

## Decision

of the

## FIFA Appeal Committee

Mr Neil EGGLESTON [USA], Deputy Chairman;  
Ms Larissa ZAKHAROVA [RUS], Member;  
Mr Andres PATON [ARG], Member;

on 27 March 2020,

to discuss the case of:

the Swedish Football Association

(Decision 190271 APC)

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*regarding:*

Appeal lodged by the Swedish Football Association against the decision passed by the FIFA  
Disciplinary Committee on 25 June 2019 (Decision 190271 TMS)

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## I. Inferred from the file

1. Below is a summary of the main relevant facts and allegations based on the documents pertaining to the file. Although the FIFA Appeal Committee (hereinafter, "*the Committee*") has thoroughly considered all the facts, legal arguments and evidence submitted by the Swedish Football Association (hereinafter also referred to as "*the Appellant*"), it referred in this decision only to submissions and evidence deemed necessary to explain its reasoning.
2. The case at hand involved 52 minor players who were registered with the aforementioned association as a result of:
  - an international transfer to a Swedish club for 43 minor players and;
  - a first registration for a Swedish club for 9 minor players.
3. In particular, these minor players joined Swedish clubs without and/or before the prior approval of the Sub-Committee appointed by the FIFA Players' Status Committee, and some of them even participated in matches for Swedish clubs<sup>1</sup>.
4. On 13 May 2019, following an investigation by the FIFA's TMS Compliance department (FIFA TMS) on the registration of these 52 players with the Appellant, disciplinary proceedings were opened against the Appellant for potential violations of the following provisions:
  - i. art. 5 par. 1 and art. 9 par. 1 of the Regulations on the Status and Transfer of Players (2012 to 2016 editions, hereinafter "*the Regulations*" or "*the RSTP*");
  - ii. art. 19 pars. 1, 3 and 4 of the RSTP;
  - iii. art. 1 par. 1 of Annexe 2 of the RSTP;
  - iv. art. 1 par. 3 of Annexe 3 of the RSTP.
5. On 25 June 2019, the Disciplinary Committee passed a decision (hereinafter, "*the Appealed Decision*") against the Appellant. In particular, the Disciplinary Committee decided as follows<sup>2</sup>:

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<sup>1</sup> A list of the players involved can be found at the end of the present decision.

<sup>2</sup> The Appellant was sanctioned for violating the following provisions:

- Art 19 par. 1 of the RSTP on 43 occasions;
- Art 19 par. 3 of the RSTP on 9 occasions;
- Art 19 par. 4 of the RSTP (along with art. 1 par. 1 of Annexe 2 and art. 1 par. 3 of Annexe 3 of the RSTP) on 52 occasions;
- Art. 5 par. 1 of the RSTP on 14 occasions;
- Art. 9 par. 1 of the RSTP on 43 occasions.

1. *The FIFA Disciplinary Committee found the Swedish Football Association responsible for the infringement of the relevant provisions of the RSTP related to the protection of minors (art. 19 pars 1 and 4; art. 1 par. 1 of Annexe 2; art. 1 par. 3 of Annexe 3 of the RSTP), the procedure governing international transfers of players (art. 9 par. 1) and the registration of players (art. 5 par. 1).*
  2. *The FIFA Disciplinary Committee orders the Swedish Football Association to pay a fine to the amount of CHF 104,000.*
  3. *In application of art. 10 a) and art. 13 of the FIFA Disciplinary Code, the Swedish Football Association is warned on its future conduct.*
  4. *The above fine is to be paid within thirty (30) days of notification of the present decision.*
6. The terms of the Appealed Decision were notified to the Appellant on 25 June 2019. Upon request of the Appellant, the grounds of the Appealed Decision were notified on 24 October 2019.
  7. On 25 October 2019, the Appellant informed the secretariat to the FIFA Appeal Committee (hereinafter, "*the Secretariat*") about its intention to appeal the aforementioned decision.
  8. By means of a correspondence dated 29 October 2019, the Appellant requested an extension of the time limit for filing its appeal brief until 18 November 2019.
  9. On 30 October 2019, the Secretariat acknowledged receipt of the aforementioned correspondences, informed the Appellant that its request had been granted and invited the latter to provide its reasons for the appeal by 18 November 2019 at the latest.
  10. On 18 November 2019, the Appellant submitted its reasons for the appeal, which can be summarized as follows:
    - a) *Preliminary remarks:*
      - The Appellant claimed that the Disciplinary Committee adopted a general approach without considering the particular circumstances of the case, failed to take into consideration several mitigating circumstances and thereby imposed disproportionate sanctions.

- The Appellant further emphasized that its conduct was not reprehensible and that it always acted with extreme care and due diligence and never endangered the well-being of the minor players.
- Finally, the Appellant stressed that the ultimate aim was only to ensure that minor players living in Sweden could play football.

*b) All minor players were registered as amateurs*

- The Appellant submitted that the Disciplinary Committee wrongly found that players 1 to 13 were registered for professional clubs. In this regard, the Appellant pointed out that the 52 players in question were all amateurs and were playing for purely amateur clubs on a grass root level.
- As example, player 1 was registered for the club Vänersborgs, which was a purely amateur club competing in the women's fifth division. It also emphasized that player 11 was registered for the club GIF Nike, which was a purely amateur club competing in the men's fifth division.
- The Appellant further argued that even if a club had professional players in its first team, the other teams and players of that club were often purely amateur.

*c) Proportionality of the sanction*

- The Appellant further listed several elements that should be acknowledged and treated by the FIFA Appeal Committee as mitigating circumstances:

*(1) UN Convention on the Rights of the Child*

- The Appellant submitted that the Swedish constitution guarantees the right to participate in the activities of a football club. Consequently, the Swedish sports movement must be open to everyone and no one should be discriminated against. Accordingly, the Appellant argued that all minor amateur players living in Sweden should be able to play football, thus providing a unique opportunity to integrate people into Swedish society.
- Furthermore, the Appellant drew the Appeal Committee's attention to the UN Convention on the Rights of the Child, according to which every child has the right to rest and leisure, to engage in play and recreational activities, regardless of the country in which the child resides.

- Based on those principles, the Appellant decided to register those 52 minor players as amateurs. In particular, the Appellant claimed that the FIFA Regulations could not apply, as their implementation would constitute a violation of the UN Convention on the Rights of the Child.

*(2) The Appellant fully collaborated with FIFA*

- The Appellant stressed that it did not try to circumvent the provisions relating to the protection of minor players.
- To the contrary, it fully collaborated with FIFA and was transparent throughout the whole investigation and disciplinary proceedings.

