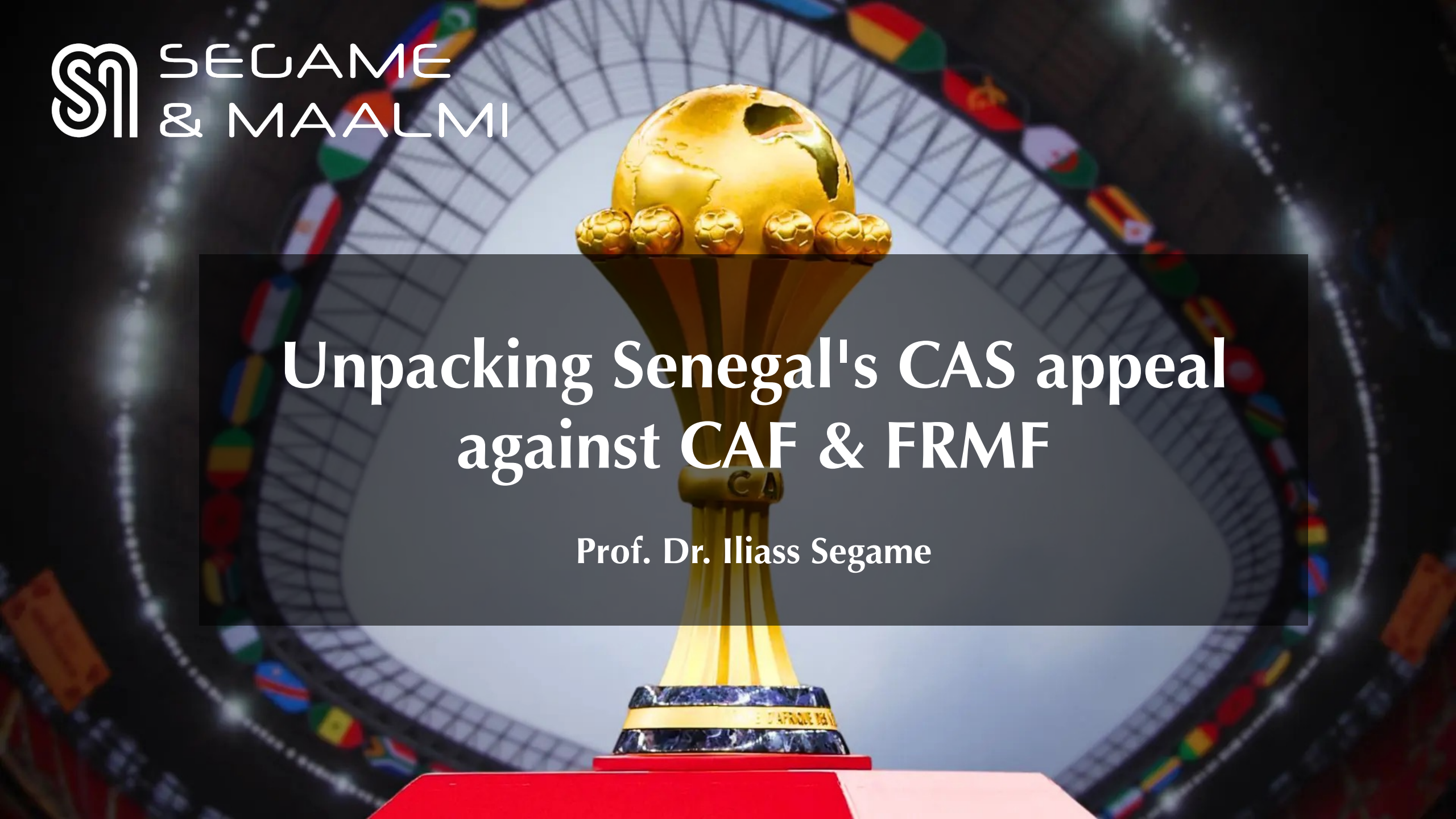




Unpacking Senegal's CAS appeal against CAF & FRMF

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About the speaker



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Agenda

1

Background of the case

2

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Insights on potential outcome

Background of the case

1. Match incident: key facts

1. 90+8' — VAR Penalty Decision

After a Senegal goal had just been disallowed, referee Jean-Jacques Ndala awards Morocco a penalty after VAR review of Diouf foul on Brahim Diaz.

2. Walk-off (14–17 minutes)

- Coach Pape Thiaw instructs players to leave the pitch in protest.
- Only captain Sadio Mané remains.
- No referee authorisation obtained.

3. Return to Play

- Mané persuades teammates to return.
- Diaz's Panenka saved by Mendy.
- Match continues to extra time.

4. Final Result

- Pape Gueye scores in extra time.
- Senegal wins 1–0. Referee validates full match.
- Senegal lifts the AFCON 2025 trophy.

Background of the case

2. From the facts to the CAF appeal board decision

18 Jan 2026	Late Jan 2026	17 Mar 2026	25 Mar 2026
The Match	CAF Disciplinary Board	CAF Appeal Board Ruling	CAS Filing
AFCON Final, Rabat. Senegal 1–0 Morocco (AET) 14–17 min walk-off by FSF players. Penalty saved; Pape Gueye scores winner.	Fines >\$1M. Suspension: coach Pape Thiaw (5 matches). Result LEFT UNTOUCHED.	Sets aside Disciplinary decision. Articles 82 & 84 AFCON Regs invoked. Forfeiture: Morocco wins 3–0. AFCON 2025 title awarded to Morocco.	FSF files CAS 2026/A/12295. Respondents: CAF + FRMF. Seeks reinstatement as AFCON 2025 champions.

