



TEMPORARY RULE, STRUCTURAL IMPACT:
RETHINKING FIFA NORMALISATION
COMMITTEES

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ABSTRACT

This thesis examines FIFA's use of Normalisation Committees as an exceptional intervention in the governance of member associations, focusing on their legal basis, operation in practice and external review by CAS.

Combining doctrinal analysis of FIFA's regulatory framework with interviews from three former Committee members and a FIFA governance official, it reconstructs how mandates are defined, exercised and extended in concrete cases.

The study concludes that Normalisation Committees are a legitimate and often useful reset mechanism but argues that their effectiveness and perceived fairness depend on targeted refinements to mandate design, preparatory legal analysis and internal committee governance.



CONTENTS

GLOSSARY OF TERMS.....	4
------------------------	---

I. INTRODUCTION.....	5
I.1 Background and motivation.....	5
I.2 Problem statement and research question.....	6
I.3 Methodology and sources.....	7
I.4 Scope and structure of the thesis.....	8
I.5 Acknowledgements.....	8

II. FIFA AND THE GOVERNANCE OF MEMBER ASSOCIATIONS.....	8
II.1 Introduction.....	8
II.2 FIFA in the global football governance architecture.....	9
II.3 Autonomy of sport and the principle of non-intervention.....	10
II.4 Lex sportiva and FIFA’s transnational regulatory role.....	12
II.5 Regulatory and developmental leverage over Member Associations.....	12
II.6 Confederations, national legal orders and multi-level governance.....	14

III. LEGAL FRAMEWORK OF FIFA NORMALISATION COMMITTEES.....	16
III.1 Introduction.....	16
III.2 Legal basis under the FIFA Statutes.....	16
III.3 The concept of “exceptional circumstances”.....	18

III.4 Appointment procedure and institutional actors	19
III.5 Definition and scope of the mandate	20
III.6 Duration and temporal limits	21
III.7 Interim Conclusion	22
<hr/>	
IV. POWERS AND OPERATIONAL FUNCTIONING OF NORMALISATION COMMITTEES	23
IV.1 Introduction.....	23
IV.2 Functional substitution of the executive committee	24
IV.3 Statute revision and institutional restructuring.....	25
IV.4 Daily management and limits on long-term commitments.....	27
IV.5 Election organisation and the transition back to ordinary governance.....	28
<hr/>	
V. PRINCIPAL GOVERNANCE CHALLENGES OF THE NORMALISATION COMMITTEE FRAMEWORK	30
V.1 Introduction.....	30
V.2 FIFA as a Private Association and the Democratic Principle.....	30
V.3 Compensatory Safeguards within the FIFA Framework.....	31
V.4 Legal Certainty and FIFA’s Discretion.....	33
V.5 Proportionality and Member Association Autonomy	33
V.6 Accountability and Procedural Safeguards	34
<hr/>	
VI. CAS JURISPRUDENCE ON NORMALISATION COMMITTEES	35
VI.1 Introduction.....	35
VI.2 Institutional Framework: Statutes and Exclusive Arbitration	36

VI.3 Standing and Admissibility before CAS – FECAFOOT (Cameroon) – TAS 2014–A–3860 and 2015–A–4023.....	37
VI.4 Standard of Review and the Scope of FIFA’s Discretion.....	39
VI.5 National Courts and the TTFA Litigation.....	41
VI.6 Interim Conclusion.....	44
<hr/>	
VII. EMPIRICAL INTERVIEW ANALYSIS, NORMALISATION COMMITTEES IN PRACTICE.....	44
VII.1 Introduction.....	44
VII.2 Contextual Overview: Three Cases and One Institutional Perspective.....	45
VII.3 The Mandate and the Problem of Operational Vagueness.....	49
VII.4 Legitimacy, Local Resistance, and the Interface with Domestic Law.....	50
VII.5 Internal Organisation of the Committee.....	52
VII.6 Duration, Extensions, and the Perverse Incentive Structure.....	53
VII.7 Resources and Operational Capacity.....	54
VII.8 Coordination Between FIFA and the Confederation.....	55
VII.9 Stakeholder Communication and External Relations.....	57
VII.10 Interim Conclusion.....	58
<hr/>	
VIII. TOWARDS A BETTER NORMALISATION PRACTICE.....	59
<hr/>	
IX. CONCLUSION.....	62
<hr/>	
REFERENCES.....	64

GLOSSARY OF TERMS

CAS	Court of Arbitration for Sport
FIFA	Fédération Internationale de Football Association
MA	Member Association
NFA	Namibia Football Association
AUF	Asociación Uruguaya de Fútbol
TTFA	Trinidad and Tobago Football Association
CAF	Confederation of African Football
AFC	Asian Football Confederation
UEFA	Union of European Football Associations
FECAFOOT	Fédération Camerounaise de Football

I. INTRODUCTION

I.1 Background and motivation

In recent years, the Fédération Internationale de Football Association (FIFA) has increasingly relied on so-called normalisation committees to intervene in the governance of its member associations (MAs) when serious crises arise. These committees temporarily replace the elected executive bodies of a national association and are entrusted with running day-to-day affairs, revising statutes and organising fresh elections in order to restore institutional stability. This mechanism is grounded in Article 8 paragraph 2 of the FIFA Statutes, which allows the FIFA Council, “under exceptional circumstances,” to remove an association’s executive bodies and appoint a normalisation committee for a specific period of time.¹The provision creates an explicit derogation from the ordinary requirement that MAs manage their affairs independently and without undue influence from third parties.²

When the instrument was discussed during a lecture of my master program, it immediately stood out as an unusually far-reaching tool in the hands of a private international sports federation. The idea that an association based in Zurich can, in effect, sideline democratically elected football leaders in another jurisdiction and install its own committee to govern a national association raises obvious questions about legitimacy, legal basis and accountability. At the same time, normalisation committees are often presented as the only realistic way to unlock entrenched governance crises, protect competitions and safeguard the interests of players and other stakeholders. This tension between intrusive intervention and the promise of institutional “reset” forms the starting point of this thesis.

¹ FIFA Statutes (2024), art. 8(2).

² FIFA Statutes (2024), arts. 14(1)(i) and 19(1).

I.2 Problem statement and research question

Existing scholarship on FIFA governance has paid only limited, and often incidental, attention to the mechanism of normalisation committees. While there is a growing body of work on FIFA's regulatory framework more generally, there is still relatively little in-depth analysis of how this specific intervention tool is designed, applied in practice and assessed from a governance perspective. It is only treated briefly or as one illustration among many of FIFA's enforcement tools. The internal guidelines developed by FIFA and a growing body of the Court of Arbitration for Sports (CAS) awards add important layers to the regulatory picture, yet their combined implications for how the mechanism operates in practice, and whether it actually delivers stable and credible governance outcomes, have not been fully explored.

Against this background, the central research question of the thesis is:

How does FIFA's legal and regulatory framework govern the establishment and operation of normalisation committees, how effectively does this mechanism function in practice, and to what extent should FIFA adjust its approach in order to better support stable and legitimate football governance?

This overarching question is unpacked into five sub-questions that structure the analysis

- i. The thesis examines the legal basis for the appointment of normalisation committees and the circumstances in which FIFA may legitimately intervene in the governance of an MA.
- ii. It investigates the powers that committees exercise in practice and the extent to which they operate as a workable substitute for elected executive bodies in steering day-to-day management, statute reform and electoral processes.
- iii. It considers the main governance challenges and legitimacy concerns that emerge from this framework, including but not limited to questions of democratic representation, accountability and stakeholder participation.
- iv. It analyses the mechanisms through which FIFA's recourse to normalisation committees can be challenged or reviewed, particularly before CAS and, in

exceptional cases, before national courts, and asks how far these avenues provide an effective check on the exercise of FIFA's discretion.

- v. It draws on both the doctrinal and empirical findings, the thesis develops proposals for refinements to FIFA's regulatory and general practice around the normalisation committees.

I.3 Methodology and sources

The thesis adopts a doctrinal legal methodology as its primary approach. It offers a close reading of the FIFA Statutes, the Regulations Governing the Application of the Statutes and the FIFA Governance Regulations,³ as well as relevant CAS jurisprudence dealing with normalisation committees and related questions of autonomy, government interference and proportionality. These materials are complemented by academic articles on sports governance and autonomy, and publicly available FIFA media releases and governance reports.

In order to move beyond the formal legal framework, and given the limited volume of in-depth academic work on normalisation committees, the doctrinal analysis is complemented by a modest empirical component. The thesis draws on interviews with three former members of normalisation committees in Namibia, the Maldives and Curaçao, as well as an interview with a FIFA governance official who has been directly involved in the design and oversight of normalisation mandates. The interviews explore, among other things, how mandates are defined, how committees interact with domestic stakeholders and FIFA, how conflicts are managed and which structural obstacles tend to recur across cases. The empirical material does not claim statistical representativeness; its function is to provide grounded insight into the decision-making culture surrounding normalisation committees and to test whether the safeguards identified in the legal framework are effective in practice.

The empirical part of the research is based on informed consent. Interviewees were provided with an explanation of the project.

³ FIFA Statutes (2024); Regulations Governing the Application of the Statutes (2024).

I.4 Scope and structure of the thesis

The thesis focuses on FIFA normalisation committees as provided for in Article 8 paragraph 2 of the FIFA Statutes and elaborated in the Regulations Governing the Application of the Statutes. It does not analyse in detail other forms of intervention. Geographically, the analysis is not limited to a single confederation, but draws on examples from different regions in order to capture the diversity of political and legal environments in which normalisation committees operate.

I.5 Acknowledgements

The (empirical) research presented in this thesis has benefited greatly from the generosity of practitioners who agreed to share their experience with normalisation committees, often based on demanding and politically sensitive mandates. I am very thankful to the former committee members and the FIFA governance official who took the time to participate in the interviews. It has added a dimension that could not have been captured through doctrinal analysis alone.

I also wish to express my sincere gratitude to my supervisor, Rolf Tanner, for his guidance, thoughtful criticism and constant encouragement throughout the research process. Any remaining errors or omissions are, of course, my own responsibility.

II. FIFA AND THE GOVERNANCE OF MEMBER ASSOCIATIONS

II.1 Introduction

This chapter sets out the conceptual governance framework within which FIFA's intervention mechanisms, including normalisation committees, operate. It does not yet undertake a detailed doctrinal analysis of the relevant provisions; that task is reserved for Chapter 3. Instead, the present chapter (i) situates FIFA within the global football

governance architecture, (ii) explains the autonomy and non-intervention principles in broad terms, (iii) outlines FIFA's regulatory and developmental leverage over its MAs, and (iv) introduces the multi-level governance context involving confederations and national legal orders. This broader framework is necessary to understand both the possibilities and the limits of FIFA's most intrusive intervention tool.

II.2 FIFA in the global football governance architecture

FIFA stands at the top of a stratified governance structure that organises association football through a pyramid of international, continental and national actors. At the apex, FIFA defines the overarching regulatory framework, organises its flagship competitions and allocates substantial financial resources to its members. Beneath FIFA operate six continental confederations, and at the base are 211 MAs that are responsible for administering and regulating football within their territories.⁴

In comparative terms, football is a leading example of a sport dominated by a single international federation. Analytical models of “multi-centred regulation” in sport distinguish between fragmented ecosystems with multiple regulators and systems where one international federation retains near-monopoly control over rules, events and rankings. Football belongs largely to the latter category: FIFA (together with the different confederations controls the most valuable competitions, the international calendar and the key regulatory instruments that define the rules, disciplinary framework and transfer system.⁵

This concentration of power has ambivalent implications. It facilitates uniform application of technical rules and disciplinary standards across jurisdictions, thereby contributing to regulatory coherence. At the same time, it creates pronounced asymmetries between FIFA and its MAs. National associations are formally constituted under domestic law, but their sporting and financial viability depends on continued FIFA recognition, participation in international competitions and access to centralised

⁴ FIFA, ‘Member Associations’ accessed 17 April 2026.

⁵ E Bayle, ‘A model for the multi-centred regulation of world sport’ (2023) 15(2) *International Journal of Sport Policy and Politics* 309–327.

revenues and development funding. This structural dependence informs the debate on autonomy, intervention and accountability that runs through this thesis.⁶

II.3 Autonomy of sport and the principle of non-intervention

The relationship between FIFA and its MAs is structured by a layered normative framework of rights and obligations set out in the FIFA Statutes. Under Article 14 paragraph 1(i), each MA is bound to comply fully with the Statutes, regulations, directives and decisions of FIFA bodies at all times.⁷ Against this backdrop of regulatory compliance, the principle of autonomy emerges as a cardinal principle imposed on MAs through the Statutes themselves. Article 19 paragraph 1 provides that each MA "shall manage its affairs independently and without undue influence from third parties".⁸ Comparable formulations appear in the Olympic Charter and in international sport governance policy documents, confirming that organisational autonomy is widely regarded as a foundational value of the international sports movement, one that nonetheless operates within, and remains conditioned by, the broader regulatory framework of the governing body.⁹

Historically, autonomy was often treated as a broad shield against governmental involvement in football. For much of the twentieth century, FIFA tolerated extensive state control over national football structures, including in authoritarian and state-socialist regimes, as long as basic international commitments were honoured. From the early 1990s onwards, however, FIFA began to apply a much more assertive non-intervention policy. The organisation frequently threatened to suspend, or actually

⁶ JG Hylton, 'How FIFA Used the Principle of Autonomy of Sport to Shield Corruption in the Sepp Blatter Era' (2017) 32 *Maryland Journal of International Law* 136–137.

