

CAF V SENEGAL: WHEN A WALK OFF BECOMES A FORFEIT AND FOOTBALL'S LAWS WALK OFF THE FIELD

CAF v Senegal: When a Walk Off Becomes a Forfeit and Football's Laws Walk Off the Field

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Introduction

Football is built on the principle of finality. Once the referee blows the whistle, the result is meant to be settled. The AFCON 2025 final, however, defied that certainty. In a decision that stunned the football world, the Confederation of African Football overturned Senegal's on-field victory and awarded the title to Morocco based on forfeiture.

This unprecedented ruling raises profound legal questions about the meaning of "withdrawal" under Articles 82-84 of the AFCON Regulations, the authority of governing bodies to revisit matches

concluded on the field, and the delicate balance between competition rules, the Laws of the Game, and Court of Arbitration for Sport (CAS) jurisprudence.

This article reviews the Laws of the Game, examining the concept of "withdrawal" during football matches, being the basis for the decision, and analysing the effect of the decision on African football.

CAF Announces Morocco Winner of AFCON 2025

On March 17, 2026, the Confederation of African Football's (CAF) Appeal Board took an unprecedented step. It overturned the Africa Cup of Nations (AFCON) 2025 final and awarded Morocco a 3–0 victory, holding that Senegal forfeited the match by leaving the field during a late-game protest.²

The ruling rewrote the result of the January 18, 2026, final in Rabat, Morocco, a match Senegal had originally won 1–0 after extra time, courtesy of Pape Gueye's thunderous strike. The controversy stemmed from a VAR-assisted penalty awarded to Morocco against El Hadji Malick Diouf's challenge on Brahim Díaz, which triggered a 14–17 minute walk-off by Senegal's players before they returned; Díaz attempted a Panenka that Édouard Mendy easily saved, the tie then went into extra time³ and the eventual on-the-field success of the Senegalese team.

The CAF Appeal Board anchored its decision on Articles 82 and 84 of the AFCON

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² **Confederation of African Football**, 'CAF Appeal Board Media Statement' (CAFOnline, 17 March 2026) <<https://www.cafonline.com/news/caf-appeal-board-media-statement/>> accessed 18 March 2026.

³ Kevin Hand, 'How Senegal's AFCON win was awarded to Morocco and what next – all to know' (Al Jazeera, 18 March 2026)

<<https://www.aljazeera.com/sports/2026/3/18/how-senegals-afcon-win-was-awarded-to-morocco-and-what-next-all-to-know>> accessed 18 March 2026

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Regulations provisions, which was adopted by the Executive Committee of CAF on 12 April 2019 and came into force on the same date, that deem a team to have refused to play if it leaves the field without the referee's authorization and impose a 3–0 defeat for such an infringement. The official statement explicitly recorded the final as a 3–0 result in Morocco's favour. Senegal has now appealed the decision to CAS.

Withdrawal Definitions under Article 82-84 of AFCON Regulations

Articles 82 – 84 of the AFCON Regulations provide as follows:

“Article 82: 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 the loser and shall be eliminated for good from the current competition. The same shall apply to the teams previously disqualified by the decision of CAF.

Article 84: The team which contravenes the provisions of articles 82 and 83 shall be eliminated for good from the competition. This team will lose its match by 3-0 unless the opponent has scored a more advantageous result at the time when the match was interrupted; in this case, this score will be maintained. The Organising Committee may adopt further measures.”

Articles 82-84 reproduced above appear uncompromising: leave the pitch and you forfeit. Yet their application to the AFCON final is less

straightforward. From a cursory look at the Articles, the Articles appear to target leaving “before the regular end of the match,” implying finality rather than a temporary disruption. Senegal's case is that it did not abandon the match; it returned, and the referee completed the game.⁴

This is not a semantic quibble. CAF's own chronology admits that the match resumed under the referee's authority and was completed to a sporting conclusion on the field. This was witnessed by spectators both on and off the pitch. If a strict reading of Article 82 equates any walk-off (no matter how brief or subsequently remedied) with withdrawal, the line between interruption and abandonment disappears. Notably, Article 83 uses a 15minute threshold for failure to appear at kickoff, but there is no defined time parameter for mid-match departures, leaving CAF to rely on discretion rather than a codified standard.⁵

The clash with IFAB's Law 5

IFAB's Law 5 (The Referee) is explicit: “The decisions of the referee regarding facts connected with play, including whether or not a goal is scored and the result of the match, are final.” The law also reinforces that the referee's decisions and those of all match officials must be respected. In Rabat, Congolese referee Jean Jacques Ndala allowed play to continue after Senegal returned, and the match finished under his authority. CAF's retrospective forfeiture recharacterizes the incident as a withdrawal, effectively overruling the referee's management of the game months later.

