



A Juridical Analysis of the Title Revocation of Senegal's 2025 AFCON: A Review of Walk-out Sanctions under CAF Regulations

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Abstract

*This study analyzes the juridical conflict surrounding the revocation of the Senegal National Team's 2025 Africa Cup of Nations (AFCON) championship title by the Confédération Africaine de Football (CAF). The research focuses on the "analytical gap" between the enforcement of strict disciplinary sanctions for a match "walk-out" and the fundamental principle of legal certainty. Using a normative legal research method with a doctrinal and conceptual approach, this article examines the CAF Disciplinary Code (Articles 82–84) and the FIFA Statutes within the framework of *lex sportiva*. The results indicate that while Senegal's mid-match protest formally violated competition integrity rules, the administrative decision to annul a 1-0 on-field victory and convert it to a 3-0 loss sixty days after the final whistle severely undermines the "finality of the referee's decision" (Law 5.2 LOTG) and the stability of sporting results. Furthermore, because the team eventually returned to complete the match, the retroactive title revocation is deemed a disproportionate punitive measure. The study concludes that there is an urgent need to reform international sports law to include clear "statutes of limitations" for administrative interventions to protect vested rights and ensure that the dignity of the game is not superseded by unpredictable, retroactive adjudication.*

1. Introduction

Sports law, or *Lex Sportiva*, represents a unique and autonomous legal order characterized not only by its international nature but also by its non-governmental status, distinguishing it from traditional forms of domestic or international law¹ (Casini, 2011). As a genuine form of "global law," these sporting rules are applied uniformly across the globe, transcending national boundaries and directly affecting individuals through private acts of a constitutional nature, such as the Olympic Charter or the FIFA Statutes. In the Indonesian legal system, this global dimension is acknowledged through Law No. 11 of 2022 on Sports, which serves as a national juridical foundation for sports governance, ensuring that the development of physical and social potential remains grounded in the principles of justice and the rule of law. However, the private and transnational nature of these rules often creates complex jurisdictional challenges when global sporting norms intersect with the fundamental rights of athletes and the administrative decisions of regional confederations.

The practical implications of this global regulatory regime were severely tested during the 2025 Africa Cup of Nations (AFCON) following a controversial "walk-out" by the Senegal national team. By leaving the field of play mid-match, the team engaged in an act that squarely falls under the disciplinary jurisdiction of the *Confédération Africaine de Football* (CAF). According to Articles 82 through 84 of the CAF Disciplinary Code, such actions classified as match abandonment or refusal to play constitute a grave breach of the integrity of the competition and the ethical obligations of participants² (Confédération Africaine de Football, 2025). The legal drama escalated significantly when CAF, acting as a quasi-judicial body, decided to retroactively revoke Senegal's championship title more than two months after the tournament had concluded. This delayed intervention by a private international regulator underscores the immense power of sporting institutions as law-makers and law-enforcers, often operating outside the immediate reach of public law oversight.

¹ Lorenzo Casini, "The Making of a *Lex Sportiva* by the Court of Arbitration for Sport," *German Law Journal* 12, no. 5 (2011): 279–280. *Lex sportiva*

² Regulations of the Africa Cup of Nations 2025 (Confédération Africaine de Football, 2025)

This article aims to provide a rigorous legal analysis of this unprecedented case. The subsequent sections will evaluate the kualifikasi of Senegal's actions as a violation of *match integrity* and examine whether the revocation of a title after such a long interval is procedurally valid under the general principles of law recognized within the *Lex Sportiva* framework. By dissecting the intersection of disciplinary rules and the requirement for finality, this study seeks to offer recommendations for harmonizing the enforcement of integrity-related rules with the necessity for legal certainty in international football.

2. Problem Statement

A critical "analytical gap" arises from the conflict between the enforcement of strict disciplinary measures and the overarching doctrine of legal certainty. While *Lex Sportiva* grants sports organizations wide discretion to punish ethical violations like "walk-outs," the implementation of such sanctions must be balanced against the principle of finality in competition results. The decision to annul a championship status after a sixty-day period creates a state of legal instability that threatens the predictability and legitimacy of the sporting legal order. There is a lack of clear synchronization between the immediate punitive powers of CAF (under Articles 82-84) and the protection of the acquired rights of the winner, raising significant questions about the "statute of limitations" for administrative actions in global sports governance.

