

Principle of *Pacta Sunt Servanda* in Football Arbitration Compliances among Selected Clubs in South-South Nigeria

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Abstract

This study examines the application of the principle of *Pacta Sunt Servanda*, “agreements must be kept”, in football arbitration compliance among selected clubs in South-South Nigeria. Rooted in contract law and codified in FIFA’s Regulations on the Status and Transfer of Players (RSTP), this principle is vital for maintaining contractual stability, fairness, and trust in professional football. Despite clear regulatory frameworks and arbitration rulings by the Nigeria Football Federation’s Players’ Status and Arbitration Committee, compliance among clubs remains inconsistent. Through a quantitative survey of 120 stakeholders, including legal practitioners, sports administrators, and club representatives, the research identifies financial constraints, weak enforcement mechanisms, political interference, and limited stakeholder awareness as key barriers to compliance. Findings reveal that institutional weaknesses, such as the absence of effective sanctions, procedural inefficiencies, and state-ownership dynamics, significantly undermine enforcement. The study highlights that while stakeholders recognize the benefits of strengthening *Pacta Sunt Servanda*, including improved contractual stability and governance, sustainable change requires tailored institutional reforms. Recommended strategies include legislative amendments to bolster enforcement powers, establishment of internal

compliance monitoring mechanisms, engagement of legal advisors, and targeted stakeholder education. By situating these findings within both domestic and international sports arbitration contexts, the study contributes to the discourse on strengthening legal certainty and contractual integrity in African sports governance. It underscores the need for coordinated reforms to transition from formalistic adherence toward meaningful compliance, thereby enhancing the credibility of Nigerian football and aligning it with global best practices.

Introduction

The principle of *Pacta Sunt Servanda*, Latin for “agreements must be kept” is a foundational maxim in contract law and international arbitration, underscoring the expectation that parties will honor their contractual commitments in good faith (Zhifeng, 2022). This principle is particularly vital in professional football, where contractual stability fosters trust, fairness, and the smooth operation of player transfers, employment agreements, and financial dealings among clubs, players, coaches, and governing bodies. FIFA’s Regulations on the Status and Transfer of Players (RSTP), along with national frameworks such as the Nigeria Football Federation’s (NFF) arbitration rules, explicitly embody this doctrine to ensure that contracts are respected and arbitral decisions enforced (Akinsanya, 2024). Over the past decade, the football industry in Nigeria’s South-South region has undergone notable growth, driven by increased investment, rising professionalism, and heightened competition among clubs. This expansion has coincided with a surge in contractual disputes involving unpaid salaries, bonuses, and breach of contract claims, many of which have been resolved through the NFF Players’ Status and Arbitration Committee. Despite the existence of clear regulatory provisions and arbitration awards in favor of aggrieved parties, compliance remains inconsistent, undermining the credibility of dispute resolution mechanisms and threatening the integrity of football governance (Kassim & Oloruntoba, 2023).

In particular, the financial fragility of clubs often dependent on government subventions, coupled with weak institutional enforcement and political interference, hampers the effective application of *Pacta Sunt Servanda* in this context. For example, Akwa United FC was adjudged liable to pay over ₦47 million in outstanding dues to players and staff, yet delayed payment persisted for years. Similarly, Dakkada FC and Dolphin FC (now Rivers United) have been embroiled in protracted non-compliance issues despite arbitration rulings (Olanrewaju, 2025). Such cases illustrate a systemic

gap between legal obligations and actual practice, raising critical questions about the enforcement mechanisms within Nigerian football arbitration. This challenge is not unique to Nigeria; many African football federations face similar hurdles, including institutional weaknesses, political interference, and financial constraints that diminish contractual sanctity (Ncube, 2023). However, the South-South region's concentration of government-linked clubs provides a distinct case study to explore how these factors converge to influence compliance behavior.

This study aims to critically assess the adherence of selected South-South Nigerian football clubs to arbitration awards governed by *Pacta Sunt Servanda*, uncover the multidimensional barriers to compliance, and propose reform strategies aligned with international best practices. By doing so, it contributes to the broader discourse on strengthening the rule of law and contractual integrity in African sports governance, with implications for players' rights protection, institutional credibility, and the sustainable development of football in Nigeria.

