



LEGAL UPDATE

Morocco's Belated AFCON Triumph: A Legal Analysis of Articles 82, 83 and 84

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Introduction

The dust had barely settled on the chaotic scenes witnessed during the showcase final of the 2025 Africa Cup of Nations ("AFCON"), only for the controversy to reignite, and intensify. This comes after the seismic and unprecedented decision, handed down by the appeal board of the continental governing body ("CAF"), to strip Senegal of its title, and hand the trophy to Morocco.

Almost inevitably, a decision aiming at 'rectifying' a controversial final, has caused a volcano of controversy, and an eruption of indignation and outrage on both sides of the argument.

Viewers will recall witnessing Senegal's walk-off during the final, in protest of a penalty being awarded to Morocco, only to be coaxed back to the field by Senegal's captain. In Hollywood scenes, the penalty was missed, and the apparent redemption arc was completed when Senegal grabbed a late winner. However, whilst victory on the field was hard won, Senegal, after what

must seem the longest VAR review in history, has (at least for now) lost the debate (and the trophy) over the interpretation and application of the Regulations of AFCON ("**Regulations**").

Controversy on the field, has now been followed by controversy over the governing rules.

Article 82 and 83 of the Regulations

Article 82 is clear. It stipulates that:

"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 authorisation of the referee, it shall be considered loser and shall be eliminated for good from the current competition. The same shall apply for the teams previously disqualified by decision of CAF".

Article 83 provides that:

"a team that shall not be present on the ground, dressed to play at the time fixed for kick-off or at most 15 minutes later, shall forfeit the match. The referee shall register the absence of the team and shall write it in his report. The Organising Committee shall take the final decision in this respect".

At first blush, there appears to be little leeway to argue that Senegal's departure from the pitch, before the match concluded and without the referee's permission, did not trigger article 82.

However, this is not necessarily a simple issue: at what point does a temporary protest cross the line and become an 'abandonment'? If Senegal had indeed been regarded as having refused to continue playing, why would the referee (the official that has the decision-making authority over a match) allow the resumption of the match, instead of bringing it to a close on the basis of article 82? The head-scratching question also arises: how long after an apparently final outcome, can an on-field decision be countermanded?

Moreover, no engagement with article 83 as Senegal, correctly dressed, arrived on time for kick-off.

Article 84 of the Regulations

Article 84 sets out the consequences of breach:

*"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".*

Herein lies what is likely to be the fierce debate: the use of the word "**and**" in article 84, appears to suggest that **both** article 82 **and** article 83 must be triggered before article 84 is applied. In other words: do the devastating consequences of article 84 only apply if **both** articles 82 and 83 are breached, or will a breach of one suffice in order for article 84 to apply?

A strict textualist will argue that article 84's consequences do not apply, as only article 82, and not article 83 also, was triggered. On the other hand, an alternative interpretation might be premised on the broader regulatory context and CAF's objective of maintaining competition integrity, and that article 84 can be applied whenever **either** article 82 **or** article 83 is triggered. One presumes that CAF appeal board's decision, chose to follow this latter interpretation, although others will argue it resulted in an unnecessarily punitive outcome.

Conclusion

The battle for the AFCON 2025 title, between Morocco and Senegal, seems destined to continue. The contest, initially determined within the confines of a grass pitch, will now be fought in the media and in public discourse. But it is likely to be a battle that will be contested and ultimately determined, long after the final whistle, within the confines of the Regulations. The

two sides will inevitably exchange tackles and vie for ultimate victory in a new arena, with the final now likely to be determined not on a football field, but rather at the Court of Arbitration for Sport.



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