3. Methods

This study employs a normative legal research method, specifically utilizing a doctrinal approach to examine the regulatory framework of international football. The primary legal materials consist of the *Lex Sportiva* corpus, focusing on the CAF Disciplinary Code (Articles 82–84) and the FIFA Statutes regarding the integrity of competitions. The research adopts a conceptual approach to analyze the tension between disciplinary authority and the principle of *legal certainty* (finality of decisions), as well as a case-based approach to scrutinize the specific circumstances of Senegal's walk-out and the subsequent title revocation. Following the theoretical framework of Lorenzo Casini (2011), this study treats sports rules as a form of "global law" that operates independently of national governmental systems. The data, comprising international regulations, Court of Arbitration for Sport (CAS) jurisprudence, and academic literature, are analyzed qualitatively through deductive

reasoning to determine whether CAF's retroactive sanctions align with the established standards of global administrative law.

4. Discussion and Results

The norm conflict between federation disciplinary authority and the principle of legal certainty in the AFCON final dispute between Senegal and Morocco originates from Senegal's walk-out triggered by cognitive dissonance following a VAR penalty decision. This culminated in CAF's administrative ruling to annul Senegal's 1-0 on-field victory, converting it to a 3-0 loss two months later under Articles 82 and 84 of the AFCON Regulations. This retroactive intervention undermines the *finality of the referee's decision* principle (Law 5.2 LOTG), which safeguards referee sovereignty as exemplified by the "Hand of God" Maradona precedent. From a *lex sportiva* perspective, CAF's prioritization of administrative procedure over field results generates legal instability, necessitating proportionality testing per Lorenzo Casini's theoretical framework to preserve global sports law integrity

4.1. Chronology and Regulations of the Africa Cup of Nations (AFCON) 2025

In the final minutes of the football match between the Senegal National Team and the Morocco National Team, a foul was committed by Senegal. The infringement involved contact between Senegal's player number 25, Youssouf Sabaly, and Morocco's player number 10, Brahim Diaz, at the 94:52 mark. This action served as the basis for the referee's decision to award a penalty kick to Morocco following a Video Assistant Referee (VAR) review. The Senegal National Team subsequently protested the referee's decision. According to Festinger's Theory of Cognitive Dissonance, as defined in the EKOBIS journal³, this phenomenon constitutes cognitive dissonance. The Senegalese players understood that committing a foul inside the penalty box would grant a penalty to the opposing team, yet they proceeded with the action and continued to protest to the referee even after the VAR review.

This protest culminated in the Senegal National Team staged a walk-out for a portion of the match. After some time, the Senegal National Team returned to the field and resumed to

³ Alfitman, . "KONSTRUK DISONANSI KOGNITIF DALAM PENELITIAN PERILAKU KONSUMEN: APAKAH POPULARITASNYA MEMANG SUDAH MEREDUP?", *EKOBIS* 22, no. 1, (May 2017) 44-57

play. The penalty kick was taken by Brahim Diaz, but Senegal's goalkeeper, Edouard Mendy (number 16), successfully saved the shot. The match continued into extra time. In the 93:13 minute of added time, Senegal managed to score a goal, delivered by Pape Gueye (number 26). This goal led the Senegal National Team to victory once the referee blew the final whistle. In that match, Senegal was officially declared the winner by the referee with a score of 1-0.

This match between Senegal and Morocco served as the final of the Africa Cup of Nations (AFCON). The final whistle had been blown with a score of 1-0, securing the championship for Senegal. However, following Senegal's victory, Morocco, through the Fédération Royale Marocaine de Football (FRMF), filed an appeal with the Confédération Africaine de Football. This filing was based on the walk-out performed by the Senegal National Team during the match. CAF subsequently imposed a sanction by stripping Senegal of their championship title and awarding it to Morocco with a final score of 3-0⁴. This statement was released via the CAF Appeal Board Media Statement on March 17 on the official CAF website.

The CAF decision refers to Articles 82 and 84 of the Regulations of the Africa Cup of Nations, which govern withdrawals. These articles strictly state that if a team withdraws from the competition, fails to report for a match, refuses to play, or leaves the ground before the regular end of the match without the authorization of the referee, they shall be considered the loser and shall be eliminated for good from the current competition. The same applies to teams previously disqualified by a CAF decision⁵. This regulation is considered to have undermined the principle of the "finality of the referee's decision," as it overturned a field decision for administrative reasons. This principle is enshrined in Law 5.2 of the Laws of the Game (LOTG) established by the International Football Association Board (IFAB).

A primary reference for the application of the "finality of the referee's decision" principle is the 1986 World Cup match between England and Argentina. In that match, Argentine player Diego Maradona scored a highly controversial goal known as the "Hand of God." Maradona executed the goal with a heading motion, but his hand also made contact with

⁴ Confédération Africaine de Football (CAF), "CAF Appeal Board Media Statement," CAF, March 17, 2026,

⁵ Regulations of the Africa Cup of Nations 2025 (Confédération Africaine de Football, 2025)

the ball. The referee at the time blew the whistle to signal the goal's validity. Referee Bin Nasser later revealed that he did not see the position of Maradona's hand and relied solely on the linesman, who did not signal a handball⁶. This phenomenon demonstrates that even when a playing team commits an infringement, the principle of the finality of the referee's decision remains applicable.

