A LEGAL CRITIQUE OF THE EVOLUTION OF NATIONAL AND INTERNATIONAL SPORTS ARBITRATION: LESSONS FOR NIGERIA*

Abstract

As sports disputes increasingly involve athletes, clubs, federations and sponsors from different countries, national and international dispute resolution mechanisms face rising demands for speed, expertise and legitimacy. This article undertakes a legal critique of the evolution of national and international sports arbitration, focusing on Nigeria. It examines the conceptual foundations of sports disputes and sports arbitration, before mapping Nigeria's legal and institutional framework, including the Constitution, the Arbitration and Mediation Act 2023, and the Nigeria Football Federation Statutes 2010, against the structure and practice of the Court of Arbitration for Sport (CAS). Employing a doctrinal methodology, the article evaluates documented Nigerian sports disputes, from the unenforced Warri Wolves FC award to the 2025/2026 Super Eagles bonus crisis, and situates Nigeria's practice within a comparative study of the United Kingdom, South Africa, the United States, India and China. It finds that Nigeria's difficulty is not an absence of law: its Constitution, arbitration legislation and football statutes already provide the necessary architecture. What Nigeria has never done is establish the National Dispute Resolution Chamber that article 68 of the NFF Statutes has required since 2010, leaving disputes to escape into ordinary courts, ad hoc political mediation, or foreign institutions. Comparative evidence, particularly China's construction of a domestic sports arbitration commission within a single year, confirms this gap is solvable once political will exists. The article recommends the immediate establishment of the Chamber, replacement of the outdated 1971 Sports Commission Decree, and clearer protocols linking domestic awards to enforcement before the National Industrial Court.

Keywords: Sports arbitration, Court of Arbitration for Sport, National Dispute Resolution Chamber, Nigeria Football Federation, Alternative Dispute Resolution

1. Introduction

In the world of professional sport, disputes are as inevitable as competition itself.[1] They arise between athletes and clubs, between federations and their members, and increasingly, across national borders, wherever contracts, transfers and sponsorships cross jurisdictional lines.[2] Arbitration, one of several Alternative Dispute Resolution (ADR) mechanisms alongside mediation, negotiation and conciliation, has emerged as the preferred means of resolving these disputes because litigation, with its attendant delay and publicity, is ill-suited to an industry defined by short careers and reputational sensitivity.[3] At the international level, the Court of Arbitration for Sport (CAS) has become the closest thing world sport possesses to a supreme court, receiving nearly 9,000 cases between 1986 and 2021 alone.[4] At the national level, however, the picture is far less settled. Nigeria offers a striking illustration: its football statutes have, since 2010, promised the creation of a National Dispute Resolution Chamber, yet that chamber has never been established, leaving disputes to escape either into the ordinary courts or past Nigeria's borders entirely.[5]

This article undertakes a legal critique of the evolution of national and international sports arbitration, with particular focus on Nigeria. It examines the conceptual and legal architecture of sports dispute resolution, evaluates Nigeria's institutional practice against documented case studies, situates Nigeria's experience within a comparative study of five other jurisdictions, and proposes reforms capable of closing the persistent gap between what Nigerian law promises and what its institutions actually deliver. The article proceeds doctrinally, analysing statutes, arbitral rules, institutional practice and case law across Nigeria and comparator jurisdictions.

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[1]A Khumalo and D Jonker, 'Alternative Dispute Resolution in the Sports Arena: It's a Knock-Out!' https://www.webberwentzel.com/News/Pages/alternative-dispute-resolution-in-the-sports-arena-its-a-knock-out.aspx accessed 28 April 2025.
[2]Ibid.
[3]Y Gbenga-Ogundare, 'A Look at Principles of Arbitration in Sports' Tribune Online https://tribuneonlineng.com/a-look-at-principles-of-arbitration-in-sports/ accessed 28 April 2025.
[4]CR Speechlys, 'An Overview of the Court of Arbitration for Sport' https://www.charlesrussellspeechlys.com/en/insights/expert-insights/dispute-resolution/2024/an-overview-of-the-court-of-arbitration-for-sport/ accessed 29 July 2026.
[5]Nigeria Football Federation Statutes 2010, art 68.

