TAS / CAS
TRIBUNAL ARBITRAL DU SPORT
COURT OF ARBITRATION FOR SPORT
TRIBUNAL ARBITRAL DEL DEPORTE

MEDIA RELEASE

FOOTBALL – AFRICA CUP OF NATIONS (AFCON) 2025

THE COURT OF ARBITRATION FOR SPORT (CAS) UPHOLDS APPEAL BY SENEGALESE FOOTBALL FEDERATION (FSF)

Lausanne, Tuesday 24 November 2026 – The Court of Arbitration for Sport (CAS) has upheld the appeal by the Senegalese Football Federation (FSF) against the Confederation of African Football (CAF) and the the Royal Moroccan Football Federation (FRMF, in French) concerning the final of the Africa Cup of Nations Morocco 2025 (AFCON 2025). The decision rendered by the CAF Appeal Board is set aside and the decision by the CAF Disciplinary Board is reinstated. Consequently, the result obtained at the end of the AFCON 2025 final is confirmed (1-0 for Senegal).

The FSF appealed to CAS against a decision of the CAF Appeal Board declaring that the Senegal national team forfeited the AFCON 2025 final and recording the Moroccan national team as the winners.

In their appeal, the FSF argued that the decision of the Referee, Mr Jean-Jacques Ngambo Ndala, to resume the match at the 109th minute (90+19) during the AFCON 2025 final and to allow it to be concluded with a sporting result could not be reviewed, pursuant to the 'field of play' doctrine.

The FRMF argued, on the contrary, that the Referee's decision did not fall under the 'field of play' doctrine, as it cannot be applicable to the disciplinary consequences of the Senegalese team's behaviour. The FRMF alleged that, by leaving the pitch temporarily, the Senegalese team breached Articles 82 and 84 of the AFCON Regulations, which should have led the Referee to bring the match to an early conclusion. The FRMF also argued that the Referee erred in law and that his decision was arbitrary.

After having examined the arguments raised by the Parties, the Arbitral Panel considered that the Referee's decision to resume the match or to stop it fell definitively within his sole authority. By blowing his whistle to restart play, the Referee considered that the conditions for resuming the match had been met - both teams were on the pitch again, and both expressed their willingness to resume.

In the Panel's view, there is no doubt that the effects of the Referee's decision were limited to the pitch. As such, the Panel considers that the Referee's decision was covered by the 'field of play' doctrine. Since Articles 82 and 84 of the AFCON Regulations are intended solely to determine the outcome of a match when a team's conduct leads the referee to call off the game permanently, they are therefore not applicable in this case. In conclusion, the Panel considers that in resuming the match, the Referee did not err in law.

The Panel acknowledged that the Referee had to make a decision in an atmosphere of extreme tension. However, these circumstances do not justify describing the decision as "arbitrary". On the

contrary, the Referee's judgment did not appear to have been affected by factors external to the game.

Regarding the disciplinary aspects of the case, the Panel noted that the FSF, the FSF coach Mr. Pape Thiaw, and certain players had already been sanctioned by CAF following separate disciplinary proceedings.

Consequently, the appeal by the FSF was upheld. This was a unanimous decision by the CAS Panel.

This is an unofficial summary for media use. For legal purposes, only the wording used in the written decision is binding.

Overview of CAS procedure

- The CAS Panel for this procedure was composed of Professor Gérald Simon as President (France), Professor Dr. Ulrich Haas (Germany) and Professor Luigi Fumagalli (Italy).
- The appeal by the FSF was registered by CAS on 25 March 2026. It sought to set aside the CAF decision declaring that the Senegal national team forfeited the AFCON 2025 final and recording the Moroccan national team as the winners of the match by 3-0. The appeal requested that CAS declare the FSF winners of AFCON 2025.
- An in-person hearing took place behind closed doors at CAS headquarters, in Lausanne, on Thursday 8 October 2026.
- The Parties did not agree to expedite this procedure, which therefore followed a standard timeline according to CAS procedural rules.
- Proceedings were conducted in French.
- The full grounds for this decision have been issued to the Parties today. Unless the Parties request confidentiality, the full CAS Award will be published in due course.

The ‘field of play’ doctrine in sports law

The Swiss Federal Tribunal recently defined the ‘field of play’ doctrine as follows (4A_494/2024, 23 January 2026, para. 4.2):

“CAS has long developed a practice known as the ‘field of play doctrine’ […] under which it refrains from ‘reviewing decisions taken on the playing field by referees or other officials responsible for applying the rules of the game, unless there is evidence that those rules were applied arbitrarily or in bad faith’”