

**CAS 2025/A/11464 Northern Ireland Federation of Sea Anglers v. Confédération Internationale de la Pêche Sportive & Fédération Internationale de la Pêche Sportive en Mer**

**ARBITRAL AWARD**

delivered by the

**COURT OF ARBITRATION FOR SPORT**

sitting in the following composition:

President: Mr. Michele A.R. Bernasconi, Attorney-at-Law in Zurich, Switzerland  
Arbitrators: Rt. Hon. Lord John A. Dyson, Arbitrator in London, United Kingdom  
Mr. Efraim Barak, Attorney-at-law in Tel-Aviv, Israel

in the arbitration between

**Northern Ireland Federation of Sea Anglers**, Bangor, Northern Ireland, United Kingdom  
Represented by Mr. Brian Moss, Solicitor, Belfast, Northern Ireland, United Kingdom

**- Appellant -**

and

**Confédération Internationale de la Pêche Sportive**, Rome, Italy,

and

**Fédération Internationale de la Pêche Sportive en Mer**, Luxembourg

Both represented by Mr. Borja Osés and Mr. Toni García, Attorneys-at-Law, Terrassa, Barcelona, Spain

**- Respondents -**

## **I. PARTIES**

1. The Northern Ireland Federation of Sea Anglers (the "NIFSA" or the "Appellant") is an association established in 2018 and based in Bangor, Northern Ireland. According to its Constitution, the Appellant purports in particular to represent sea anglers and sea angling clubs, to promote and regulate the sport of sea angling, and to organise competitions and international participation, in Northern Ireland.
2. The Confédération Internationale de la Pêche Sportive (the "CIPS" or the "First Respondent") is a non-profit international association established in 1952 in Rome, Italy. According to its statutes, CIPS promotes mutual understanding and friendship among its member federations, with the overarching aim of fostering peace and international cooperation through the sport of fishing, in line with the principles of the Olympic ideal. CIPS comprises three international federations, each governing a distinct discipline of sport fishing: (i) the Fédération Internationale de la Pêche Sportive en Eau Douce; (ii) the Fédération Internationale de la Pêche Sportive Mouche; and (iii) the Fédération Internationale de la Pêche Sportive en Mer.
3. The Fédération Internationale de la Pêche Sportive en Mer (the "FIPS-M" or the "Second Respondent") is an international association established in 1972 in Prague and currently based in Luxembourg. FIPS-M is one of the three international federations that form part of CIPS. According to its statutes, FIPS-M aims to promote the practice of sport fishing at sea worldwide, in cooperation with all national federations affiliated to CIPS. It also seeks to protect marine species and their environment. Furthermore, it pursues goals of international understanding and friendship through sea angling, in line with the Olympic ideal, and maintains relations with other global organisations that share these objectives. Pursuant to Article 3.1 of its Statutes, any national federation wishing to become a member of FIPS-M must recognise the statutes of both FIPS-M and CIPS.
4. The First Respondent and the Second Respondent are hereinafter jointly referred to as the "Respondents".
5. The Appellant and the Respondents are hereinafter jointly referred to as the "Parties".

## **II. FACTUAL BACKGROUND**

6. What follows is a short summary of the background facts and allegations based on the Parties' written and oral submissions, pleadings and evidence examined during the present proceedings. Additional facts and allegations contained in the Parties' submissions, pleadings and evidence will be set out, where relevant, in the legal discussion below. While the Panel has considered all the facts, allegations, legal arguments and evidence submitted by the Parties, this award (the "Award") refers only to the submissions and evidence considered necessary to explain the reasoning.
7. To properly understand the context of the present dispute, it is necessary to recall the institutional structure of the international federations governing the sport of angling. CIPS, established in Rome in 1952, is the umbrella organisation for sport fishing at a

global level. CIPS promotes, coordinates, and develops all forms of angling as a sport and is composed of three specialised international federations: (i) the Fédération Internationale de la Pêche Sportive en Eau Douce (FIPS-ED), for freshwater fishing; (ii) the Fédération Internationale de la Pêche Sportive Mouche (FIPS-Mouche), for fly fishing; and (iii) the Fédération Internationale de la Pêche Sportive en Mer (FIPS-M), for sea angling.

8. As of today<sup>1</sup>, the composition of these organisations is as follows: (i) CIPS: 110 national federations from 84 countries; (ii) FIPS-ED: 69 national federations; (iii) FIPS-M: 46 national federations; and (iv) FIPS-Mouche: 38 national federations.
9. Among the current members of CIPS and FIPS-M is the Irish Federation of Sea Anglers ("IFSA"), which was founded in 1953 and has been affiliated to both organisations since 1980. According to its Constitution<sup>2</sup>, IFSA's objectives are to: (a) develop, foster and regulate the sport of sea angling in Ireland; (b) act and speak on behalf of sea angling in Ireland and where such interests are involved, with similar organisations in other countries; and (c) make rules governing the sport of sea angling, particularly in festivals and competitions of all kinds.
10. IFSA is organised into four Provincial Councils, one for each of the four historic provinces of Ireland: Ulster, Munster, Leinster, and Connacht. The province of Ulster comprises nine counties, six of which form part of Northern Ireland, while the remaining three lie within the Republic of Ireland. Consequently, IFSA has jurisdictional reach over the entire island of Ireland, including Northern Ireland.
11. IFSA was admitted as a member of CIPS in 1980, and subsequently affiliated to FIPS-M, as the national federation for the discipline of sea angling representing the entire island of Ireland. This affiliation, which remains in full force today, reflects the inclusive structure of IFSA, which encompasses the four Irish provinces—Leinster, Munster, Connacht and Ulster. Given that six of Ulster's nine counties lie within Northern Ireland, IFSA's jurisdiction extends to that territory as well.
12. Crucially, Sport Northern Ireland — the public authority responsible for the development and regulation of sport within Northern Ireland — formally recognises IFSA as the sole national governing body for the discipline of sea angling within that jurisdiction. This is expressly confirmed in the public authority's official materials, including <The Sports Councils: Recognition Process – Applicant Guidance 2017>, which provides that an organisation in Northern Ireland may operate on an All-Ireland or Ulster Provincial basis. This institutional framework is also reflected in the allocation of national governing bodies for the other angling disciplines.
13. The background to the present dispute dates back several years. On 24 February 2023, the Appellant submitted an initial application for membership to both FIPS-M and CIPS. This

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<sup>1</sup> Based on data provided by Respondents in their Answer.