2. Conceptual Clarifications

Professional Sports and Sports Disputes

Sport, in its ordinary sense, refers to organised or casual physical activity undertaken for competition, fitness or entertainment.[6] Professional sport narrows this to organised athletic competition in which participants are compensated for their performance, structured into leagues, franchises and large-scale events.[7] The Kenyan Sports (Amendment) (No. 2) Act 2024 defines a professional sportsperson as one engaged under a contract for remuneration to prepare for or participate in a sporting competition, a definition that usefully captures the commercial character underlying most modern sports disputes.[8] Sports disputes, correspondingly, are conflicts or disagreements arising within the sports arena, involving athletes, clubs, coaches, officials, governing bodies, sponsors and even fans.[9] They range from contractual and employment disagreements over wages, transfers and terminations, to disciplinary and doping matters, to leadership and governance contests within federations themselves.[10] Given the short and physically demanding nature of an athletic career, sportspersons have a particular interest in swift resolution; protracted litigation that might be tolerable in an ordinary commercial dispute can consume an athlete's entire competitive window.[11]

Sports Arbitration: National and International

Arbitration is a consensual method of dispute resolution in which parties submit their disagreement to a neutral third party for a final and binding award, in preference to litigation before the ordinary courts.[12] Sports arbitration applies this mechanism specifically to sporting disputes, prized for its efficiency, confidentiality and finality, and above all its capacity to place the decision in the hands of adjudicators, often former athletes, administrators or specialist lawyers, who genuinely understand a sport's rules on transfers, eligibility and competition regulation.[13] Two distinguishable tiers operate within sports arbitration. National sports arbitration, typically administered through a federation's own tribunal or a domestic arbitration centre, generally serves as a court of first instance, applying the sport's own rules alongside domestic law.[14] International sports arbitration, by contrast, operates as a transnational mechanism independent of any single legal system, resolving disputes that cross borders and, through CAS, receiving most of its cases only on appeal from a national or continental body.[15] The relationship between these two tiers, and the consequences of Nigeria's failure to properly constitute its own national tier, forms the central concern of this article.

3. Legal and Institutional Frameworks for Sports Dispute Resolution in Nigeria

Nigeria's legal architecture for resolving sports disputes draws on both domestic and international sources. The Constitution of the Federal Republic of Nigeria 1999 does not mention sport expressly, but section 36 guarantees every athlete, official or club the right to a fair hearing before an impartial tribunal, while section 40 protects the freedom of association that underlies player unions and representative bodies.[16] Section 254C further vests the National Industrial Court with exclusive jurisdiction over labour and employment disputes, a provision of particular importance given that many sports disputes are, at their core, employment disputes between clubs and their players or coaches.[17] The Arbitration and Mediation Act (AMA) 2023 is Nigeria's principal ADR legislation. It repeals the former Arbitration and Conciliation Act and, crucially, aligns Nigeria with the Convention on the Recognition and Enforcement of Foreign Arbitral Awards (the New York Convention) 1958 for the first time.[18] The Act enforces arbitration agreements irrespective of written form, empowers tribunals to grant interim measures, permits electronic

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[6]O Akor, 'Global Trends on Alternative Dispute Resolution and its Application to Sport.'

[7]Global Sports Advocates, 'How the Court of Arbitration for Sport Helps Athletes, Coaches, and Sports Organizations Resolve Disputes' https://www.globalsportsadvocates.com/library/dispute-resolution-at-the-court-of-arbitration-for-sport.cfm accessed 29 July 2026.

[8]Kenyan Sports (Amendment) (No 2) Act 2024, interpretation section.

[9]A Jain, 'Dispute Resolution and Sports: Analysing the Failed Mechanism Surviving on Bits' https://ssrn.com/abstract=4841888 accessed 28 April 2025.

[10]RunSensible, 'Sports Contract Law and Legal Issues in Sports' https://www.runsensible.com/blog/sports-contract-law/ accessed 29 July 2026.

[11]A Jain (n 9).

[12]O Akor (n 6).

