U.S. Taxes World Cup Players:

Would Nigeria do the same?

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Introduction

For the better part of June and July 2026, the FIFA World Cup had the world enthralled with nerve-racking matches, record-breaking performances and celebrations that stretched far beyond the stadiums. But while fans counted goals, another spectator was keeping a different score – the taxman. The tournament ended weeks ago, but for the players, the story did not end on the pitch. In its wake, athletes were faced with taxation tied to the sporting activities they performed in host countries, and for those who played on American soil, this meant up to 37% of their earnings, in some cases, going to the taxman.[1]
Is the case the same in Nigeria? Is income earned by a non-resident athlete taxable in Nigeria?

Before answering these questions, let's see what actually happened at this year's tournament.

Why were players at the 2026 World Cup taxed?

The taxation of income earned by sportspersons is not novel. Like the income of other individuals, athletes' earnings may be subject to tax in the jurisdictions where the sporting activity giving rise to that income is performed. In previous years, World Cup host countries entered into agreements with FIFA to grant blanket tax exemptions to FIFA, its affiliates, and other participants, including participating member associations (PMAs), players, coaches, and broadcasters, on income earned in relation to the tournament.

As one of the host countries for the 2026 World Cup, the U.S. took a narrower approach by granting tax exemptions only to FIFA and PMAs. This left players exposed to potential income tax liabilities for income earned while playing in America. In June 2026, the U.S. Taxpayer Advocate Service of the U.S. Internal Revenue Service ("IRS") published the "Tax Playbook for Foreign Participants in the 2026 FIFA World Cup", explaining that organisations making payments to players, such as PMAS and promoters, were required to withhold tax on the payments and remit it to the IRS.[2]

Would Nigeria tax a non-resident player?

Yes, and the trigger is income earned within Nigeria. Under the Nigeria Tax Act, 2025 ("NTA"), income of a non-resident person "derived from" or "accruing in" Nigeria is taxable in Nigeria.[3] For a non-resident player, this would include prize money from a tournament hosted in Nigeria, performance and appearance fees for matches played in Nigeria, royalties, and fees earned from endorsement, advertising and sponsorship deals in Nigeria. Under the Nigerian Tax Administration Act, income earned by non-resident athletes is subject to a withholding tax (WHT), which is the final tax payable on such income.[4] The Deduction of Tax at Source (Withholding) Regulations, 2024 currently set the WHT rate on payments made to sportspersons at 15%.[5]

Would Nigeria tax a non-resident player?

The organisation or company paying an athlete is required to deduct the applicable tax and remit it to the Nigeria Revenue Service ("NRS").[6]

The NRS may also appoint a party in custody of the payment as a collection agent to deduct and remit the tax to the NRS.[7]

What is the place of Double Taxation Agreements (DTAs)?

Withholding at source is not necessarily the end of the story if the player's home country and Nigeria have a DTA. If a non-resident athlete is resident in a country with which Nigeria has a DTA, they may obtain relief from double taxation, typically in the form of a tax credit or an exemption on the Nigerian-source income, subject to the DTA's specific terms.

[1]More Than Half of World Cup Countries Face Extra Costs as Fifa Fails to Agree US Tax Deal' The Guardian (London, 2 April 2026) [1]International Chamber of Commerce (ICC), "Global Insights, Trade Finance." Last accessed here. on 17 August 2026.
accessed 11 September 2026.
[2]The Tax Playbook for Foreign Participants in the 2026 FIFA World Cup' (Taxpayer Advocate Service, 9 June 2026, last updated 13 July 2026) [1]International Chamber of Commerce (ICC), "Global Insights, Trade Finance." Last accessed here. on 17 August 2026. accessed 12 September 2026. [3]Nigeria Tax Act, s. 17(1).
[4]Nigerian Tax Administration Act, s. 51(2).

Conclusion

The rule is simple. Play in Nigeria, earn in Nigeria, pay tax in Nigeria.

Should Nigeria ever host another sports tournament, foreign players would find their Nigerian-source earnings subject to WHT.[8] While a few players may be cushioned by a DTA from a second tax bill back home, others would not be so lucky and may be taxed without relief in their home countries as well. Nigeria could, like previous host countries, carve out an exemption for the tournament's participants, but unless it does, the default stands: play, earn, pay.

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[5] *Deduction of Tax at Source (Withholding) Regulations, 2024, First Schedule.*
[6] *Nigerian Tax Administration Act, s. 3(1)(a)(iv) & 51(1); Deduction of Tax at Source (Withholding) Regulations, 2024, paragraphs 4 & 7.*
[7] *Nigerian Tax Administration Act, s. 60.*
[8] *Nigeria has previously hosted a number of football tournaments, including: the Confederation of African Football's (CAF) Men's Africa Cup of Nations (AFCON) in 1980 and in 2000 (with Ghana as co-host) and the African Women's Championship (now regarded as the Women's Africa Cup of Nations (WAFCON) in 1998, 2002 and 2006; as well as FIFA's 1999 World Youth Championship (U-20 World Cup) and 2009 Under-17 (U-17) World Cup.*