⁷ FIFA, FIFA Statutes (2024) art 14(1).

⁸ FIFA, FIFA Statutes (2024) art 19(1).

⁹ JL Chappelet, 'Autonomy and governance: necessary bedfellows in the fight against corruption in sport' in *Global Corruption Report: Sport* (Transparency International 2016) 16–27.

suspended, MAs where public authorities were perceived to interfere in elections, appointments or the operation of internal judicial bodies.¹⁰

This policy was progressively codified. Earlier editions of the FIFA Statutes contained only indirect references to independence in the context of elections and decision-making. Later amendments introduced explicit membership obligations to manage affairs independently, authorised sanctions even when third-party interference was not attributable to the MA itself, and directed football-related disputes away from ordinary courts towards sports arbitration, including the CAS.¹¹ At the same time, FIFA developed standard statutes that MAs are expected to adopt.

Insulating MAs from day-to-day political control can protect against opportunistic governmental interference and short-term political objectives. Yet a rigid non-intervention doctrine, enforced primarily through the threat of suspension, may also discourage legitimate state efforts to investigate or remedy corruption and mismanagement within domestic football structures, and may entrench existing elites in power.¹²

The 2016 revision of the FIFA Statutes narrowed the autonomy clause by referring to “undue” influence rather than any form of third-party involvement.¹³ This change signals, at least in principle, that some forms of interaction between states and MAs can be compatible with membership. However, the notion of “undue” is not defined in detail, leaving FIFA with substantial discretion to decide when government involvement crosses the line.¹⁴ How that discretion is exercised in practice, and how it interacts with MAs’ own statutory obligations, will be examined in legal terms in Chapter 3.

¹⁰ JG Hylton, ‘How FIFA Used the Principle of Autonomy of Sport to Shield Corruption in the Sepp Blatter Era’ (2017) 32 *Maryland Journal of International Law* 139.

¹¹ FIFA, FIFA Statutes (2024 edn) arts 14, 19.

¹² Hylton 142–147.

¹³ FIFA, FIFA Statutes (2024) art 19(1).

¹⁴ Hylton 145–147.

II.4 Lex sportiva and FIFA's transnational regulatory role

The regulatory framework governing international football does not operate in isolation. It forms part of a broader transnational private order often referred to as *lex sportiva*. This term captures the body of rules, principles and arbitral case law generated by international sports federations and adjudicatory bodies such as CAS, which together regulate many aspects of sport independently of state legislation.

Within this order, FIFA exercises both normative and executive functions. It adopts and amends its Statutes and regulations, supervises compliance by MAs and confederations, and imposes disciplinary and administrative sanctions where necessary. CAS, for its part, reviews certain FIFA decisions on appeal, including those affecting MAs, and contributes through its jurisprudence to the clarification of key concepts such as independence, government interference and proportionality of sanctions¹⁵.

The interaction between FIFA's regulatory instruments and CAS case law gives substance to core principles, including the autonomy of MAs and the scope of permissible intervention by FIFA. Normalisation committees, as a specific type of intervention, must therefore be analysed not only against the text of the Statutes but also in light of the emerging *lex sportiva* on governance and third-party interference.

II.5 Regulatory and developmental leverage over Member Associations

FIFA's influence over MAs is exercised through a combination of regulatory and financial mechanisms. On the regulatory side, the FIFA Statutes and the Regulations Governing the Application of the Statutes lay down conditions for admission, membership obligations and the competences of FIFA bodies with respect to MAs. MAs must adopt statutes reflecting principles such as political and religious neutrality, non-

¹⁵ FIFA, FIFA Statutes (2024) arts 2, 8, 34 – 38.

discrimination, internal judicial independence and the obligation to submit football-related disputes to sports arbitration rather than domestic courts.¹⁶

In parallel, FIFA has increasingly embedded governance expectations in more detailed internal regulations and assessment tools. Governance frameworks and benchmarking projects emphasise board composition, democratic procedures, transparency, risk management and integrity controls as key criteria for evaluating the quality of governance in international sports organisations and their members. These benchmarks, although formally soft law, shape how FIFA and external observers assess MAs' performance and justify interventions in cases of serious governance failings.¹⁷

On the financial side, FIFA exerts significant leverage through development programmes such as FIFA Forward. Public reports indicate a substantial increase in available funding since 2016, with each MA eligible for several million US dollars per four-year cycle, subject to compliance with governance, reporting and auditing standards. These funds are framed as instruments to promote more professional, transparent and independent administration of football at national level and are tied to specific projects and objectives.¹⁸

The combination of binding rules, soft governance standards and conditional financial support creates a dense network of incentives and constraints. MAs that fail to meet core governance expectations risk not only disciplinary measures and sporting sanctions but also the loss or suspension of key development funds. This environment provides the background against which more intrusive interventions, such as the temporary replacement of an MAs' executive bodies, must be understood.

¹⁶ FIFA, FIFA Statutes (2024) arts 14, 19, 59; FIFA, *Regulations Governing the Application of the Statutes* (2024 edn) arts 1–5.

¹⁷ Arnout Geeraert, *Sports Governance Observer 2018: An Assessment of Good Governance in Five International Sports Federations* (Play the Game 2018).

¹⁸ FIFA, 'FIFA FORWARD 3.0 bolsters investment in football development' (FIFA, 2022); FIFA, 'FIFA Forward – Core principles'.

II.6 Confederations, national legal orders and multi-level governance

The governance of MAs does not operate within a purely bilateral channel between FIFA and national bodies. Confederations such as the Union of European Football Associations (UEFA), the Confederation of African Football (CAF) and the Asian Football Confederation (AFC) play an important intermediary role. They organise continental competitions, issue their own statutes and regulations, run development programmes and, increasingly, articulate governance expectations for their MAs

When governance crises arise within an MA, either FIFA or the relevant confederation may be the first institution to detect and raise concerns, depending on the region and the nature of the issue. In certain regions, FIFA has in practice taken a more proactive stance on governance matters, acting before the confederation becomes involved. In practice, decisions by FIFA to escalate matters, including through the use of strong intervention measures, are typically preceded by consultations with the relevant confederation and may be accompanied by regional oversight or support measures. Media releases on the establishment of normalisation committees frequently make this explicit, noting that “the decision was taken in consultation with [the confederation]” and that committee members “will be appointed jointly by FIFA and [the confederation]”. This layered structure can be viewed as a form of decentralised control: FIFA retains ultimate authority, but extends its reach and contextual understanding through confederations.¹⁹

At the same time, MAs remain legal persons under domestic law. They are usually incorporated as associations or foundations and are therefore subject, at least in principle, to national rules on corporate governance, non-profit supervision and, in some jurisdictions, specific sports legislation. Frictions arise where domestic legal requirements, such as state oversight over public funding, financial reporting duties or rules on democratic representation appear to conflict with FIFA’s insistence on

¹⁹ FIFA, ‘Normalisation committee appointed for the Montserrat Football Association’ (30 January 2026).

independence from “third-party influence” and on exclusive resort to arbitral fora recognised within the football regulatory system.²⁰

Recent disputes in countries such as India²¹, Trinidad and Tobago²² and others show that governments, domestic courts and FIFA may advance competing claims to regulate the governance of MAs, particularly where serious allegations of corruption, mismanagement or non-compliance with national law are at stake. These examples, including the Indian case, demonstrate that situations of non-compliance with national law often trigger competing regulatory responses. While domestic courts or governments may impose transitional governance structures, FIFA may respond either by rejecting such measures as third-party interference or by imposing its own normalisation committee. Taken together, these conflicts illustrate that the autonomy of sport is not fixed, but continuously negotiated within a multi-level and multi-actor governance framework.

In such a context, instruments like normalisation committees cannot be assessed purely within the internal logic of FIFA’s regulatory system. Their legitimacy and effectiveness depend also on how they interact with confederation structures, national legal frameworks and broader expectations of good governance and accountability.

²⁰ P Torchetti, *Legal aspects of FIFA politics: independence, normalisation committees and the FIFA Ethics Committee* (2020) Football Legal 18–22.

²¹ ‘Analysis of FIFA’s Approach on Third-Party Intervention’ (Sports Law Review India, 6 January 2023).

²² Trinidad and Tobago Football Association v. FIFA – the validity of normalisation committees and exclusive jurisdiction of CAS.

III. LEGAL FRAMEWORK OF FIFA NORMALISATION COMMITTEES

III.1 Introduction

Normalisation committees constitute one of the most intrusive governance instruments available to FIFA in its relationship with MAs. Their establishment entails the temporary replacement of an elected executive body by an appointed committee, which raises immediate questions regarding legal basis, procedural safeguards and institutional limits. In preparing this chapter, the author was granted access to internal FIFA guidelines which, alongside the FIFA Statutes and the Regulations Governing the Application of the Statutes, provides unusually detailed insight into how this intervention mechanism is conceived and structured within FIFA's own legal order.

This chapter examines the legal framework underpinning normalisation committees, focusing on the interpretation of Article 8 of the FIFA Statutes, the notion of "exceptional circumstances", and the procedural mechanisms through which committees are established and mandated. It does not yet analyse individual country situations; the application of this framework in concrete cases will be addressed in later chapters.

III.2 Legal basis under the FIFA Statutes

The primary legal basis for the establishment of normalisation committees is found in Article 8 paragraph 2 of the FIFA Statutes. This provision authorises the FIFA Council, "under exceptional circumstances", to remove the executive bodies of a MA, in consultation with the relevant confederation, and to replace them with a normalisation committee for a specific period of time,²³ as further regulated in Article 3 of the Regulations Governing the Application of the Statutes.²⁴ The norm thus creates a targeted derogation from the ordinary governance of MAs, which are otherwise

²³ FIFA, FIFA Statutes 2024 edn, art 8(2).

²⁴ FIFA, Regulations Governing the Application of the Statutes(2024) art 3.

required, under Articles 14 and 19 Statutes, to manage their affairs independently and without undue influence from third parties, while complying with FIFA's regulatory framework and principles of good governance.²⁵

Doctrinally, Article 8 paragraph 2 is notable for its brevity. It does not define what constitutes "exceptional circumstances", nor does it spell out the procedural steps to be followed in establishing a committee beyond the requirement of consultation with the confederation. This open-textured drafting gives FIFA's political organs considerable room for manoeuvre in determining when intervention is justified and how far it should extend. From a rule-of-law perspective, the same openness generates a structural tension between flexibility and legal certainty: the provision enables a sufficient reaction to governance crises, but offers limited statutory guidance to MAs seeking to anticipate the conditions under which their elected organs may be displaced.²⁶

The Regulations Governing the Application of the Statutes mitigate this indeterminacy to some extent. Article 3, introduced as part of the 2024 revision of these Regulations, specifies that the "appointment and implementation of a normalisation committee shall be carried out by the general secretariat in consultation and collaboration with the relevant confederation", and that this process must in particular address the tasks of the committee, the duration of its mandate and the criteria for the selection and appointment of its members. Prior to this revision, the regulatory framework contained no such procedural detail: the sole statutory basis was Article 8 of the FIFA Statutes, which granted the Council authority to appoint a normalisation committee under exceptional circumstances without further specification as to the process to be followed.²⁷

²⁵ FIFA, FIFA Statutes (2024), arts 14,19.

²⁶ FIFA, FIFA Statutes (2024), art 8(2).

²⁷ FIFA, FIFA Statutes (2024), art 8(2); FIFA, Regulations Governing the Application of the Statutes(2024), art 3.

III.3 The concept of “exceptional circumstances”

Because the Statutes do not define “exceptional circumstances”, their content must be reconstructed from interpretative material and the logic of the regulatory system. The internal FIFA guidelines identify a set of situations that have been treated as falling within this concept, including mass resignations of executive committee members, inability to conduct valid elections, persistent stakeholder conflicts at congress or executive committee level, expiry of mandates without replacement and other serious governance challenges. These examples are expressly characterised as indicative rather than exhaustive, underscoring that the Council retains discretion in classifying new constellations as exceptional.