[13]L Reilly, 'Introduction to the Court of Arbitration for Sport (CAS) & the Role of National Courts in International Sports Disputes' (2012) J Disp Resol https://scholarship.law.missouri.edu/jdr/vol2012/iss1/5 accessed 29 July 2026.

[14]Penn State Law Review, 'Arbitration Practices in Professional Sports: A Comparative Analysis' https://www.pennstatelawreview.org/the-forum/arbitration-practices-in-professional-sports-a-comparative-analysis/ accessed 29 July 2026.

[15]Global Sports Advocates (n 7).

[16]Constitution of the Federal Republic of Nigeria 1999, ss 36, 40.

[17]Constitution of the Federal Republic of Nigeria 1999, s 254C; National Industrial Court of Nigeria, 'Amarachi Ukaegbu -VS- Heartland Football Club & 4 ORS' https://nicnadr.gov.ng/judgement/details.php?id=5212 accessed 30 July 2026.

[18]S 1(1) and (4) Arbitration and Mediation Act 2023; N Christopher, 'Doctrine of Kompetenz-Kompetenz.'

conclusion of arbitration agreements well suited to how sports contracts are frequently negotiated, and obliges courts to stay proceedings in favour of a valid arbitration agreement.[19]

At the institutional level, the National Sports Commission remains, despite its reinstatement in October 2024 as Nigeria's apex sports authority, governed by the National Sports Commission Decree No. 34 of 1971, a military-era instrument never designed with any dispute resolution mandate in mind.[20] The Nigeria Football Federation Statutes 2010 go further: article 4(3) mandates the creation of institutional mechanisms for resolving disputes involving NFF members, while articles 68 and 69 expressly prohibit recourse to the ordinary civil courts, directing football-related disputes instead to the NFF Arbitration Tribunal or, for international matters, to CAS.[21] Article 68 specifically requires the establishment of a National Dispute Resolution Chamber, modelled on FIFA's own Dispute Resolution Chamber, to hear internal football disputes falling outside the Disciplinary Committee's remit.[22] More than a decade after that mandate took effect, the Chamber has never been constituted, a failure this article returns to below.

Internationally, Nigeria's football administration remains tied to the FIFA Statutes 2024 and the Code of Sports-related Arbitration 2020, both of which anticipate that domestic disputes will first be exhausted through national machinery before any recourse to CAS.[23] The National Sports Industry Policy 2022 supplements this picture with broader commitments to investment and infrastructure but adds little in the way of binding dispute resolution obligations.[24] Taken together, Nigeria's legal architecture is not deficient on paper; the difficulty, as sections 5 and 7 below demonstrate, lies in the gap between what this architecture promises and what Nigeria's institutions have actually built.

4. The Court of Arbitration for Sport: Structure and International Practice

The Court of Arbitration for Sport was proposed by International Olympic Committee President Juan Antonio Samaranch and began hearing cases in 1984, receiving a total of 8,865 cases between 1986 and 2021, including as many as 600 in a single year at its busiest.[25] CAS was not always fully independent: the Swiss Federal Tribunal's decision in the Gundel case exposed its early financial and administrative dependence on the International Olympic Committee, prompting the 1994 creation of the International Council of Arbitration for Sport (ICAS) as an independent oversight body and the division of CAS into Ordinary and Appeals Arbitration Divisions.[26] CAS today operates through four channels: an Ordinary Division for first-instance commercial disputes, an Anti-Doping Division, an Appeals Division that hears the bulk of its caseload from federations' own decisions, and ad hoc divisions convened for major events such as the Olympic Games to resolve urgent disputes within days.[27] Doping matters make up close to thirty per cent of its total caseload.[28] CAS awards, treated as ordinary Swiss arbitral awards, are enforceable internationally under the New York Convention, with review confined to a narrow challenge before the Swiss Federal Tribunal on limited procedural grounds.[29] That narrow scope of review has not gone unquestioned. In International Skating Union v European Commission, the Court of Justice of the European Union began to scrutinise how much deference CAS awards should automatically receive, while the European Court of Human Rights' ruling in Semenya v Switzerland raised similar concerns from a human rights perspective.[30] These developments suggest that CAS's finality, though still formidable, is no longer entirely beyond challenge, a theme of some importance for any jurisdiction, Nigeria included, that treats CAS as the ultimate backstop for its own unresolved domestic disputes.