<sup>2</sup> The Parties have not used the term "Statutes" or "Constitution" in a strictly consistent manner. The Panel considers both terms equivalent, and they are therefore both used in this Award.

request was formally considered at the CIPS Congress held in Rome on 29 April 2023<sup>3</sup>. As recorded in the official minutes of the Congress, the matter was discussed under the agenda items concerning new memberships requests. The President of FIPS-M addressed the issue, explaining that the whole island of Ireland was part of IFSA, which was affiliated to FIPS-M and that it well represented the four provinces. He pointed out that if the assembly was going to accept a new federation as a member, this would automatically destroy the current member federation, IFSA, with which they have never had any problem. He therefore proposed to the CIPS Congress to keep the existing member federation and to reject the new membership proposal. The Congress unanimously accepted this proposal.

14. Following this decision, on 25 September 2023, the Appellant's legal counsel sent a formal letter to FIPS-M urging a prompt response to the membership request.
15. On 25 October 2023, CIPS issued a written reply, which reiterated the grounds for rejection. The CIPS letter stated that the CIPS Congress held in Rome in April 2023 had unanimously decided to reject the application for affiliation. This unanimous decision derived from the fact that Northern Ireland was already represented in CIPS by IFSA, a federation that includes and acts on behalf of the four Irish provinces, that is, the whole of Ireland. CIPS stated that the problem between IFSA and the Appellant was a political issue that could and should be resolved locally and not by a sports body such as CIPS. CIPS did not want to be authorised to make political decisions or intervene in issues concerning the internal structures of CIPS-affiliated national federations.
16. On 2 February 2024, the CIPS Praesidium held a meeting in which the membership application submitted by the Appellant was once again addressed. As recorded in the official minutes, the discussion reaffirmed the conclusions already reached at the 2023 CIPS Congress, making clear that no new arguments or documentation had been presented by the Appellant to justify a reconsideration of CIPS's position. The minutes stated that the letter sent by the Appellant did not contain any further information beyond that already in the possession of CIPS and FIPS-M. The Praesidium unanimously approved the decision to reconfirm the affiliation of IFSA as it still represented the four provinces of Ireland.
17. On 14 January 2025, the Appellant formally submitted a renewed application for membership to both FIPS-M and CIPS, seeking to be admitted as the national federation for sea angling in Northern Ireland. This application contained letters of support from members of the UK Parliament, Irish Parliament and Northern Ireland Assembly across the political spectrum, together with testimonials from key stakeholders and relevant information about the constitutional position of Northern Ireland and the operation of the Good Friday Agreement of 1998.
18. This request was discussed at the CIPS Congress held in Slovenia on 24, 25 and 26 April 2025. The CIPS Congress, relying on Articles 3.2 of the FIPS-M Statutes and 4.4 of the

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<sup>3</sup> The Panel notes that the Parties and the documents submitted sometimes refer to 28, other times to 29 April 2023. This is likely to be a typo. In any event, none of the Parties has argued that this formal inaccuracy is of any relevance.

CIPS Statutes, unanimously resolved to maintain the affiliation of IFSA (the "Appealed Decision"). This decision confirmed the one previously taken at the 2023 CIPS Congress. The Appealed Decision was communicated to Appellant on 7 May 2025.

### **III. THE PROCEEDINGS BEFORE THE COURT OF ARBITRATION FOR SPORT**

19. On 27 May 2025, the Appellant filed a Statement of Appeal against the Appealed Decision. In its Statement of Appeal, the Appellant nominated Rt. Hon Lord John A. Dyson (United Kingdom) as arbitrator.
20. On 6 June 2025, the Appellant filed its Appeal Brief in accordance with Article R51 of the Code.
21. In a letter dated 16 June 2025, the Respondents jointly nominated Mr Efraim Barak (Israel) as arbitrator. In this letter, the Respondents also requested that the time limit to file their Answer be fixed after the payment by the Appellant of its share of the advance of costs, pursuant to Article R55 (3) of the Code.
22. On 31 July 2025, the Respondents filed their joint Answer in accordance with Article R55 (1) of the Code.
23. On 8 August 2025, the CAS Court Office informed the Parties that the Panel appointed to decide the matter was constituted as follows:  
  
President: Mr Michele A.R. Bernasconi, Attorney-at-law in Zurich, Switzerland  
  
Arbitrators: Rt. Hon Lord John A. Dyson, Arbitrator in London, United Kingdom  
Mr Efraim Barak, Attorney-at-law in Tel-Aviv, Israel.
24. On 17 September 2025, a case management conference ("CMC") took place, at which all Parties were represented and during which practical matters were discussed and agreed.
25. On 14 October 2025, following several procedural submissions made by the Parties, the Panel informed the Parties that for the reasons explained and discussed in detail during the CMC of 17 September 2025, the Panel did not allow additional written submissions. Furthermore, the Panel informed the Parties that it was not satisfied that the requirements set out in Article R56 of the CAS Code were fulfilled and, accordingly, the Panel declined to permit additional written submissions. The Parties were however reminded that they would be afforded the opportunity to address these matters during the Hearing, should they wish to do so.
26. On 10 December 2025, the Hearing was held, in person, at the CAS Court Office in Lausanne. The following persons attended the hearing besides the Panel and Mr Fabien Cagneux, Managing Counsel at the CAS:

