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Steering Stewarding Calls on Track: An Examination of the Review Process in International Motorsports

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This paper shows that the right of review under Article 14 of the International Sporting Code seems onerous to Formula 1 (F1) teams because it has been blindly transplanted into the Code. Due regard has not been given to the adversarial principles that inform the review process in legal systems—particularly, the right of parties to make submissions before a decision is taken. It studies successful right of review petitions from the last five years in Formula 1 and other series. This study reveals that due to the nature of the sport, there is certain critical evidence which can only be accessed either by the stewards or the teams after the end of the race. This means that, currently, stewards are taking calls based on incomplete information, which is both unfair and unjust. To remedy this gap, the paper proposes that for certain pre-defined cases, stewards and teams should be able to request a preliminary hearing before a final decision. It also puts forward policy consideration to support this proposal.

Keywords: Formula 1; right of review; motorsports; FIA; stewards

Introduction

Irrespective of team loyalty, the subject that unites all Formula 1 (F1) fans is their fervent disagreement with the decisions of the stewards and stewarding procedures. This subject took centre stage again when a very controversial 10-second penalty was handed to Carlos Sainz for a collision with Liam Lawson during the 2025 Dutch Grand Prix. Even Williams Racing (the team for which Sainz drives) disagreed with the stewards and decided to challenge this decision by filing a review petition (Corsmit *et al.* 2025). Rooted in Article 14 of the International Sporting Code (2025), right of review allows F1 teams to approach the stewards to re-examine their decision. However, the team's request must satisfy a specified threshold for their re-examination request to be successful.

In this instance, the petition filed by Williams was successful, which is an exceedingly rare occurrence (Cleeren 2025). According to the teams, this low success rate can be attributed to the high threshold that must be satisfied (Cleeren 2025). This paper rebuts this prevailing view. It studies successful right of review petitions from the last five years to show that, due to the nature of the sport, there is certain critical evidence that can only be presented after the end of the race. Currently, stewards are taking calls based on incomplete information, which is neither fair nor just. To remedy this, the paper proposes that stewards and teams should be able to request a preliminary hearing to present all relevant evidence before a final decision is made. It builds this proposal by demonstrating that the incorporation of the right of review as a remedy requires that adversarial principles must be followed, of which prior hearing is an essential element. It does this by highlighting the way review process functions within the courts in India and those established by the Fédération Internationale de l'Automobile (FIA). These are both examples of judicial systems informed by adversarial principles.

The literature on this subject has focused on the current structure of decision-making in F1 and the appeals process (Murugan and Panchalingam 2025; Vidyarthi 2023). The focus on Article 14 has been limited to the issues the teams face with the review process (Straw 2024). There is little to no engagement with the legal principles, which underpin the right of review. This paper attempts to fill this noticeable gap.

The Delta in Decision-Making

Stewards currently base their decision on evidence available during the race (like external and in-car video, timing, telemetry, and team radio). However, the high speeds at which these cars move, track designs, and at times even the weather conditions make it humanly impossible for the stewards to gather all the information required (Smith 2025). F1 has tried to remedy this information asymmetry by introducing the Remote Operations Centre (ROC) based in Geneva, which functions as a monitor and occasional advisor (Kalinauckas 2022). However, despite the ROC, due to the

nature of the sport, it is not possible to access *all* relevant information required to make an accurate call in real-time. Footage from cameras on the car and drivers' testimony are two examples of such information.

Footage from cameras on the cars

Series of successful review petitions show that stewards changed their original decisions after reviewing videos taken from the helicopter and footage from various cameras fixed on the cars (on-board, rear-facing, 360 degrees, roll hoop). The catch is that this footage can be accessed by Formula One Management only after the race (Corsmit *et al.* 2025). Neither the teams nor stewards have access to any of this vital footage during the race when the decision needs to be made.

Beyond F1, the International Sporting Code (2025) is applicable to all motorsport competitions that fall under the FIA, the apex decision-making authority in motorsports (International Sporting Code 2025, Art. 1.1.1). Review petitions in other FIA championships also demonstrate the importance of such footage in decision-making.

Below (**Table 1**) are examples that demonstrate the importance of engaging with video footage from the cars to correctly determine which driver is at fault and should be given a penalty.

Table 1: Outcomes of review petitions in F1 and Formula-E.