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[19]S 2(3), s 20 and s 73(5) Arbitration and Mediation Act 2023; B Agbakoba-Onyejiana and O Afolabi, 'Analysis of the English FA and Nigerian Sports Arbitration.'

[20]National Sports Commission Decree No 34 of 1971, Government Gazette Supplement, 12 August 1971; Federal Executive Council Communique, October 2024; S Usman, 'Dikko's NSC under Fire: 'Colossal Failure' Looms for Nigerian Sports.'

[21]Nigeria Football Federation Statutes 2010, arts 4(3), 68 and 69.

[22]Nigeria Football Federation Statutes 2010, art 68.

[23]FIFA Statutes 2024; Code of Sports-related Arbitration 2020.

[24]C Nwosu, 'Why the Nigerian National Sports Industry Policy 2022/26 Matters.'

[25]CR Speechlys (n 4); D Morris, 'The Development and Structure of the Court of Arbitration for Sport' https://blogs.duanemorris.com/internationalarbitration/2023/07/06/cas-development-and-structure/ accessed 29 July 2026.

[26]Lexology, 'The Development and Structure of the Court of Arbitration for Sport' https://www.lexology.com/library/detail.aspx?g=45351b4d-4004-4130-a457-634cdb253e68 accessed 29 July 2026.

[27]Global Sports Advocates (n 7).

[28]Penn State Law Review (n 14).

[29]Sportlegis, 'Compilation of Swiss Federal Tribunal Judgments from 2024' https://www.sportlegis.com/2024/12/20/compilation-of-swiss-federal-tribunal-judgments-from-2024/ accessed 29 July 2026.

[30]Kluwer Arbitration Blog, 'CJEU's Decision in International Skating Union v European Commission: Its Manageable Consequences for International Arbitration' https://legalblogs.wolterskluwer.com/arbitration-blog/cjeus-decision-in-international-skating-union-v-european-commission-its-manageable-consequences-for-international-arbitration/ accessed 30 July 2026; White & Case, 'European Court of Human Rights Delivers Final Ruling in the Case of Semenya v Switzerland' https://www.whitecase.com/insight-alert/european-court-human-rights-delivers-final-ruling-case-semenya-v-switzerland accessed 29 July 2026.

5. National Sports Dispute Resolution in Nigeria: Case Studies and Evaluation

Nigeria's actual practice, examined against documented disputes, reveals a pattern strikingly at odds with its statutory promise. In the Warri Wolves FC unpaid wages dispute, eighteen players who won an award before the NFF's Players' Status Committee following the club's refusal to renew their contracts after the 2008/09 season never had that award enforced; more than a decade later it remained a live and frequently cited grievance.[31] By contrast, in the Nasarawa United FC case, twelve players and five coaches who obtained a similar award for unpaid entitlements approached the National Industrial Court directly, and on 17 April 2018 Honourable Justice Kenneth Amadi, invoking section 254C of the Constitution, adopted the federation's award as the judgment of the court, ordering payment of ₦98 million.[32] The contrast between these two cases shows that Nigeria's enforcement machinery works when invoked, but fails whenever claimants do not, or cannot, take the extra procedural step of engaging the National Industrial Court. The jurisdictional confusion this produces was laid bare in *Amarachi Ukaegbu v Heartland Football Club & 4 Others,* where the claimant successfully argued that FIFA's requirement of exhausting internal football arbitration before recourse to ordinary courts had never been properly domesticated into Nigerian law, allowing her claim to bypass the NFF's machinery altogether.[33]

Governance disputes have proved still more damaging. The Nigeria Football Federation leadership crisis of 2014 to 2018, arising from a disputed election following the detention of then-president Aminu Maigari, saw CAS uphold FIFA's refusal to recognise a rival board, only for a Federal High Court in Jos to issue orders in 2018 that directly contradicted both FIFA's and CAS's earlier rulings, a Nigerian court effectively disregarding the finality of a final CAS award.[34] The Nigeria Basketball Federation's own leadership crisis has never been resolved by any Nigerian institution; it took a two-year federal government withdrawal from international competition and, eventually, intervention by the international federation FIBA to force any resolution.[35]

