision may weaken the effectiveness of anti-doping enforcement. To strengthen fairness, football clubs and relevant authorities should ensure compliance with standardised doping control procedures. Testing should be conducted both during and outside competitions, in accordance with applicable testing plans. The Athlete Biological Passport may also serve as an additional monitoring instrument by tracking selected biological variables over time to identify potential indications of doping.[9] Furthermore, anti-doping supervision should be conducted by an organisation that operates independently in its testing and results management functions. Clear institutional responsibilities and safeguards against conflicts of interest are necessary to maintain the credibility of doping control. Transparency must also be maintained throughout sample collection, testing, and results management, while respecting athletes' privacy and procedural rights.[6] A clear enforcement mechanism is also essential to ensure that anti-doping rule violations result in appropriate sanctions. The WADA Code provides a framework for determining violations and imposing consequences, while also recognising athletes' rights to notice, a hearing, and appeal.[10] PSSI and other relevant stakeholders should therefore strengthen

coordination with IADO and international sports organisations. Football clubs should also educate athletes and support personnel about prohibited substances, anti-doping obligations, and the consequences of violations. The media can contribute by providing accurate and responsible reporting on anti-doping issues, thereby encouraging public awareness and institutional accountability. The controversy surrounding the Persebaya vs. Mitra Kukar match demonstrates the importance of strengthening Indonesia's doping control system. A more effective framework requires consistent testing procedures, clear institutional responsibilities, adequate resources, and fair enforcement. Through cooperati

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 strengthen its anti-doping framework through several measures. First, legal certainty should be enhanced by establishing clearer national regulations aligned with WADA and FIFA standards. Detailed procedural

guidelines governing doping tests, results management, and appeals are necessary to ensure consistency, transparency, and fairness.

Second, coordination among the Indonesia Anti-Doping Organization (IADO), the Indonesian Football Association (PSSI), and relevant international organisations must be improved to ensure effective and consistent enforcement. Cooperation with WADA and FIFA is essential to strengthen institutional capacity and harmonise national anti-doping practices with international standards.

Third, investment in testing facilities and the development of qualified anti-doping personnel are necessary to improve the effectiveness of doping control. Adequate infrastructure, technical expertise, and professional training can minimise procedural errors and delays in sample collection and testing.

Fourth, anti-doping education should be expanded to include players, coaches, and club officials. Mandatory educational programmes and regular workshops should address prohibited substances, supplement risks, medication use, and athletes' rights and responsibilities. These initiatives are particularly important in preventing inadvertent anti-doping rule violations.

Fifth, sanctions and enforcement mechanisms must be applied consistently while safeguarding athletes' procedural rights. Clear rules on sanctions, hearings, and appeals are essential to ensure legal certainty and prevent arbitrary or disproportionate treatment.

Finally, independent oversight of anti-doping procedures and results management must be strengthened. Institutional independence and transparent decision-making are important to prevent conflicts of interest and maintain public confidence in the anti-doping system.

The Persebaya vs. Mitra Kukar case provides an important context for evaluating the challenges of anti-doping enforcement in Indonesian football. By implementing these measures, Indonesia can strengthen the alignment of its national framework with international standards, promote fair competition, and protect athletes' rights. Ultimately, effective anti-doping governance requires not only comprehensive regulations but also institutional accountability, adequate resources, and sustained cooperation among all relevant stakeholders.

4. Conclusion

The implementation of doping tests in Indonesian football, particularly in the Persebaya

vs. Mitra Kukar match, highlights legal and regulatory challenges in anti-doping enforcement. Although Indonesia has adopted the anti-doping framework established by WADA and FIFA, inconsistencies in implementation, limited testing infrastructure, and insufficient educational programmes may undermine the effectiveness of doping control. Furthermore, procedural uncertainties and institutional coordination challenges may complicate the application of the strict liability principle and the protection of athletes' rights. Strengthening anti-doping enforcement requires greater legal certainty, improved coordination among relevant institutions, adequate testing facilities, and comprehensive education for athletes and other stakeholders. These measures are essential to prevent inadvertent violations, ensure fair and consistent enforcement, and strengthen institutional accountability. Ultimately, aligning national implementation with international anti-doping standards is crucial to maintaining fair competition, protecting athletes, and upholding the integrity of Indonesian football.

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