There are two objective criteria that should guide this assessment. First, “exceptional circumstances” presuppose that the institutional and regulatory framework of the MA does not provide appropriate means to resolve the crisis. This may be the case where statutes or electoral regulations are silent, contradictory or otherwise incapable of producing a legitimate outcome. Second, all other reasonable means or remedies should have been exhausted before a normalisation committee is established, notably mediation efforts, on-site or virtual missions by FIFA and the confederation, and technical support tailored to the situation. In this sense, the appointment of a normalisation committee is framed as an *ultima ratio* instrument, to be used only where less intrusive forms of intervention have failed.²⁸

At the same time, there is a conceptual boundary between crises that are “internal in nature” and situations of undue third-party interference. The internal FIFA guidelines emphasises that a normalisation committee cannot be installed where a MA has lost the ability to manage its affairs independently due to external intervention, for example by a government; in such cases, the appropriate response lies in suspension under Articles 14 and 16 Statutes until certain conditions are met.²⁹ Only once the

²⁸ H Kent, *‘FIFA’s normalisation committees – what are they and how do they work?’* (2020) LawInSport, section “When is FIFA entitled to intervene?”.

²⁹ FIFA, FIFA Statutes (2024), arts 14,16.

association's formal autonomy has been restored, but its internal governance remains paralysed, does the normalisation committee appear as an acceptable tool.

This interpretation aligns with broader principles of proportionality in sports regulation: direct substitution of elected organs is presented as legitimate only when internal mechanisms are structurally incapable of restoring compliance and when the core autonomy requirement has been reaffirmed at the interface between FIFA and the state. However, because the criteria remain non-binding guidance rather than codified thresholds, the ultimate decision whether a given situation qualifies as “exceptional” continues to depend on FIFA's discretionary assessment.³⁰

III.4 Appointment procedure and institutional actors

Formally, the competence to remove executive bodies and appoint a normalisation committee lies with the FIFA Council. The Statutes provide that the Council decides under Article 8 paragraph 2³¹, while Article 38 authorises the Bureau of the Council to deal with all matters within the Council's competence that require an immediate decision between meetings, subject to later ratification.³² The internal Guidelines confirm that, in practice, the Bureau is frequently seized of normalisation matters on this basis, precisely because governance crises often require swift action to prevent further disruption to competitions or institutional functioning.

The Regulations Governing the Application of the Statutes assign a central operational role to the general secretariat. Acting in consultation and collaboration with the relevant confederation, the administration prepares the intervention by (i) assessing the situation on the ground, (ii) defining the proposed tasks of the committee, (iii) estimating a reasonable duration of the mandate adapted to the association's specific context, and (iv) setting criteria for the selection of committee members. Consultation with the confederation is a mandatory element both at the decision-making stage

³⁰ P Torchetti, ‘*Legal aspects of FIFA politics: independence, normalisation committees and the FIFA Ethics Committee*’ (2020) *Football Legal* p.18–20.

³¹ FIFA, FIFA Statutes (2024), art 8(2).

³² FIFA, FIFA Statutes (2024), art 38(1)–(3).

(Article 8 paragraph 2) and at the implementation stage (Article 3 Regulations), reflecting FIFA’s multi-level governance structure in which confederations function as regional intermediaries between FIFA and Member Associations.³³

Once the decision to establish a normalisation committee has been taken, the same collaborative pattern governs composition. FIFA and the confederation identify potential candidates, conduct interviews and then submit a list of proposed members to the Bureau or Council. Article 3 paragraphs 2 and 5 Regulations stipulate that committees must consist of a “proportionate and suitable” number of members and that all appointees are subject to eligibility checks by the FIFA Review Committee under the FIFA Governance Regulations.³⁴ These integrity checks operate as an additional filter intended to ensure that members meet minimum standards of independence, reputation and professional competence.³⁵

III.5 Definition and scope of the mandate

A defining feature of normalisation committees is that their mandate is determined in the individual Council or Bureau decision establishing them. Article 3 Regulations requires that each decision specify the tasks of the committee and the duration of its mandate, taking into account the specific circumstances of the MA concerned.³⁶ Despite this case-by-case approach, the Regulations governing the Statutes reveal a relatively standardised functional model. Three core tasks recur in most mandates: managing the daily affairs of the association, revising its statutes (and often also the electoral code), and organising elections for a new executive body.³⁷ The

³³ FIFA, FIFA Statutes (2024), art 8(2); FIFA, Regulations Governing the Application of the Statutes (2024), art 3(1).

³⁴ H Kent, ‘*FIFA’s normalisation committees – what are they and how do they work?*’ (2020) LawInSport, section “When is FIFA entitled to intervene?”.

³⁵ FIFA, Regulations Governing the Application of the Statutes (2024), art 3(2) and (5); FIFA, FIFA Governance Regulations (2024), arts 5–7.

³⁶ FIFA, Regulations Governing the Application of the Statutes (2024 edn), art 3(1) and (3).

³⁷ H Kent, ‘*FIFA’s normalisation committees – what are they and how do they work?*’ (2020) LawInSport, section “Scope of powers”.

practical exercise of these functions, and the limits that apply to them in concrete country situations, will be examined in greater detail in Chapter 4.”

III.6 Duration and temporal limits

Article 8 paragraph 2 FIFA Statutes provides that a normalisation committee must be appointed “for a specific period of time”,³⁸ while Article 3 paragraph 4 Regulations states that “a normalisation committee shall always be appointed for a specific period of time” and that the “duration of the mandate shall be reasonable and adapted to the Member Association’s specific situation”.³⁹ The Regulations further clarify that the Council may extend the mandate “if the circumstances so require”, thereby creating an explicit legal basis for prolongation when unforeseen developments or delays prevent timely completion of the mandate.

The internal guidelines elaborated this by explaining how initial durations are estimated and under which conditions extensions are sought. In setting the initial term, FIFA and the confederation must consider, *inter alia*, the complexity of the required statutory reforms, the need for stakeholder consultation and the likelihood of legal challenges that may affect timelines. Because not all contingencies can be anticipated, extensions are described as a frequent, but not automatic, feature of normalisation processes; any prolongation must be justified by reference to outstanding tasks and the continued necessity of the committee in light of its original objectives.

CAS has confirmed that such extensions are not *per se* unlawful. In CAS 2014/A/3541 *John Begheni Ndeh v FIFA*, the tribunal accepted that the mandate of a normalisation committee may be extended, even more than once, provided the extension remains necessary and proportionate to the committee’s objectives. This decision lends interpretative support to FIFA’s practice of keeping committees in place

³⁸ FIFA, FIFA Statutes (2024), art 8(2).

³⁹ FIFA, Regulations Governing the Application of the Statutes (2024), art 3(4).

until the defined tasks are supposed to have been completed, while simultaneously underscoring that temporal limits constitute an element of the legality assessment.⁴⁰

From a legal–theoretical standpoint, the tension between formal temporariness and potentially open–ended extensions is evident. The longer a normalisation committee remains in office, the more difficult it becomes to reconcile its existence with principles of democratic governance and the autonomy of MAs. The requirement that mandates be specific, reasonable in duration and justified in any extension therefore plays a crucial role in maintaining the proportionality of this far–reaching intervention mechanism.

III.7 Interim Conclusion

The preceding chapters 2 and 3 have established both the structural governance context and the legal framework within which FIFA’s use of normalisation committees must be situated. Together, they demonstrate that this intervention mechanism is embedded in a system characterised by significant central authority combined with open–ended legal standards.

At the structural level, FIFA occupies a dominant position within a hierarchical yet multilevel governance system. While MAs are formally autonomous entities under domestic law, their practical dependence on FIFA through regulatory recognition, access to competitions and financial support creates a relationship of asymmetry. This imbalance is further reinforced by FIFA’s ability to impose governance requirements and to enforce compliance through sanctions or more intrusive measures.

The principle of autonomy of sport, as codified in the FIFA Statutes, operates as a foundational norm within this framework. However, its application reveals inherent tensions. While autonomy serves to shield football governance from undue political interference, its strict enforcement may also constrain legitimate state action aimed at addressing governance failures within MAs. As such, autonomy functions less as an

⁴⁰ CAS 2014/A/3541 John Begheni Ndeh v FIFA.

absolute rule and more as a balancing concept, requiring reconciliation with competing considerations such as accountability and institutional integrity.

Within this broader context, the legal basis for normalisation committees reflects a deliberate choice for flexibility. Article 8 paragraph 2 of the FIFA Statutes provides the formal competence to intervene under “exceptional circumstances”, yet does not define this threshold. Although the Regulations Governing the Application of the Statutes and internal FIFA guidance introduce procedural elements such as consultation with confederations, defined mandates and temporal limits, these do not substantially restrict FIFA’s discretion. Instead, they structure its exercise while preserving a wide margin of appreciation.

This is particularly evident in the interpretation of “exceptional circumstances”, which remains largely discretionary despite indicative criteria suggesting that normalisation committees should function as an ultima ratio instrument. Similarly, while committees are formally temporary, the possibility of extending their mandates raises questions regarding the compatibility of prolonged intervention with principles of democratic governance and autonomy.

Overall, the analysis demonstrates that normalisation committees are both legally grounded and structurally facilitated by FIFA’s governance model, yet insufficiently constrained by precise legal standards. Their use therefore raises fundamental questions regarding legal certainty, proportionality and the balance between centralised control and the autonomy of MAs. These tensions form the basis for the subsequent examination of how normalisation committees operate in practice and whether their application aligns with these underlying principles.

IV. POWERS AND OPERATIONAL FUNCTIONING OF NORMALISATION COMMITTEES

IV.1 Introduction

Normalisation committees are established with a relatively standard set of core tasks: managing the daily affairs of the MA, revising its statutes and related regulations, and organising elections for a new executive body. This chapter examines how these tasks are exercised in practice and what they reveal about the actual scope of authority of normalisation committees.

The analysis focuses on three dimensions. First, the extent to which a normalisation committee functions as a substitute for the elected executive committee. Second, the use of statute revision as an instrument of institutional restructuring. Third, the way in which daily management and election organisation are carried out under a temporary mandate. The chapter draws on FIFA media communications, practitioner analyses and a selection of documented country situations.

IV.2 Functional substitution of the executive committee

When a normalisation committee is appointed, the existing executive body is effectively displaced and the committee assumes responsibility for the association's governance for the duration of the mandate. FIFA decisions establishing committees typically state that they are empowered to “run the daily affairs” of the association, revise statutes where necessary and organise elections, which indicates that the transfer of authority is broad rather than limited to isolated issues.⁴¹

In operational terms, this means that the committee oversees competitions and development programmes, approves budgets, supervises administrative staff and represents the association in dealings with FIFA, the relevant confederation, public authorities and commercial partners.⁴² In at least one judicial decision concerning Pakistan, the committee was described as the highest body for football matters within the national association's structure for as long as its mandate remained in force,

⁴¹ FIFA, 'FIFA appoints normalisation committees in Guinea and Chad' (28 November 2021) (tasks: “run the daily affairs”, “review the statutes and electoral code”, “ensure elections are held”).

⁴² H Kent, *'FIFA's normalisation committees – what are they and how do they work?'* (2020) LawInSport, section “Scope of powers”.

underlining the comprehensive nature of the substitution.⁴³ Removed office-holders do not retain residual executive powers in the areas covered by the committee's remit.

Although this design suggests that a normalisation committee, in functional terms, simply steps into the position of the displaced executive committee, later empirical material in this thesis nuances that picture. The expert interviews conducted for the research indicate that, in practice, the exercise of these powers is not always as straightforward as the formal mandate might imply. The precise ways in which practice diverges from the substitution model, and the reasons for such divergences, are explored in the empirical chapter

At the same time I think that the temporary nature of a normalisation committee's mandate suggests that not all decisions are of equal weight. Mandates issued by FIFA emphasise tasks such as restoring the association's ability to function, addressing acute financial or governance problems and preparing elections, rather than pursuing long-term commercial or infrastructure projects. In practice, committees have focused on stabilising competitions, regularising finances and revising statutes, with major strategic initiatives either postponed or framed as preparatory steps for the incoming elected executive. This practice should narrow the effective decision-making horizon of normalisation committees: they are authorised to take far-reaching measures to restore stability and compliance, but are discouraged from locking the association into long-term commitments that are not strictly necessary for that purpose. Limited arbitral material confirms that the temporary and corrective nature of the mandate forms part of the legality assessment when the use or extension of committees is reviewed.

IV.3 Statute revision and institutional restructuring

FIFA developed Standard Statutes for MAs first introduced around 2005, which served as a model that MAs were expected to adopt in order to align their domestic governance documents with FIFA's requirements. Earlier versions of the FIFA Statutes, specifically Article 14 paragraph 1(f), formally reflected this approach by requiring

⁴³ Muhammad Anwar v Nasir Kareem Baloch and others, Civil Court Lahore (Complaint No 21/2024, judgement 29 July 2024) 13.

MA "to ratify statutes that are in accordance with the requirements of the FIFA Standard Statutes".⁴⁴ However, this practice was progressively abandoned from around 2010 onwards, and the 2024 revision of the FIFA Statutes formalised this shift: Article 14 paragraph 1(f) now requires MAs "to ratify statutes that are in accordance with the requirements laid down in these Statutes", removing any reference to the Standard Statutes altogether.⁴⁵ This change reflects a broader reorientation in FIFA's approach to MA governance: rather than seeking uniformity through a model document, FIFA now focuses on the minimum principles of good governance enshrined in Article 15 of the Statutes, which sets out substantive requirements on matters such as political neutrality, non-discrimination, the independence of judicial bodies and recourse to sports arbitration.