Nigeria's most significant recent doping matter, involving athlete Blessing Okagbare, was decided entirely by the Athletics Integrity Unit and, on appeal, by CAS, with no visible role for any Nigerian domestic body at any stage.[36] Most tellingly of all, the 2025/2026 Super Eagles unpaid bonuses dispute, in which the national football team twice threatened to boycott matches over unpaid entitlements, was resolved not through any tribunal or grievance procedure but through public pressure, a captain's personal financial pledge, and last-minute intervention by a government minister and the Central Bank of Nigeria.[37]

These cases point to a single underlying diagnosis. Nigeria's difficulty is not an absence of rules; it is that the institution those rules require, a properly funded, genuinely independent National Dispute Resolution Chamber, has never been built. Every dispute examined above found its way either into the ordinary courts, into ad hoc political mediation, or past Nigeria's borders into the hands of FIFA, FIBA, the Athletics Integrity Unit or CAS, precisely because the chamber that should have caught it does not exist.[38]

6. Comparative Perspectives from Selected Jurisdictions

A comparative review of five jurisdictions situates Nigeria's predicament within a wider pattern. The United Kingdom offers the most mature model: Sport Resolutions, an independent, stakeholder-funded body, has resolved more than 1,500 disputes across 40 sports over a decade, saving British sport more than £15,000,000 in legal costs, and channels domestic doping appeals to CAS through a clear two-tier structure.[39] South Africa, by contrast, has proposed a

[31]Omaplex Law Firm, 'The Legal Framework for Arbitration in Sports' https://omaplex.com.ng/the-legal-framework-for-arbitration-in-sports/ accessed 25 August 2026.

[32]National Industrial Court of Nigeria, 'Industrial Court Orders Nasarawa Govt, NUFC to Pay Coaches, Players N98 million Entitlements' https://nicnadr.gov.ng/news/164/ accessed 30 July 2026.

[33]National Industrial Court of Nigeria (n 17).

[34]BBC Sport, 'Nigeria Football Federation Split After 'Election"'; ESPN, 'Court Declares Nigeria Football Federation Board Elections...'; BBC Sport, 'Nigeria Avoid a Global Football Ban from Fifa' https://feeds.bbci.co.uk/sport/football/29107600 accessed 30 July 2026.

[35]Leadership, 'NVBF Crisis: FIBA Backs Kida's Board, Sets October Deadline'; The Cable, 'Nigeria Basketball Federation (NBBF) Crisis: The Facts' https://www.thecable.ng/nigeria-basketball-federation-nbbf-crisis-the-facts/ accessed 30 July 2026.

[36]ESPN, 'Nigerian Sprinter, Olympic Medalist Blessing Okagbare Banned'; India.com, 'Nigerian Sprinter Blessing Okagbare Banned For 10 Years.'

[37]Legit.ng, 'NFF Insider Breaks Silence on Super Eagles' Unpaid Bonuses'; Vanguard, 'Super Eagles Threaten to Boycott Algeria Match Over Unpaid Bonuses'; ESPN, 'AFCON 2025 - Nigeria Captain Wilfred Ndidi Pledges to Pay Super Eagles Bonuses Out of Own Pocket' https://www.espn.com/espn/story/_/id/47567699/nigeria-captain-wilfred-ndidi-pledges-pay-super-eagles-bonuses-own-pocket accessed 30 July 2026.

[38]Guardian Nigeria, 'Ending Cycle of Crises in Sports Federations.'

