

Type: Research Article

Normative Conflicts in Professional Soccer Industrial Relations: The Boundaries Between the Application of Labor Laws and *Lex Sportiva*

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ABSTRACT

This article examines the normative conflict between Indonesian Labor Law and *lex sportiva* as implemented by FIFA in the context of professional football industrial relations. The main issue arises when players' rights as workers must be protected under national law, while FIFA statutes demand full autonomy and reject state intervention, particularly in dispute resolution. The research employs a normative juridical method by analyzing legislation, legal doctrines, and court decisions. The findings reveal fundamental differences regarding contract duration, grounds for termination, compensation schemes, and dispute settlement forums between national law and *lex sportiva*. Such discrepancies create a protection gap for athletes, as the rights guaranteed under Indonesian Labor Law cannot always be enforced within the *lex sportiva* framework. Therefore, a new harmonization model is required, either through the establishment of a special law for professional athletes, the adaptation of labor law with sports jurisprudence, or clear legislative provisions that delineate the scope of each legal regime. Such harmonization is expected to ensure legal certainty while providing optimal protection for professional football players in Indonesia.

KEYWORDS

Industrial Relations;
Labor Law; *Lex Sportiva*; FIFA;
Professional Football



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INTRODUCTION

Sports are no longer just a means of survival and entertainment for humans. With the passage of time, additional value has been added, giving sports a significance that goes beyond mere survival and entertainment.¹ The shift in sports is certainly caused by the development of the sports system and human mindset itself, where humans always see opportunities and potential around them to survive. Opportunities in sports actually exist because the demand for sports as entertainment is increasing, so that economic elements can arise in the world of sports, and this is in accordance with the principle of supply and demand, where the value of sports entertainment will increase in line with demand.² High values with high cash flow will create business potential with very high cash flow through broadcasting rights, sponsorships, and highly profitable player transfers. However, the issues involved are quite complex, one of which is the issue of athletes' rights as the main players in the world of sports.³

Soccer is one of the most popular sports in the world, especially in Indonesia, which is a member of the International Federation of Association Football (FIFA), the governing body of soccer worldwide.⁴ As discussed above, soccer in Indonesia also faces various problems, one of which is labor disputes, resulting from clubs failing to fulfill the rights of soccer players. These disputes are caused by the advancement of the sports industry, which is not balanced by the advancement of a legal framework that is adequate. As a result, industrial relations in professional soccer in Indonesia are consistently marred by disputes, with issues of unpaid or delayed player salaries frequently arising and being exposed to the public. This problem is not merely a financial and legal issue, but also indicates that the law in Indonesia has not been able to adapt to the industrialization of sports, particularly in the field of soccer.

There are problems in industrial relations involving soccer players, particularly professional soccer players, with Indonesian labor laws conflicting with *lex sportiva*, the principle adopted by FIFA, which oversees the Indonesian Soccer Association (PSSI), emphasizing PSSI's compliance with FIFA statutes.⁵ The norms contained in Law No. 13 of 2003 concerning Manpower (Manpower Law) with other related regulations such as Law No. 6 of 2023 are the Law on the Stipulation of Government Regulation instead of Law No. 2 of 2022 concerning Job Creation into Law (Law on the Stipulation of Perppu Ciptaker) essentially contains elements of government intervention, whereby the government holds full control as a third party or mediator in labor relations.⁶ This Labor Law clearly contradicts FIFA

¹ Hariyoko, *Sejarah Olahraga dan Perkembangan Pendidikan Jasmani di Indonesia*, 1st ed (Malang: Wineka Media, 2019).

² Hari Sutra Disemadi & Cindy Kang, "Tantangan Penegakan Hukum Hak Kekayaan Intelektual dalam Pengembangan Ekonomi Kreatif di Era Revolusi Industri 4.0" (2021) 7:1 J Komun Huk 54.

³ Sugito & Muhammad Akbar Husein Allsabab, "Peluang pengembangan industri keolahragaan dalam meningkatkan potensi olahraga dan perekonomian di Indonesia" (2018) 1:1 Pros SNIKU (Seminar Nas Ilmu Keolahragaan UNIPMA 60–69).

⁴ Vika Azkiya Dihni, "Sepak Bola Jadi Olahraga Paling Populer di Dunia", (2021), online: *databoks*.

⁵ Raka Fauzan Hatami, "Perjanjian Kerja Antara Pemain Sepak Bola dan Klub Sepak Bola Indonesia Dengan *Lex Sportiva* dan Undang-Undang Ketenagakerjaan" (2019) 3:1 J Wawasan Yuridika 93.