4.2. The Legality of Senegal's Walk-Out

The imposition of sanctions by the Confédération Africaine de Football (CAF) against the Senegal National Team raises a crucial discourse regarding the limits of disciplinary authority within the *lex sportiva* ecosystem⁷. Normatively, Senegal's walk-out constitutes a clear violation of competition integrity as stipulated in Articles 82 to 84 of the AFCON Regulations. These provisions explicitly state that a team leaving the field before the end of regular time without the referee's authorization shall be deemed to have lost and disqualified⁸. However, juridical issues arise when field facts indicate that Senegal actually returned to play and completed the match until the final whistle sounded. This creates ambiguity as to whether the "automatic loss" sanction remains applicable to a team that technically won the match on the green pitch.

This legal conflict intensifies when confronted with the principle of legal certainty (legal certainty) and the doctrine of finality of results. CAF's decision to strip Senegal of its championship title was only announced on March 17, 2026⁹, approximately two months after the tournament concluded. From the perspective of global administrative law, this 60-day intervention delay generates serious legal instability against the winner's status, which should have been final (*inkracht*) post-trophy handover. The analytical gap between CAF's punitive power and the protection of vested rights reveals a lack of synchronization regarding "prescription" or time limits for administrative actions in international football governance. If match results can be altered retroactively over extended periods, competition legitimacy remains perpetually threatened by administrative uncertainty.

⁶ Abdullah Segaf, "Diego Maradona & Tangan Tuhan: Gol Paling Terkenal Dalam Sejarah Piala Dunia," *Goal.com*, June 23, 2022,

⁷ Ibid.

⁸ Regulations of the Africa Cup of Nations 2025 (Confédération Africaine de Football, 2025)

⁹ Confédération Africaine de Football (CAF), "CAF Appeal Board Media Statement," CAF, March 17, 2026,

Furthermore, CAF's post-match intervention is seen as undermining the principle *Finality of the referee's decision*. This principle states that the referee's decisions regarding on-field events are final and not subject to challenge to preserve game continuity¹⁰. Football history records the "Hand of God" Maradona precedent as evidence that even blatant technical violations validated by the referee stand firm for result certainty. By altering the score to 3-0 in Morocco's favor through desk adjudication, CAF indirectly executed an "administrative annulment" of the on-duty referee's discretion.

Finally, this analysis underscores the need for proportionality testing in every quasi-judicial decision by sports federations. Referencing Lorenzo Casini's theoretical framework, sports rules as "global law" must respect general legal principles, including procedural justice¹¹. Revoking a competitively earned championship title solely due to temporary protest actions is deemed excessive punishment relative to disciplinary enforcement goals. Therefore, synchronizing integrity enforcement via Articles 82-84 of the AFCON Regulations with legal certainty needs urgently reformulated. Without clear regulations on match result revision time limits, the dignity of *lex sportiva* risks being viewed as an unpredictable system that neglects the values of certainty central to the rule of law.

5. Conclusion

The revocation of the Senegal National Team's championship title by CAF presents a profound conflict between the strict enforcement of disciplinary regulations and the fundamental legal principles of *lex sportiva*. This study concludes that while Senegal's walk-out action constitutes a formal violation of Articles 82 and 84 of the AFCON Regulations, the administrative intervention performed sixty days after the final whistle severely undermines the principle of Legal Certainty. The "finality of the referee's decision" and the "finality of results" are the cornerstones of sports stability; allowing retroactive changes to match results after a trophy presentation creates a dangerous precedent of administrative unpredictability in global football governance.

¹⁰ The Football Association, "Law 5 - The Referee," *The FA*

¹¹ Lorenzo Casini, "The Making of a *Lex Sportiva* by the Court of Arbitration for Sport," *German Law Journal* 12, no. 5 (2011): 279–280. *Lex sportiva*

Furthermore, the implementation of sanctions in this case reveals an absence of proportionality. Stripping a title earned through technical merit on the field especially when the team eventually returned to complete the match is a disproportionate punitive measure compared to the objective of maintaining discipline. Moving forward, there is an urgent need to reform the *lex sportiva* framework within international and national sports laws to include clear "statutes of limitations" for administrative interventions. Harmonization between federative authority and general legal principles, such as procedural justice and the protection of vested rights, is essential to ensure that the dignity of the game is not superseded by rigid, retroactive administrative adjudication.

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