[39]Sport Resolutions, 'Overview' https://www.sportresolutions.co.uk/about-us/who-we-are/overview accessed 29 July 2026; Sport Resolutions, 'National Anti-Doping Panel (NADP)' https://www.sportresolutions.com/services/national-anti-doping-panel accessed 29 July 2026.

dedicated Sport Arbitration Tribunal for years without finally establishing it, relying meanwhile on the general Arbitration Foundation of Southern Africa, a pattern that closely mirrors Nigeria's own unestablished National Dispute Resolution Chamber.[40]

The United States has built no unified national sports arbitration law at all, leaving dispute resolution to each professional league's collective bargaining agreement; while Major League Baseball's transparent salary arbitration and the National Basketball Association's jointly chosen arbitrators are regarded as reasonably fair, the National Football League's concentration of disciplinary authority in the Commissioner's office, criticised sharply in the 'Deflategate' controversy, shows that an arbitration clause alone does not guarantee independence.[41] India, historically reliant on federation self-regulation following Zee Telefilms Ltd v Union of India, introduced the National Sports Governance Bill 2025 to create a National Sports Tribunal with civil court powers, even as its athletes, illustrated by the dismissal of Vinesh Phogat's appeal at the Paris 2024 Olympics, continue to depend on CAS for urgent international matters.[42]

China offers perhaps the clearest template of all. Before 2022, Chinese courts, including the Beijing Chaoyang Court, held that football's own internal dispute commissions were not recognised arbitral institutions under the PRC Arbitration Law.[43] Within a single year, China's legislature amended the Sports Law of the People's Republic of China and the General Administration of Sport promulgated rules establishing the China Commission of Arbitration for Sport, a fully staffed domestic equivalent of CAS.[44] China demonstrates that a government can move from legal vacuum to a functioning domestic sports arbitration commission once political will is present, a lesson of direct relevance to Nigeria's own long-delayed National Dispute Resolution Chamber.

7. Challenges and Findings

Read together, sections 5 and 6 support four findings. First, Nigeria's domestic machinery functions adequately in ordinary employment disputes, provided claimants invoke the National Industrial Court's jurisdiction under section 254C, as Nasarawa United shows.[45] Second, that same machinery fails wherever claimants do not take that extra step, as Warri Wolves shows, a failure of awareness and access to justice rather than of underlying law.[46] Third, Nigeria's institutional architecture is porous enough that even football's own internal exhaustion requirement can be, and has been, successfully challenged as unenforceable, as Ukaegbu shows.[47] Fourth, whenever a dispute becomes genuinely significant, whether a governance crisis, a doping charge, or a national team grievance, Nigeria's domestic institutions tend to be spectators rather than participants, leaving resolution to foreign federations, CAS, or ad hoc political intervention.[48] The comparative material in section 6 confirms that Nigeria's difficulty is not unique; South Africa and, until recently, India occupy a similar pre-reform position. It also confirms, through the United Kingdom's and China's examples, that the difficulty is solvable, and can be solved quickly once a government commits to the task.[49]

8. Conclusion and Recommendations

This article has shown that Nigeria's difficulty in resolving professional sports disputes is not a want of law. Its Constitution guarantees fair hearing, the Arbitration and Mediation Act 2023 finally aligns it with the New York Convention, and the NFF Statutes 2010 set out a disciplinary, appeal and arbitration structure comparable to those found in more developed sporting jurisdictions. What Nigeria has never done is build the one institution, a properly funded and genuinely independent National Dispute Resolution Chamber, that its own football statutes have promised

[40]South African Sports Confederation and Olympic Committee v Lane (1016/2013) [2014] ZASCA 189 (27 November 2014); Arbitration Foundation of Southern Africa, 'Home' https://arbitration.co.za/ accessed 29 July 2026.
[41]Cardozo Journal of Conflict Resolution, 'Arbitration in Professional Sports: Is It Time to Move On?' https://www.cardozojcr.com/cjcr-blog/arbitration-in-professional-sports-is-it-time-to-move-on accessed 29 July 2026.
[42]Zee Telefilms Ltd v Union of India (2005) 4 SCC 649; Storyboard18, 'Govt Tables Landmark Sports Governance Bill; Brings BCCI Under Oversight' https://www.storyboard18.com/how-it-works/govt-tables-landmark-sports-governance-bill-brings-bcci-under-oversight-76363.htm accessed 29 July 2026; ESPN Africa, 'Vinesh Phogat's Appeal for a Shared Silver Olympic Wrestling Medal Rejected by Arbitration Court' https://africa.espn.com/olympics/story/_/id/40858964/vinesh-phogat-paris-olympics-2024-cas-rejects-appeal-no-silver-medal accessed 29 July 2026.
[43]Lexology, 'Sports Law in China' https://www.lexology.com/library/detail.aspx?g=67e116f0-2025-48c1-80ff-46a7a3cb39ed accessed 29 July 2026.
[44]Mondaq, 'China's Sports Arbitration System Finally In Place!' https://www.mondaq.com/china/sport/1228170/chinas-sports-arbitration-system-finally-in-place accessed 29 July 2026.
[45]National Industrial Court of Nigeria (n 32).
[46]Omaplex Law Firm (n 31).
[47]National Industrial Court of Nigeria (n 17).
[48]World Anti-Doping Agency, 'WADA Refers Compliance Cases Against the Nigerian and Venezuelan NADOs to Court of Arbitration for Sport' https://www.wada-ama.org/en/news/wada-refers-compliance-cases-against-nigerian-and-venezuelan-nados-court-arbitration-sport accessed 30 July 2026.
[49]Mondaq (n 44); Sport Resolutions (n 39).