⁶ Denial Ikram & Arinto Nugroho, "ANALISIS YURIDIS JAMINAN KEHILANGAN PEKERJAAN PADA PEKERJA DENGAN MASA KERJA DI BAWAH 12 BULAN" (2024) 11:4 Novum J Huk 246–258.



statutes, which adhere to the principle of *lex sportiva* by completely rejecting any government intervention, which also means rejecting the use of the Labor Law in regulating industrial relations for professional athletes in Indonesia.

Issues in industrial relations in sports are certainly not limited to conflicts between labor laws and FIFA statutes as manifestations of *lex sportiva*. Issues regarding industrial relations also arise because there are no clear boundaries between which areas are regulated by national law (which automatically allows government intervention) and which areas can only be regulated by internal regulations of sports associations.

METHOD

This study employs a normative juridical method, also known as doctrinal legal research, which focuses on the analysis of applicable positive legal norms. The main focus is directed toward examining statutory regulations, legal doctrines, and relevant court decisions concerning industrial relations in professional football. Several approaches are applied, including the statute approach by reviewing Law Number 13 of 2003 on Manpower, Law Number 11 of 2022 on Sports, as well as the FIFA Statutes and international regulations such as the latest *Regulations on the Status and Transfer of Players (RSTP)*. A conceptual approach is also used to analyze the concept of industrial relations, the status of professional athletes as workers, and the principle of *lex sportiva* in international sports law. In addition, a case approach is employed to examine relevant court rulings, such as Decision No. 9/Pdt.Sus-PHI/2019/PN.GSK regarding the unpaid salaries of Persegres Gresik United players, which serves as an important precedent in industrial disputes in football.

The types of legal materials used in this research consist of primary legal materials, namely national legislation, FIFA Statutes, and PSSI regulations; secondary legal materials in the form of legal literature, scholarly journals, and expert opinions; and tertiary legal materials such as legal dictionaries and encyclopedias. All legal materials are analyzed qualitatively by describing, interpreting, and comparing national legal norms with *lex sportiva*. This analysis aims to identify the points of normative conflict, understand their juridical implications, and formulate possible models of legal harmonization that can be applied in the context of professional football industrial relations in Indonesia.

RESULT & DISCUSSION

Lex sportiva, or sports law, is defined as a set of autonomous and transnational legal rules that specifically regulate sporting activities. This concept goes beyond mere “rules of the game” (*lex ludica* or *law of the game*), encompassing the entire regulatory framework created and enforced by international and national sports federations.⁷ This includes organizational statutes, disciplinary and ethical codes, regulations on player status and transfers, and jurisprudence developed by sports arbitration bodies. In legal discourse, there are two main schools of thought regarding *lex sportiva*. First, the “Global Sports Law” school of thought views it as an autonomous legal order separate from national law, created by global private

⁷ Dicky Eko Prasetyo & Zeidan Izza Al-farisi, “Lex Sportiva in Indonesian Sports Law : Autonomy , Independence , and Harmonization with National Laws” (2023) 01:2 Indones J Sport Law.



entities such as FIFA. Second, the “National Sports Law” school of thought views it as a branch of national law applied to the field of sports. FIFA's regulatory framework clearly adheres to the first school of thought, creating a private legal system that applies globally to its members.⁸ The manifestations or embodiments of *lex sportiva* in soccer include:

1. FIFA and PSSI Statutes: As the highest legal instrument, the FIFA Statutes require all member associations, including PSSI, to adopt its basic principles, such as managing affairs independently without third-party intervention and resolving disputes internally. PSSI, in the 2019 edition of the Statutes, adopted this mandate and explicitly prohibited its members from bringing disputes to the general courts, as well as recognizing the jurisdiction of the Court of Arbitration for Sport (CAS) for international disputes.
2. FIFA Regulations on the Status and Transfer of Players (RSTP): This document can be considered the most relevant *lex sportiva* “substantive law” for industrial relations. The RSTP, including the latest edition of June 2024, regulates in detail crucial aspects such as the definition of professional players, contract stability, termination of contracts with or without “just cause,” and the protected period.⁹

The implementation of FIFA and PSSI regulations is certainly in line with the main principles developed by the Court of Arbitration for Sport. The autonomy or independence inherent in *lex sportiva* affirms that sports organizations must be free from state or political intervention in their governance.¹⁰