For the Appellant:

- Mr. David Sharpe KC, Counsel

- Ms Katherine Sharpe BL, Counsel
- Mr. Brian Moss, Solicitor
- Mr. Harry McKee, for the Appellant

For the Respondents:

- Mr. Toni Garcia, Counsel
- Mr. Borja Osés, Counsel
- Mr. Juan Antonio Barreda, by video, for CIPS
- Mr. José Luis Bruna, by video, for FIPS-M

27. At the outset of the Hearing, the Parties declared that they had no objection to the appointment of the Panel and to the way in which the procedure had been conducted until the Hearing.
28. The Panel heard the Parties and their representatives. During the Hearing, the Parties made full oral submissions. Before the Hearing concluded, the Parties expressly stated that they had no objection to the procedure adopted by the Panel and confirmed that they had been given a full opportunity to present their cases, submit their arguments, and to answer the questions posed by the Panel. They confirmed that their right to be heard had been respected and that due process had been granted.

#### **IV. SUBMISSIONS OF THE PARTIES**

29. This section of the Award does not contain an exhaustive list of the Parties' contentions; its aim is to provide a summary of the substance of the Parties' main arguments, to facilitate the understanding of the Award. In considering and deciding upon the Parties' claims, the Panel has accounted for and carefully considered all the submissions made and all the evidence adduced by the Parties, including allegations and arguments not mentioned in this section of the Award or in the discussion of the claims below.

##### **A. The Appellant's Position**

30. The Appellant's submissions, in essence, may be summarised as follows:
- (i) Unlawful interpretation of the Statutes
31. The Appellant contends that the Respondents have interpreted Article 3.2 of the FIPS-M Statutes and Article 4.4 of the CIPS Statutes in an overly restrictive manner, contrary to established CAS jurisprudence.
32. Article 3.2 of the FIPS-M Statutes reads as follows:

*"Each Nation can have only one Federation [...] per discipline of sport sea angling [...] only the Federation which is accredited and recognised by its Nation will be accepted."*

33. Article 4.4 of the CIPS reads as follows:

*"Each Nation shall not be allowed to affiliate more than one National federation or other nationally recognized Organization to an International Federation of C.I.P.S., except if the Statutes of a C.I.P.S. International Federation authorise the affiliation of more than one National Federation per Country, in different disciplines."*

34. According to the Appellant, the terms "Nation" and "Country" should not be construed solely in their political or sovereign sense but must be interpreted in line with prior practice and CAS decisions, which allow for flexible recognition of non-sovereign entities as countries or nations in the framework of specific sport activities. The Appellant argues that, given the admission of England, Scotland, Wales, and Gibraltar as members of FIPS-M and CIPS, the same approach should apply to Northern Ireland. Furthermore, the Appellant asserts that the principle of *in dubio contra stipulatorem* requires that the statutes be interpreted against the Respondents.

35. The Appellant submits that the CAS decision in CAS 98/2001 indicates that the word 'country' is not to be understood as having its common political meaning. In CAS 2002/O/410, the Court noted that the territory of Gibraltar was a dependent territory of the United Kingdom and it was not an independent state. The CAS noted that it was not consistent with the opinion of CAS, as expressed in previous decisions, that the concept of a nation or a country in the sports context must necessarily be understood as having its common political meaning. The Appellant argues that it meets the objective membership criteria of both CIPS and FIPS-M.

(ii) Violation of general principles of law

36. The Appellant claims that the refusal to grant it membership violates general principles of law, including procedural fairness, proportionality, legitimate expectations, equal treatment, and good faith.

(iii) Failure to consider material evidence

37. The Appellant alleges that the Respondents failed to consider material evidence submitted with its application, including letters of support from local politicians and sports bodies, the historical and political context of Northern Ireland under the Good Friday Agreement, and the differentiated international treatment of Northern Ireland and the Republic of Ireland. The Appellant also refers to the existing membership of other UK constituent parts (i.e. England, Scotland and Wales) and Gibraltar as precedents.

(iv) Unreasonable and irrational decision

38. The Appellant argues that the refusal of membership was unreasonable and irrational, particularly given the precedents of other constituent parts of the UK. It criticises the decision-making process as cursory and lacking serious consideration of newly presented facts, asserting that the Respondents acted arbitrarily and without proper justification. The application was effectively ignored by the Respondents who dismissed it with apparent

disregard and failed to notify the Appellant of the outcome until requested by email on 7 May 2025.

39. The Appellant submitted the following Prayers for relief:

*“a) Set aside and/or amend the decision of the Respondents communicated to the Appellant on 7th May 2025;*

*b) Declare that the Respondents have acted unlawfully and/or unreasonably and/or unreasonably and/or irrationally in their refusal to grant the Appellant's request to be appointed as the NF for sea angling in Northern Ireland;*

*c) Order the Respondents to appoint the Appellant as a member of FIPS-M and CIPS;*

*d) Further or other relief as the Panel deems appropriate;*

*e) Order the Respondents to bear the costs of the arbitration and the Appellant's legal expenses.”*

## **B. The Respondent's Position**

40. The Respondents' submissions, in essence, may be summarised as follows:

(i) Lack of standing to be sued alone

41. In accordance with well-established jurisprudence of CAS, the proper identification of the respondent in an appeal is a fundamental procedural requirement. The Respondents submit that they lack standing to be sued alone in these proceedings. The IFSA is the national federation formally admitted within the structures of both Respondents. IFSA's jurisdiction expressly includes the entire island of Ireland, comprising all four provinces, and thus encompasses also the territory of Northern Ireland. Notably, IFSA is also the only organisation recognised by Sport Northern Ireland — the public authority responsible for the development of sport in that jurisdiction — as the national governing body for the discipline of sea angling. Despite this, the Appellant has chosen not to join IFSA to the present proceedings as a co-respondent, even though the relief it seeks would directly affect IFSA's legal position and membership status within both CIPS and FIPS-M.