The reliance on centrally developed models contributes to a high degree of structural similarity between revised statutes in different MAs. Key features such as strengthened integrity provisions, clearer eligibility criteria for office-holders and more elaborate disciplinary and electoral procedures recur across different regions.

In the context of normalisation committees, statute revision takes place under external stewardship and within the time constraints of a temporary mandate, which may limit opportunities for broad domestic consultation. This raises questions about the depth of internal ownership over the resulting framework and about its resilience once the committee has handed over power.

On the other hand, the temporary nature and external backing of normalisation committees can facilitate reforms that might otherwise be blocked by entrenched interests. In several interventions following corruption scandals or prolonged internal conflicts, committees have been tasked with introducing stricter governance standards, including term limits and enhanced financial oversight mechanisms. These reforms may increase transparency and reduce opportunities for abuse, but they also embed FIFA's preferred governance model more firmly in the domestic association's statutes. The quality of the long-term settlement therefore depends not only on the technical content

⁴⁴ FIFA Statutes (2022), art. 14 par. 1(f): "to ratify statutes that are in accordance with the requirements of the FIFA Standard Statutes".

⁴⁵ FIFA, *FIFA Statutes* (2024) arts 14–15 and Annexe "Standard Statutes for Member Associations".

of the reforms but also on how they are received and implemented by the newly elected leadership.⁴⁶

IV.4 Daily management and limits on long-term commitments

Managing daily affairs is the most immediate and visible part of a normalisation committee's work. FIFA decisions and press releases state that committees are appointed to run the association's everyday operations, which typically include approving annual budgets, supervising competitions, managing staff appointments and maintaining relations with key stakeholders.⁴⁷

Similar combinations of operational management and targeted corrective measures can be observed in other associations. In Chad and Guinea, committees were installed after periods of suspension and internal crisis, with mandates to administer daily affairs while preparing elections and revising statutes. "In Pakistan, disputes over the FIFA-appointed normalisation committee's authority and management decisions prompted sustained resistance by domestic stakeholders, including the occupation of the PFF headquarters and the operation of a parallel body claiming to represent the federation, an experience which illustrates that the effective exercise of daily management powers by such committees depends not only on formal authorisation under the FIFA Statutes but also on their acceptance by key local actors."⁴⁸

The tension between the need for decisive action and the limits appropriate to a temporary body is particularly evident in the area of long-term financial and commercial commitments. Soft constraints in the form of consultation requirements

⁴⁶ H Kent, 'FIFA's Normalisation Committees – *What Are They And How Do They Work?*' (LawInSport, 10 November 2020) 2–5 (Ghana, Greece, Argentina, TTFA).

⁴⁷ FIFA, 'Normalisation committee appointed for the Cameroonian FA' (22 August 2017).

⁴⁸ FIFA, 'FIFA appoints normalisation committees in Guinea and Chad' (28 November 2021) (Guinea: mandate to run the daily affairs and review statutes and electoral code; Chad: appointment following suspension and governance crisis); Asian Football Confederation, 'Pakistan Football Federation suspended due to third-party interference' (28 October 2021) (hostile takeover of PFF headquarters and removal of the FIFA-appointed normalisation committee); 'As FIFA suspends Pakistan, Ashfaq seeks dialogue to resolve issue' (7 April 2021) (domestic resistance, occupation of headquarters and parallel leadership).

with FIFA and the relevant confederation and expectations of prudence, aim to prevent committees from entering into major agreements that would bind the association far beyond the mandate. In practice, the effectiveness of these constraints is difficult to assess, as decisions on whether a given matter is “long-term” or “structural” involve a degree of discretion and are not governed by detailed regulatory criteria. This ambiguity leaves space for divergent interpretations by committees, FIFA officials and domestic stakeholders.

IV.5 Election organisation and the transition back to ordinary governance

The organisation of elections marks the formal end point of a normalisation process. Mandates consistently require committees to organise and conduct elections for a new executive committee on the basis of revised statutes and electoral codes. The committee typically oversees the drafting or adaptation of electoral regulations, verifies the eligibility of candidates and delegates, administers the voting process and certifies the results.⁴⁹ In several interventions, the normalisation committee has either directly assumed the role of electoral commission itself, thereby replacing any existing electoral body within the MA, or has been tasked with ensuring that duly constituted electoral bodies within the association organise and supervise the elections in accordance with applicable requirements.⁵⁰ The first solution, in which the normalisation committee itself acts as electoral commission, has proven to be the more common approach in practice. In both scenarios, considerable procedural control over the electoral process rests with a structure that is appointed by FIFA rather than elected by the MA’s congress, which raises questions of democratic legitimacy within the association’s governance framework.

⁴⁹ H Kent, ‘FIFA’s *Normalisation Committees – What Are They And How Do They Work?*’ (LawInSport, 10 November 2020) 4–5 (mandate to “organise and conduct elections for a new executive committee”).

⁵⁰ FIFA, ‘Normalisation committee appointed for the Cameroonian FA’ (22 August 2017) (tasks include to organise elections of a new executive committee); FIFA, ‘Normalisation committee appointed in Congo DR’ (23 April 2023) (NC to ensure that electoral committees are appointed and that elections take place on the basis of the new statutory framework).

Country examples illustrate both the centrality and the sensitivity of this function. In Ghana, a normalisation committee supervised the adoption of new statutes and the conduct of elections under the revised framework, a process that later gave rise to an arbitral appeal concerning the electoral process.⁵¹ Reports from other associations note disagreements over candidate eligibility or delegate accreditation and indicate that decisions taken during normalisation-era elections can reshape domestic power balances.⁵² The committee's dual role as transitional executive and organiser of elections therefore raises delicate questions about impartiality and perceived neutrality, especially in environments marked by factional conflicts.

The legitimacy of the overall intervention depends to a large extent on whether elections organised under a normalisation mandate are regarded as credible, inclusive and procedurally fair by the association's stakeholders. Where this is the case, the transition back to ordinary governance may consolidate the reforms introduced during the mandate. Where doubts persist, the new leadership may inherit a framework whose legal validity is recognised but whose political acceptance is fragile. The adequacy of existing safeguards to ensure fair and transparent election processes under normalisation will be analysed further in the subsequent examination of due process and accountability standards.⁵³

⁵¹ FIFA, 'Appointment of a normalisation committee in Ghana' (27 August 2018) (NC mandated to revise statutes and organise elections); 'GFA Elections: Normalization Committee Responds To CAS Over Osei Palmer's Case' *Modern Ghana* (20 October 2019) (CAS appeal against NC decision to disqualify a presidential candidate).

⁵² Kent, 2–5 (examples of Greece, Argentina and Trinidad and Tobago where NC-era electoral decisions affected domestic power balances).

⁵³ H Kent, 'FIFA's Normalisation Committees – What Are They And How Do They Work?' (LawInSport, 10 November 2020) 2–6 (criticism of NCs and emphasis on "free, fair and transparent elections" in Pakistan), and 8–9 (effectiveness and legitimacy concerns).

V. PRINCIPAL GOVERNANCE CHALLENGES OF THE NORMALISATION COMMITTEE FRAMEWORK

V.1 Introduction

This chapter examines the principal governance challenges arising from FIFA's normalisation committee framework. It focuses on the structural tension between FIFA's intervention powers and the foundational principles of association law, in particular democratic legitimacy, legal certainty and proportionality. At the same time, it considers the extent to which FIFA's framework incorporates procedural and institutional safeguards designed to mitigate these concerns.

The analysis proceeds from the premise that normalisation committees constitute an exceptional governance instrument within a private regulatory system. Their legitimacy cannot therefore be assessed solely by reference to democratic standards applicable to public bodies, but must be evaluated within the contractual and institutional framework accepted by FIFA's MAs. Against that background, the chapter assesses whether the existing system strikes an appropriate balance between effective intervention and the preservation of associational autonomy.

V.2 FIFA as a Private Association and the Democratic Principle

FIFA is constituted as a private association under Swiss law and operates within the framework of Articles 60 to 79 of the Swiss Civil Code. This legal structure is central to understanding both the scope of FIFA's powers and their limits. Swiss association law is characterised by a high degree of organisational autonomy, allowing associations to regulate their internal affairs through their statutes. At the same time, it reflects a fundamentally democratic logic, in which ultimate authority rests with the membership acting through the general assembly.⁵⁴

⁵⁴ Swiss Civil Code (ZGB) arts 60–79; in particular art 60 (associations with a non-commercial purpose acquire legal personality) and art 64 (the general meeting of members is the supreme governing body of the association).

Within this framework, executive authority derives from the members and remains subject to their control. The general assembly retains the power to appoint and dismiss the executive and functions as the supreme organ of the association. Members are further protected by the possibility of challenging decisions that are unlawful or contrary to the statutes. These principles collectively ensure that governance is anchored in the will of the membership.⁵⁵

The normalisation committee mechanism departs from this model by replacing an elected executive body with a committee appointed by FIFA. This creates an inherent democratic deficit, as the committee does not derive its authority from the association's members. From a purely internal perspective, such a replacement would be difficult to reconcile with the core principles of Swiss association law.

However, this departure must be understood within the broader structure of international football governance. MAs are not independent entities in a purely domestic sense, but form part of a transnational regulatory system. By becoming members of FIFA, they have contractually accepted its statutes and the authority derived from them, including the possibility of intervention in exceptional circumstances. The legitimacy of the normalisation committee therefore rests, in part, on this prior consent.⁵⁶

V.3 Compensatory Safeguards within the FIFA Framework

The democratic deficit inherent in the appointment of a normalisation committee is not ignored within FIFA's framework. Instead, it is addressed through a set of compensatory safeguards that seek to preserve a degree of legitimacy and accountability.

First, the statutes of the MA remain in force throughout the normalisation mandate. The general assembly continues to exist as the supreme governing body and

⁵⁵ Swiss Civil Code (ZGB), arts 64 – 65 (general meeting as supreme organ, power to appoint and dismiss the committee) and art 75 (right of members to challenge unlawful or unconstitutional decisions of association bodies before state courts).

⁵⁶ FIFA Statutes (2024) arts 8(2), 14(1)(i) and 19(1) (membership obligations and competence to appoint normalisation committees in “exceptional circumstances”); CAS 2017/A/5356 South African Football Association v FIFA (Award of 23 March 2018) para 83 (association statutes as contractual framework binding on members under Swiss law).

retains the powers conferred upon it by those statutes. This means that, in principle, the membership is not entirely excluded from the governance process. Where a sufficient majority can be assembled, the congress remains capable of influencing key decisions, including those relating to statutory reform.⁵⁷

Second, the members of the normalisation committee are subject to extensive eligibility checks. These assessments examine integrity, independence, political neutrality and potential conflicts of interest. In practice, this results in a level of scrutiny that is often more stringent than that applied to candidates in ordinary elections. While this does not replace democratic legitimacy, it provides an alternative form of legitimacy based on competence and integrity.⁵⁸

Third, the mandate of the normalisation committee is both limited and functional. It is defined in the appointment decision and typically focuses on specific objectives, such as the revision of statutes and the organisation of elections. The committee is therefore not intended to act as a permanent governing body, but as a transitional mechanism designed to restore normal governance. This temporal limitation is an important element in justifying the departure from the ordinary democratic model.⁵⁹

Taken together, these safeguards indicate that FIFA does not seek to replace democratic governance as such, but rather to temporarily suspend and subsequently

⁵⁷ Swiss Civil Code (ZGB) arts 64–65 (general meeting as the supreme organ of an association with power to appoint and dismiss the executive); FIFA Statutes (2024) arts 14(1), 19(1) and 20 (obligations of member associations to adopt statutes reflecting core principles such as political and religious neutrality, non-discrimination and internal judicial independence).

⁵⁸ FIFA Governance Regulations (2016) arts 5 and 55–57 (independence criteria and role of the Review Committee in conducting eligibility checks); FIFA, ‘Informative note on eligibility checks’ (22 September 2016) (integrity and conflicts-of-interest review based on independent investigative reports and eligibility questionnaires); H Kent, ‘FIFA’s Normalisation Committees – *What Are They And How Do They Work?*’ (LawInSport, 10 November 2020) 4–5 (all NC members “required to pass an eligibility test in accordance with the Statutes and the FIFA Governance Regulations, which is conducted by the FIFA Review Committee”).

⁵⁹ FIFA Statutes (2024) art 8(2) (executive bodies of member associations may, under exceptional circumstances, be removed and replaced by a normalisation committee “for a specific period of time”); Regulations Governing the Application of the Statutes (2024) art 3 (mandate of a normalisation committee must specify tasks and duration).

restore it. The extent to which these safeguards are effective in practice is, however, open to debate.