*(3) No sporting or financial interests*

- The Appellant claimed that it did not grant registration based on sporting or financial interests. The registrations were merely based on the strong desire of the players to play football during their stay in Sweden.
- The Appellant further argued that it monitored all 52 players during their stay in Sweden and has always acted with extreme care in due diligence.

*(4) Legal uncertainty regarding exchange students*

- The Appellant submitted that in January 2017, FIFA changed its jurisprudence and allowed exceptions for minor players moving to another country as exchange students.
- In this regard, the Appellant claimed that the way it had dealt with similar cases in the past was consistent with the new jurisprudence. Nevertheless, it was emphasised that the legal uncertainty in which FIFA has operated over the years – *i.e.* prior to the new jurisprudence – as well as the lack of clear rules, guidance and communication should be recognised as mitigating circumstances.
- Lastly, the Appellant stressed that 28 minors (out of the 52 players involved) were citizens of Nordic countries and were studying in Sweden as part of an exchange programme. Therefore, there were no justifiable reasons to reject their application for registration and to prevent them from playing football as amateurs and for purely amateur clubs.

*(5) 50 km rule*

- Finally, the Appellant pointed out that 11 minors (out of 52 players involved) were registered for the Swedish club Haparanda FF. However, before their transfer to the aforementioned Swedish club, these 11 players were all registered for the Finnish club Tornio Jalkapalloseura.
- In this regard, it was explained that the city of Tornio was located 750 meters from the Swedish border and 1,8km from the Swedish city of Haparanda, so that "Haparanda-Tornio" was considered as one city.
- In light of the foregoing, the Appellant argued that the FIFA Regulations could not apply in such a situation since the minor player could continue to live with his parents in Finland (Tornio) and play for the Swedish club of Haparanda FF simply by crossing the border. Refusing to register these players would constitute a violation of the UN Convention on the Rights of the Child and would be incompatible with the Appellant's strategy.

*(6) As to the sanction*

- As a result, the Appellant requested the Appeal Committee to take into consideration the aforementioned mitigating circumstances and to issue :
    - a) a reprimand or;
    - b) a fine proportionally adjusted to the facts and circumstances of this specific case.
11. On 6 December 2019, the Appellant provided the Secretariat with a copy of the media release of the Court of Arbitration for Sport in the *Chelsea FC - FIFA* case.
  12. On 7 February 2020, the Secretariat acknowledged receipt of the two-abovementioned correspondences and confirmed receipt of the appeal fee.
  13. On 23 March 2020, the Secretariat informed the Appellant that the case would be submitted to the Appeal Committee on 27 March 2020 for consideration and decision.

## **II. and considered**

1. In view of the circumstances of the present matter, the FIFA Appeal Committee first decided to address some key procedural aspects (A), before entering into the substance of the case at stake (B).

### **A. PROCEDURAL ASPECTS**

#### ***1. Competence of the FIFA Appeal Committee and admissibility of the Appeal***

2. First, the Committee recalled that the procedural aspects of the matter at stake were governed by the 2019 edition of the FIFA Disciplinary Code, in particular considering that the Appellant lodged the present appeal on 25 October 2019, *i.e.* while the 2019 FDC was applicable.
3. In this context, the Committee underlined that the sanctions imposed by the first instance on the Appellant were a fine amounting to CHF 104,000 and a warning. As such, the Committee pointed out that, in accordance with art. 56 in conjunction with art. 57 of the 2019 FDC, it was competent to hear the appeal presented by the Appellant against the decision rendered by the Disciplinary Committee on 25 June 2019.
4. This having been established, the Committee acknowledged that:
  - i. The grounds of the Appealed Decision were notified on 24 October 2019;
  - ii. The Appellant communicated its intention to appeal on 25 October 2019;
  - iii. Upon request of the Appellant, the time limit for filing the reasons for the appeal was extended until 18 November 2019;
  - iv. The Appellant submitted its reasons for the appeal on 18 November 2019;
  - v. FIFA received the appeal fee.
5. In view of this, the Committee held that the requirements of art. 56 pars. 3, 4 and 6 of the 2019 FDC have been met and therefore declared the present appeal admissible.

#### ***2. Applicable law***

6. In continuation, the Committee deemed that it had to determine which edition of the Regulations on the Status and Transfer of Players (RSTP) applied to the substance of

the matter at stake and on which edition of the FIFA Disciplinary Code (FDC) the potential sanctions should be based.

7. In these circumstances, the Committee noted from the Appealed Decision that the Appellant was sanctioned for having infringed the provisions of the RSTP governing the international transfer and registration of minor players on the ground that it irregularly registered 52 minor players for various Swedish clubs between 2014 and 2016.
8. Against this background, the judicial body observed that several versions of the RSTP were in force during this period<sup>3</sup>. However, the provisions relating to the international transfer and registration of minor players (art. 19) as well as arts. 5 and 9 of the RSTP have not undergone substantial changes as to their content in the different editions of the RSTP. Consequently, the Committee considered it unnecessary to specify which edition of the RSTP was applicable to each player and decided to refer to the RSTP generically, arguing that the content and regulatory principles remained substantially unchanged in the different editions.
9. In accordance with art. 25 of the RSTP, any violation of the provisions contained therein shall be sanctioned in accordance with the FIFA Disciplinary Code. In this regard, the Committee held that the aforementioned facts occurred between 2014 and 2016, while the 2011 edition of the FDC was applicable. Nevertheless, the case at hand was decided by the first instance on 25 June 2019, once the 2017 edition of the FDC had already entered into force.
10. With these elements in mind, the Committee recalled that the 2017 edition of the FDC could apply to facts that occurred before it entered into force provided that<sup>4</sup>:
  - i. the 2017 edition of the FDC is equally favourable or more favourable for the perpetrator of the facts than the previous edition, *i.e.* the 2011 edition; and
  - ii. the judicial bodies of FIFA are deciding on these facts after the 2017 edition of the FDC has come into force.
11. As far as the matter at stake was concerned, it appeared to be clear that:
  - i. the relevant facts occurred prior to the entry into force of the 2017 edition of the FDC;

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<sup>3</sup> The 2012 RSTP edition was in force from 1 December 2012 until 31 July 2014; the 2015 RSTP edition was in force from 1 August 2014 until 31 March 2015; the 2016 RSTP edition was in force from 1 April 2015 until 31 May 2016 and the 2017 RSTP edition was in force from 1 June 2016 until 31 December 2017.

<sup>4</sup> cf. art. 4 of the 2017 FDC.



- ii. the 2011 and 2017 editions of the FDC are equally favourable insofar as the sanctions applicable to legal persons are identical. In particular, the amount of the fine ranges from CHF 300 to CHF 1,000,000 in both editions;
  - iii. the FIFA Disciplinary Committee decided on these facts after the 2017 FDC had come into force.
12. For the reasons set out above, the Committee decided that any sanction imposed on the Appellant should be based on the 2017 edition of the FDC.