From a governance perspective, this is a high-stakes

⁴ GhanaWeb, ‘Inside CAF's Article 84: The law that decided the AFCON final’ (18 March 2026)

<<https://www.ghanaweb.com/GhanaHomePage/SportsArc>

[hive/Inside-CAF-s-Article-84-The-law-that-decided-the-AFCON-final-2026352](https://www.hive/Inside-CAF-s-Article-84-The-law-that-decided-the-AFCON-final-2026352)> accessed 18 March 2026.

⁵ Ibid.

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collision: tournament regulations (CAF) versus the Laws of the Game (IFAB). The latter governs the global conduct and finality of match decisions, while the former governs competition administration. When the result has been produced on the field and ratified in real time by the referee, later administrative reversal sits uneasily with Law 5's finality principle.⁶ In our assessment, the IFAB rules ought to take precedence and override the CAF Regulations.

The field of play doctrine: CAS's long shadow

Beyond IFAB, the field-of-play doctrine deeply embedded in CAS jurisprudence counsels strict restraint in reviewing on-field decisions. CAS has consistently held that field of play decisions are final unless there is persuasive evidence of bad faith, malice, fraud, bias, arbitrariness, or corruption. The doctrine exists to protect officials' autonomy, preserve sporting finality, and avoid rewriting results in boardrooms.⁷

Recent summaries of CAS cases reiterate this narrow gateway. Even when a decision is later believed to be wrong, CAS intervenes only in extreme circumstances. The doctrine's rationale, sometimes called a "qualified immunity" for referees, has been affirmed by panels and commentary alike. Senegal's CAS appeal will almost certainly lean on this line of authority.⁸

Proportionality and precedent

The sanction in this case deserves scrutiny. Stripping a team of a trophy after full time is typically reserved for ineligibility, fraud or match-fixing categories involving integrity violations that undermine the competition's fairness at its core.⁹ Senegal's temporary departure from the field was followed by a return to play, the taking of the penalty, and the completion of the match under the referee's authority, which does not appear to strike at the core of the game.

The situation raises questions about how a brief interruption should be treated under the rules, and how the distinction between a temporary stoppage and full abandonment is applied in determining appropriate sanctions.¹⁰

Historically, in the 2019 CAF Champions League final between Espérance de Tunis and Wydad Casablanca, the first leg ended 1–1, and in the second leg in Tunis, Espérance led 1–0 when Wydad appeared to score an equaliser, only for the referee to disallow it. When Wydad demanded a VAR review, it emerged that VAR was not functioning, prompting the Moroccan side to refuse to continue play and effectively abandon the match after a long delay, leading the referee to award Espérance the victory and the trophy on the night, but days later CAF

⁶ IFAB, 'The Referee: Liability of Match Officials' (IFAB, 2026) <<https://www.theifab.com/laws/latest/the-referee/#liability-of-match-officials>> accessed 18 March 2026.

⁷ Squire Patton Boggs, 'Skating on Thin Ice: The CAS Reaffirms the Field of Play Doctrine in the "Kyiv Capitals" Case' (National Law Review, 17 April 2025) <<https://natlawreview.com/article/skating-thin-ice-cas-reaffirms-field-play-doctrine-kyiv-capitals-case>> accessed 18 March 2026.

⁸ Elite Law, 'The Doctrine of the Field of Play: Understanding Referees' Immunity in Sports' (Elite Law,

2026) <<https://www.elitelaw.ch/the-doctrine-of-the-field-of-play/>> accessed 18 March 2026.

⁹ This can be seen in previous decisions of CAS including the recent decision against South Africa in the country's 2026 World Cup qualifiers games, where they fielded Teboho Mokoena who was on suspension and were held to have forfeited the match.