Although FIFA claims that *lex sportiva* has central autonomy governing all aspects of soccer worldwide, *lex sportiva* cannot automatically override the national laws of the country where a soccer match is held.¹¹ FIFA's autonomy is not absolute and must comply with the restrictions imposed by mandatory national law and supranational legal systems such as Indonesian national law. The argument that FIFA, with its *lex sportiva*, cannot simply override national law is justified by a similar case, namely the Bosman ruling by the European Court of Justice, in which European Union competition law can limit and reshape the rules on player transfers established by sports federations.¹² Another argument is that FIFA itself recognizes this limitation. Article 1, paragraph 3(b) of the RSTP explicitly states that each member association, in drafting its regulations, must “pay due respect to mandatory national law.” This clause is a crucial gateway for the enforcement of the fundamental norms of the Indonesian Manpower Act.¹³

⁸ Moch Marsa Taufiqurrohman & Muhamad Ghifari Fardhana Bahar, “Problematik Kedudukan, Kepastian, dan Penegakan Hukum Statuta FIFA di Indonesia” (2023) 20:3 J Legis Indones 14–25.

⁹ *Regulations on the Status and Transfer of Players*, 2024.

¹⁰ Denial Ikram, I Made Sri Undy Mahardika & Heppy Hyma Puspytasari, “Analysis of Norm Conflict Between Law Number 11 of 2022 Concerning Sports and the Regulation of the Minister of Youth and Sports Number 14 of 2024 Concerning Management Standards for Sports Organizations within the Scope of Achievement Sports Indonesia ha” (2025) 2:1 Indones J Sport Law.

¹¹ Maria Francesca Serra, “Lex Sportiva: Present and Future Perspectives” (2020) 13:2001 Int Sport Law Rev Pandektis 1–2.

¹² Klaus Vieweg, “Lex Sportiva and the Fairness Principle” (2014) 10:3–4 Int Sport Law Rev Pandektis.

¹³ Morgan Sport Law, “The new FIFA rules concerning the loan of players – contractual consequences for players”, (2022), online: *Morgan Sport Law*.



The claim that *lex sportiva* automatically supersedes labor laws due to the element of state intervention is certainly debatable. Norm conflicts usually occur between one law and another, which can be resolved using the principle of *lex specialis derogat legi generali* as an argument to resolve the norm conflict. However, in this case, there is a conflict of norms between the national public legal system (created by the state) and the transnational private regulatory system (created by FIFA). Therefore, this is not merely a matter of *lex specialis*, but a more complex issue in the field of international civil law concerning legal conflicts. The key question is not “which specific law applies?”, but rather “to what extent does Indonesian law allow its legal subjects (players and clubs) to deviate from mandatory protection rules through contractual agreements that refer to foreign private legal systems?”.

According to the provisions of the Manpower Act, the requirements for an employment relationship that automatically define such a relationship in the workplace include the elements of work, wages, and orders, which must be fulfilled cumulatively, meaning that all three must be fulfilled.¹⁴ In terms of the existence of work, players clearly perform work, namely providing their expertise in playing soccer, participating in training, and participating in matches for the benefit and profit of the club. In terms of wages, players clearly receive compensation for their work; players receive remuneration in the form of monthly salaries, match bonuses, performance bonuses, and other compensation from the club. Regarding the requirement for government involvement, this can be reflected in the obligation of players or athletes to carry out training and matches for the club in accordance with club policy. With these three elements fulfilled, various legal analyses consistently conclude that the legal relationship between professional soccer players and their clubs in Indonesia is an employment relationship, and thus, players can be defined as workers and protected by the Labor Law.

Referring to the provisions of the Manpower Act, there will be provisions such as the requirements and form of employment agreements, BPJS Manpower and health obligations, working hours, and worker classifications that need to be adjusted, which tend to differ from FIFA regulations. Some of the potential conflicts between the Manpower Act and FIFA statutes include the following:

Aspect	Labor Law	FIFA Statutes
Contract Duration	PKWT can last for a maximum of 5 years.	The contract must have a minimum duration from the effective date until the end of the season, and a maximum duration of 5 years.

¹⁴ Suratman, *Pengantar Hukum Ketenagakerjaan Indonesia*, 1st ed (Depok: PT. RajaGrafindo Persada Depok, 2019).