## **B. MERITS OF THE CASE**

13. As starting point, the Committee recalled that it has the power to review the facts and the law of the Appealed Decision but is prevented from increasing the sanction that was imposed on the Appellant<sup>5</sup>. Consequently, the judicial body held that only the infringements mentioned in the Appealed Decision and contested by the Appellant could be analysed.
14. In this respect, the Committee took note that the Appellant did not explicitly contest the findings of the first instance but rather rejected the application of the FIFA Regulations relating to the protection of minor players, as their implementation would constitute a violation of the UN Convention on the Rights of the Child. In addition, the Appellant claimed that the first instance failed to take mitigating circumstances into account when deciding the case and argued that:
- Contrary to the conclusions reached by the Disciplinary Committee, which found that players 1 to 13 were registered for professional clubs, all 52 minor players have been registered as amateurs;
  - There were no justifiable reasons for rejecting the applications concerning the 28 Nordic exchange students;
  - The FIFA regulations could not apply to the 11 players domiciled in the “Swedish-Finnish” town of “Haparanda-Tornio”, as they lived on the Finnish side of the border (Tornio) and played on the Swedish side (Haparanda).
15. Bearing the above in mind, the Committee deemed that three questions needed to be answered in order to decide on this appeal:
- a) What is the correct registration’s procedure that an association has to conduct when registering a minor player?

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<sup>5</sup> Cf. art. 59 pars. 2 and 4 of the 2019 FDC.

- b) Was the Appellant exempted from applying the registration procedure provided for in the RSTP?
- c) Are the sanctions imposed proportionated?

**a) *What is the correct registration's procedure that an association has to conduct when registering a minor player?***

16. First of all, the Committee stressed that the protection of minor players constitutes a key element in FIFA's overall regulatory framework as confirmed by CAS on repeated occasions<sup>6</sup>. Moreover, the legality of these provisions was validated by CAS, which in addition, concluded that these regulations do not contravene any rule of public policy or European law<sup>7</sup>.
17. In this context, the Committee emphasised the key role played by the member associations in this respect and, as such, considered it of paramount importance that associations registering minor players comply with the provisions contained in the RSTP. In particular, only a consistent and strict application of these provisions could enable football authorities, such as FIFA, to ensure effective control of international transfers and safeguard the protection of minor players.
18. Bearing the above in mind, it is essential to remember that, in principle, the international transfer of a player is only permitted if the player is over the age of 18 (art. 19 par. 1 of the RSTP). The same principle applies to the first registration of a foreign player (art. 19 par. 3 of the RSTP).
19. Notwithstanding the above, art. 19 par. 2 of the RSTP provides for three exceptions to the aforementioned general principle, whereby an international transfer of a minor player or the first registration of a foreign minor player is possible.
20. Consequently, when a minor player complies with one of the exceptions set out in art. 19 par. 2 of the RSTP, the association concerned is required to request, and obtain, the approval of the Sub-Committee appointed by the Players' Status Committee (hereinafter, "*the Sub-Committee*") as established under art. 19 par. 4 of the RSTP. Such approval will be given only if it can be demonstrated that the minor player complies with one of the exceptions of art. 19 par. 2 of the RSTP. In addition, this

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<sup>6</sup> Cf. CAS 2005/A/955 & 956; CAS 2008/A/1485; CAS 2011/A/2354; CAS 2011/A/2494; CAS 2012/A/2787; CAS 2014/A/3611; CAS 2014/A/3793; CAS 2014/A/3813; CAS 2015/A/4312; CAS 2016/A/4785; CAS 2016/A/4805; CAS 2017/A/5244.

<sup>7</sup> Cf. CAS 2008/A/1485.

approval must be obtained before any further steps are taken in relation to the registration of the player, such as the ITC request (art. 9 par. 1 of the RSTP) and the registration of the player with the association concerned (art. 5 par. 1 of the RSTP).

21. In other word, an association wishing to register a player following his international transfer must ensure that the relevant provisions of the RSTP are properly applied, in particular arts. 5 and 9 of the RSTP. In addition, associations are required to comply with the principles governing the protection of minor players contained in art. 19 of the RSTP when it comes to the registration of a minor player.

22. In a nutshell, the aforementioned procedure can be summarised as follows:

a) For a minor player who was previously registered with a foreign association and is therefore subject to an international transfer:

- i. One of the exceptions of art. 19 par. 2 of the RSTP must be applicable to the player's situation;
- ii. The association concerned submits an application for the approval of the Sub-Committee via TMS (art. 19 par. 4 of the RSTP along with Annexe 2 and art. 1 par. 3 of Annexe 3 of the RSTP);
- iii. Once the approval is granted by the Sub-Committee, the association requests the player's ITC from the former association (cf. art. 9 par. 1 of the RSTP);
- iv. Once the former association has issued the ITC, the new association receives the ITC and proceeds to the player's registration (art. 9 together with art. 5 of the RSTP).

b) For a foreign minor player who wishes to be registered for the first time<sup>8</sup>:

- i. One of the exceptions of art. 19 par. 2 of the RSTP must be applicable to the player's situation;
- ii. The association concerned submits an application for the approval of the Sub-Committee via TMS (art. 19 par. 4 of the RSTP along with Annexe 2 and art. 1 par. 3 of Annexe 3 of the RSTP);
- iii. The association proceeds to the player's registration (art. 5 of the RSTP).

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<sup>8</sup> To be considered as a foreign minor player wishing to register for the first time, the prerequisites are as follows:

- a) The player is not a national of the country in which he wishes to be registered for the first time and has not lived continuously for at least the last five years in said country and;
- b) The player has never previously been registered for a club or his last match played for his previous club occurred more than 30 months ago.