¹⁰ Al Jazeera, 'CAF strips Senegal of AFCON title, Morocco declared African champions' (17 March 2026) <<https://www.aljazeera.com/sports/2026/3/17/caf-strips-senegal-of-afcon-title-morocco-declared-african-champions>> accessed 18 March 2026

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controversially ordered a replay and asked for the trophy to be returned, a decision that was challenged at the Court of Arbitration for Sport (CAS), which annulled CAF's replay ruling on procedural grounds and sent the matter back to CAF's disciplinary bodies, who then ruled that Wydad had forfeited by abandoning the match and reinstated Espérance as champions, a verdict that was ultimately upheld when CAS rejected Wydad's final appeal, definitively confirming Espérance as the 2019 champions.

From the above, the absence of a clear temporal standard for mid-match departures compounds the uncertainty. Articles 82–84 provide no defined threshold for when a temporary walk-off becomes a forfeiture or refusal to play, leaving the determination to post hoc interpretation. CAF's application of these provisions in the present case effectively converts a brief interruption into a definitive forfeiture, thereby introducing a fluid and indeterminate standard.

The result is a precedent in which even matches completed under the referee's authority are no longer insulated from subsequent administrative reversal. This outcome sits uneasily with the field-of-play doctrine, which is intended to preserve finality by confining decisive authority to events on the pitch rather than retrospective determinations of it.¹¹

Integrity cuts both ways

Morocco's case is not frivolous. The federation argued for strict application of the rules to

preserve integrity after a chaotic finale that included pitch incursions and prolonged delay. CAF Appeal Board accepted that logic in full. Yet if integrity was irreparably compromised, the logical in-competition remedy would have been to abandon and replay, not to complete the match under the referee's authority and then retroactively default one team two months later.¹²

What happens next?

Senegal's football federation has confirmed that it has appealed to CAS, calling the decision "unfair, unprecedented and unacceptable." CAS will not re-referee the final; it will examine jurisdiction, regulatory interpretation, and whether CAF's decision was arbitrary or disproportionate in light of the Laws of the Game and established *lex sportiva*. Whatever the outcome, this case will likely shape future competition rules, for example, by defining a clear time threshold and operational protocol for mid-match walk-offs that distinguishes protest from withdrawal.¹³

Conclusion

CAF's ruling may have been intended to enforce the rules, but it stretches the meaning of "withdrawal," clashes with the principle that a referee's final whistle should settle a match and shifts decision-making away from the pitch to the boardroom. If anything, less than full, uninterrupted play can lead to a forfeiture, then no result is ever truly certain. This uncertainty goes beyond legal theory; it undermines fairness, predictability, and confidence in how the

¹¹ GhanaWeb, 'Inside CAF's Article 84: The law that decided the AFCON final' (18 March 2026) <<https://www.ghanaweb.com/GhanaHomePage/SportsArchive/Inside-CAF-s-Article-84-The-law-that-decided-the-AFCON-final-2026352>> accessed 18 March 2026.

¹² France 24, 'Senegal stripped of Africa Cup of Nations title, Morocco declared champion by CAF appeal board' (17 March 2026) <<https://www.france24.com/en/sport/20260317-senegal-stripped-of-africa-cup-of-nations-title-morocco-declared-champion-by-caf-appeal-board>> accessed 18 March 2026.

¹³ Ibid.

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game is governed.

These concerns are heightened by the need for consistency in applying the rules. In the 2019 CAF Champions League final between Espérance de Tunis and Wydad Casablanca, Wydad refused to continue play following a disputed refereeing decision and the absence of VAR, leading the referee to award the match and title to Espérance on the night. CAF subsequently ordered a replay, but that decision was annulled by the Court of Arbitration for Sport (CAS) on procedural grounds and referred back to CAF's disciplinary bodies, which then ruled that Wydad had forfeited the match, reinstating Espérance as champions, a decision later upheld by CAS. That sequence illustrates both the complexity of such disputes and the importance of applying the rules in a clear and consistent manner across comparable situations.

Against this backdrop, the present dispute has now moved beyond CAF. Senegal has filed an appeal before the Court of Arbitration for Sport (CAS) within the required ten-day period, challenging the decision of the CAF Appeal Board. The outcome will have implications far beyond this single match. It will help define the limits of regulatory power, the proper interpretation of "withdrawal," and, ultimately, whether the final whistle still brings true finality to the game. Because if results can be changed after the match has been played and concluded, then football risks being decided not on the pitch, but after the fact.¹⁴

The decision will either correct the optics of the African Cup of Nations and place it at par with other continental competitions such as the UEFA European

Championship, Copa America or continue to mar the image of the competition.

Disclaimer

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¹⁴ IFAB, 'The Referee: Liability of Match Officials' (n 6).

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