Reasons for Contract Termination	Strictly regulated, layoffs are prohibited for reasons such as illness for up to 12 months.	It can be terminated for “just cause,” which is interpreted flexibly and determined based on CAS jurisprudence. A serious injury can be grounds for termination if it renders the player unable to perform his or her duties.
Severance Pay	Calculated based on the severance pay formula, UPMK, and UPH according to length of service. For PKWT, there is compensation money.	Compensation is calculated based on the residual value of the contract and other factors (e.g., the opportunity to obtain a new contract), to compensate the innocent party for the losses incurred.
Working Hours & Breaks	Strictly regulated: 40 hours/week, with specific overtime rules.	Not specifically regulated, left to the nature of the profession. FIFA/FIFPro recommends mandatory rest periods between seasons and during the season.
Dispute Resolution Forum	The Industrial Relations Court (PHI) can be an option for industrial relations disputes other than arbitration bodies.	Must go through internal mechanisms: National Dispute Resolution Chamber (NDRC) at the national level and Court of Arbitration for Sport (CAS) as an international appeal body.

The provisions regarding the definition of athletes under the Manpower Act may be outdated and need to be updated with more specific details, given that the status of professional athletes is quite complicated to define.¹⁵ The debate regarding the application of the Labor Law to industrial relations in sports, particularly in professional soccer, has been caused by several conflicts, with the most notable conflict being the resolution of a dispute in one case that has become an important precedent, namely Decision No. 9/Pdt.Sus-PHI/2019/PN.Gsk regarding the unpaid

¹⁵ Leanne O’Leary, Maximillian Seltmann & Vanja Smokvina, “Elite Athletes and Worker Status” (2024) 025 Ind Law J 1–30.



wages of Persegres Gresik United players.¹⁶ In the ruling, the PHI panel of judges at the Gresik District Court declared itself competent to hear the case. The judges rejected the Defendant's (the club's) objection that the dispute should be resolved through PSSI mechanisms in accordance with FIFA and *lex sportiva* provisions.

Questions regarding the application of the Labor Law to industrial relations in sports also arise due to one of the rules on industrial relations dispute resolution through Law No. 2 of 2004 on Industrial Relations Dispute Resolution (PPHI Law), which allows disputes to be resolved through litigation in the District Court, which at the same time, FIFA prohibits its members from bringing disputes to the general courts, which in Indonesian law are the District Courts. These provisions on the settlement of industrial relations were also previously regulated in Law Number 3 of 2005 concerning the National Sports System (SKN Law), which explicitly regulated the settlement of disputes through litigation, but was repealed by Law No. 11 of 2022 concerning Sports (Sports Law), which removed the phrase on the grounds of harmonization with the principle of *lex sportiva*.¹⁷ If FIFA prohibits its members from bringing disputes to the general courts, then FIFA automatically violates the provisions of the Manpower Act and the PPHI Act, which means that the application of the Manpower Act in professional football industrial relations cannot be enforced. Before 2022, players had a strong legal basis to directly bring their disputes to the District Court (also specifically referred to as PHI), with the argument that the 2005 SKN Law allowed it. After 2022, clubs have a stronger counterargument that the newer and more specific Sports Law mandates the parties to first pursue internal channels. This creates a *de facto* doctrine that requires the parties to exhaust internal resolution efforts before they can access state courts. As a result, the NDRC has become the main gateway for dispute resolution. However, this also creates a potential “justice gap” as players are forced into an internal system with weak enforcement powers, while their access to the stronger state court system becomes more limited.¹⁸

The lack of common ground between the Manpower Act and FIFA statutes is due to the prohibition of litigation in the settlement of industrial relations disputes as stipulated in the Manpower Act, and automatically, other provisions in the Manpower Act cannot be implemented either, because the implementation of a regulation cannot be carried out partially by disregarding other provisions in the same law. This shows that harmonization needs to be carried out by the government, not just by revising or revoking one law and replacing it with another, but by carrying out comprehensive legal reform and harmonization. The repeal of the SKN Law with the Sports Law is one example of the government's efforts to solve problems by creating new ones, where provisions that have the potential to conflict with *lex sportiva* are resolved, but half-heartedly and not comprehensively.

¹⁶ Danang Purnomo Jakti, *Hubungan Hukum Pemain Sepak Bola Dengan Klub Sepak Bola (Studi Putusan Pengadilan Hubungan Industrial No 9/Pdt.Sus-Phi/2019/Pn Gsk)* Universitas Kristen Satya Wacana, 2023) [unpublished].