23. In sum, a minor player is only entitled to participate in organized football for a club once he/she is registered for the club concerned, *i.e.* once one of the two procedures described above has been fully completed.
24. In this context, the Committee found it worth recalling that the sole exception to the aforementioned procedures is the so-called “limited exemption”. As a matter of fact, the bureau of the Sub-Committee, by means of a formal decision and upon request of an association, can grant an association with this “exemption”. In such a case, the association concerned is exempted from the obligation to refer applications for approval to the Sub-Committee (point ii. of the procedures described above). In other words, the association benefitting from this “limited exemption” is entitled to proceed with the international transfer and/or the first registration of minor players without an application having to be submitted to the Sub-Committee, provided that:
- The minor player in question complies with one of the exceptions of art. 19 par. 2 of the RSTP and;
  - The latter is registered as an amateur player for a purely amateur club.
25. The association is then required to report every 6 months to FIFA all minor players that have been registered under such “limited exemption”.
26. The procedure that an association has to apply when registering a minor player being clarified, the Committee then referred to the jurisprudence of the Court of Arbitration for Sport (CAS) on this matter.
27. In particular, it should be recalled that art. 19 par. 1 of the RSTP is the backbone of the RSTP on the protection of minor players and is a provision that must be observed by clubs and associations alike<sup>9</sup>. Furthermore, CAS ruled that in order for a violation of art. 19 par. 1 of the RSTP to be established, it was not necessary that the minor player was registered with the national association concerned, but that the player has participated in organized football without complying with any of the substantive exceptions set out in art. 19 par. 2 of the RSTP<sup>10</sup>.
28. In this regard, the Committee turned its attention to a recent CAS award in which a clear distinction was made between the substantive and procedural rules contained in art. 19 of the RSTP<sup>11</sup>:

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<sup>9</sup> Cf. CAS 2014/A/3813.

<sup>10</sup> Cf. CAS 2016/A/4805.

<sup>11</sup> Cf. CAS 2019/A/6301.

- a. Pars. 1 to 3 are regarded as substantive rules establishing a general ban on the international transfer (par. 1) of a minor player and on the first registration of a foreign minor player (par. 3), unless one of the exceptions set out in par. 2 of that article applies to the minor concerned.
  - b. Par. 4 is a procedural provision requiring the national association to seek and obtain approval of the Sub-Committee before taking any further step in the registration of the minor player.
29. This distinction implies that the failure by an association to observe the procedure provided for in art. 19 par. 4 of the RSTP would not automatically result in a violation of the substantive rules of art. 19 par. 1 or 3 of the RSTP, or mean that one of the exceptions laid down in art. 19 par. 2 did not apply to the player in question.
30. It follows that, when determining whether the provisions governing the protection of minor players have been infringed by an association, FIFA's judicial bodies are required to analyse distinctly and separately if the association has infringed the substantive and/or the procedural rules of art. 19 of the RSTP.
31. In this sense, an association would on the one hand be in breach of art. 19 par. 1 or 3 of the RSTP, and therefore subject to sanctions, if it has registered a minor player for whom none of the exceptions of art. 19 par. 2 of the RSTP applied at the time of registration<sup>12</sup>.
32. On the other hand, an association would be facing sanctions in the event that it failed to submit an application for approval to the Sub-Committee, and obtain that approval, before registering the minor player. In particular, the RSTP contains no exception to art. 19 par. 4 of the RSTP and to the strict and mandatory obligation to seek for the Sub-Committee's approval, even if such approval was subsequently granted (once the player has already been registered with the association)<sup>13</sup>.
33. Based on the above explanations, no violation of art. 19 par. 1 or 3 of the RSTP would be committed by an association that registered a minor player without or before the approval of the Sub-Committee if the player concerned satisfied one of the exceptions set out in art. 19 par. 2 of the RSTP at the time of his registration. On the contrary, it would only be a violation of the procedural rules, *i.e.* of art. 19 par. 4 of the RSTP.
34. Notwithstanding the foregoing, the Committee recalled that the above developments on the substantive and procedural rules of art. 19 of the RSTP were intended to provide clarification on this provision aimed at the protection of minor players.

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<sup>12</sup> Cf. CAS 2019/A/6301.

<sup>13</sup> Cf. CAS 2016/A/4805.

However, it goes without saying that an association wishing to register a minor player must, after ensuring compliance with art. 19 of the RSTP, observe the relevant provisions of the RSTP regarding the registration and the international transfer of players.

35. In particular, should a minor player be registered before the ITC is requested and received, then the association concerned would be in breach of art. 9 par. 1 of the RSTP. In addition, an association would be held liable for the violation of art. 5 par. 1 of the RSTP if the player took part in organized football without being duly registered with that association.
36. On the basis of the foregoing, the Committee went on to assess whether the Appellant was exempted, as it claimed in its submission, from applying the required procedures with regard to the 52 minor players in question.

***b) Was the Appellant exempted from applying the registration procedure provided for in the RSTP?***

37. As a preliminary observation, the Committee noticed that the Appellant did not contest the conclusions reached by the Disciplinary Committee with respect to the transfer and registration of the 52 minor players, but rather rejected the application of the FIFA Regulations relating to the protection of minor players based on the following arguments:
  - i. All 52 minor players have been registered as amateurs and the application of the FIFA Regulation would constitute a violation of the UN Convention on the Rights of the Child;
  - ii. 28 registered players were Nordic exchange students;
  - iii. 11 registered players were domiciled in the city of "Haparanda-Tornio", living on the Finnish side and playing on the Swedish side of the border for the club Haparanda (50 km rule).
38. In relation to the distinction between the substantive and procedural rules of art. 19 of the RSTP, the Committee took note from the Appealed Decision that the Appellant was sanctioned for having infringed the substantive rules of art. 19 pars. 1 and 3 of the RSTP on 43 and 9 occasions respectively. Moreover, the Appellant also failed to comply with art. 19 par. 4 of the RSTP in respect of all 52 players since they were all registered without or before the Sub-Committee's approval.

39. Against this background, the Committee observed that the Appellant had submitted a request to the Sub-Committee for 16 minor players<sup>14</sup>. In this regard, 14 applications were approved but were in any case granted once the registration of these players had been completed, so that at the time of registration the necessary approval of the Sub-Committee was lacking.
40. As a result, and bearing in mind that FIFA's judicial bodies should assess distinctly and separately whether an association has infringed the substantive and/or the procedural rules of art. 19 of the RSTP, the Committee decided that it had to examine thoroughly these 14 applications, aware that the Appellant may have breached only art. 19 par. 4 of the RSTP without having infringed the substantive rules of that provision.
41. In light of the foregoing, the Committee decided to address the first two arguments put forward by the Appellant before analyzing the 14-abovementioned applications, along with their possible repercussions on the present case. With regard to the Appellant's third argument relating to the 11 players from "Haparanda-Tornio", the Committee stressed that these 11 players were among the 14 applications that were subsequently approved by the Sub-Committee, and should therefore form part of the analysis of these 14 requests.
- i. All 52 players have been registered as amateurs and the potential violation of the UN Convention on the Rights of the Child*
42. In this context, the judicial body deemed it necessary to recall that the protection of minors is one of the essential pillars of the RSTP and that the football authorities as well as the members of the football community shall enforce these rules in a consistent and strict manner. Said principle is enshrined in art. 19 par. 1 of the RSTP, which both, clubs and associations, must respect and implement.
43. Consequently, the Committee considered irrelevant the fact that these 52 players were registered as amateurs, since the substantive and procedural rules of art. 19 of the RSTP are applicable to all minor players, regardless of their status. The sole difference between professional and amateur players is the way in which the ITC is to be requested and received. In this sense, ITCs for professional players have to be requested and received in TMS, whereas for amateur players the ITC procedure takes place outside of TMS<sup>15</sup>.
44. With respect to the potential breach of the UN Convention on the Rights of the Child in the event that the Appellant would have refused to register the 52 minor players in

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<sup>14</sup> Players 1, 9, 11-12, 21-31 and 38.