for well over a decade. The comparative evidence from the United Kingdom, South Africa, the United States, India and China confirms both that Nigeria is not alone in this difficulty and that the difficulty can be overcome, in some cases within a single year, once the requisite political will is found. Aligning Nigeria's domestic practice with the standard its own law already sets for itself would give Nigerian athletes, clubs and federations somewhere reliable to turn before disputes escalate into the prolonged and often embarrassing episodes this article has documented, and would finally close the gap between what Nigerian sports law promises and what Nigerian sports institutions deliver.

Building directly on the findings above, this article makes the following recommendations.

First, and most urgently, the Nigeria Football Federation, working with the National Sports Commission, should finally establish the National Dispute Resolution Chamber that article 68 of its own Statutes has required since 2010; this calls for compliance with an existing rule, not new legislation.[50]

Second, the National Assembly should replace the National Sports Commission Decree No. 34 of 1971 with a modern National Sports Commission Act that clearly defines the Commission's powers, including a specific mediation and referral function distinct from its developmental role.[51]

Third, Nigeria needs a clearer, legislated boundary between government's legitimate oversight of federations and the kind of direct interference that triggers international sanctions, informed by the contrasting outcomes of the 2014 NFF crisis and the 2025/2026 Super Eagles bonus dispute.[52]

Fourth, the National Industrial Court's enforcement route under section 254C should be made better known and built directly into the new Chamber's rules, so that its awards are automatically referred for adoption as court judgments, removing the burden of discovery from individual claimants.[53]

Fifth, the Chamber's establishing rules should expressly domesticate the requirement that football-related disputes first be submitted to it, closing the gap exposed in Ukaegbu, while preserving the National Industrial Court's role in enforcement rather than duplicating fact-finding.[54]

Sixth, once proven in football, a similarly adapted mechanism should be extended to basketball, athletics and other federations, rather than leaving each to build its own machinery from scratch.[55]

Seventh, the 2025 National Anti-Doping Act and its resulting Nigeria Anti-Doping Centre should be properly resourced and made genuinely independent, so that future doping cases need not be decided entirely by foreign bodies with no domestic input.[56]

Finally, Nigeria's government should build a genuine mediation stage into the new Chamber's rules and examine whether accession to the 2019 Singapore Convention on Mediation would strengthen the enforceability of mediated sports settlements involving foreign parties.[57]

[50]Nigeria Football Federation Statutes 2010, art 68; Sport Resolutions (n 39); Mondaq (n 44).
[51]National Sports Commission Decree No 34 of 1971 (n 20).
[52]BBC Sport (n 34); ESPN (n 37).
[53]Constitution of the Federal Republic of Nigeria 1999, s 254C.
[54]National Industrial Court of Nigeria (n 17).
[55]The Cable (n 35); ESPN (n 36).
[56]National Anti-Doping Act 2025 (Nigeria); World Anti-Doping Agency (n 48).
[57]Taylor & Francis, 'The Role of Artificial Intelligence in Online Dispute Resolution: A Brief and Critical Overview' https://www.tandfonline.com/doi/full/10.1080/13600834.2022.2088060 accessed 29 July 2026.