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Senegal's Title Battle: A Legal Look at the AFCON 2025 Decision and the CAS Proceedings

Can Tokat · April 2026 · tokatco.com/en/articles/senegal-afcon-2025-cas

Introduction

The 2025 edition of the Africa Cup of Nations (AFCON), the most recent tournament organised by the Confederation of African Football (CAF), made headlines with its final, both for the sporting contest itself and because the outcome of the tournament was ultimately decided, in a legal sense, by a confederation's disciplinary proceedings.

Following disciplinary proceedings conducted by the competent bodies of CAF, the Senegal men's national football team, which had won the 2025 Africa Cup of Nations on the pitch, was stripped of the title, and the Morocco men's national football team, its opponent in the final, was declared champion.

To briefly summarise the facts underlying the disciplinary proceedings: during the final between Senegal and Morocco on 18 January 2026, the referee awarded a penalty in favour of Morocco. The Senegalese players protested collectively against the decision, which they considered unjust, and the entire Senegal team left the pitch. Although the Senegalese team continued its protest for approximately 10–15 minutes, it eventually returned to the pitch and decided to resume the match.

After play resumed, Senegal took the lead with a goal in extra time and the match ended in their victory. Senegal thus left the pitch as tournament champions. In the process that followed the on-field declaration of the title, CAF's bodies responsible for disciplinary review decided that Senegal had forfeited the match and that the title should pass to Morocco, the other finalist. It was recently confirmed officially that, following acceptance by the Court of Arbitration for Sport (CAS), the Senegalese Football Federation has brought the matter before the CAS.

Legal Basis of the CAF Disciplinary Proceedings

Under the principle of "*lex sportiva*", legal proceedings arising from sporting competitions should be conducted independently of national courts. The main reason for this lies in the need for legal processes in sport to be concluded swiftly, as well as in the need to ensure international uniformity within the same sport. For this reason, disputes to which sports clubs are parties are resolved, for each sport and independently of national laws and courts, by bodies such as the disciplinary and appeal committees of the national federations to which those clubs belong and of the international federations to which those national federations are affiliated.

When assessing disputes, the federation bodies charged with deciding them must conduct their review in accordance with the regulations issued by the federation, and their decisions must remain within the provisions and sanctions set out in those regulations.

As noted above, although sports law develops with a certain degree of independence from national and international legislation, this does not mean that the review of such disputes is not bound by any rules. In other words, it must be accepted that the universal rules recognised in legal proceedings also apply to proceedings concerning the parties to disputes arising from sporting relationships.

Indeed, the organiser of the Africa Cup of Nations is the Confederation of African Football (CAF), and the first instance for resolving any disputes that may arise between teams during the tournament is CAF′s Disciplinary Board and Appeal Board. These two bodies are required to review and decide disputes arising in the course of the tournament between matches and clubs in accordance with the provisions of the Regulations of the Africa Cup of Nations.

In their assessment following the application of the Royal Moroccan Football Federation (FRMF) after the final between Senegal and Morocco, CAF′s disciplinary and appeal bodies examined the Senegalese players′ departure from the pitch under Articles 82 and 84 of the relevant Regulations and ruled that the Senegal national team had forfeited the match.

Article 82 of the Regulations expressly sets out the sanctions applicable where a team withdraws from a match. After the match had ended and the Senegal national team had been declared champion, the FRMF applied to CAF, arguing primarily that the Senegal national team had breached Article 82 of the Regulations and that, consequently, under Article 84 of the same Regulations, its own national team should be deemed to have won the match 3–0. CAF′s competent bodies upheld the application on the basis of those provisions and stripped the Senegal national team of the title.

The original text of Article 82 of the Regulations reads as follows:

> *“If, for any reason whatsoever, a team withdraws from the competition or does not report for a match, or refuses to play or leaves the ground before the regular end of the match without the authorisation of the referee, it shall be considered looser and shall be eliminated for good from the current competition. The same shall apply for the teams previously disqualified by decision of CAF.”*

Read literally, the provision clearly means that “*a team that leaves the ground before the regular end of the match without the referee′s authorisation shall be deemed to have lost the match and shall be eliminated from the competition*”.

The bodies that assessed the dispute relied on this literal interpretation and treated the Senegalese players′ 10–15-minute departure from the pitch entirely as “leaving the ground”, basing their decision on that finding.

However, although the Senegal team left the pitch for 10–15 minutes in protest, the players returned before the referee ended the match and completed it.

Assessment of the Events from Senegal′s Perspective

The Senegal team temporarily left the pitch in protest, on the grounds that the penalty awarded by the referee was biased and wrong. As noted, however, the team returned to the pitch and completed the match before the referee took any decision to terminate or abandon it.