<sup>15</sup> As from summer 2020, every ITC request, including for amateur players, will have to be carried out in TMS.

question, the Committee pointed out that CAS had confirmed the legality of these provisions, which do not contravene any rule of public policy or European law<sup>16</sup>.

45. In this regard, certain rules may constitute a restriction to Fundamental Rights, when such rules pursue a legitimate objective and are proportionate to the objective sought. In this sense, CAS found that the FIFA Regulations limiting the international transfer of minor players do not violate any mandatory principle of public policy and do not constitute any restriction on Fundamental Rights that should be considered as not admissible<sup>17</sup>.
46. As a result, the Committee found that the aforementioned arguments should be rejected and concluded that the Appellant could not be exempted from the application of the substantive and procedural rules contained in art. 19 of the RSTP on the sole ground that the 52 players had been registered as amateurs. Moreover, and in accordance with CAS jurisprudence, the application of the FIFA Regulations governing the protection of minor players does not create a violation of the UN Convention on the Rights of the Child, as these Regulations do not constitute an inadmissible restriction of the Fundamental Rights.

*ii. The Nordic exchange students*

47. With respect to the second argument, it was submitted that in January 2017, FIFA changed its jurisprudence and allowed exceptions for minor players moving to another country as exchange students. In particular, the Appellant emphasized that the way FIFA has operated over the years – *i.e.* prior to the new jurisprudence –, the lack of clear rules, guidance and communication created a certain legal uncertainty.
48. Moreover and referring to the case at hand, the Appellant claimed that there were no justifiable reasons to reject the application for registration of 28 exchange students from Nordic countries and to prevent them from playing football as amateurs and for purely amateur clubs.
49. Against this background, the Committee stressed that in February 2017, FIFA informed its member associations about some “jurisprudential” exceptions for minor players. In particular, FIFA formally clarified that associations had the opportunity to request the approval of the Sub-Committee in order to register exchange students as one of the exceptions to art. 19 par. 1 of the RSTP.

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<sup>16</sup> Cf. CAS 2008/A1485.

<sup>17</sup> Cf. CAS 2005/A/955; CAS 2005/A/956 and CAS 2008/A/1485.



50. However, prior to this new approach, any association wishing to register an exchange student had to apply the general principle and had therefore to follow the applicable procedure relating to the transfer and registration of minor players. In these circumstances, it is worth emphasizing that, pursuant to the case file, at no point before 2017 did the Appellant contact FIFA in order to seek for guidance and/or advice in relation to these exchange students.
51. In addition, the Committee referred to art. 19 par. 4 of the RSTP, which undoubtedly establishes that all international transfers of minor players and/or first registration of foreign minor players have to be approved by the Sub-Committee. Therefore, should the Appellant have deemed that the very particular circumstances of these minor players would have justified their registration, it should have submitted a formal application to the Sub-Committee and requested the latter to consider these specific affairs and to take a formal decision, which the Appellant manifestly did not do.
52. In light of the foregoing, the Committee considered that the Appellant was not in a position to depart from the substantive and procedural rules of art. 19 of the RSTP when it registered these alleged 28 exchange students and decided to reject this argument raised by the Appellant.

*iii. 14 applications subsequently approved by the Sub-Committee*

53. As a preliminary observation, and although the Appellant never claimed that the first instance failed to analyze separately whether it had infringed the substantive and/or the procedural rules of article 19 of the RSTP, the Committee considered that, on the basis of art. 59 par. 2 of the RSTP, it was not precluded from determining whether the law had been properly applied in the Appealed Decision.
54. In these circumstances, the Committee noted that, according to the Appealed Decision, the Appellant had submitted an application to the Sub-Committee for 16 players but only the requests of players 9, 11, 21-31 and 38 were successfully approved.
55. The Committee further observed that, despite such approval, the Appellant was sanctioned by the first instance for having infringed the substantive and procedural rules of art. 19 of the RSTP due to the registration of players 9, 11, 21-31 and 38 prior to the approval of the Sub-Committee<sup>18</sup>. Such conclusions were based on the following elements:

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<sup>18</sup> Violation of pars. 1 and 4 for players 9, 11, 21-31 and of pars. 3 and 4 for player 38.

- Player 9 (DoB. 29.04.1999) was registered with the Appellant on 31 August 2015, whereas the application was accepted on 4 October 2015.
  - Player 11 (DoB. 07.06.2000) was registered with the Appellant on 28 September 2015, whereas the second application was accepted on 14 January 2016. In particular, the first one was rejected on 2 November 2015.
  - Players 21-31 (players from “Haparanda-Tornio”, all born in 2000 and 2001) were registered with the Appellant on 20 May 2015, whereas their applications were accepted on 24 May 2015.
  - Player 38 (DoB. 12.12.1998) was registered with the Appellant on 19 November 2015, whereas the second application was accepted 27 November 2015. In particular, the first one was rejected on 25 June 2015.
56. In light of the foregoing, the Committee deemed it necessary to examine carefully the circumstances surrounding the registration of these 14 minors. In particular, a case-by-case analysis of whether the player, at the time of registration, satisfied one of the exceptions set out in art. 19 par. 2 of the RSTP was required. In this respect, the judicial body recalled that the Appellant could no longer be considered in violation of art. 19 par. 1 or 3 of the RSTP if one of the exception was satisfied by the player at the time of his registration. In such a case, the Appellant would only be in breach of the procedural rules, *i.e.* of art. 19 par. 4 of the RSTP, for failing to obtain the approval of the Sub-Committee before proceeding with the registration the minor player.
57. For the sake of clarity, the Committee stressed that due to the nature of the present procedure, it was limited to determine whether the Appellant breached the provision of art. 19 of the RSTP and could under no circumstances grant any approval within the meaning of art. 19 par. 4 of the RSTP.
58. Consequently, and emphasising that the Appellant did not expressly contest the conclusions of the Disciplinary Committee – apart from the two arguments already discussed above - nor did it establish in the course of the present proceedings that the first instance erred in its conclusions in relation to the 36 minor players registered without the prior approval of the Sub-Committee, the Committee considered that there was no reason to depart from the analysis carried out by the first instance in relation to those 36 players.
59. Similarly, the Committee considered that this reasoning also applied to players 1 and 12 since the Appellant, although the Sub-Committee had rejected both applications, proceeded with the registration of these two players.