Conceptual Overview of *Pacta Sunt Servanda* in Sports Arbitration

The doctrine of *Pacta Sunt Servanda*, literally “agreements must be kept”, is a foundational principle of contract law that underpins the entire edifice of binding agreements within both domestic and international legal regimes (Zhifeng, 2022). Rooted in the Latin maxim and formally codified in Article 26 of the Vienna Convention on the Law of Treaties (1969), the principle mandates that treaties and contracts entered into voluntarily by parties are to be performed in good faith, without arbitrary withdrawal or evasion (Akinsanya, 2024). This requirement of good faith performance is central to ensuring legal certainty, predictability, and trust in commercial and legal transactions. In the domain of sports law, particularly football arbitration, *Pacta Sunt Servanda* holds special significance. Professional football contracts, including employment agreements between players and clubs and commercial arrangements, are subject to complex regulations designed to protect the interests of all stakeholders. FIFA's Regulations on the Status and Transfer of Players (RSTP) explicitly embed the principle, underscoring that contracts must be respected until they expire or are lawfully terminated (FIFA, 2023). This legal framework seeks to deter breaches, reduce disputes, and maintain the integrity of the football transfer system.

The necessity of *Pacta Sunt Servanda* in football arbitration arises from the unique characteristics of the sport's labor market. Players' careers are short and highly mobile, meaning contractual stability is crucial for both player welfare and club planning (Zhifeng, 2022). The principle ensures that parties do not renege on obligations without just cause, preserving fairness and competitive balance. Arbitration tribunals, such as the Court of Arbitration for Sport (CAS) and national bodies like the Nigeria Football

Federation's Players' Status Committee, rely heavily on this principle to uphold contract sanctity and provide binding dispute resolution (Akinsanya, 2024). Moreover, *Pacta Sunt Servanda* promotes the rule of law within sports governance by affirming that contractual and arbitration awards are not mere formalities but enforceable obligations. This discourages frivolous breaches and enhances the credibility of arbitration as an effective mechanism for resolving disputes outside ordinary courts, which might be slow or less specialized (Hart, 2023). In this light, the principle acts as a bridge between voluntary agreement and legal enforcement, giving arbitration decisions normative weight.

However, the principle is not absolute and is balanced against doctrines like just cause, force majeure, or public policy exceptions that allow lawful termination or modification of contracts (FIFA, 2023). This nuanced approach ensures fairness while preserving contractual stability, allowing the arbitration framework to adapt to the realities of professional football. In contexts like Nigeria and broader African football governance, the formal recognition of *Pacta Sunt Servanda* marks progress toward professionalization. Yet, the principle's practical effectiveness depends on robust enforcement mechanisms, institutional capacity, and stakeholder awareness (Ncube, 2023). Without these, the good faith expectation becomes aspirational rather than actual, resulting in widespread non-compliance, delayed payments, and protracted disputes. Therefore, understanding the conceptual grounding of *Pacta Sunt Servanda* is critical for diagnosing enforcement failures and designing reforms that strengthen contractual discipline in football arbitration.

Compliance Challenges in Football Arbitration: The Nigerian Context

Despite the well-established normative framework of *Pacta Sunt Servanda* and its codification in FIFA's Regulations on the Status and Transfer of Players (RSTP), enforcement of arbitration awards in Nigerian football remains fraught with challenges. Empirical studies reveal that while arbitration tribunals consistently issue rulings favoring players and other aggrieved parties, actual compliance by clubs is often delayed, partial, or entirely absent (Kassim & Oloruntoba, 2023).

One significant factor is the precarious financial situation of many Nigerian clubs, especially in the South-South region, where state ownership and dependence on government subventions create vulnerabilities to irregular funding and fiscal mismanagement (Ncube, 2023). Clubs frequently cite liquidity shortages as justification for defaulting on salary payments, bonuses, and other contractual obligations recognized through arbitration. Such financial instability undermines the practical application of *Pacta Sunt Servanda*, reducing the principle from a binding obligation to a theoretical ideal. Institutionally, the Nigeria Football Federation's (NFF) Players'

Status and Arbitration Committee, while empowered to adjudicate disputes, faces limitations in enforcing compliance. Unlike courts with statutory authority to execute judgments, the NFF's mechanisms lack automatic enforcement powers such as financial penalties, transfer bans, or point deductions that could coerce delinquent clubs into compliance (Okonkwo & Musa, 2024). This institutional weakness is compounded by procedural inefficiencies, delays in ruling implementation, and insufficient coordination with government or judicial agencies.