The CAS appeal

Why CAS?

1

Internal remedies exhausted

FSF used Art. 44 AFCON Regs appeal to CAF Appeal Board. No further internal recourse available after 17 March ruling.

2

CAF Statutes, Art. 48

Recognises CAS as the final appellate instance for disputes involving CAF bodies.

3

CAS Code, Art. R47

Appeal permitted against a sports body decision once all internal remedies are exhausted.

4

No further CAF avenue

The Appeal Board is the highest CAF judicial instance. CAS is the only remaining forum.

CAS Filing — Key Details



Case Number

CAS 2026/A/12295



Filed

25 March 2026



Appellant

Fédération Sénégalaise de Football (FSF)



Respondents

CAF (1st) & FRMF (2nd)



Reliefs Sought

(i) Set aside CAF Appeal Board decision of 17 March 2026 and declare Senegal winner of AFCON 2025



Procedural Status

No hearing date set as of April 2026



Panel

3 arbitrators: 1 per party + neutral President appointed by CAS.
CAS Director General: Matthieu Reeb.

Key issues of the case

A Art. 82 & 84 Interpretation

Withdrawal = abandonment? Or temporary interruption?

B Referee Authority vs. Admin Power

Can CAF override the referee's on-field decisions?

C Safari Remarks & Irregularities

CAF instruction not to caution players on return

D Procedural Due Process (FSF)

Fair hearing before CAF Appeal Board?

E Proportionality of Sanction

Forfeiting a completed final — unprecedented?

Key issues of the case

A — Interpretation of Articles 82 & 84

Art. 82: A team leaving the ground before the regular end of the match without the authorisation of the referee → deemed loser + eliminated.

CAF / FRMF

No minimum time threshold; no exception for return. Breach is complete the moment players step off without permission. Walk-off = forfeiture, automatic & mandatory.

FSF

Art. 82 presupposes a definitive rupture. The referee allowed resumption, the penalty was taken, the match was validly completed since the game finished under the referee's authority.

Note: Plain text of Art. 82 does not require permanence of departure. No minimum time threshold = strict textual interpretation likely to favour CAF/FRMF.

B — Referee Authority vs. Administrative Power

IFAB Law 5: The referee has full authority to enforce the Laws in connection with the match. Decisions on the field are final.

FSF Argument

Referee Ndala allowed the match to resume and finish. If the on-field authority is final, CAF's administrative body cannot retroactively declare the match forfeited post facto. This is a fundamental *lex sportiva* tension.

CAF / FRMF Argument

Disciplinary rules are separate from the referee's in-match authority. The referee cannot waive a regulatory sanction by allowing the match to continue. Administrative override is expressly provided by Art. 82 & 84.

Note: Interesting tension, but CAS likely to hold that regulatory sanctions coexist independently of in-match referee authority. Precedent: administrative bodies may act post-match.

Key issues of the case

C Safari Remarks & Refereeing Irregularities

CAF Referees Committee chairman Olivier Safari reportedly stated: "We gave instructions not to caution players upon return, to preserve the match."

→ CAF consciously kept match alive.

→ Doping control non-compliance also alleged.

CAF Exec. Comm. – 13 Feb 2026

D Procedural Due Process (FSF)

CAF Appeal Board found FRMF's right to fair hearing was violated at first instance — justifying override.

FSF will challenge whether this alone warranted reversing the match result.

Key: CAS de novo review purges prior procedural defects.

CAS Code, Art. R57 | CAF Disc. Code, Art. 19

E Proportionality of Sanction

Stripping a completed final title = unprecedented in major football.

No major international tournament has ever retroactively overturned a completed final.

FSF invokes CAF Disciplinary Code, Art. 115(4): 'all circumstances must be considered'.

CAF/FRMF: sanction is automatic, not discretionary → proportionality cannot override mandatory rule.

CAF Disc. Code, Art. 115(4) | CAS 2024/A/11189

Insights on potential outcome

Outcome 1: CAF Decision Confirmed

Forfeiture upheld. Morocco declared AFCON 2025 champion (3–0).

- ▶ Art. 82 text is clear: no time threshold, no return exception
- ▶ Sanction (Art. 84) is automatic: proportionality cannot override mandatory rule
 - ▶ CAS de novo review purges any CAF procedural defects (incl. Nasri incompatibility)
- ▶ General Coordinator's report: contemporaneous evidence of 'withdrawal' (Art. 32 CAF Disc. Code)

Outcome 2: Partial Annulment

Breach confirmed but decision remitted to CAF for alternative sanction.

- ▶ Art. 82/84 designed for group stage/KO rounds not a completed final
- ▶ Safari admissions: CAF itself chose to keep match alive → estoppel risk
 - ▶ First Disciplinary Board left result intact — ambiguity in regulatory interpretation
- ▶ CAS crafts a 'middle way': fines, bans, suspended sentence preserving sporting result

Outcome 3: Full Annulment (Senegal Champion)

CAS reinstates 1–0 result; Senegal declared AFCON 2025 champion.

- ▶ Would require Art. 82 held inapplicable to temporary departure
- ▶ Or: fundamental procedural violation not purged by CAS review
- ▶ No precedent for CAS reversing completed final in favour of on-field winner
- ▶ Would be perceived as unprecedented intrusion into CAF autonomy



Thank you for your attention



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