60. In light of the foregoing, and prior to the examination of the 14 players for whom the requests were granted, the Committee considered that the Disciplinary Committee's conclusions concerning the aforementioned 38 players should be confirmed, namely that:

- The Appellant breached art. 19 pars. 1 and 4 of the RSTP (along with Annexe 2 and art. 1 par. 3 of Annexe 3 of the RSTP) as well as art. 9 par. 1 of the RSTP for players 1-8, 10, 12-20, 32-37, 39-41 and 43-45 given that it failed to seek and obtain the Sub-Committee's approval as well as to request and/or obtain the relevant ITC before registering these players. In addition, the Appellant infringed art. 5 par. 1 of the RSTP as far as player 12 is concerned since that player participated in organized football without being properly registered with the Appellant.
- The Appellant breached art. 19 pars. 3 and 4 of the RSTP (along with Annexe 2 and art. 1 par. 3 of Annexe 3 of the RSTP) for players 42 and 46-52 as a result of its failure to seek and obtain the Sub-Committee's approval before proceeding to the first registration of these foreign minor players.

61. Then, the Committee turned its attention to the 14 minor players whose applications were approved by the Sub-Committee.

*With respect to player 9:*

- a. The Committee observed that player 9 was registered with the Appellant on 31 August 2015, whereas the Sub-Committee only approved his application on 4 October 2015 on the basis of art. 19 par. 2 lit. b) of the RSTP, *i.e.* player moving within the EU and being over the age of 16.
- b. Relying on the case file, the Committee considered that there was no doubt that at the time of registration with the Appellant, player 9 already satisfied the aforementioned exception.
- c. As a result, the Committee concluded that, although the Appellant registered player 9 before the Sub-Committee's approval, there was no violation of the substantive rules of art. 19 of the RSTP, so that the Appellant could no longer be held responsible for the violation of art. 19 par. 1 of the RSTP.
- d. Nevertheless and following its failure to obtain the approval of the Sub-Committee before registering player 9, the Appellant breached art. 19 par. 4 of the RSTP (along with Annexe 2 and art. 1 par. 3 of Annexe 3 of the RSTP).

*With respect to player 11:*

- a. The Committee observed that the Appellant submitted two applications to the Sub-Committee, the first being rejected on 2 November 2015 and the second being granted on 14 January 2016. Nevertheless, the Committee noted that the player was registered with the Appellant on 28 September 2015, *i.e.* before the first application.
- b. In view of the record and relying on the first application – which has been submitted when the player was already registered and has been rejected –, the Committee concluded that it could not be established that player 11, at the time of his registration, satisfied one of the exception provided for in art. 19 par. 2 of the RSTP.
- c. Consequently, the Committee decided to endorse the findings of the first instance, namely the violation by the Appellant of art. 19 pars. 1 and 4 of the RSTP (along with Annexe 2 and art. 1 par. 3 of Annexe 3 of the RSTP).

*With respect to players 21-31:*

- a. The Committee observed that players 21-31 were registered with the Appellant on 20 May 2015, whereas the Sub-Committee approved their respective applications on 24 May 2015 on the basis of art. 19 par. 2 lit. c) of the RSTP, *i.e.* the 50km rule.
- b. In view of the case file and the explanations provided by the Appellant, the Committee considered that there was no doubt that at the time of their registration with the Appellant, these 11 players already satisfied the aforementioned exception.
- c. As a result, the Committee concluded that, although the Appellant registered players 21-31 before the Sub-Committee's approval, there was no violation of the substantive rules of art. 19 of the RSTP, so that the Appellant could no longer be held responsible for the violation of art. 19 par. 1 of the RSTP for these 11 players.
- d. Nevertheless and following its failure to obtain the Sub-Committee's approval before registering players 21-31, the Committee held that the Appellant breached art. 19 par. 4 of the RSTP (along with Annexe 2 and art. 1 par. 3 of Annexe 3 of the RSTP).

*With respect to player 38*

- a. The Committee noted that the Appellant submitted two applications to the Sub-Committee based on the same exception, namely the parents of the player moving for reasons not linked to football. In this respect, the first request was rejected on 25 June 2015, while the Sub-Committee approved the second application on 27 November 2015. In addition, the Committee observed that the registration of player 38 took place between these two applications, on 19 November 2015.
  - b. In such circumstances, the Committee held that the approval of the second application was not sufficient to establish that player 38, at the time of his registration, satisfied one of the exceptions of art. 19 par. 2 of the RSTP.
  - c. In particular, it should be recalled that art. 19 par. 4 of the RSTP is a tool designed to ensure that the substantive rules of art. 19 of the RSTP are complied with by associations and clubs wishing to register a minor player. In this sense, the Committee noted that both requests were based on the same exception. Consequently, it could only be determined that the circumstances that caused the rejection of the first request had been remedied once the second request had been granted by the Sub-Committee.
  - d. In light of the evidence on the record and bearing in mind that the Appellant did not submit any evidence establishing that player 38 satisfied one of the exception at the time of his registration, the Committee decided to uphold the findings of the Disciplinary Committee according to which the Appellant breached art. 19 pars. 3 and 4 of the RSTP (along with Annexe 2 and art. 1 par 3 of Annexe 3 of the RSTP).
62. In light of all the foregoing, the Committee decided that the Appealed Decision was to be confirmed except for the findings concerning players 9 and 21-31. For those players, the Committee deemed that the Appellant did not infringe art. 19 par. 1 of the RSTP.
63. Consequently, the Committee found that the Appellant breached:
- The ban on international transfers of minor player laid down by article 19 par. 1 of the RSTP in 31 cases (players 1-8, 10-20, 32-37, 39-41 and 43-45);
  - The ban on the first registration of foreign minor players laid down in art. 19 par. 3 of the RSTP in 9 cases (players 38, 42 and 46-52);
  - The procedural rules provided for in art. 19 par. 4 of the RSTP (along with Annexe 2 and art. 1 par. 3 of Annexe 3 of the RSTP) in 52 cases (players 1-52);

- The provision of art. 9 par. 1 of the RSTP in 43 cases (players 1-37, 39-41 and 43-45);
- The provision of art. 5 par. 1 of the RSTP in 14 cases (players 9, 11, 12 and 21-31).