V.4 Legal Certainty and FIFA's Discretion

A central challenge of the normalisation committee framework lies in the lack of a precise definition of the conditions under which it may be applied. The FIFA Statutes provide that such committees may be appointed in “exceptional circumstances”, but do not define this concept or establish clear criteria for its application.⁶⁰

This absence of definition grants FIFA a wide margin of discretion in determining when intervention is justified. While such flexibility may be necessary in a diverse and rapidly evolving governance environment, it also creates uncertainty for MAs. They may find it difficult to predict when a situation will be considered sufficiently serious to warrant intervention.⁶¹

In practice, certain recurring patterns can be identified, including situations of institutional paralysis, contested elections or severe governance failures. However, these patterns are not codified, and their application remains dependent on FIFA's assessment in each individual case. This limits the transparency and predictability of the framework.

The absence of clearly articulated criteria also complicates external review. Where the threshold for intervention is not precisely defined, it becomes more difficult to assess whether it has been met. This reinforces the discretionary nature of FIFA's authority and places greater emphasis on the integrity of its decision-making process.

V.5 Proportionality and Member Association Autonomy

⁶⁰ FIFA Statutes (2024) art 8(2) and P Torchetti, *Legal aspects of FIFA politics: independence, normalisation committees and the FIFA Ethics Committee* (2020).

⁶¹ Torchetti 19–20 (arguing that the lack of definition leaves FIFA with “limitless discretion” to impose a normalisation committee, potentially even where an MA executive has been duly elected in accordance with its constitution).

The principle of autonomy of MAs constitutes a cornerstone of FIFA's regulatory framework. Associations are required to manage their affairs independently and to ensure that their governing bodies are established through democratic procedures. At the same time, they are bound by FIFA's statutes and subject to its supervisory authority.⁶²

The normalisation committee mechanism reflects the tension between these two elements. On the one hand, it constitutes a significant interference with the autonomy of the MA, as it replaces its executive body and centralises decision-making authority. On the other hand, it is justified as a means of restoring that very autonomy in situations where the association is no longer able to function effectively.⁶³

The proportionality of such intervention depends on the circumstances of each case. Where an association is unable to govern itself due to internal conflict or structural failure, the appointment of a normalisation committee may be seen as a necessary and appropriate measure. In other situations, particularly where an elected executive is in place, the justification may be less clear. FIFA's practice suggests that intervention is generally framed as a measure of last resort.

V.6 Accountability and Procedural Safeguards

In addition to substantive constraints, the legitimacy of the normalisation committee mechanism depends on the existence of procedural safeguards. These include the right to be heard, transparency in decision-making, and the management of conflicts of interest.

Within FIFA's framework, procedural guarantees are present but limited. While affected associations may, in principle, challenge intervention measures through arbitration, the initial decision to appoint a normalisation committee is taken within FIFA's institutional structure and is not subject to a formalised adversarial process. This

⁶² FIFA Statutes (2024) arts 14(1), 15 and 19(1).

⁶³ FIFA Statutes (2024) art 8(2) and H Kent, 'FIFA's Normalisation Committees – *What Are They And How Do They Work?*' (LawInSport, 10 November 2020) 2–5 (normalisation committees as far-reaching, but framed as tools to restore effective, autonomous governance).

may limit the extent to which affected parties can influence the decision at an early stage.⁶⁴

Transparency also remains a concern. Appointment decisions are typically communicated through brief public statements, which provide limited insight into the reasoning underlying the intervention. This contrasts with the significant impact such decisions have on the governance of the association.

Conflict-of-interest management is addressed more directly through the eligibility requirements imposed on normalisation committee members. As noted above, these requirements are relatively stringent and contribute to the integrity of the process. However, they do not fully compensate for the lack of transparency in the decision-making process itself.⁶⁵

VI. CAS JURISPRUDENCE ON NORMALISATION COMMITTEES

VI.1 Introduction

This chapter analyses the legal mechanisms that may constrain FIFA's recourse to normalisation committees. It examines, first, the role of the CAS as the primary forum for challenging such interventions and, secondly, the limited openings that exist before national courts. Particular attention is paid to issues of standing, admissibility and standard of review in selected CAS awards, and to the structural limits of ex post arbitration as a corrective mechanism. The chapter then turns to litigation in Trinidad and Tobago as a stress test for the compatibility of FIFA's intervention practice with domestic constitutional and administrative frameworks. The concluding section

⁶⁴ FIFA Statutes (2024) art 57 (jurisdiction of the Court of Arbitration for Sport to resolve disputes between FIFA and member associations).

⁶⁵ FIFA Governance Regulations (2016, 2022) arts 5 and 55 – 57; FIFA, 'Informative note on eligibility checks' (22 September 2016).

assesses the overall effectiveness of existing review mechanisms in constraining FIFA's use of normalisation committees.

VI.2 Institutional Framework: Statutes and Exclusive Arbitration

Under the FIFA Statutes, MAs undertake not to submit disputes of a sporting nature to ordinary courts, but to resolve such disputes through independent arbitration. In this framework, the CAS functions as the ultimate instance for international disputes involving FIFA and its members. At the same time, the Statutes empower the Council, in "exceptional circumstances", to remove the executive bodies of a MA and to appoint a normalisation committee in their place for a defined period of time.

In institutional terms, the imposition of a normalisation committee is thus a unilateral decision of a Swiss private association. Formally, decisions of FIFA bodies are subject to internal remedies and, ultimately, to review by the CAS. Recourse to ordinary courts is as a general rule framed as a violation of the Statutes that may attract disciplinary sanctions. However, this prohibition is not absolute. Article 51 paragraph 3 of the FIFA Statutes expressly provides that MAs must insert in their own statutes a clause prohibiting recourse to ordinary courts "unless the FIFA regulations or binding legal provisions specifically provide for or stipulate recourse to ordinary courts of law".⁶⁶ This reservation is of practical significance: in matters governed by mandatory national law, such as labour law or provisions protecting fundamental rights, recourse to ordinary courts may remain available notwithstanding the general arbitration obligation, precisely because such legal provisions are beyond the regulatory reach of FIFA.

In conclusion the question can be raised whether arbitral review offers a meaningful legal constraint on FIFA's interventions, or whether it primarily serves to regularise decisions already taken.

⁶⁶ FIFA Statutes (edition 2024), art. 51 par. 3.

VI.3 Standing and Admissibility before CAS – FECAFOOT (Cameroon) — TAS 2014-A-3860 and 2015-A-4023

FECAFOOT (Cameroon) — TAS 2014-A-3860 and 2015-A-4023

The consolidated cases TAS 2014-A-3860 *Oryx de Douala & others v FIFA* and TAS 2015-A-4023 *Etoile Filante de Garoua & others v FIFA* arose out of a protracted institutional crisis within the Cameroonian football federation (FECAFOOT). FIFA had suspended FECAFOOT following allegations of government interference and irregularities in the electoral process, and subsequently appointed a normalisation committee to manage the federation's affairs, revise its statutes and organise new elections. When the mandate of this committee was extended and a new electoral road map was imposed, a large group of clubs and officials affiliated to FECAFOOT appealed to CAS.⁶⁷

FIFA challenged the admissibility of these appeals. It argued that only FECAFOOT, as the direct member of FIFA, had standing to challenge decisions of the association, and that the clubs were not directly and individually affected in the sense required under Swiss association law. The Sole Arbitrator rejected this restrictive view. He accepted that, as a rule, the association itself is the primary subject entitled to bring an action, but held that such an approach cannot lead to a denial of justice where the association is effectively controlled by the very organ whose decision is challenged. In the circumstances, FECAFOOT was represented externally by the normalisation committee appointed by FIFA and had no institutional interest in bringing proceedings against FIFA. The Arbitrator therefore recognised that the clubs, as members of FECAFOOT whose governance structure and electoral rights were directly affected, had a sufficient legal interest to request annulment of the impugned decisions.

The FECAFOOT cases thus establish that CAS is willing to interpret standing requirements flexibly in normalisation disputes, in order to avoid a situation in which no actor within the association is able to contest a potentially unlawful intervention. This approach implicitly recognises that the creation of a normalisation committee may

⁶⁷ TAS 2014-A-3860 *Oryx de Douala & consorts v FIFA*; TAS 2015-A-4023 *Etoile Filante de Garoua & consorts v FIFA*, Award of 25 May 2016, paras 3–17 (institutional crisis, suspension of FECAFOOT, appointment and extension of the normalisation committee).

deprive the member association of its capacity to act independently vis-à-vis FIFA, and that member clubs may then be the only actors capable of initiating review.⁶⁸

AUF (Uruguay) – CAS 2018-A-5888

In CAS 2018-A-5888 *Centro Atlético Fénix & others v FIFA, CONMEBOL and Asociación Uruguaya de Fútbol (AUF)*, a similar question of standing arose. Fifteen Uruguayan professional clubs appealed against the decision of the Bureau of the FIFA Council to appoint a normalisation committee for the AUF, with a mandate to run the federation's daily affairs, to revise its statutes and to conduct elections.⁶⁹

The respondents argued that the clubs lacked standing, contending that only AUF, as the direct member of FIFA and CONMEBOL, could challenge decisions addressed to it, and that the clubs were affected merely indirectly. The Panel rejected this argument. It emphasised that the normalisation decision fundamentally altered the internal governance structure of AUF and directly affected the clubs' rights as members, including their representation in the General Assembly, their participation in statutory reform and their involvement in the electoral process. On that basis, the Panel held that the clubs had a sufficient and current interest to seek annulment.⁷⁰

Taken together, the FECAFOOT and AUF awards confirm that CAS does not confine access to appeal against normalisation decisions to the national association whose executive has been replaced. Member clubs can also be recognised as having standing where the intervention significantly affects their institutional position and participation in the association's decision-making. In this way, CAS seeks to preserve at least a minimal avenue for affected stakeholders to challenge the legality of FIFA's most intrusive governance measures.⁷¹

⁶⁸ *Ibid.*, paras 60–61, 86–96.

⁶⁹ CAS 2018-A-5888 *Centro Atlético Fénix & others v FIFA, CONMEBOL & AUF*, Award of 25 June 2019, paras 1–4 (parties and nature of the dispute), 51, 67–69, 67–74 (Bureau of the FIFA Council decision to appoint a normalisation committee for AUF, mandate to manage daily affairs, revise statutes and organise elections; appeal by fifteen Uruguayan clubs).

⁷⁰ *Ibid.*, paras 173–182, 183–195.

⁷¹ TAS 2014-A-3860 & TAS 2015-A-4023 *Oryx de Douala & others v FIFA; Etoile Filante de Garoua & others v FIFA*, Award of 25 May 2016, paras 60–61, 86–96 (acceptance of standing of FECAFOOT

Limits of access: procedural and financial barriers

The generous approach to standing in FECAFOOT and AUF must, however, be placed alongside the practical requirements of CAS proceedings. Arbitration in Lausanne presupposes the ability to pay advances on costs, to secure specialised legal representation and to litigate in a foreign forum. In financially weak or distressed associations, this might constitute a substantial obstacle.

VI.4 Standard of Review and the Scope of FIFA's Discretion

AUF as the leading authority

The AUF award is the most elaborated articulation of the standard of review applicable to FIFA's recourse to normalisation committees. The Panel started from the premise that FIFA, as a Swiss association, enjoys considerable autonomy in its internal affairs. Decisions adopted under Article 8(2) are therefore assessed not de novo, but in light of the limits imposed by Swiss association law, including the prohibition of arbitrariness, discrimination, bad faith and violations of fundamental procedural guarantees.⁷²

In applying this framework, the Panel examined the long history of attempts to align AUF's statutes with FIFA and CONMEBOL requirements, the repeated postponement of votes on statutory reform, and the concerns expressed by the continental and global federations regarding transparency and integrity in the AUF presidential election process. It concluded that these elements amounted to "exceptional circumstances" within the meaning of Article 8(2) and that the appointment of a normalisation committee was a necessary and proportionate response. The measure

clubs in normalisation disputes); CAS 2018-A-5888, paras 183–195 (acceptance of standing of AUF clubs).

⁷² CAS 2018-A-5888 *Centro Atlético Fénix & others v FIFA, CONMEBOL & AUF*, Award of 25 June 2019, paras 196–201 (FIFA as Swiss association with significant autonomy).

pursued legitimate objectives linked to statutory compliance and good governance, and the means chosen were not manifestly excessive.⁷³

The standard of review applied in AUF is thus deferential. CAS does not substitute its own assessment of national governance dynamics for that of FIFA. It limits itself to verifying that the factual basis invoked by FIFA is plausible, that the decision pursues a legitimate purpose recognised by the Statutes, and that the intervention does not clearly overstep the bounds of necessity and proportionality.⁷⁴

FECAFOOT (extensions of a normalisation committee)

The FECAFOOT awards exhibit a similar approach. The Sole Arbitrator acknowledged that the situation in Cameroon was characterised by repeated annulments of electoral processes by the national sports arbitration body, internal disputes over the composition of the General Assembly, and tensions between domestic law and FIFA's statutory requirements. Against this background, he accepted that both the initial appointment of the normalisation committee and the subsequent extensions of its mandate fell within the range of reasonable responses open to FIFA. Although critical of certain choices made by the committee and of the length of the process, he did not consider the extensions to be arbitrary or discriminatory.⁷⁵

These cases underline that CAS is reluctant to interfere with FIFA's assessment of when and how long a normalisation committee is needed. The temporal dimension of interventions, often justified by reference to complex statutory reforms and sensitive electoral calendars, is treated as an area where FIFA's judgement deserves particular deference, provided that basic procedural standards are respected.⁷⁶

⁷³ Ibid., paras 6 – 50, 66 – 67, 136 – 139.