Moreover, political interference further complicates enforcement efforts. Many clubs in the South-South are owned or sponsored by state governments or politically connected entities, which can influence the arbitration process and shield clubs from sanctions. This political patronage creates an environment where rules are selectively applied, eroding fairness and the integrity of dispute resolution (Kassim & Oloruntoba, 2023). Another compliance barrier is the limited awareness and understanding of arbitration obligations among players, club officials, and even some legal practitioners involved in football administration. Training on the importance of arbitration awards and the consequences of non-compliance remains sporadic, reducing the pressure on clubs to honor their commitments promptly (Ncube, 2023). Collectively, these factors highlight the multifaceted nature of compliance challenges in Nigerian football arbitration. They demonstrate that while *Pacta Sunt Servanda* provides a sound legal foundation, its effectiveness depends heavily on financial viability, institutional strength, political will, and stakeholder education. Addressing these interconnected issues is essential for transitioning from formalistic compliance toward meaningful enforcement that protects contractual rights and promotes professionalism in Nigerian football.

Case Law and Precedents in Football Arbitration

The principle of *Pacta Sunt Servanda* and its enforcement in football arbitration have been tested and clarified through both international and local case law, highlighting the complexities involved in upholding contractual obligations. Internationally, landmark cases such as **Adrian Mutu vs. Chelsea FC** demonstrate the importance of honoring arbitration awards and the challenges when contractual breaches occur. Mutu's case, adjudicated by the Court of Arbitration for Sport (CAS), reinforced the binding nature of contracts and the enforceability of sanctions where breaches are proven (Zhifeng, 2022). This case illustrates that despite the global appeal of football, contractual discipline must be maintained to preserve fairness and deter misconduct. Locally, Nigerian football clubs have faced similar disputes that expose weaknesses in enforcement mechanisms. For example, arbitration rulings against clubs like Akwa United FC, Dakkada FC, and Dolphin FC (now Rivers United) over unpaid salaries and

bonuses provide instructive precedents. Despite clear decisions in favor of players and staff, compliance has been slow or incomplete, revealing systemic issues such as lack of effective sanctions and political interference (Olanrewaju, 2025). These precedents also emphasize the legal gap between the issuance of arbitration awards and their enforcement. Unlike courts, arbitration panels depend on federations' internal mechanisms, which in Nigeria remain underdeveloped. The absence of statutory backing for arbitration awards means that aggrieved parties sometimes resort to civil courts, prolonging dispute resolution and undermining the purpose of specialized sports arbitration (Okonkwo & Musa, 2024).

Collectively, these cases underscore the necessity for legal and institutional reforms aimed at reinforcing the binding nature of arbitration awards and ensuring that *Pacta Sunt Servanda* is not only a theoretical principle but an actionable reality within Nigerian football governance. Strengthening enforcement frameworks will promote contractual certainty, enhance the reputation of Nigerian clubs, and align domestic practice with international sports law standards.

Theoretical Underpinning

This study is guided by Legal Positivism, which holds that the validity and binding nature of laws and agreements arise from their formal recognition within an established legal system, rather than from moral or ethical considerations (Hart, 2023). Under this theory, contracts and arbitration awards are enforceable because they are created and upheld by recognized legal institutions, such as the Nigeria Football Federation (NFF) and FIFA's regulatory bodies. In the context of football arbitration, *Pacta Sunt Servanda* gains its normative power from the codified rules and regulations that govern player-club contracts and dispute resolution, including FIFA's Regulations on the Status and Transfer of Players (RSTP) and the NFF's arbitration procedures (Akinsanya, 2024). Legal Positivism emphasizes that compliance with arbitration awards is obligatory because parties have consented to be bound under these formal legal frameworks. However, this theory also helps explain the challenges faced in practice when enforcement mechanisms are weak or political interference undermines legal authority (Kassim & Oloruntoba, 2023). It highlights the gap between formal legal obligations and actual compliance, pointing to the necessity of robust institutions and effective enforcement to uphold the principle of *Pacta Sunt Servanda* in Nigerian football arbitration.

Methodology

This study employed a quantitative survey research design to investigate compliance with *Pacta Sunt Servanda* in football arbitration among stakeholders in Nigerian sports.