42. The Respondents refer to CAS 2021/A/8225, where the Sole Arbitrator found that the respondent lacked standing to be sued alone in connection with the appealed decision, and thus that the appellant erred in filing his appeal only against the federation and not also against the clubs directly affected by the outcome of the appeal. The same reasoning was confirmed in CAS 2020/A/7061, where the Panel refused to entertain an appeal, whose outcome would have directly affected clubs that were not party to the procedure.

43. The Respondents submit that Articles 4.4 of the CIPS Statutes and 3.2 of the FIPS-M Statutes confirm that the admission of a second national federation for the same discipline

and territory is not permitted, absent statutory authorisation, and that the national federation recognised by the relevant national authority shall be the one admitted.

44. In the present case, IFSA is the body recognised by Sport Northern Ireland, the competent public authority. Additionally, IFSA has been admitted since several years as member of the Respondents, in accordance with the applicable rules. Accordingly, granting the relief sought would not only interfere directly with IFSA's acquired rights and legal status within CIPS and FIPS-M, but would also breach the applicable statutory framework and require the Panel to issue an order that contravenes the binding regulations of both federations — all in the absence of the party most directly affected.
45. In practical terms, this relief would produce legal consequences that interfere with IFSA's rights, including its exclusive representational status, its voting rights within CIPS and FIPS-M, and its capacity to enter athletes into international competitions. The Panel would therefore be issuing an order that alters the institutional equilibrium in which IFSA operates — without hearing its position.
  - (ii) Correct interpretation and application of the Statutes
46. The Respondents submit that the Appellant's main contention is that the Respondents have applied Article 3.2 of the FIPS-M Statutes and Article 4.4 of the CIPS Statutes in an unduly restrictive manner, contrary to the object and purpose of those instruments and to established CAS jurisprudence, particularly regarding the recognition of non-sovereign entities in international sport.
47. The Respondents acknowledge that they have consistently accepted as full members national federations representing entities that do not correspond to sovereign states — such as England, Scotland, Wales, and Gibraltar. This reflects a long-standing practice in international sport, where the concepts of "nation" or "country" are not interpreted strictly in their political sense, but in a flexible, functional manner, adapted to the sporting context.
48. However, this flexibility does not mean that multiple federations may be recognised for the same sport and territory. Quite the contrary: the very provisions invoked by the Appellant impose strict limitations in this regard. Article 4.4 of the CIPS Statutes provides that each nation shall not be allowed to affiliate more than one national federation or other nationally recognized organization to an International Federation of CIPS, except if the Statutes of a CIPS International Federation authorise the affiliation of more than one national federation per country, in different disciplines. Likewise, Article 3.2 of the FIPS-M Statutes provides that each nation can have only one federation per discipline of sport sea angling, and that only the federation which is accredited and recognised by its nation will be accepted.
49. These provisions make clear that, regardless of how the term "nation" is interpreted, only one federation per discipline may be affiliated per territory. That is precisely the situation here. IFSA — founded in 1953 and affiliated to both CIPS and FIPS-M for several decades — was admitted as the national federation for sea angling representing all four Irish provinces, including the territory of Northern Ireland. IFSA is therefore the

federation currently exercising jurisdiction over the entire island of Ireland, including Northern Ireland. Moreover, as required by Article 3.2 of the FIPS-M Statutes, IFSA is officially recognised by Sport Northern Ireland as the national governing body for the sport of sea angling in that jurisdiction, a criterion it has consistently fulfilled throughout its longstanding affiliation.

50. The Respondents submit that the Appellant seeks to be recognised as the national federation for sea angling in Northern Ireland within the international structures of CIPS and FIPS-M, notwithstanding the fact that this jurisdiction is already covered by IFSA's existing and long-standing recognition. Under the applicable statutes, such recognition can only be granted to one federation per nation or territory and per sport discipline. As such, the Appellant's application could only be granted if IFSA were first disaffiliated. That is not the case. Quite the contrary: at its General Assembly held in Slovenia in April 2025, the CIPS Congress examined the Appellant's application and, in full compliance with the governing statutes, unanimously resolved to maintain the affiliation of IFSA, confirming the decision taken, in April 2023, at the CIPS Congress of Rome.
51. The Respondents submit that this is not a case in which Northern Ireland is barred from having a national governing body for sea angling. Rather, it is a case in which Northern Ireland is already represented by a national governing body — IFSA — which has been recognised by both CIPS and FIPS-M, as well as by Sport Northern Ireland, and which continues to fulfil all the applicable membership criteria.
52. Finally, the Respondents submitted the following Prayers for relief:

*"1. The appeal lodged by the Northern Ireland Federation of Sea Anglers against the decision rendered by the Confédération Internationale de la Pêche Sportive in April 2025 is dismissed, and the decision confirmed.*

*2. The entire costs of the proceedings and a contribution towards the legal fees and other expenses of the Respondents are paid by the Appellant."*

## **V. JURISDICTION**

53. This arbitral procedure is governed by the Article 176 *et seq.* of the Swiss Private International Law Act ("PILA"), as at least one of the Parties is domiciled outside Switzerland and because the seat of the arbitration is in Switzerland (Article R27 of the CAS Code). Furthermore, the Parties have not opted out of the applicability of chapter 12 of the PILA.
54. Article R47 (1) of the CAS Code provides as follows:

*"An appeal against the decision of a federation, association or sports-related body may be filed with the CAS if the statutes or regulations of said body so provide or if the parties have concluded a specific arbitration agreement and if the Appellant has exhausted the legal remedies available to it prior to the appeal, in accordance with the statutes or regulations of that body".*

55. The Respondents do not contest the jurisdiction of CAS to decide appeals directed against final decisions issued by the competent CIPS bodies, as set out in Article 23 (21) of the CIPS Internal Rules<sup>4</sup>.