⁷⁴ Ibid., paras 196 – 201, 209 – 211.

⁷⁵ TAS 2014-A-3860 & 2015-A-4023 *Oryx de Douala & others v FIFA; Etoile Filante de Garoua & others v FIFA*, Award of 25 May 2016, paras 3 – 17 (institutional crisis; repeated annulments of electoral processes by the CCACNOSC), 21 – 27, 30 – 32, 39 – 42 (disputes over the composition of the General Assembly; tensions between national law and FIFA's requirements), 41 – 47, 60 – 66 (initial appointment and subsequent extensions of the normalisation committee's mandate considered within FIFA's margin of appreciation; criticism of aspects of the process without finding arbitrariness or discrimination).

⁷⁶ Ibid., paras 41 – 47, 60 – 68.

Structural limitations of ex post arbitral control

From a systemic perspective, the jurisprudence on AUF and FECAFOOT suggests that CAS review places only modest substantive constraints on FIFA's use of normalisation committees. The threshold for annulment is high, the standard is one of reasonableness rather than of strict necessity, and proceedings are typically concluded after key steps in the normalisation process (statutory amendments, elections) have already occurred. Even where an appeal is formally admissible and standing is recognised, the combination of deference and temporal delay reduces the capacity of CAS to function as an effective ex post corrective. Its principal function lies in policing egregious abuses and procedural defects, rather than in recalibrating the balance between intervention and autonomy in individual cases.⁷⁷

VI.5 National Courts and the TTFA Litigation

Appointment of a normalisation committee for TTFA

The experience of the Trinidad and Tobago Football Association (TTFA) illustrates how FIFA's normalisation practice can collide with domestic legal orders. In March 2020, the Bureau of the FIFA Council removed the TTFA executive committee and appointed a normalisation committee, citing severe financial mismanagement, substantial indebtedness and a risk of insolvency. The normalisation committee was given full authority to manage TTFA's affairs, to review its statutes and to organise elections.

TTFA occupies a particular position within Trinidad and Tobago's legal system. Its constitution was incorporated into national law by an Act of Parliament, thereby granting it a statutory character. The elected officers argued that this status prevented an external private association from unilaterally dismissing them and imposing an alternative governance structure. In their view, the decision to appoint a normalisation

⁷⁷ CAS 2018-A-5888, paras 196–201, 209–211 (high threshold for finding a violation; focus on manifest excess, arbitrariness or procedural breaches rather than strict necessity); TAS 2014-A-3860 & 2015-A-4023, paras 60–68.

committee was inconsistent with the domestic constitutional framework governing TTFA and exceeded FIFA's contractual authority.⁷⁸

Attempted CAS proceedings and withdrawal

Initially, a challenge against FIFA's decision was brought before CAS. It is important to note that this appeal was not filed by the TTFA as recognised by FIFA, that is, the association as represented by the normalisation committee installed by FIFA, but by the former officials of the TTFA who claimed to continue to represent the association legitimately and contested the authority of the normalisation committee itself. The appeal, filed in Lausanne, sought to contest the legality of the appointment of the normalisation committee and requested its annulment. However, the appeal was subsequently withdrawn. The claimants indicated that they were unable to meet the advance on costs required by CAS. For officials of a federation already in financial distress, the burden of funding an arbitral procedure against FIFA proved prohibitive.

This episode highlights a practical dimension that does not surface in the FECAFOOT and AUF awards. Even where CAS is formally available as the exclusive forum for review, financially weak associations may be effectively excluded by the cost structure of arbitration. In such circumstances, the theoretical availability of CAS cannot be equated with actual access to justice.

High Court proceedings and disciplinary suspension

Following the withdrawal of the CAS appeal, TTFA turned to the High Court of Trinidad and Tobago. The claim sought declarations that the FIFA decision was ultra vires the TTFA Act, that the elected officers remained the lawful executive, and that the normalisation committee had no authority to act on behalf of TTFA. In an important first-instance judgment, the High Court accepted the essence of these arguments. It held that the domestic legal status of TTFA could not be overridden by the internal

⁷⁸ High Court of Justice of Trinidad and Tobago, *The Trinidad and Tobago Football Association v The Federation Internationale de Football Association*, Claim No. CV2020-01208, Judgment of 13 October 2020 (Gobin J), paras 1 – 2, 20 – 22 (FIFA decision of 17 March 2020 removing the TTFA executive and appointing a normalisation committee).

rules of an external association, and that TTFA's officers were entitled to seek redress before the national courts.

FIFA responded by suspending TTFA from international football, on the ground that the recourse to ordinary courts constituted a serious breach of the Statutes. The suspension was coupled with an explicit demand that TTFA withdraw its High Court action and recognise the authority of the normalisation committee as a condition for reinstatement. In effect, the use of national remedies triggered sanctions that directly affected the national teams and clubs.⁷⁹

On appeal, the Court of Appeal of Trinidad and Tobago overturned the High Court's judgment. It held that TTFA had bound itself, through its constitution and its membership of FIFA, to resolve disputes of this nature exclusively by arbitration. The Court of Appeal concluded that the national courts should not entertain the claim, and that the dispute fell within the exclusive jurisdiction of CAS. This brought the domestic legal position into line with FIFA's expectations and removed, in formal terms, the national judicial route as a vehicle for challenging the normalisation decision.

TTFA as a stress test for legal constraints

The TTFA litigation serves as a stress test for the robustness of legal constraints on FIFA's intervention powers. At first instance, the High Court demonstrated that domestic constitutional and administrative norms can offer a principled basis for resisting an externally imposed restructuring of a national association's governance. In the longer term, however, the combination of contractual commitments to exclusive arbitration, the threat and imposition of suspension, and the deferential stance adopted by the Court of Appeal significantly limited the capacity of national courts to function as a counterweight.

When contrasted with the CAS jurisprudence on FECAFOOT and AUF, the TTFA experience underscores the structural imbalance between FIFA's central authority and the legal remedies available to MAs. CAS offers a narrow, deferential and costly form of review; national courts face contractual and systemic incentives to defer to the

⁷⁹ Despina Mavromati, LawInSports, *Trinidad and Tobago Football Association v. FIFA – the validity of normalisation committees and exclusive jurisdiction of CAS*.

arbitral order. The scope for effective external control of normalisation decisions is therefore limited.

VI.6 Interim Conclusion

The analysis in this chapter indicates that existing review mechanisms provide only limited constraints on FIFA's use of normalisation committees. While CAS allows challenges in principle, it consistently affords FIFA a wide margin of discretion, reflecting its status as a private association whose members have accepted its regulatory authority. The standard of review remains deferential, and proceedings typically occur after the intervention has already been implemented. National courts, as illustrated by the TTFA case, may offer an alternative in theory, but their role is restricted by arbitration clauses and the agreed regulatory framework. Overall, the system confirms rather than restricts FIFA's power to intervene in exceptional circumstances.

VII. EMPIRICAL INTERVIEW ANALYSIS, NORMALISATION COMMITTEES IN PRACTICE

VII.1 Introduction

The preceding chapters have examined FIFA's normalisation committee framework from a predominantly doctrinal perspective, drawing on the statutory basis in Article 8(2) of the FIFA Statutes, the internal guidelines made available to the author, and the jurisprudence developed by the CAS. That analysis has shown that the framework grants FIFA considerable discretion, that formal procedural safeguards exist but remain structurally limited, and that external review mechanisms have so far placed only modest constraints on FIFA's intervention practice. The present chapter shifts the focus to the practical dimension of that framework. It analyses how normalisation committees actually function when confronted with the realities of governance crises in

MAs, drawing on semi-structured interviews conducted with four individuals who have been directly involved in these processes.

Three of the interviewees are former members of normalisation committees: Bisey Uirab, who served as chairman of the Namibia Football Association Normalisation Committee (NFA) (2022 to 2023); Ismail Siman, a legal professional who served on the Maldives Football Association Normalisation Committee (August 2024 to June 2025); and Sueena Francisco, a lawyer and governance advisor who served on the Football Federation Curaçao Normalisation Committee (approximately December 2023 to August 2024). The fourth interviewee is Bruno Comicholi, a senior governance manager within FIFA's Member Associations Division, who provided an institutional perspective on how normalisation committees are managed from the FIFA side.

Together, these four perspectives cover different regional, institutional, and operational contexts. They are analysed here in a manner that is thematically structured, drawing across all four interviews where relevant, but with the specifics of each case introduced first. The analysis focuses on the following dimensions: the contextual background and installation of each committee; the mandate and decision-making powers; the internal organisation of the committee; the duration of the mandate and the conditions for its extension; the availability of resources; the relationship between the committee and FIFA and the relevant confederation; and communication with domestic stakeholders. The section concludes with an assessment of the tensions and structural patterns that emerge across the cases and from the institutional perspective.

It should be noted that all interviews were conducted on the basis of informed consent.

VII.2 Contextual Overview: Three Cases and One Institutional Perspective

Bisey Uirab – NFA

Bisey Uirab is the Chief Executive Officer of the Namibia Airports Company and previously led the Namibian Ports Authority for ten years. He was contacted by FIFA's governance team out of the blue, as he describes it, and had not previously been

involved in football governance. FIFA had identified him through contacts in Namibia on the basis of his management background and personal integrity, and offered him the chairmanship of a four-member committee.

The Namibia committee was the second normalisation committee to operate within the NFA. A first committee, installed in 2019, had succeeded in organising elections and handing over authority to a new executive committee. That committee, however, proved short-lived: internal conflict between the incoming president and the secretary-general led to a vote of no confidence in the president, while disciplinary proceedings against the secretary-general were already underway when Uirab's committee took office. The institution that received Uirab's committee was one in considerable disarray. Financial records were inadequately maintained, multiple findings had been raised by FIFA's auditors, and relationships with commercial sponsors and financial partners had deteriorated to the point where those parties refused to engage with football officials. Rebuilding institutional credibility with government ministries, the diamond industry and financial institutions was among the committee's most pressing early tasks.

The committee consisted of four members with complementary expertise, one or two of whom had some prior knowledge of the Namibian football environment. Uirab describes the composition as a formidable team: members with corporate governance backgrounds complemented those with some existing familiarity with the NFA context, enabling both an external perspective and a degree of contextual awareness.

Ismail Siman – Maldives Football Association

Ismail Siman is a lawyer by profession. He describes the situation that the normalisation committee encountered upon its installation at the Maldives Football Association as "a complete failure of the governance system as a whole." The immediate cause of the intervention was financial mismanagement of a serious character: FIFA development funds, received in US dollars, had been exchanged through the black market currency system in the Maldives, exploiting the difference between the official fixed exchange rate of approximately MVR 15.42 per dollar and the informal rate of

MVR 17 to 19. Over time, this practice escalated into a broader pattern of unsigned beneficiary cheques, unaccountable cash transactions, and unilateral modification of FIFA-funded projects without authorisation. During the COVID-19 period, when alternative financial inflows dried up, the scheme became unsustainable and the irregularities came to light.

By the time the committee arrived, the police had raided the office and seized documents as part of a money laundering investigation, staff salaries had not been paid for periods ranging from three months to over a year, and the committee had access to only a fraction of the institutional documentation. The committee initially consisted of five members: two legal professionals, two finance professionals, and a chairperson. After approximately three to four months, FIFA decided to reduce its size to three following internal disagreements about the scope and direction of the mandate, including the removal of the original chairperson.

Siman notes that the composition of the committee consisted of professionals from legal and financial backgrounds rather than from football. He views this as having been the right approach given the nature of the crisis, observing that the trust extended by creditors, government interlocutors and service providers was in part a function of that professional profile.

Sueena Francisco – Football Federation Curaçao

Sueena Francisco is a lawyer and boardroom advisor based in Curaçao. She was contacted by a CONCACAF official who had been given her name and was specifically looking for a woman with legal and governance expertise for the committee. Francisco had no prior involvement in football and entered the process with what she describes as a straightforward attitude: she brought governance experience but no prior attachment to the football world on the island.

The crisis at the Football Federation Curaçao (FFK) originated in a dispute between the board and a number of clubs over the eligibility of a player. What began as a narrow disciplinary matter escalated into a prolonged institutional impasse, with the result that no local football matches had been organised for two consecutive years from 2022 onwards. Efforts to resolve the situation through new statutes in 2024

ultimately failed at the point of elections: none of the candidates who put themselves forward passed the compliance screening that had been designed under the revised statutory framework. Francisco questions whether the criteria for that screening had been calibrated appropriately for an association at the development stage of the FFK, suggesting that an exceptionally rigorous enhanced due diligence process had been applied to individuals whose governance responsibilities were not commensurate with that level of scrutiny.