The population comprised legal practitioners specializing in sports law, sports administrators, representatives of Nigerian sporting clubs, and members of relevant international sports organizations, targeting 120 respondents. Purposive sampling was used to select participants with relevant expertise and experience in international sports arbitration and football governance. Data were collected via a structured questionnaire containing both closed and open-ended questions, designed based on a comprehensive literature review and validated through expert consultation and pilot testing to ensure reliability and validity. The questionnaire gathered demographic data and respondents' views on compliance challenges, legal reforms, and institutional solutions. Primary data from the questionnaires were supplemented with secondary data from legal documents, academic literature, and case studies. Quantitative data analysis was performed using descriptive statistics with SPSS software to identify patterns and insights related to arbitration compliance among selected South-South Nigerian football clubs.

Results

Table 1: Demographic Profile of Respondents

| Demographic Variable | Category | Frequency | Percentage (%) |
|----------------------|-------------------|-----------|----------------|
| Gender | Male | 71 | 61.7 |
| | Female | 44 | 38.3 |
| Age | 18–25 | 27 | 23.5 |
| | 25–35 | 46 | 40.0 |
| | 36–45 | 20 | 17.4 |
| | 56 and above | 22 | 19.1 |
| Education Level | Primary/Secondary | 18 | 15.7 |
| | ND/HND | 32 | 27.8 |
| | BSc | 58 | 50.4 |
| | MSc | 7 | 6.1 |
| Marital Status | Single | 41 | 35.7 |
| | Married | 66 | 57.4 |
| | Divorced | 8 | 6.9 |

Most respondents were male (62%) and within the 25–35 age group (40%), indicating a relatively young and predominantly male sample. A majority held at least a Bachelor's degree, reflecting a well-educated group. Most respondents were married (57%), showing a diversity in life stages among participants.

Table 2: Compliance Challenges Faced by Nigerian Sporting Clubs

| Compliance Challenge | Frequency | Percentage (%) |
|------------------------------|-----------|----------------|
| Financial Constraints | 38 | 33.0 |
| Resistance from Stakeholders | 28 | 24.3 |

| Compliance Challenge | Frequency | Percentage (%) |
|-----------------------------------|-----------|----------------|
| Lack of Awareness about Awards | 26 | 22.6 |
| Legal Complexities in Enforcement | 23 | 20.0 |

Financial difficulties were the biggest obstacle to complying with arbitral awards, followed by resistance within clubs, lack of awareness of the awards, and legal issues. These challenges highlight areas where clubs struggle the most in honoring arbitration decisions.

Table 3: Manifestations of Compliance Challenges

| Manifestation | Frequency | Percentage (%) |
|---|-----------|----------------|
| Failure to Implement Required Decisions | 37 | 32.2 |
| Ignoring or Challenging Award Validity | 31 | 27.0 |
| Delay or Non-payment of Awarded Amounts | 26 | 22.6 |
| Lack of Cooperation with Arbitral Process | 21 | 18.3 |

The most common way these challenges show up is through failure to act on decisions made by arbitration, with many also ignoring or disputing awards. Payment delays and lack of cooperation with arbitration processes are also significant issues.

Table 4: Factors Contributing to Compliance Challenges

| Contributing Factor | Frequency | Percentage (%) |
|---|-----------|----------------|
| Weak Legal Framework and Enforcement | 39 | 33.9 |
| Limited Understanding of Arbitration | 32 | 27.8 |
| Cultural/Institutional Resistance | 24 | 20.9 |
| Lack of Effective Governance Structures | 20 | 17.4 |

Weak legal systems and poor enforcement are seen as the main reasons clubs face compliance issues. Limited knowledge of arbitration, resistance to external control, and weak governance within clubs also play important roles.

Table 5: Perception of Legal and Regulatory Framework

| Framework Perception | Frequency | Percentage (%) |
|-----------------------|-----------|----------------|
| Very Facilitating | 29 | 25.2 |
| Somewhat Facilitating | 36 | 31.3 |
| Somewhat Hindering | 27 | 23.5 |
| Very Hindering | 23 | 20.0 |

More than half the respondents feel that Nigeria's legal framework somewhat helps enforce sports arbitration, but a significant minority believes it creates obstacles. This split suggests ongoing issues within the legal and regulatory environment.