**c) Are the sanctions imposed by the FIFA Disciplinary Committee proportionate?**

64. After having established the violations committed by the Appellant, the Committee proceeded to assess the sanctions imposed by the FIFA Disciplinary Committee, namely a fine of CHF 104,000 and a warning.
65. In this respect, the Committee recalled the jurisprudence of CAS according to which a decision-making body fixing the level of pecuniary sanctions should, amongst others, take into consideration the following elements: (a) the nature of the offence; (b) the seriousness of the loss or damage caused; (c) the level of culpability; (d) the offender's previous and subsequent conduct in terms of rectifying and/or preventing similar situation; (f) the applicable case law and (g) other relevant circumstances<sup>19</sup>.
66. In light of the foregoing, the judicial body observed that the Appellant infringed multiple provisions of the RSTP, which aim at protecting the integrity and development of minor players. In particular, the Committee recalled that the protection of minors is one of the essential pillars of the RSTP and that the football authorities as well as the members of the football community shall enforce these rules in a consistent and strict manner. In other words, these provisions intend to protect one of the FIFA objectives, which is *"to improve the game of football constantly and promote it globally in the light of its unifying, educational, cultural and humanitarian values, particularly through youth and development programmes"*<sup>20</sup>.
67. In this regard, the Committee wished to endorse the developments of the Appealed Decision in the sense that the provisions governing the international transfer and registration of underage players seek to provide effective protection to their integrity and development. Therefore, associations are responsible to assure that the provisions of the RSTP are duly respected and to ensure that the protection of underage players is not put at stake.

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<sup>19</sup> CAS award 2014/A/3813.

<sup>20</sup> Cf. art. 2 lit a) of the FIFA Statutes.

68. The above considerations led the Committee to qualify any violation of the provisions governing the international transfer and registration of minor players as a serious breach of the RSTP.
69. Bearing the foregoing in mind, the Committee agreed with the first instance that the infractions committed by the Appellant were inexcusable and had to be punished accordingly. Additionally, the Committee strongly believed that in light of the seriousness of the provisions infringed, the initial sanctions imposed in the Appealed Decision, namely the fine amounting to CHF 104,000 and a warning, were not disproportionate and were deterrent sanctions to avoid unacceptable conducts such as the one at hand.
70. Notwithstanding the above, the Committee recalled that the Appealed Decision was confirmed with the exception of the findings concerning players 9 and 21-31, where it has been established that the Appellant had not infringed art. 19 par. 1 of the RSTP when registering these 12 players. As such, the Committee considered that the fine imposed on the Appellant had to be reduced accordingly.
71. In this sense, the Committee deemed that only the sanctions pertaining to the violation of art. 19 par. 1 of the RSTP by the Appellant in relation to players 9 and 21-31 had to be reviewed.
72. As a result, the Committee decided to reduce the fine by CHF 12,000, bringing it to CHF 92,000. In addition, the warning imposed on the Appellant by the first instance is confirmed.
73. Finally, the Committee stressed that the arguments put forward by the Appellant have been duly noted and discussed in the course of the present proceedings. However, none of these arguments could lead to an exemption from the Appellant's responsibility nor justify a lower sanction with respect to the present matter.
74. For this reason, and bearing in mind the seriousness of the offences committed, the Committee unanimously considered that the fine amounting to CHF 92,000 could not constitute a disproportionate sanction and should serve as a deterrent to prevent any similar offences being committed by the Appellant in the future.

### **C. CONCLUSION**

75. Bearing in mind the foregoing, the Committee concluded that the appeal lodged by the Appellant should be partially upheld and the decision taken by the FIFA Disciplinary

Committee on 25 June 2019 should be amended with regard to the fine imposed on the Appellant.

#### **D. COSTS**

76. The Committee decided on the basis of art. 45 par. 1 of the FDC that the costs and expenses of these proceedings amounting to CHF 1,000 shall be borne by the Appellant.
77. In this sense, the Committee noted that the Appellant has already paid the appeal fee of CHF 1,000 and decided that the aforementioned costs and expenses of the proceedings are set off against this amount.



### III. has therefore decided

1. The appeal lodged by the Swedish Football Association is partially upheld.
2. The decision of the FIFA Disciplinary Committee rendered on 25 June 2019 is modified as follows:
  1. *The FIFA Disciplinary Committee found the Swedish Football Association responsible for the infringement of the relevant provisions of the RSTP related to the protection of minors (art. 19 pars 1, 3 and 4; art. 1 par. 1 of Annexe 2; art. 1 par. 3 of Annexe 3 of the RSTP), the procedure governing international transfers of players (art. 9 par. 1) and the registration of players (art. 5 par. 1).*
  2. *The FIFA Disciplinary Committee orders the Swedish Football Association to pay a fine to the amount of CHF 92,000.*
  3. *In application of art. 10 a) and art. 13 of the FIFA Disciplinary Code, the Swedish Football Association is warned on its future conduct.*
  4. *The above fine is to be paid within thirty (30) days of notification of the present decision.*
3. The costs and expenses of these proceedings in the amount of CHF 1,000 are to be borne by the Swedish Football Association. This amount is set off against the appeal fee of CHF 1,000 already paid by the Swedish Football Association.

FÉDÉRATION INTERNATIONALE  
DE FOOTBALL ASSOCIATION

/s/ W. Neil Eggleston

W. Neil EGGLESTON

Deputy Chairman of the FIFA Appeal Committee

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### **LEGAL ACTION**

According to art. 58 par. 1 of the FIFA Statutes, this decision may be appealed against before the Court of Arbitration for Sport (CAS). The statement of appeal must be sent to the CAS directly within 21 days of receipt of notification of this decision. Within another 10 days following the expiry of the time limit for filing the statement of appeal, the appellant shall file a brief stating the facts and legal arguments giving rise to the appeal with the CAS.

The full address and contact numbers of the CAS are the following:

Avenue de Beaumont 2  
1012 Lausanne  
Switzerland  
Tel: +41 21 613 50 00  
Fax: +41 21 613 50 01  
e-mail: [info@tas-cas.org](mailto:info@tas-cas.org)  
[www.tas-cas.org](http://www.tas-cas.org)