56. Article 23 (21) of the CIPS Internal Rules reads as follows:

*"Decisions taken by the C.O.A, together with those resolutions which cannot be resolved within the C.I.P.S. Internal Justice System, and provided that the latter do not constitute res judicata, may be submitted exclusively by way of appeal to the Court of Arbitration for Sport in Lausanne, Switzerland, which will resolve the dispute definitively in accordance with the Code of sports-related arbitration. The time limit for appeal is twenty-one days after the reception of the decision concerning the appeal."*

57. It follows from the above that CAS has jurisdiction to hear the appeal against the Appealed Decision. This has been confirmed by the Parties, all of whom signed the Order of Procedure without reservation.

## **VI. ADMISSIBILITY**

58. Article R49 of the CAS Code provides as follows:

*"In the absence of a time limit in the statutes or regulations of the federation, association or sports-related body concerned, or in a previous agreement, the time limit for the appeal shall be twenty-one days from the receipt of the decision appealed against. The Division President shall not initiate a procedure if the statement of appeal is, on its face, late and shall so notify the person who filed the document. When a procedure is initiated, a party may request the Division President or the President of the Panel, if a Panel has been already constituted, to terminate it if the statement of appeal is late. The Division President or the President of the Panel renders her/his decision after considering any submission made by the parties".*

59. It has remained undisputed that the Appeal has been filed in time and in accordance with the formal requirements under the CAS Code. Accordingly, the Appeal is admissible.

## **VII. OTHER PROCEDURAL ISSUES**

60. As indicated above, and confirmed at the Hearing, the Parties agreed that only a single Award would be issued covering both Respondents. In fact, answering questions from the Panel, the Parties also agreed at the hearing that the Appealed Decision is the decision taken by the CIPS General Congress held in Slovenia on 24, 25 and 26 April 2025 and notified to Appellant on 7 May 2025.

61. Finally, the Panel notes that, as clarified during the Hearing, there is no decision of FIPS-

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<sup>4</sup> Appellant also referred to Article 20.2 of the FIPS-M Statutes and Article 20.3 of the CIPS Statutes.

M for the Panel to deal with. The subject of the present arbitration proceedings is therefore only the Appealed Decision.

### VIII. APPLICABLE LAW

62. Article R58 of the CAS Code provides as follows:

*“The Panel shall decide the dispute according to the applicable regulations and, subsidiarily, to the rules of law chosen by the parties or, in absence of such choice, according to the law of the country in which the federation, association or sports-related body which has issued the challenged decision is domiciled or according to the rules of law that the Panel deems appropriate. In the latter case, the Panel shall give reasons for its decision”.*

63. The Panel notes that the Parties agree that the present dispute shall be resolved primarily according to the applicable regulations of CIPS and FIPS-M.

64. At the Hearing the Appellant has claimed that the present dispute shall be resolved, subsidiarily, by general principles of law. Further, the Appellant has referred to Swiss law and has also claimed that Italian law, i.e. the law at the seat of CIPS, is, in relation to issues of relevance for the present case, basically identical to Swiss law.

65. The Respondents are of the view that based on Article R58 of the CAS Code, the present dispute shall be resolved, subsidiarily, under Italian law, as CIPS — the federation that adopted the Appealed Decision — is domiciled in Italy.

66. The Panel is satisfied that in accordance with the CAS Code, it shall decide the present dispute according to the applicable regulations of CIPS (and, to some extent, FIPS-M), and, subsidiarily, to Italian law, which is indeed the law of the country in which CIPS, i.e. the federation that has issued the challenged decision, is domiciled. The Panel considers it appropriate to evaluate carefully the general principles of law referred to by the Appellant as well.

### IX. MERITS

#### *(a) The Main Issue at Stake*

67. The main issue to be resolved by the Panel is whether the Appealed Decision violates the applicable CIPS Regulations and, potentially, any state law that applies subsidiarily. In other words, the main issue at stake is whether the Appellant should become a national member federation of CIPS.

#### *(b) Standing to be Sued Alone*

68. The Panel must first address the preliminary issue raised by the Respondents concerning their standing to be sued alone in these proceedings.

69. The Respondents submit that IFSA, which is not party to these proceedings, is the entity most directly affected by the relief sought by the Appellant. Respondents argue that

granting the Appellant's request would necessarily interfere with IFSA's acquired rights and legal status within CIPS and FIPS-M, including its exclusive representational status, voting rights, and capacity to enter athletes into international competitions.