Table 6: Factors Facilitating Sports Arbitration

| Facilitating Factor | Frequency | Percentage (%) |
|--|-----------|----------------|
| Availability of Competent Judicial Authorities | 36 | 31.3 |
| Clarity and Specificity of Laws | 31 | 27.0 |
| Pro-Arbitration Stance of Courts | 27 | 23.5 |
| Ease of Procedural Requirements | 21 | 18.3 |

Table 7: Hindrances to Enforcement of Arbitration Awards

| Hindering Factor | Frequency | Percentage (%) |
|---|-----------|----------------|
| Limited Remedies or Sanctions | 39 | 33.9 |
| Inconsistencies in Application of Arbitration | 28 | 24.3 |
| Lack of Judicial Awareness | 26 | 22.6 |
| Complex and Lengthy Enforcement Procedures | 22 | 19.1 |

Respondents value the presence of knowledgeable courts and clear laws as the biggest helpers in enforcing arbitration decisions. A supportive attitude from courts and simpler procedures also help but are seen as less critical.

Table 8: Perceived Benefits of Strengthening *Pacta Sunt Servanda*

| Benefit | Frequency | Percentage (%) |
|-----------------------|-----------|----------------|
| Very Beneficial | 41 | 35.7 |
| Somewhat Beneficial | 36 | 31.3 |
| Not Very Beneficial | 25 | 21.7 |
| Not Beneficial at All | 13 | 11.3 |

The biggest barrier is that there are not enough consequences for ignoring awards. Other problems include uneven application of laws, judges not understanding arbitration well, and complicated enforcement steps.

Table 9: Impact of Strengthening *Pacta Sunt Servanda*

| Impact | Frequency | Percentage (%) |
|--|-----------|----------------|
| Improve Contractual Compliance and Stability | 42 | 36.5 |
| Foster Respect for Contractual Obligations | 38 | 33.0 |
| Improve Sports Governance and Management | 27 | 23.5 |
| Enhance Attractiveness to Investors/Sponsors | 8 | 7.0 |

Strengthening *pacta sunt servanda* is expected to improve how contracts are followed and build respect for agreements. It could also raise governance quality, but few believe it would significantly boost investor interest.

Table 10: Institutional Solutions to Enhance Compliance

| Institutional Solution | Frequency | Percentage (%) |
|---|-----------|----------------|
| Compliance Monitoring Mechanisms within Clubs | 40 | 34.8 |
| Development of Internal Arbitration Policies | 36 | 31.3 |
| Engagement of Legal Advisors/Consultants | 29 | 25.2 |
| Training and Education Programs | 10 | 8.7 |

The top solutions involve setting up monitoring systems and internal policies to ensure compliance, supported by hiring legal experts. Training programs were seen as less urgent.

Table 11: Tailoring Institutional Compliance Solutions

| Tailored Solution | Frequency | Percentage (%) |
|--|-----------|----------------|
| Thorough Assessment of Club Compliance Challenges | 39 | 33.9 |
| Ongoing Support and Guidance for Compliance | 33 | 28.7 |
| Customizing Compliance Programs to Club Structures | 27 | 23.5 |
| Collaboration with Stakeholders (Federations, Legal) | 16 | 13.9 |

Respondents agree that compliance solutions must start with a detailed assessment of each club's needs, plus ongoing support and customized programs. Collaboration with other stakeholders was seen as less important.

Discussion

The demographic data reveal a predominance of male respondents (61.7%), which reflects the gender imbalance often reported in sports governance and legal sectors globally (Henry & Brook, 2023). This underrepresentation of females could potentially limit the diversity of perspectives, particularly in areas concerning gender-specific challenges in sports arbitration. The age distribution indicates a majority of younger respondents (63.5% between 18-35 years), suggesting an engagement of physically active and possibly more progressive stakeholders in sports arbitration matters. This aligns with findings by Smith and Jones (2022), who noted that younger sports professionals tend to be more receptive to innovative dispute resolution mechanisms. In terms of education, most participants held a bachelor's degree or higher, ensuring a relatively well-informed sample capable of critically engaging with the complex issues surrounding international sports arbitration (Anderson et al., 2021). The marital status diversity further enriches the dataset, suggesting the inclusion of varied life experiences which can influence perspectives on compliance and governance.

The primary compliance challenges identified, financial constraints, stakeholder resistance, lack of awareness, and legal complexities, underscore multifaceted barriers that Nigerian sporting clubs face in adhering to international arbitral awards. Financial limitations as the foremost challenge (33%) resonate with global literature emphasizing the critical role of adequate funding in the effective enforcement of arbitration awards (Kaufmann & Tiedemann, 2024). Similarly, the lack of awareness points to a communication gap within clubs, which corroborates findings by Lee and Walker (2023) on the necessity of stakeholder education in improving compliance.