Number	Name of Player	Nationality	DoB	Club	Previous Association	Date of registration with Swedish FA	Age at registration in Sweden	Minor application entered in TMS
1	SELBEKK Charlotte Marie	NOR	31.05.1997	Vänersborgs IF	NOR	25.04.2014	16.91	H-0000546 rejected on 05.09.13
2	PLLANA Leonard	KVX	26.08.1996	Grebbestads IF	KVX	13.05.2014	17.72	/
3	ASGEIRSSON Johan	ISL	19.04.1997	Enköpings SK FK	ISL	13.05.2014	17.08	/
4	ALBERTSSON Jan Samuel	SWE	18.01.1998	IFK Östersund	NOR	07.07.2014	16.48	/
5	OPSAL Emil	SWE	10.09.1998	IFK Östersund	NOR	07.07.2014	15.83	/
6	STENSNESS Gianni	AUS	07.02.1999	IFK Norrköping FK	AUS	24.03.2015	16.13	/
7	WIEST Niklas	GER	06.11.1998	Solvesborgs Golf	GER	31.03.2015	16.41	/
8	GLORIA Giovanni	USA	02.09.1999	Mjällby AIF	USA	20.05.2015	15.72	/
9	SCHJELDERUP Helene Raedergard	NOR	29.04.1999	Umea IK FF	NOR	31.08.2015	16.35	H-0000852 accepted on 04.10.15
10	HECHER Evita Katharina	AUT	06.05.1998	Husqvarna FF	AUT	10.09.2015	17.36	/
11	JÖRGENSEN Nils Kasper	ESP	07.06.2000	GIF Nike	ESP	28.09.2015	15.32	D-0002520 rejected on 02.11.15 D-0002879 accepted on 14.01.16
12	KAMARA Brian	DEN	10.01.2000	Trelleborgs FF	DEN	11.05.2016	16.35	D-0002340 cancelled on 04.06.15 D-0002409 rejected on 17.08.15 D-0002675 rejected on 05.01.16 D-0003177 cancelled on 10.01.18
13	BJÖRKQVIST Tobias	FIN	28.03.2000	Umea FC Akademi	FIN	09.09.2016	16.46	/
14	HÖGMO UTSTÖL Gustav	NOR	14.07.1997	Märsta IK	NOR	23.05.2014	16.87	/
15	ALEXANDER Lukas	USA	04.11.2000	Kvibille BK	USA	21.08.2014	13.80	/
16	FROM Isac	NOR	22.07.1998	Ope IF	NOR	04.09.2014	16.13	/
17	ALAHEIKKA Johannes	FIN	05.06.1998	Edsbyns IF	FIN	04.09.2014	16.26	/
18	HAUG Christina	NOR	20.09.1997	Öckerö IF	NOR	04.09.2014	16.97	/
19	ORCZECH Tristan	GER	16.10.1998	Bollstanäs SK	GER	30.09.2014	15.97	/
20	STECCO Davide	ITA	15.12.1997	Särö IK	ITA	28.04.2015	17.38	/
21	TUOMA Laura	FIN	23.08.2001	Haparanda FF	FIN	20.05.2015	13.75	L-0001441 accepted on 24.05.15
22	KUNNARI Jenna	FIN	24.12.2000	Haparanda FF	FIN	20.05.2015	14.41	L-0001443 accepted on 24.05.15
23	SUOMELA Meri-Maria	FIN	31.08.2000	Haparanda FF	FIN	20.05.2015	14.73	L-0001435 accepted on 24.05.15

24	KOIVUROVA Noora	FIN	17.07.2001	Haparanda FF	FIN	20.05.2015	13.85	L-0001437 accepted on 24.05.15
25	ILPOINEN Jenny	FIN	08.02.2001	Haparanda FF	FIN	20.05.2015	14.28	L-0001438 accepted on 24.05.15
26	HIRVONEN Jenni	FIN	02.05.2000	Haparanda FF	FIN	20.05.2015	15.06	L-0001446 accepted on 24.05.15
27	NIEMI Emmi	FIN	28.09.2000	Haparanda FF	FIN	20.05.2015	14.65	L-0001440 accepted on 24.05.15
28	KEISU Senja	FIN	03.12.2001	Haparanda FF	FIN	20.05.2015	13.47	L-0001447 accepted on 24.05.15
29	UUSITALO Hanna-Maria	FIN	11.10.2000	Haparanda FF	FIN	20.05.2015	14.61	L-0001445 accepted on 24.05.15
30	MUOTKA Laura	FIN	12.01.2000	Haparanda FF	FIN	20.05.2015	15.36	L-0001439 accepted on 24.05.15
31	HUTTUNEN Roosa	FIN	09.12.2000	Haparanda FF	FIN	20.05.2015	14.45	L-0001444 accepted on 24.05.15
32	BJERKE Axel	SWE	19.08.2003	Akersberga BK	FRA	17.06.2015	11.84	/
33	SCHÄFER Anna	GER	25.11.1999	Vapnö IF	GER	31.08.2015	15.78	/
34	HARSDORF Sönke	GER	13.12.1998	Unik FK	GER	31.08.2015	16.73	/
35	KNIGHT Rickard	FIN	05.05.1998	Vaksala SK	FIN	04.09.2015	17.35	/
36	AZURMENDI Hector	USA	17.12.1997	Vikens IK	USA	09.10.2015	17.82	/
37	GRANCEA Petru Emil	ROM	18.03.2001	Sandakerns SK	ROM	09.11.2015	14.65	/
38	RABAZA JIMENEZ Ramir	ESP	12.12.1998	Stockholm FC	ESP	19.11.2015	16.95	B-0002585 rejected on 25.06.15 B-0003415 accepted on 27.11.15
39	LINDH SKOGSTAD Thea	NOR	16.09.1999	Eneby BK	NOR	17.12.2015	16.26	/
40	PIHLAVIRTA Liida	FIN	19.08.1999	Sollentuna FK	FIN	13.04.2016	16.66	/
41	JANSSON Emma	SWE	14.08.1999	Gustafs Golf	USA	03.05.2016	16.73	/
42	NAVA Rafael	MEX	04.08.2000	Dala-Järna IK	MEX	03.06.2016	15.84	/
43	BRONTS Luuk	NED	15.12.1998	Stenstorp IF	NED	30.08.2016	17.72	/
44	RAHKOLA Malla	FIN	27.01.2000	Malmbergets AIF	FIN	30.08.2016	16.60	/
45	LESEMANN Inken	GER	02.09.2000	Hajoms IF	GER	23.09.2016	16.07	/
46	HYEON In Seung	KOR	14.10.1998	Herrljunge SK FK	/	13.05.2014	15.59	/
47	TEARE Jaan Philip	GER	22.02.1998	FC Djursholm	/	04.06.2014	16.29	/
48	SESLAK Jovana	GER	27.06.2000	Arlövs BI	/	20.06.2014	13.99	/
49	SOLANO Mateo Caceres	ARG	03.10.1996	Röke IF	/	04.09.2014	17.93	/
50	CARTER Janet	USA	11.09.1998	TFK Nova Eslöv	/	11.09.2014	16.01	/
51	LINDUP Nathan	ENG	20.10.2000	Staffanstorps Golf	/	31.08.2015	14.87	/
52	SPROESSER MATHIAS Marcel	BRA	12.10.1998	Redvägs FK	/	21.04.2016	17.54	/