Series	Race	Original Decision	Outcome of Review Petition	Takeaway
F1	2025 Dutch Grand Prix	10-second penalty issued to Carlos Sainz for colliding with Liam Lawson.	Successful and penalty was overturned.	Footage from 360-degree camera on Sainz's car and the rear-facing camera on Lawson's car showed Sainz was not responsible for causing the collision (Corsmit <i>et al.</i> 2025).
Formula-E	2024 Tokyo E-Prix	Five-second penalty issued to Norman Nato for colliding with Robin Frijns.	Successful and penalty was overturned.	Additional onboard video footage that was unavailable during the race showed Nato was not at fault (Giordmaina 2024).
Formula-E	2025 Jakarta E-Prix	Five-second penalty issued to Sebastien Buemi for colliding with Edoardo Mortara.	Successful and penalty was overturned.	Footage from the roll hoop onboard camera on Buemi's helmet showed that no one driver could be held responsible for the collision (Wirtz 2025).
Formula-E	2025 Jakarta E-Prix	Five-second penalty issued to Oliver Rowland for an incident with Max Guenther.	Unsuccessful.	Footage did not change but rather affirmed the steward's original analysis of the incident. However, the stewards noted that 'often the roll hoop camera of the overtaking car offers the most informative and decisive perspective...' (Smith 2025).

Drivers' testimony

It is common for teams to submit witness statements of the penalised driver as part of the review petition, but F1 stewards have consistently held that this kind of evidence does not satisfy the review criteria. However, stewards have mentioned that driver statements can be 'potentially relevant and of some assistance' (Corsmit *et al.* 2025) and do consider the driver's viewpoints (Wirtz 2025). Drivers' testimony can provide valuable insight into the incident being investigated by the stewards, which can help stewards make a factually informed call.

Additionally, there may be other circumstances where it is important to hear the teams or race control before a decision is made. For example, a miscommunication between the Race Director, Sporting Director, and stewards led to Aston Martin being wrongfully penalised. It was only when Aston Martin presented evidence to correct the stewards' understanding of the issue was the penalty reversed (Shetty *et al.* 2023). Further, stewards might levy a penalty based on their review of a wrong moment (Pence, Al-Hilli and Tubb 2025).

These are all examples of evidence that the stewards should have considered before making their decision and imposing a penalty on drivers. I propose that to remedy this current trend of decision-making with incomplete information, concerned stakeholders must be able to convene or request a hearing before the stewards. I show that it is both legally and practically possible to implement this proposal within the design of the current system.

Article 14: Only One Piece of the Puzzle

In practice, review petition is a three-step process. First, teams must file the review petition within 96 hours after the race ends and deposit the fees specified in the sporting regulations (International Sporting Code 2025, Art. 14.4.1). Upon fulfilment of these conditions, as the second step, stewards determine the admissibility of the petition by analysing whether it satisfies the ground for review mentioned in Article 14.1.1. This Article requires that teams present 'a significant and relevant new element which was unavailable to the parties seeking the review at the time of the decision

concerned.' This review criterion is conjunctive, that is, every individual element must be satisfied for the petition to be admissible. It is only after the stewards are satisfied that the standard set by this ground has been met that they will reopen their decision—the third step. Most petitions fail after the second step because the evidence fails to satisfy one or more elements of the review criterion. Teams do not view this criterion favourably due to the 'high bar' it sets (Dean *et al.* 2024). However, the deeper issue with the review process is not the conjunctive nature of the review criterion but the mismatch between its intended purpose and the way it is being used currently. Based on Article 14's design, stewards have noted that it is intended to serve as a subsequent hearing to revisit a decision taken after the stewards have heard all the relevant parties (Dean *et al.* 2024). This observation of the stewards is grounded in an understanding of the legal rationale and adversarial principles that inform the review process. This rationale and principle can be better understood by exploring the way the review process works in the Indian and FIA Courts.

Formula of adversarial principles

The Indian legal system is guided by the adversarial system under which parties to a dispute are given a chance to present their case before an impartial judge. It is the obligation of the parties to make use of the trial to present all relevant evidence to the extent possible (Takwani 2020). However, after the judge has given their ruling, it is possible for parties to approach the original judge to re-examine their decision, but they must meet one of three grounds for review. Like Article 14, one of the grounds is 'discovery of new and important evidence' which was not available to the party during the first hearing of the case (Takwani 2020). The logic of the review procedure is that re-consideration mechanism with a limited scope should exist because decision-making by humans is imperfect and prone to errors (Takwani 2020). In this background, it is valid for an original presiding judge to analyse whether the new evidence presented is relevant and strong enough to change the original decision. The review procedure followed before the FIA Courts—International Tribunal (IT) and the International Court of Appeal (ICA)—is similar.

The FIA established these two courts to preside over sporting and non-sporting disputes that may arise within or be brought against the FIA (FIA n.d.). The ICA functions as an appellate authority with jurisdiction over stewards' decisions and courts of first instance like IT (Judicial and Disciplinary Rules of the FIA 2025, Art. 9.1.1). The procedure followed by these courts is modelled on the adversarial system where parties are allowed to make written and oral submissions (Judicial and Disciplinary Rules of the FIA 2025, Art. 6.6.2; Art. 10.11.1). Like the Indian system, parties have the right to approach the appropriate FIA Court that issued the judgement to re-examine its original decision. However, unlike the Indian system, the only ground for initiating a review is presenting new and previously unknown evidence. The evidence must be of a character that 'calls into question or causes the FIA Courts to modify its decision' (Judicial and Disciplinary Rules of the FIA 2025, Art. 8.3.1; Art. 11.3.1).