Manifestations of these challenges, such as failure to implement awards and delays in payments, indicate systemic issues in enforcing arbitral decisions. Such behaviors have been noted in other developing contexts, where enforcement is undermined by institutional weaknesses and cultural resistance (Nguyen, 2023). The finding that weak legal frameworks and enforcement mechanisms are the leading contributing factors (33.9%) to compliance challenges aligns with international critiques of Nigeria's arbitration infrastructure (Eze & Okeke, 2022), which call for legislative reform and stronger judicial support.

The respondents' mixed perceptions of the legal and regulatory framework, where 56.5% see it as facilitating and 43.5% as hindering enforcement, reflect the complex realities of arbitration enforcement in Nigeria. This duality highlights progress in some areas, such as judicial competence and clarity of laws, but persistent challenges remain. The prominence of competent judicial authorities (31.3%) and clear laws (27.0%) as facilitators underscores the importance of legal expertise in resolving disputes effectively (Peters & Ali, 2023). Conversely, hindrances such as limited remedies for non-compliance (33.9%) and inconsistent application of arbitration laws (24.3%) echo calls for systemic improvements noted in recent arbitration reviews (Bello, 2024).

The generally positive attitude toward strengthening the *pacta sunt servanda* principle, where 67% view it as beneficial to some degree, indicates broad recognition of the importance of upholding contractual agreements to enhance compliance. This finding is consistent with the theoretical underpinnings of international arbitration, which emphasize contractual sanctity as a cornerstone of dispute resolution (Müller, 2023). The anticipated benefits, improved contractual compliance, fostering respect for obligations, and better governance, align with empirical evidence from comparable sports systems, where strengthened arbitration compliance correlates with increased stability and investor confidence (Thompson & Miller, 2022).

Institutional solutions prioritized by respondents focus heavily on internal compliance mechanisms (34.8%) and development of arbitration policies (31.3%), reinforcing the necessity of organizational readiness for effective enforcement (Garcia & Smith, 2023). Engagement of legal advisors (25.2%) further supports the view that expert guidance is

essential in navigating the complex arbitration landscape. The relatively low emphasis on training programs (8.7%) may reflect a perception that structural and legal reforms take precedence over educational initiatives, though literature suggests ongoing education remains critical for long-term compliance (Omar & Khalid, 2024).

Tailoring solutions by assessing each club's unique compliance challenges (33.9%) and providing ongoing support (28.7%) reflect best practices in institutional reform that advocate for context-specific approaches rather than one-size-fits-all policies (Brown et al., 2023). Customization and stakeholder collaboration, though less emphasized, remain important for sustainable improvements (Nguyen et al., 2024).

Overall, these findings emphasize the urgent need for strengthened legal frameworks, institutional capacity-building, and strategic stakeholder engagement to overcome compliance challenges in Nigerian sports arbitration. Aligning reforms with international best practices while addressing local contextual realities will be critical to enhancing the efficacy of *pacta sunt servanda* and the integrity of sports governance in Nigeria.

Conclusion

This study has explored the compliance challenges Nigerian sporting clubs face in adhering to international sports arbitration awards, focusing particularly on the enforcement of the *pacta sunt servanda* principle. The findings highlight critical issues such as financial constraints, limited awareness, stakeholder resistance, and legal complexities that undermine effective enforcement. Moreover, weaknesses in Nigeria's legal and regulatory framework, including limited sanctions for non-compliance and inconsistencies in arbitration law application, have been identified as significant barriers. Nonetheless, there is a general consensus on the potential benefits of strengthening *pacta sunt servanda*, notably in improving contractual compliance, fostering respect for obligations, and enhancing governance standards. The study further reveals that institutional solutions, especially the establishment of internal compliance monitoring mechanisms, the development of clear arbitration policies, and the engagement of specialized legal advisors, are essential for enhancing adherence to arbitral awards. Tailoring these solutions to the unique challenges of individual clubs and providing ongoing support emerged as key strategies for sustainable compliance improvement.

Recommendations

1. Nigerian lawmakers and sports authorities should prioritize reforming arbitration laws to introduce stronger enforcement mechanisms, including clearer sanctions for non-compliance and streamlined procedures to reduce enforcement delays.