Even if, on a narrow reading of Article 82 of the Regulations, the conduct of the Senegal team may be regarded as leaving the ground, the team in substance returned to the pitch and completed the match. On a closer reading, the provision states that a team which leaves the ground before the regular end of the match without the referee′s consent shall be deemed to have lost the match and to have been eliminated from the competition. Yet in the final between the Senegal and Morocco national teams, even though the Senegalese players left the pitch for a period, the match came to a regular end. It is therefore possible to conclude that the provision was examined through a very narrow literal interpretation, to the exclusion of a purposive interpretation.

In our view, given the way the match concluded, holding that the Senegal team left the ground in this match would be an overly strict assessment.

Possible Issues Before the CAS

As is well known, the CAS is the final instance in sporting disputes where there is an international element between the parties. Since the existence of an international element between the parties to this dispute is not in question, the referral of the dispute to the CAS by the FSF rests on a sound legal basis.

Given that the CAS proceedings have only just begun, it is not yet clear which issues the parties will raise in their submissions and defences; however, in view of the nature of the dispute, it is evident that certain issues will be at the centre of the debate.

Misinterpretation of the Regulation

The decisions of CAF′s disciplinary and appeal bodies are essentially the product of an assessment based on the provisions of the Regulations of the Africa Cup of Nations. There is therefore no doubt that the central issue will be whether Article 82, on which the decision is based, was correctly interpreted.

Whether one is dealing with fundamental legal rules or with regulations governing sporting competitions under the lex sportiva, provisions must be applied correctly. The core argument will therefore concern whether the provision of the Regulations was assessed correctly.

Breach of the Principle of Proportionality

Another issue to be assessed in this dispute is whether CAF′s decision complies with the principle of proportionality. As stated at the outset, even though sports law has a structure distinct from national and international legal orders owing to its specific rules, it cannot be considered separately from universal fundamental principles of law.

The principle of proportionality, as one of the most important and fundamental principles of law, arises in many disputes.

Although the Senegal team left the pitch for 10–15 minutes in protest, its conduct did not lead to an outcome such as the match being cancelled altogether or postponed. At the end of that period, the Senegalese players returned to the pitch before the referee took any decision on the fate of the match. With the return of the Senegalese players, the match resumed its normal course and was completed.

Considering that the match ultimately resumed from where it had stopped and ended within its regular time with the referee's final whistle, CAF's decision to declare that Senegal had forfeited the match and to strip it of the title must be examined for its compliance with the principle of proportionality.

Field of Play Doctrine

Another rule to be taken into account in sporting competitions and sports law is what is known as the "***field of play doctrine***". The main aim of this doctrine is to protect the referee's sphere of authority and to ensure that such decisions cannot subsequently be altered by administrative or disciplinary bodies. Although the "***field of play doctrine***" may appear in four different forms, in its basic sense it means that a decision taken by the referee, alone or together with the refereeing team, during the course of a match cannot later be changed by an administrative or disciplinary body[1].

The "***field of play doctrine***" is one of the claims or defences most frequently encountered in sports proceedings. It is an argument that arises especially often where a decision taken by a referee in the course of a match has affected the outcome, such as a team's progress in a tournament or its winning of a title[2].

Indeed, the "***field of play doctrine***" has been relied on as a claim or defence in many CAS proceedings, and the CAS has reached different conclusions depending on the particular facts of each case[3].

As noted earlier in this article, the match between Senegal and Morocco was interrupted when the Senegalese players left the pitch in protest and went to the dressing room, but it subsequently resumed with the referee's whistle. After extra time, the match came to its normal end with the referee's final whistle and Senegal was declared champion. Seen in this light, while the referee's decision was to continue the match, the title subsequently changed hands by a decision of the disciplinary body.

Although the content of the claims advanced by Senegal in its application to the CAS is not yet known, in our view, given the course of the match and the subsequent events, the "field of play doctrine" lends itself very well to being raised as an argument.

Conclusion and Assessment

As can be seen, the annulment, by administrative decisions taken outside the match, of the title that Senegal won through its victory on the pitch touches upon highly significant issues in sports law.

Given the current stage of the proceedings, it remains unclear which issues will come before the CAS arbitrators or in which direction the parties' claims and defences will develop; it is nevertheless evident that the forthcoming award will be important for sports law.

The outcome of this dispute between the Senegalese Football Federation and CAF will therefore be an important decision not only for clarifying the limits of administrative bodies' power to affect the result of a match, but also for defining the limits of on-field protests by athletes against referees.

Footnotes

1. Vieweg Klaus, 'Sports Rules and 'field of Play'decisions-Can the Fairness Principle Be Applied' books.google.com
2. O'Leary Leanne, 'Jurisprudence of the CAS Ad Hoc Division: Themes from Paris 2024' [2025] The international sports law journal link.springer.com
3. UAE Equestrian and Racing Federation & Ismail Mohd v. Federation Equestre Internationale (CAS 2022/A/9018), award of 15 March 2023; Hockey Club Kyiv Capitals v. Ice Hockey Federation of Ukraine (CAS 2024/A/10449), award of 20 February 2025

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