¹⁷ I KETUT SATRIA WIRADHARMA SUMERTAJAYA, Kadek Ary Purnama Dewi & Ni Putu Ari Setyaningsih, “Penyelesaian Sengketa Upah Pemain Sepakbola Profesional Pasca Berlakunya Undang-Undang Nomor 11 Tahun 2022 Tentang Keolahragaan” (2023) 17:2 *J Yustitia* 76–86.

¹⁸ Arinto Nugroho et al, “Dispute Resolution between Players and Clubs after the Enactment of Law Number 11 Year 2022 Concerning Sports” (2023) 50:32–35 *Tech Soc Sci J* 379–397.



The assumption that the government's harmonization efforts are half-hearted and incomplete can be seen in at least the following points:

1. Efforts to eliminate normative conflicts by removing dispute resolution through the District Court in the SKN Law with the Sports Law, but this removal was not accompanied by new mechanisms and regulations (which, in this case, is evident in the lack of implementing regulations in the Sports Law). The government's efforts through the Sports Law have effectively shifted the conflict of norms from the previous focus on the SKN Law (resolved through the Sports Law) to the Manpower Law and other laws relevant to industrial relations in sports.
2. The lack of implementing regulations as described above has resulted in a legal vacuum (if indeed *lex sportiva* requires exemption from national laws that conflict with it).
3. The establishment of other regulations that actually contradict the Sports Law, such as the Minister of Youth and Sports Regulation (Permenpora) Number 14 of 2024 concerning Standards for the Management of Sports Organizations in the Field of Competitive Sports, which completely disregards the principle of *lex sportiva*.

The government needs to establish boundaries where the Labor Law, which is a product of national legislation, is enacted with the FIFA Statutes as a form of *Lex Sportiva*. The creation of these boundaries is a win-win solution to the conflict of norms in industrial sports relations, where, if there is no win-win solution, the application of the law will likely be inconsistent with the following possibilities:

1. The implementation of the Labor Law as a whole, including the settlement of industrial relations disputes in district courts, with implications of sanctions from FIFA on players or clubs that apply it.
2. The application of provisions on labor aspects that are entirely delegated to FIFA statutes, including allowing the prohibition of industrial relations dispute resolution through the State court.
3. The application of a mixture of labor laws and FIFA statutes allows clubs to adopt regulations that are more favorable to themselves and override regulations that are favorable to players, automatically demonstrating the absence of legal certainty in industrial relations in sports.

There are at least three very feasible options for the Indonesian government in resolving the conflict of norms, including:

1. The creation of specific regulations, such as special laws governing the employment relationships of professional athletes, as implemented by Spain.¹⁹
2. The application of general labor law with specific adaptations and jurisprudence for sports as implemented by the United Kingdom.²⁰
3. A clear statement through the implementing regulations of the Sports Law that industrial relations in sports, particularly in professional football, are governed entirely by FIFA statutes and are excluded from the national labor law framework.

¹⁹ Sven Wassmer, "Particularities of Employment Contracts of Professional Athletes in Spain", (2024), online: *Monereo Meyer Abogados*.

²⁰ Maryam Abu Hussein, "How footballer employment contracts compare to standard employment agreements", (2023), online: *Legislate*.



The three options above can certainly be adjusted to the direction of government policy, where each option has its own advantages and disadvantages. However, in this case, a special mechanism with the creation of specific regulations that take into account harmonization in all aspects is needed to avoid potential conflicts with other norms.

CONCLUSION

Basically, the conflict between the Labor Law and *lex sportiva*, which is embodied in the FIFA Statutes, is an issue that must be resolved by the government. The need to resolve this issue stems from the state's legal obligation to intervene in labor relations as stipulated in the Labor Law to protect workers, in this case, professional soccer players. However, on the other hand, the *lex sportiva* adopted by FIFA demands full autonomy and rejects state intervention, especially in the settlement of disputes, which requires resolution through internal mechanisms and rejects attempts at resolution through the state courts. The government's harmonization policy through the Sports Law marks a significant shift in legislative policy towards recognizing the primacy of the *lex sportiva* dispute resolution mechanism. However, this procedural shift does not automatically resolve substantive conflicts and has the potential to create a protection gap. Substantive rights guaranteed by the Manpower Law are not automatically enforced within the *lex sportiva* framework. Therefore, the solution needed is not an exclusionary model (choosing one regime and rejecting the other), but rather a new harmonization model that integrates the principles of worker protection from national law into the specific mechanisms of sports law.

DECLARATION OF CONFLICTING INTERESTS

The authors state that there is no conflict of interest in the publication of this article.

FUNDING INFORMATION

None.

ACKNOWLEDGMENT

None.

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