In both systems, the review process is preceded by a trial during which the parties are provided the chance to present all relevant evidence and the judge rules based on these submissions. This is in marked distinction to the way the review process is structured under the Code. The stewards (judges) conduct fact-finding independently of the teams (parties to a trial) without providing the teams an opportunity to be heard before they reach a decision. The decision of the Code's drafters to stray from adversarial principles is strange given the similarity in the language and structure of Article 14 and Articles that lay down the review process to be followed by the FIA Courts.

The next section makes a recommendation that can correct this misalignment of Article 14 with adversarial principles. It suggests that relevant stakeholders must be allowed to present all relevant evidence before stewards make their final decision.

Drivers Assemble

Stewards routinely summon drivers to hear about incidents that take place at the start, during, or after a race to hear from them and then issue a penalty (Warwick *et al.* 2025). Access to this superior information should lead to the stewards making an accurate call and reduce instances of penalties being levied or reversed too late (Calandrillo and Davison 2017; Fleischer 2022). For example, after Red Bull Racing's review petition succeeded, Hamilton was penalised before the 2020 Austrian just a few minutes before the race started (Jobst *et al.* 2020). Buemi's penalty was reversed and the order of the race changed after 13 days (Wirtz 2025).

Building on this, this section proposes that both stewards and teams should be able to convene a hearing to present all relevant evidence before stewards make their final decision. The design and functioning of the Decision Review System (DRS) in cricket can provide some guidance. It is the technology used by the third umpire to review calls made by the on-field umpire regarding the dismissal of a batter (Nalwala 2023). Just like the DRS in cricket, stewards should be allowed to have unlimited chances to convene a hearing. The teams' right should be limited to a pre-defined number across the race weekend or the season to the most contentious instances to guard against diversionary tactics (Khorounzhiy and Mitchell-Malm 2023). To prevent a pile-up at the stewards' room after the race, teams should request a hearing during the race (i.e., before it ends). This prior knowledge can be used to organise hearings in an orderly manner and ensure that relevant evidence has been arranged. To allay concerns of complete uncertainty over the finishing order (Straw 2024), a provisional race classification can be issued, which is already done by the stewards. The final race classification can reflect any penalties handed to the drivers.

The value of this proposal is not diminished even if a system of in-race appeals, permanent or rotating stewards is adopted (Cleeren 2025; Murugan and Panchalingam 2025; Vidyarthi 2023). Prior hearing will be essential in either case because, as shown above, certain pieces of evidence are available only after the race.

Policy considerations

The FIA has been mired in controversies with questions about its commitment to accuracy, justice and fairness being raised at every turn (Murugan and Panchalingam 2025). Installing systems that improve and reinforce FIA's commitment to these foundational values is critical to maintain and sustain the current explosive growth of the sport (Calandrillo and Davison 2017). The opportunity to be heard before a decision is taken on an alleged infringement promises to increase transparency. This may mark the start of a long process of trust-building between the FIA and the teams and drivers (Smith 2025). When teams and drivers believe that stewards are likely to make the right call (Calandrillo and Davison 2017), they may also take more calculated risks, leading to more exciting on-track battles. It is wheel-to-wheel racing that makes F1 exciting and attractive to so many. This quality of the sport must be protected and preserved.

Conclusion

This paper shows that the right of review seems onerous to F1 teams because it has been blindly transplanted into the Code. Due regard has not been given to the adversarial principles that inform the review process in legal systems. To remedy this gap, the paper proposes that for certain pre-defined cases, stewards and teams should be able to request a preliminary hearing before a final decision.

Competing Interests

The author has no competing interests to declare.

Author Notes

Following the submission of this article on November 13, 2025, the 2026 International Sporting Code (International Sporting Code 2026) was released on December 18, 2025, to be effective from January 1, 2026. The 2026 ISC was unavailable to the author at the time of writing. For completeness, this note draws attention to two revisions incorporated in the current version of Article 14 of the 2026 ISC. First, the current version of Article 14 recognises the stewards' power to hold a hearing after a race, before a final decision is made, effectively operating as a first hearing prior to review (Article 14.1.1). Second, stewards are now empowered to independently initiate a review of their own decisions upon discovering a significant and relevant new element that was unavailable to them at the time of the original decision (Article 14.1.2). The recommendations in this article closely mirror these revisions. The discussion about adversarial principles and practical insight gained from in-depth study of review decisions are relevant to understand the background of Article 14 and significance of the revisions introduced by the 2026 ISC.

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