70. The Panel observes that the relief sought by the Appellant in the present case is the admission of the Appellant to membership in CIPS as the national federation for sea angling in Northern Ireland. This seems to entail also the membership of the Appellant in FIPS-M due to the structure of CIPS and FIPS-M and the relations between the two organizations. Under the applicable statutes, specifically Article 4.4 of the CIPS Statutes and Article 3.2 of the FIPS-M Statutes, only one national federation per discipline may be affiliated per territory. IFSA is currently the federation recognised for sea angling for the entire island of Ireland, including Northern Ireland, and is recognised by Sport Northern Ireland as the sole national governing body for the discipline.
71. The Panel acknowledges the force of the Respondents' argument that IFSA has a direct and substantial interest in the outcome of these proceedings. Any decision granting the Appellant's request for admission would potentially affect IFSA's jurisdictional scope, representational rights, and membership status.
72. However, the Panel also notes that the present appeal challenges a decision made by CIPS, not by IFSA. The Appealed Decision is the resolution of the CIPS Congress to reject the Appellant's application for membership. As such, CIPS is the proper respondent to an appeal challenging that decision.
73. The Panel recognises that there is a tension between two important principles: on the one hand, the principle that all parties whose rights may be directly affected by a decision should have an opportunity to be heard; and on the other hand, the principle that an appeal should be directed against the body that issued the decision being challenged. A further tension exists between, on the one hand, the statutory requirement in CIPS Statutes that there is only one national member federation per country, and, on the other hand, the fact that Appellant is not explicitly asking that IFSA is excluded from CIPS.
74. According to CAS jurisprudence, the issue of standing to sue and of standing to be sued relates to the merits and not to the admissibility of the case<sup>5</sup>. The Panel is however of the view that the issue of standing to be sued does not necessarily have to be addressed first because standing to sue and standing to be sued are, as mentioned, questions related to the merits of a case and because an arbitral tribunal is free to determine how to address the sequence of the different substantive questions at stake in legal proceedings. Consequently, the Panel will address the issue of validity of the Appealed Decision first and will only subsequently address the standing to be sued of CIPS afterwards, if necessary.

(c) *Grounds for Nullity or Invalidity of the Appealed Decision*

75. The Panel now turns to the central question in this procedure: whether CIPS violated its

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<sup>5</sup> See *ex multis* CAS 2015/A/3959, N 81, referring to the decision of the Swiss Federal Tribunal SFT 128 II 50, 55, and CAS 2015/A/4131, N 95, referring to CAS 2009/A/1869.

- applicable rules and regulations and/or Italian law, by rejecting the request of admission of Appellant.
76. The Panel notes that the Appellant did not substantiate, neither in its written submissions nor at the hearing, under which legal basis the Appellant may have an enforceable claim to membership of CIPS.
77. The CIPS Statutes do not contain a specific rule granting to a non-member an enforceable right to be accepted as member. Articles 4.9, 4.10 and 4.11 of the CIPS Statutes state that the Status of CIPS Ordinary Member as well as the one of Candidate Member or Promoting Member "*may* be granted" to Federations that abide by CIPS Statutes. Further, Appellant has not argued that CIPS shall not enjoy the general accepted principle of freedom of an association, according to which associations have full autonomy to rule and regulate their own business and activities and their internal legal relationships. Under such principle, when an association receives an application from a prospective member, this application must be submitted to the competent body of the association. However, unless there are specific legal grounds, and no such grounds have been invoked by Appellant, this body may reject the application, even if the requirements for membership are met. In fact, there is no absolute right to join an association. This is the case both under Swiss law and Italian law<sup>6</sup>.
78. The Appellant submitted at the Hearing that the Respondent was wrong in arguing that the Appellant was not entitled to become a member. The Appellant, however, did not substantiate which legal grounds could be relied upon by the Appellant itself to prove the existence of an entitlement. Further, the Appellant relied during this procedure on CAS 2002/O/410, in which the question of freedom of an association to accept or refuse any applicant for membership and its possible limitation was dealt with by that Panel in detail. Nevertheless, the Appellant did not address the arguments set out in the 2002 CAS Award.
79. The Appellant argues that the refusal, decided by the Congress of CIPS, is unfair, discriminatory and disproportionate. The Panel does not share this view.
80. It is of course possible to understand that the Appellant was not happy to see its request for membership being denied. Also, the fact that CIPS informed the Appellant late, is regrettable and falls short of the standard of communication reasonably expected of an international federation, but it does not automatically invalidate the decision taken by the competent body within CIPS.
81. Article 3.2 of the FIPS-M Statutes provides that each nation can have only one federation per discipline of sport sea angling accepted by CIPS, and that if more applications are submitted for each discipline, only the federation which is accredited and recognised by its nation shall be accepted.
82. Article 4.4 of the CIPS Statutes provides that each nation shall not be allowed to affiliate more than one national federation or other nationally recognized organization to an

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<sup>6</sup> See, for instance, Torrente/Schlesinger, *Manuale di diritto privato*, Milano, 2013, p. 154; see also CAS 2002/O/410, N 89 *et seq.*

International Federation of CIPS, except if the Statutes of a CIPS International Federation authorise the affiliation of more than one national federation per country, in different disciplines.