2. There is a need for continuous education and training for sports administrators, club officials, athletes, and judicial officers on the importance of international arbitration and compliance with awards.
3. Nigerian sporting clubs should establish internal compliance monitoring units and develop comprehensive arbitration policies tailored to their organizational culture. This institutional readiness will facilitate better adherence to arbitration outcomes.
4. Collaborative efforts among clubs, sports federations, legal experts, and government agencies are necessary to create an enabling environment for arbitration enforcement.
5. Given the male dominance in the sector, strategies should be devised to enhance gender diversity in sports arbitration roles, ensuring that diverse perspectives enrich dispute resolution and compliance practices.
6. In sum, the successful enforcement of international sports arbitration awards in Nigeria hinges on a multi-faceted approach combining legislative reform, institutional capacity-building, stakeholder education, and cultural change.

References

- Akinsanya, T. (2024). Contract enforcement in African sports governance: A legal perspective. *Journal of Sports Law and Policy*, 12(1), 33-52.
- Anderson, P., Gupta, R., & Lee, S. (2021). *Education and Compliance in International Sports Arbitration*. *Journal of Sports Law*, 15(2), 112-130.
- Bello, M. A. (2024). Reforming arbitration enforcement in Nigeria: Challenges and opportunities. *Nigerian Law Review*, 9(1), 45-67.
- Brown, T., Smith, J., & Ng, K. (2023). Contextualizing sports governance reforms in Africa: Lessons from Nigeria. *International Journal of Sports Management*, 18(4), 235-252.
- Eze, C., & Okeke, F. (2022). Arbitration in Nigerian sports: Legal frameworks and institutional challenges. *African Journal of Law and Sports*, 11(3), 77-94.
- FIFA. (2023). *Regulations on the Status and Transfer of Players (RSTP)*. Fédération Internationale de Football Association. <https://www.fifa.com/legal/regulations>
- Garcia, L., & Smith, A. (2023). Institutional readiness and compliance mechanisms in sports organizations. *Sports Management Review*, 26(1), 50-67.
- Hart, L. (2023). Legal positivism in modern sports arbitration. *International Arbitration Review*, 8(2), 112-130.
- Henry, I., & Brook, F. (2023). Gender representation in sports governance: Progress and challenges. *Gender & Sport*, 12(1), 10-28.
- Kassim, Y., & Oloruntoba, S. (2023). Enforcement challenges in Nigerian football arbitration. *African Journal of Dispute Resolution*, 6(1), 89-105.
- Kaufmann, S., & Tiedemann, M. (2024). Financial sustainability and enforcement of arbitral awards in sports. *Journal of International Arbitration*, 41(2), 200-215.

- Lee, S., & Walker, P. (2023). Enhancing stakeholder education in international sports arbitration. *Journal of Arbitration Studies*, 34(3), 145-163.
- Müller, D. (2023). *The principle of pacta sunt servanda in international arbitration*. Springer.
- Ncube, M. (2023). Institutional capacity and sports governance in Africa. *African Governance Review*, 15(3), 201-219.
- Nguyen, L. T. (2023). Enforcement of arbitration awards in developing countries: A case study. *Asian Journal of International Law*, 13(1), 89-106.
- Nguyen, T., Brown, L., & White, R. (2024). Tailored institutional reforms in sports arbitration: A framework for success. *International Sports Governance*, 9(2), 99-117.
- Okonkwo, C., & Musa, T. (2024). Procedural inefficiencies in Nigerian football arbitration enforcement. *Journal of African Sports Law*, 7(1), 44-60.
- Olanrewaju, K. (2025). Case studies in Nigerian football arbitration: Lessons from recent disputes. *Nigerian Sports Law Journal*, 9(1), 55-74.
- Omar, H., & Khalid, N. (2024). The role of education in arbitration compliance: Evidence from sports sectors. *Dispute Resolution Journal*, 79(1), 58-75.
- Peters, J., & Ali, M. (2023). The impact of judicial competence on arbitration enforcement. *Law and Policy Review*, 40(1), 33-51.
- Smith, J., & Jones, R. (2022). Youth engagement in sports arbitration and governance. *International Journal of Sport Policy*, 14(3), 182-199.
- Thompson, R., & Miller, K. (2022). Contractual stability and investment attraction in sports industries. *Journal of Sports Economics*, 23(4), 345-362.
- Zhifeng, J. (2022). Pacta sunt servanda and its modern application in sports law. *Michigan Journal of International Law*, 43(2), 221-240.