The committee consisted of three members: Reginaldo Carolina as chair, with financial expertise and familiarity with the local football environment; Jairo Velioso, with IT expertise relevant to the modernisation of the association's operations; and Francisco in a legal capacity. The committee operated for eight months and made a deliberate strategic choice, in dialogue with FIFA and CONCACAF, to prioritise the organisation of elections over the other elements of the mandate, on the basis that sustainable reform required a legitimately elected board rather than an extended normalisation period.

Bruno Comicholi – FIFA Member Associations Division, Governance Team

Bruno Comicholi is a senior governance manager in FIFA's Member Associations Division, forming part of the governance team led by Rolf Tanner. He describes the scope of his team's work as being primarily oriented towards crisis prevention and crisis management, encompassing electoral processes, statute revision, and the oversight of normalisation committees when they are established. In practice, the governance team functions as the central point of contact between FIFA and an active normalisation committee, coordinating communications, overseeing mandate compliance, handling administrative matters such as agreements and remuneration, and conducting regular meetings and site visits.

Comicholi emphasises that the installation of a normalisation committee is never conceived as a first-line response. Before a matter is submitted to the FIFA Council for consideration, the governance team works through alternative options, including missions, mediation and targeted technical support. The triggers that most commonly lead to an NC installation are, in his account, the inability to conduct elections or to

run daily affairs in a regular way, the collapse of leadership through mass resignations or internal conflict, critical financial mismanagement, and, historically, cases of government interference.

VII.3 The Mandate and the Problem of Operational Vagueness

A concern raised with notable consistency across all three former NC members is the imprecision of the mandate as communicated to committees at the time of their installation. The operative formulation, that the normalisation committee shall run the daily affairs of the MA, revise the statutes and electoral code, and organise elections, is the standard language across mandates, yet the three interviewees converge on the view that it is insufficient to guide a committee confronted with a complex institutional crisis.

Siman is the most analytically precise on this point. He notes that the instruction to carry out day-to-day activities was understood differently by different members of the initial five-person committee. The original chairperson interpreted it as an invitation to assume a broadly executive role across the full range of the association's activities, an interpretation that Siman considered inconsistent with the committee's more pressing governance and financial stabilisation tasks. This disagreement was one of the principal contributing factors to the internal dysfunction that eventually led FIFA to reconstitute the committee. Siman had attempted to draft an internal standard operating procedure to clarify the allocation of decision-making authority within the committee, but the document was not adopted during the first phase of the mandate.

Francisco offers a pointed formulation of the same problem. She observes that the FIFA Statutes contain essentially one article on normalisation committees, and that this article provides only that the committee acts in place of the executive committee and is responsible for daily affairs. In her assessment, the description is too black and white, insufficiently attentive to the jurisdictional context in which the committee must operate. She asks a question that captures the structural ambiguity well: if the secretary-general is responsible for day-to-day management and the normalisation committee replaces the executive committee, what is the precise boundary between the respective competences of each? That question, she notes, had no clear answer in the guidance available to her.

Uirab's critique of the mandate is more directly focused on its implications for effectiveness. He argues that a normalisation committee entering an institution precisely because elected leadership has failed must have at least the same powers as that elected body, and potentially somewhat broader ones. In his experience at the NFA, local actors who were aware of the committee's formal limitations treated it as a temporary inconvenience rather than a genuine institutional authority. The committee's attempt to introduce eligibility restrictions for certain individuals at the point of elections was obstructed because its mandate did not clearly support such action.

Comicholi's perspective from FIFA offers a partial counterpoint. He acknowledges that the mandate is generic by design, but argues that the guidelines provided to committee members are clear about what falls within scope. He distinguishes between two parallel tracks that must run simultaneously: ensuring the smooth functioning of the association's ongoing activities, and addressing the specific issue that caused the FIFA Council to intervene. He notes that anything outside these two tracks, strategic long-term planning, multi-year commercial commitments, decisions driven by the committee's own governance preferences rather than the mandate, falls outside the proper scope of the NC. In his view, some of the dissatisfaction expressed by NC members may reflect attempts to go beyond the mandate rather than genuine gaps in the framework.

This perspective from FIFA is in my opinion not without merit and reflects a principled rationale for limiting NC powers in a democratic governance context. At the same time, it does not fully address the experience reported by Siman and Francisco, whose difficulties concerned not the desire to exceed the mandate but the practical impossibility of determining, in real time and without adequate guidance, where its boundaries lay.

VII.4 Legitimacy, Local Resistance, and the Interface with Domestic Law

The non-elected character of normalisation committees generates legitimacy questions that manifest differently across contexts, but that appear in all three cases examined. The forms of resistance encountered ranged from informal political lobbying

to formal legal threats, and the interviewees' experiences illuminate both the structural sources of that resistance and the tools available to committees to manage it.

Uirab describes a divided stakeholder landscape in Namibia. A portion of the football community, notably those associated with the dismissed secretary-general, regarded the committee as illegitimate and provided consistent resistance. Another portion actively welcomed the intervention and wanted the committee to remain longer. Sponsors and government interlocutors, by contrast, came to accept the committee relatively quickly as a credible institutional actor, restoring relationships that had broken down under the previous administration. Uirab attributes this partly to the professional standing of committee members outside football and partly to the sustained effort invested in direct engagement. The legitimacy deficit was thus real but manageable, provided the committee could demonstrate results and maintain active communication with the broader stakeholder community.

Francisco identifies a more legally textured dimension. Several individuals who had not passed the compliance screening for the planned elections threatened domestic legal proceedings, challenging the committee's authority on the basis of local law obligations towards association members. This experience illustrates a point of structural vulnerability in the current framework: the absence of any guidance from FIFA on how to manage the interface between the FIFA mandate and national law creates meaningful legal uncertainty for committee members and provides a lever for opposition groups to obstruct the normalisation process through domestic judicial channels. Francisco notes, somewhat pointedly, that she would not have been averse to such a challenge proceeding, as it would have produced judicial clarity on questions that the framework currently leaves open.

Comicholi's response to this category of concern reflects FIFA's position. He characterises normalisation committees as an instrument within a private regulatory system to which MAs have contractually committed themselves, and he regards their authority as flowing from that prior acceptance of the FIFA Statutes. In his view, objections to the democratic legitimacy of an NC tend to come primarily from those who were part of the problem that necessitated the intervention, and the broader football community typically welcomes the establishment of a committee precisely because it understands that a serious governance failure requires external correction.

This characterisation has empirical support in the Namibia and Maldives cases, where external creditors and government interlocutors were broadly supportive. It nonetheless leaves unresolved the question of how a committee should precisely navigate the genuine legal complexities arising from the interaction between FIFA's mandate and national law in a specific jurisdiction.

VII.5 Internal Organisation of the Committee

A finding that emerges with particular force from the Maldives interview, and is corroborated by the experience in Curaçao, is that FIFA provides no substantive procedural guidance on how a normalisation committee should organise its own internal governance. There is no document specifying how decisions should be made within the committee, what the powers of the chairperson are relative to those of the other members, how disagreements should be resolved, or how responsibilities should be allocated among members with different professional backgrounds.

In the Maldives, the absence of such guidance contributed directly to the internal breakdown that prompted FIFA to reconstitute the committee after approximately three to four months. The original chairperson brought a corporate governance model that Siman considers to have been poorly adapted to the associative context of a football federation. Decisions that could and should have been delegated to individual members were retained at committee level, creating bottlenecks and prolonging deliberations. The committee spent an excessive proportion of its time in meetings rather than executing the substantive work that needed to be done.

Francisco confirms that when she sought procedural guidance, the only document available were some internal guidelines (As discussed in earlier chapters) that she characterises as very basic and not substantive in terms of how and what. Uirab's committee in Namibia, by contrast, functioned on the basis of collective decision-making by consensus, with the chairperson exercising a *de facto* leading role that the other members accepted and respected. This outcome was the product of good personal dynamics rather than any institutional framework that could be replicated elsewhere.

Siman's own position is nuanced. He does not advocate for an exhaustive rulebook, noting that excessive procedural prescription could undermine the flexibility committees need to adapt to varied contexts. His argument is rather that a minimum

framework, covering decision-making procedures, the role of the chairperson, the allocation of responsibilities, and the escalation procedure for internal disputes, would have prevented the dysfunction of the early Maldives mandate and provided a more stable operational foundation for committees elsewhere.

VII.6 Duration, Extensions, and the Perverse Incentive Structure

All three former committee members express the view that the time allocated to their respective committees was insufficient for the tasks assigned. The Maldives committee had one year; the Namibia committee operated for approximately twelve months before receiving an extension of five to six months; and the Curaçao committee operated for eight months. In each case, the interviewee considered that the problems encountered were too deeply rooted to be resolved within the available timeframe.

Uirab argues that the standard one-year term for normalisation committees is “definitely” too short, stressing on the basis of his experience in leading large public enterprises that deeply rooted organisational and cultural problems require a multi-year horizon rather than a twelve-month cycle. He recalls that towards the end of the mandate FIFA “was rushing to have an elected body in place” and that, under this pressure, the committee became “too flexible” in accepting constitutional provisions it regarded as ill-suited to the reforms that were needed.

The extension mechanism as it currently operates attracts particular criticism from Siman. He describes a dynamic in which FIFA communicated to the Maldives committee that failure to complete the one-year mandate would risk triggering a suspension of the MA. This framing made it institutionally and politically impossible for the committee to request an extension, even though such an extension would objectively have been warranted by the volume of unresolved issues. The committee was therefore forced to prioritise, to manage FIFA's expectations downward, and to hand over matters to the incoming executive committee that a more adequately resourced normalisation process would have addressed. Siman did not request an extension because the signal from FIFA was clear enough that it was not worth asking.

Francisco's response to the time problem was more pragmatic. Rather than seeking an extension, the Curaçao committee made a deliberate strategic choice, in dialogue with FIFA and CONCACAF, to accelerate the elections and transfer responsibility to a legitimately elected board. Her reasoning was principled: sustainable institutional reform can only be delivered by an accountable body that carries the members' mandate. Extending the normalisation period would merely delay that transition without guaranteeing better outcomes. She reflects that the word “normalising”, captures the essence of the task: reset the system, and then allow those with the members' trust to rebuild it. The local football federation was technically insolvent at the time the committee arrived, and while the committee stabilised the financial situation and prepared the elections, it was pragmatic enough to recognise that strategic reconstruction required an elected board.

Comicholi's perspective from FIFA reflects a different set of considerations. He notes that extensions are possible, but that the institutional preference is to complete normalisation processes within the initial mandate period, both to minimise disruption and because it is undesirable for a non-elected body to occupy the role of an executive committee for too long. He points to the track record of elections completed and the absence of repeat normalisation committees in most cases as evidence that the framework achieves its purpose, observing that countries with multiple NC episodes are the exception rather than the rule. He also notes that in some cases where there is ongoing concern after elections, FIFA establishes a monitoring committee to oversee the activities of the new executive committee for a period, which provides a form of post-normalisation oversight that goes beyond the formal mandate.

VII.7 Resources and Operational Capacity

Related to the question of duration is the question of the resources available to a normalisation committee to carry out its work. The accounts of all three former committee members reveal significant constraints, though the nature of those constraints varies.

Uirab identifies the absence of dedicated funding for additional human resources as one of the central weaknesses of the normalisation mechanism as he experienced it.

He argues that a committee tasked with effecting genuine institutional and cultural change requires the capacity to bring in professionals who are not embedded in the existing institutional culture and who have the skills to drive reform. Without that capacity, the committee must work with the very people whose conduct contributed to the crisis it is tasked with resolving. He states that had he been able to appoint two to four additional professionals with dedicated budget, the impact of the committee's work would have been substantially greater. The fundamental constraint was financial: the committee had fund limitations that prevented it from importing the additional capacity it needed.

In the Maldives after approximately three months, the committee was able to obtain funding from FIFA to appoint a legal counsel, which relieved the members of the need to attend court hearings and debt negotiations personally. This was not available from the outset. In the early months, members with specialist expertise were performing tasks that would ordinarily fall to external service providers, at a cost in time that inevitably reduced the attention available for governance and oversight functions.

Comicholi acknowledges this dynamic. He notes that FIFA works closely with committees to ensure adequate financial flows into the association, recognising that a committee entering a financially distressed institution cannot function without some minimum level of operational resources, and that FIFA's approach is to work together with the NC and the MA to resolve financial obstacles on a case-by-case basis. Given his insistence that NCs are an exceptional tool and that MAs remain private institutions which should be run according to their own national laws and regulations, there are obvious limits to how far FIFA can and should go in permanently underwriting the operations of a non-elected interim body.

VII.8 Coordination Between FIFA and the Confederation

A further structural issue identified in the interviews concerns the alignment between FIFA and the relevant confederation during the normalisation process. The experiences in Namibia and the Maldives indicate that this alignment is not automatic and that its absence creates practical complications for committee operation.

Siman's recommendation is unambiguous: the positions of FIFA and the relevant confederation should be aligned before the committee is installed, not during its operation, as misalignment undermines the committee's position and creates contradictory messages from the two oversight bodies.