83. The Appellant contends that these provisions should be interpreted in a flexible manner, consistent with established CAS jurisprudence recognising that the concepts of "nation" and "country" in the sporting context need not be understood within their common political meaning. The Appellant relies on the CAS awards issued in CAS 98/2001 CAS 2002/O/410, which held that the concept of nation or country in the sports environment must not necessarily be understood within its common political meaning.
84. The Panel accepts that CAS jurisprudence has indeed recognised that sports federations may, and in many cases do, recognise entities as "nations" or "countries" for sporting purposes even where those entities do not constitute sovereign states in the political sense. This flexible approach reflects the autonomy of sports organisations to structure their membership in a manner appropriate to the sporting context. The recognition of England, Scotland, Wales, and Gibraltar as separate members of various international federations, notwithstanding their constitutional relationship to the United Kingdom, is a well-established example of this principle in practice.
85. However, the Panel observes that the Appellant's argument, while correctly identifying this principle of flexible interpretation, fails to grapple with the second, equally important element of the applicable statutory provisions: namely, the requirement that only one federation per nation or country may be affiliated for each sport discipline. Even accepting that "nation" and "country" should be interpreted flexibly and need not correspond to sovereign statehood, the question remains: what is the relevant "nation" or "country" for purposes of sea angling representation in the present case?
86. The Panel notes that when IFSA was admitted to membership of CIPS and FIPS-M in 1980, it was recognised as the national federation for sea angling representing the entire island of Ireland, encompassing all four Irish provinces: Ulster, Munster, Leinster, and Connacht. This institutional structure has remained in place for over four decades. IFSA's jurisdiction expressly includes Northern Ireland.
87. Significantly, Sport Northern Ireland — the public authority responsible for the development and regulation of sport within Northern Ireland — formally recognises IFSA as the sole national governing body for the discipline of sea angling within that jurisdiction. This recognition is expressly provided for in the official materials published by Sport Northern Ireland, which state that an organisation in Northern Ireland may operate on an All-Ireland or Ulster Provincial basis. This institutional framework confirms that IFSA fulfils the requirement in Article 3.2 of the FIPS-M Statutes that IFSA be "accredited and recognised by its Nation".
88. The Panel observes that there are elements that support the Appellant's argument according to which the Appellant in theory *could* become a member of FIPS-M and CIPS. It is true, however, that the Respondents do not argue that Appellant does not meet the requirements to become member of FIPS-M and/or CIPS. In fact, even looking at the email of 7 May 2025 with which the Appealed Decision was communicated to Appellant,

one can read the following: "*we confirm the decision already taken at the Assembly in 2023, unanimously during the Assembly held in April 2025 it was agreed to maintain the affiliation of the existing federation representing all 4 Irish provinces.*"

89. In essence, it seems that both in 2023 and in 2025, the decision to reject the application for membership has been motivated by CIPS with the preference to maintain IFSA as a member, also in connection to Northern Ireland.
90. The Panel notes that sports federations enjoy considerable autonomy not only in accepting or rejecting new members, but also in determining the geographical scope of their member organisations. The fact that CIPS and FIPS-M have, for more than four decades, recognised IFSA as the federation representing the entire island of Ireland for sea angling purposes reflects a legitimate organisational choice. This choice is expressly recognised and accommodated by Sport Northern Ireland itself.
91. The fact that for other territories like Scotland, England or Wales, CIPS has taken a different approach does not, based on the evidence made available to the Panel, amount to any illicit discrimination of the Appellant.
92. The Panel further observes that the Appellant has not demonstrated that the current structure is unworkable, otherwise discriminatory, or contrary to any mandatory legal principle. To the contrary, the evidence before the Panel indicates that IFSA has ordinarily represented sea angling interests across the island of Ireland, including Northern Ireland, for many decades. The Appellant's dissatisfaction with this arrangement, while understandable from its perspective, does not establish that the Respondents acted unlawfully or unreasonably in maintaining it.
93. The Panel concludes that the Respondents' interpretation of Articles 3.2 of the FIPS-M Statutes and 4.4 of the CIPS Statutes is at least reasonable and that there is no basis to question the validity of the vote.
94. The Panel emphasises that this conclusion does not mean that Northern Ireland could never be recognised as a separate "nation" for sporting purposes nor that Appellant does not fulfil the requirements to be a member of FIPS-M and, thereafter, of CIPS. These are not issues that need to be decided by this Panel within the frame of the present procedure. As the Appellant correctly argues, sports federations have flexibility in defining what constitutes a "nation" in the sporting context. However, where — as here — a federation has already made such a determination and admitted a member on that basis, a subsequent applicant cannot compel the federation to adopt a different definition simply by asserting that an alternative approach would be equally valid.
95. The above leads to the next interim conclusion that the Appellant was not able to convince the Panel that the Appealed Decision was based on a wrong application of the Statutes of CIPS.

*(d) Other Grounds for Annulment*

96. Finally, the Appellant contends that the refusal to grant it membership violates general

principles of law, including fairness, proportionality, legitimate expectations, equal treatment, and good faith.

97. The Appellant did not specify the legal basis to apply any such general principles. It did not indicate any statutory rules of CIPS or FIPS-M nor any rule under Italian or Swiss law requesting the application of such general principles. In any event, leaving open the issue of the legal basis of such principles, the Panel is satisfied that their application does not change the assessment of the validity of the Appealed Decision.
98. With respect to legitimate expectations, the Panel finds no basis for concluding that the Appellant had a legitimate expectation of being admitted to membership of CIPS. The Appellant was established in 2018. At that time, IFSA had already been a member of CIPS and FIPS-M for nearly four decades, with recognised jurisdiction over the entire island of Ireland including Northern Ireland. The Appellant was or should have been aware of this existing membership structure. Moreover, the Appellant's previous applications for membership had been rejected. In these circumstances, the Appellant could not reasonably have expected that in 2025 its renewed application would be successful, absent a material change in circumstances.
99. With respect to equal treatment, the Appellant argues that it should be treated in the same manner as England, Scotland, Wales, and Gibraltar, which are all recognised as separate members of FIPS-M and CIPS despite being constituent parts of, or territories associated with, the United Kingdom. The Panel does not find this argument persuasive.
100. The principle of equal treatment does not require that all applicants for membership in an association shall be treated alike. Northern Ireland is currently represented within the existing structure of IFSA, which covers the entire island of Ireland. Accordingly, the rejection of Appellant as a member does not mean that Northern Ireland is not represented in CIPS.
101. With respect to proportionality and good faith, the Panel finds that, as mentioned above, the Respondents acted within the bounds of their organisational autonomy and applied their statutes in a reasonable manner. There is no legal basis substantiated by the Appellant to establish an enforceable right to obtain membership of CIPS. In addition, the decision to reject the Appellant's application was based on a clear and rational application of the one-federation-per-nation principle enshrined in the statutes. This decision was taken unanimously by the CIPS Congress on multiple occasions. The Panel sees no evidence of arbitrary or bad faith decision-making.
102. Accordingly, the Panel concludes that the Appealed Decision did not violate general principles of law.

(e) *Failure to Consider Material Evidence*

103. The Appellant alleges that the Respondents failed to consider material evidence submitted with Appellant's application, including letters of support from local politicians and sports bodies, information about the historical and political context of Northern Ireland under the Good Friday Agreement, and the differentiated international treatment of Northern Ireland and the Republic of Ireland.
104. The Panel notes that the minutes of the CIPS Praesidium meeting of 2 February 2024 expressly record that "*the letter sent by the Northern Ireland Federation of Sea Anglers does not contain any further information beyond that already in the possession of CIPS and FIPS-M*". This indicates that the Respondents did consider the information submitted by the Appellant but concluded that it did not present new arguments or grounds that would justify reconsidering the decision already taken at the 2023 Congress.
105. The Panel observes that the Appellant's submissions, including the political letters of support and information about the Good Friday Agreement, primarily address the political and constitutional status of Northern Ireland. While this information may be relevant in other contexts, it does not address the fundamental issues in this case: namely, that there is no enforceable right for an applicant to become member of CIPS and that Northern Ireland is already represented for sea angling purposes by IFSA, which has jurisdiction over the entire island of Ireland and is recognised by Sport Northern Ireland as the national governing body for the discipline. The Respondents were entitled to conclude that this political information, however detailed, did not alter the analysis under the applicable statutory framework.
106. Accordingly, the Panel concludes that the Respondents adequately considered the Appellant's submissions and did not fail to take account of material evidence.

(f) *Whether the Decision Was Unreasonable and Irrational – Formal Deficiencies*

107. The Appellant argues that the refusal of membership was unreasonable and irrational, and that the decision-making process was cursory and lacking in serious consideration.
108. The Panel recalls that CAS review of federation decisions is not unlimited. Sports federations enjoy a margin of discretion in making organisational and policy decisions, and CAS will intervene only where a decision is arbitrary, or in violation of applicable rules.
109. In the present case, the Panel finds that the Appealed Decision falls comfortably within the Respondents' margin of discretion. As set out above, an association is in principle not obliged to accept any applicant as new member of the association. The Appellant failed to demonstrate that this principle should not be applied in the circumstances of this case.
110. Additionally, even assuming that the decision of the Congress needed to rely on reasonable grounds, the Panel is satisfied that the Appealed Decision was reasonable since it was based on a clear and consistent application of the statutory principle that only one federation per nation per discipline may be affiliated. The members of CIPS had before

them an existing member, IFSA, which had been affiliated for over four decades and which continues to represent the entire island of Ireland in accordance with its constitution and the recognition granted by Sport Northern Ireland. The decision to maintain that membership and to reject the application from a different federation claiming jurisdiction over part of the same territory is reasonable.

111. The Panel acknowledges the Appellant's frustration that its application was not given lengthier consideration or more detailed analysis. However, the Panel notes that the Appellant's application raised substantially the same arguments as had been raised and rejected on previous occasions. In circumstances where the fundamental facts and legal framework had not changed, the Respondents were entitled to reaffirm their previous decision without extensive further deliberation.
112. Furthermore, the Panel has not been provided with evidence supporting the Appellant's argument that the Appealed Decision and the process leading to it suffered formal deficiencies. Even if one were to assume that there were formal deficiencies, the Panel sees no reason to set aside the Appealed Decision. The Panel, referring to the Award CAS 2022/A/9078, at N 122, notes that according to the constant jurisprudence of the CAS, procedural or formal deficiencies at a previous instance may be healed in case of *de novo* hearing at the second instance: "*Procedural violations that occurred in the first instance fade to the periphery in de novo appeals proceedings, i.e., they are cured and need no longer be addressed before the CAS [...].*"
113. Accordingly, the Panel concludes that the Appealed Decision was neither unreasonable nor irrational and that no formal deficiencies have been established that would invalidate the Appealed Decision.

(g) *Conclusion*

114. Given the above, the appeal fails. The Appealed Decision, taken by the CIPS Congress held in Slovenia in April 2025, does not violate the CIPS Statutes or the applicable law, irrespective of whether that law is Italian law or Swiss law. Therefore, the request to annul the Appealed Decision shall be rejected.

(h) *Other Prayers for Relief and Requests*

115. The above conclusion on the merits, makes it unnecessary for the Panel to consider the other requests submitted by the Parties. In particular, against the above grounds, it is not necessary for the Panel to decide whether Respondent had standing to be sued alone or not.
116. Accordingly, all other requests and prayers of the Parties are dismissed.

## X. COSTS

(...)

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## ON THESE GROUNDS

### The Court of Arbitration for Sport rules that:

1. The Appeal filed on 27 May 2025 by the Northern Ireland Federation of Sea Anglers against the decision adopted by the Congress of the *Confédération Internationale de la Pêche Sportive* on 24-26 April 2025 is dismissed.
2. The decision adopted by the Congress of the *Confédération Internationale de la Pêche Sportive* on 24-26 April 2025 is confirmed.
3. (...).
4. (...).
5. All other motions or prayers for relief are dismissed.

Date: 9 April 2026

Seat of the arbitration: Lausanne (Switzerland)

## THE COURT OF ARBITRATION FOR SPORT

Michele A.R. Bernasconi  
President of the Panel

Rt. Hon. Lord John A. Dyson  
Arbitrator

Efraim Barak  
Arbitrator