Uirab raises a related concern about the management of informal communication channels between international football bodies and domestic actors. In his account, officials at confederation level were, at certain moments, accessible to local stakeholders pursuing their own agendas, and this indirect input affected some of the constitutional provisions the committee sought to introduce. He suggests that this reflects a degree of permeability in FIFA's and the confederation's communication structures, which allowed individuals from the local football environment to lobby officials and influence outcomes that, from the committee's perspective, ought to have remained within the NC's remit

Francisco's experience in Curaçao presents a contrasting picture. She describes the relationship between FIFA and CONCACAF throughout the committee's mandate as aligned, with joint meetings that brought officials from both bodies together and a consistent institutional line on all material questions. She attributes this partly to the characteristics of the CONCACAF region and partly to the fact that the Curaçao situation was less politically charged than some of the cases addressed in other regions. The variation across these three cases suggests that alignment between FIFA and the confederation depends on a combination of institutional, personal and situational factors, and that the current framework does not provide a structural mechanism to ensure it in all cases.

Comicholi broadly confirms that alignment is the norm but acknowledges that the relationship requires ongoing coordination (joint WhatsApp groups for instance) and that its intensity varies at different phases of the mandate. He describes the governance team as the central coordinating node between FIFA and the confederation, with communication intensity increasing sharply as elections or statute approvals approach.

VII.9 Stakeholder Communication and External Relations

All three committees invested substantial effort in managing relationships with stakeholders outside the football federation: government ministries, commercial sponsors, financial creditors, clubs and the broader sporting public. This dimension of a committee's work is entirely absent from the formal mandate as currently framed, yet in practice it consumed a significant portion of each committee's time and energy.

In Namibia, rebuilding institutional credibility with sponsors and financial partners was one of the committee's most pressing early tasks. Uirab describes a situation in which commercial sponsors had already withdrawn from any engagement with the NFA before the committee arrived, and in which restoring those relationships required sustained personal engagement by committee members drawing on their professional reputations outside football. The government accepted the committee's authority and worked constructively with it, which Uirab regards as a significant positive outcome. He notes that the government's support was not to be taken for granted, and that maintaining it required ongoing attention.

In the Maldives, the committee's credibility with external stakeholders was, according to Siman, relatively strong from the outset, partly because of the professional composition of the committee and partly because the period of institutional dysfunction had been long and damaging enough for creditors and government interlocutors to welcome a structured intervention. The one constituency that remained sceptical, in his account, was the football community itself, an observation that is consistent with Uirab's experience in Namibia.

Francisco identifies communication with stakeholders as an area where the absence of guidance created practical difficulties specific to the Curaçao context. The committee was required to obtain approval from FIFA and CONCACAF before communicating with external parties, including the media and the association's own members. While she understands the rationale for this requirement where the substance of the communication involves material governance decisions, she questions whether it is proportionate as a general rule in a cultural context where timely and transparent communication is important for maintaining institutional trust. The absence of clear guidance on the boundaries of the committee's autonomous communication authority

created uncertainty that was at times counterproductive. From FIFA's perspective, this requirement reflects the principle that the NC operates under a mandate and that communications concerning governance decisions should be coordinated with the bodies that established that mandate, so as to preserve institutional consistency.

VII.10 Interim Conclusion

A provisional assessment of the interview material suggests that the normalisation committee framework is neither fundamentally flawed nor straightforwardly deficient. Rather, it is a functional but under-specified instrument whose effectiveness depends heavily on context, personalities, and the capacity of FIFA and confederations to manage its inherent tensions. The institutional logic behind key design choices is, in many respects, persuasive. FIFA's insistence on a generic mandate, limited temporal scope, and constraints on long-term decision-making reflects a principled concern to avoid transforming a non-elected interim body into a de facto permanent executive, and to respect the private-law autonomy of MAs within their domestic legal orders. The preference for professional profiles with legal and financial expertise over purely footballing backgrounds appears, in the cases examined, to have strengthened external trust and facilitated the clean-up function that normalisation committees are expected to perform.

At the same time, the interviews reveal recurring structural frictions that the current framework does not adequately address: operational vagueness at the mandate's boundaries; the absence of basic internal-governance templates for committees; a time structure that creates pressure to privilege elections over deeper reform; and unresolved questions at the interface between FIFA's mandate, confederation practice, and domestic law. These are not criticisms of the underlying rationale of the instrument, but of its regulatory refinement. The empirical material therefore supports a view that the normalisation committee is a legitimate and potentially effective governance tool whose design remains incomplete. The following chapter builds on this assessment to develop a set of possible refinements while also taking into account the core principles of FIFA's current approach.

VIII. TOWARDS A BETTER NORMALISATION PRACTICE

This chapter builds on the empirical findings set out above to propose targeted refinements to FIFA’s normalisation committee framework. It does not argue for radical redesign. On the contrary, the interviews largely confirm that the basic architecture of the instrument is defensible: the open formulation of “exceptional circumstances” in Article 8(2) preserves the flexibility needed to address highly diverse governance crises. The temporary and non-elected character of normalisation committees justifies a cautious approach to their powers; and the preference for short mandates, strict conditions for extension, and limited long-term commitments responds to legitimate concerns about democratic legitimacy and the autonomy of MAs.⁸⁰ In that sense, the normative foundations of the current framework, exceptional, time-bound, and subsidiarity-oriented intervention, appear sound.

The interviews do, however, reveal a series of operational frictions that recur across cases and that are not fully addressed by existing internal guidelines. These frictions relate less to the outer limits of FIFA’s power than to the day-to-day workability of the mechanism for those who must operate it. The argument advanced here is therefore that refinement should focus on streamlining and clarifying the use of the instrument, rather than on recalibrating its legal basis.

A first area for improvement concerns the formulation and communication of mandates. All three former committee members emphasised that the generic language, running daily affairs, revising statutes and electoral code, and organising elections, was too imprecise to guide decisionmaking in complex and time-pressured environments. The resulting uncertainty manifested itself in different ways: disagreement within the Maldives committee about how far “day-to-day activities” extended into football operations; unresolved questions in Curaçao about the boundary between the committee’s powers and those of the secretary-general; and an inability in Namibia to rely on the mandate when seeking to restrict the eligibility of certain candidates. It would therefore be desirable for FIFA to develop more specific, context-sensitive mandate descriptions, at least along two axes: first, a clearer demarcation between decisions that require prior approval by FIFA and/or the confederation and those that

⁸⁰ FIFA Statutes (2024), art. 8(2).

fall within the committee's autonomous competence; and second, illustrative lists of decisions that fall inside or outside the notion of "daily affairs", tailored to the concrete problems that prompted the intervention.

A related refinement is needed at the level of internal organisation. None of the interviewees reported receiving substantive guidance on how decisions should be taken within the committee, what powers the chairperson has relative to other members, or how disagreements should be resolved. In the Maldives, this lacuna contributed directly to internal dysfunction in the first phase of the mandate.. In Namibia, by contrast, consensus-based decision-making emerged organically out of good personal dynamics, but this is not a model that can be assumed across contexts. A minimal internal-governance template, specifying decision-making procedures, the default role and limits of the chair, the allocation of responsibilities according to professional profile, and an escalation procedure for internal disputes, would not detract from contextual flexibility. It would simply provide a baseline framework that can be adapted but that does not have to be invented from scratch in the midst of a crisis.

The interviews also underscore the importance of mapping the interface with domestic law at the outset. Francisco's experience in Curaçao illustrates how the absence of prior analysis of national association law and judicial practice can leave committees exposed to legal threats and uncertainty about the limits of their authority towards members. A more systematic *ex ante* review of domestic law – ideally formalised as a short pre-installation legal memorandum shared with the committee, would allow potential obstacles to be identified and discussed early on. This would not eliminate conflict, but it would reduce the scope for surprise and help committees to distinguish between contestation that must simply be managed and situations in which the mandate itself may need adjustment to remain compatible with national law.

On the temporal dimension, the interviews are consistent in viewing existing mandates as too short to deliver deep institutional change. At the same time, both the institutional perspective and the empirical record support FIFA's insistence on strict conditions for extension and its reluctance to normalise prolonged periods of non-elected governance: repeated or very long normalisation episodes,, are seen as problematic.

The implication is not that mandates should be radically lengthened, but that the framework should more explicitly acknowledge this trade-off. One way of doing so would be for FIFA, in dialogue with the committee at an early stage, to distinguish between tasks that must be completed within the NC period and tasks that should be prepared but consciously left to the incoming executive committee, with a clear handover record. I am particularly keen of the approach taken in Curaçao, where the committee, in agreement with FIFA and CONCACAF, deliberately concentrated a short mandate on delivering credible elections: in my view, this “elections-first” strategy reflects the proper role of a normalisation committee as a temporary reset mechanism rather than a surrogate long-term government of the association.

A further refinement concerns coordination between FIFA and the relevant confederation. The Maldives case demonstrates how misalignment at the outset – with FIFA favouring normalisation and the confederation initially leaning towards suspension can weaken a committee’s institutional position and create conflicting signals. Uirab’s account of informal access routes at confederation level, through which domestic actors were able to influence constitutional outcomes, underscores the risks of porous and unstructured communication channels. Francisco, by contrast, reports a consistently aligned and well-coordinated relationship between FIFA and CONCACAF in Curaçao. This variation suggests that the current framework leaves too much to ad hoc practice. At a minimum, alignment on the basic strategy for the normalisation process should be secured and documented before the committee is installed, and the communication architecture.

I would add that there is also a need to structure the informal “right to be heard” that domestic stakeholders currently exercise in a fragmented way. At present, approaches by clubs, officials or other actors can reach different interlocutors within FIFA and the confederation with uneven transparency, a defined channel for such input, without transforming it into a formal appeal mechanism, would improve fairness, reduce the scope for back-channel lobbying, and give committees greater clarity about how stakeholder concerns are heard and taken into account.

Finally, the interviews reveal that former committee members have a strong interest in reflecting on what worked and what did not. All three articulated concrete suggestions for improvement and were candid about the limitations they encountered.

Systematising this feedback, for example through structured debriefs at the end of each mandate, feeding into iterative updates of guidelines and templates, would allow FIFA to capitalise on the experiential knowledge generated by each case. Such a learning loop would not alter the core legal framework, but would streamline its application and the operational use in practice of the NC's.

In sum, the empirical material supports a reform agenda that is modest in scope but potentially significant in effect. The central elements of FIFA's normalisation committee framework do not be abandoned. What is required, rather, is sharper drafting, better preparatory analysis, clearer allocation of responsibilities, and more deliberate use of the experience of those who have implemented the mechanism in practice.

IX. CONCLUSION

I began this thesis from a position of scepticism towards FIFA's normalisation committee framework. It seemed difficult to reconcile such a powerful intervention tool with a statutory basis that consists of a single, open-textured provision and a set of largely internal guidelines, especially given the depth of interference in the governance of formally autonomous MAs. Over the course of the research, however, my view shifted. A closer reading of the legal framework, the emerging CAS jurisprudence and the interviews with those directly involved in normalisation processes helped to clarify the institutional logic behind FIFA's choice for flexibility and minimal codification. What initially appeared as an under-specified and potentially arbitrary instrument increasingly emerged as a deliberately exceptional, time-bound and subsidiarity-oriented response to governance crises, whose contours are shaped as much by practice as by formal rules.

The thesis first situated normalisation committees within the broader architecture of global football governance, characterised by a pronounced asymmetry between FIFA and its MAs. It then examined the legal basis for normalisation committees in Article 8 paragraph 2 of the FIFA Statutes and in the Regulations

Governing the Application of the Statutes, highlighting how broad intervention powers are combined with only modest textual constraints and a high degree of institutional discretion. The analysis of CAS jurisprudence indicates that, in the majority of cases, FIFA's decisions to establish or prolong normalisation committees were considered compatible with its wide margin of appreciation.

A second strand of the thesis explored how normalisation committees operate in practice. Drawing on interviews with former committee members in Namibia, the Maldives and Curaçao, as well as with a FIFA governance official, it identified a number of recurring tensions. At the same time, the empirical material showed that normalisation committees can, under the right conditions, stabilise failing institutions, regularise finances, modernise statutes and deliver credible elections that enjoy broad stakeholder acceptance.

Against this background, the thesis did not argue for a massive change in the framework of the instrument, but for refining its use. It proposed a series of modest adjustments aimed at clarifying mandates, improving preparatory analysis of domestic law, structuring the internal governance of committees and aligning expectations around what can realistically be achieved within a short, temporary mandate. In doing so, it sought to respect the core rationale of FIFA's current approach, an exceptional, temporary reset mechanism that preserves a wide margin of appreciation, while strengthening legal certainty, transparency and accountability for those who are subject to it in practice. The conclusion is therefore that normalisation committees constitute a legitimate and often useful intervention tool, but that their effectiveness and perceived fairness depend on how carefully FIFA calibrates their design and use, and that several targeted adjustments could further strengthen their contribution to stable and credible football governance.

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