



**SUMMARY OF  
OPERATION CAROUSEL  
2021-081**

## Investigation Summary

This report details the results of Operation Carousel, a World Anti-Doping Agency (“WADA”) Intelligence and Investigation (“I&I”) Department investigation into the National Anti-Doping Agency of India (“NADA”), more specifically, an allegation (the “Allegation”) that certain elements of NADA’s testing program were not in accordance with the requirements of the World Anti-Doping Code (“Code”) and the International Standard for Testing and Investigation (“ISTI”) and the International Standard for Result Management (“ISRM”).

WADA has been working with NADA for several years to improve its anti-doping program. In 2016, WADA instigated a mentoring partnership between NADA and an experienced National Anti-Doping Organization (“NADO”).

In 2017, still concerned by the lack of progress in India, WADA audited the NADA anti-doping program as part of the WADA Code Compliance Monitoring Program. In addition to discovering that NADA was “severely understaffed”, the audit also identified several non-conformities and resulted in WADA issuing a Corrective Action Report (“CAR”). Such reports assist a Signatory to enhance their anti-doping program, on a priority basis, by providing a timeline for the implementation of corrective actions. If a Signatory fails to take satisfactory corrective action within the provided timeline, a formal process is initiated which may lead to the Signatory being deemed non-compliant.

In response to WADA’s initial compliance interventions, NADA implemented corrective actions. NADA also significantly increased its sample collections and in 2018-19, an increase in Adverse Analytical Findings (“AAFs”) was observed. However, in 2020 as part of WADA’s proactive Continuous Monitoring Program, WADA issued a second CAR to NADA. That CAR identified non-conformities in several testing related areas, including some of those outlined in this report.

## Operation Carousel

In late 2018, the Allegation was reported to WADA.

In 2019, after its creation, Operation Carousel began monitoring select sports and Athletes within India. As a result of this monitoring, Operation Carousel recommended to NADA that it develop a testing program on Indian powerlifters. In response, NADA undertook several sample collections, and **seven** powerlifters were caught doping and sanctioned.

In 2021, in preparation for the 2022 Birmingham Commonwealth Games (the “2022 Birmingham Games”), Operation Carousel began examining the doping practices (e.g., substances, sports, prevalence) and patterns of Indian Athletes.

In April 2022, Operation Carousel provided the 2022 Pre-Birmingham Games Anti-Doping Taskforce (the “Pre-Games Taskforce”) with a detailed report on the doping practices and patterns of Indian Athletes. This report enabled the Pre-Games Taskforce to tailor its testing plans and risk assessments for Indian Athletes. In compiling the report, Operation Carousel reviewed the data of 192 Indian Athletes.

In May 2022, upon the recommendation of Operation Carousel, target testing was conducted on 13 high-level Indian Athletes training abroad (outside of India). Operation Carousel had been monitoring these Athletes for some time. Of the 13 Athletes targeted, **four** had not filed their mandatory Whereabouts and **one** had updated their Whereabouts at the last minute and falsely claimed to have been in India.<sup>1</sup>

From the target testing an Athlete tested positive. More specifically, an anabolic steroid was discovered in the sample of **one** of the Athletes. This Athlete later admitted the violation and was sanctioned.<sup>2</sup> Notably, the sanctioned Athlete was one of the four that had not made the mandatory Whereabouts Filing.

## Inadequate Whereabouts Supervision and Testing

It is a fundamental requirement of the Code and the ISTI that, save in exceptional and justifiable circumstances, all out-of-competition testing shall be conducted without advance notice. To this end,

<sup>1</sup> These five Indian Athletes were part of the 2022 NADA Registered Testing Pool (“RTP”) and were therefore required to provide mandatory

Whereabouts information as per the World Anti-Doping Code (“Code”) Article 5.5.

<sup>2</sup> Three-year period of ineligibility.

select Athletes must provide accurate information as to their whereabouts (called a Whereabouts Filing) so that they can be located for testing.

To facilitate this requirement, WADA has developed an online application, the Anti-Doping Administration Management System (“ADAMS”), on which Athletes can upload and update their Whereabouts Information. An applicable Anti-Doping Organisation (“ADO”) (e.g., a NADO like NADA) is then provided access to the information entered in ADAMS by those Athletes in their respective Registered Testing Pool (“RTP”).

A violation of the Whereabouts Requirements by an Athlete constitutes a “Whereabouts Failure” in the form of a Filing Failure or a Missed Test. A combination of three Whereabouts Failures within a 12-month period amounts to an Anti-Doping Rule Violation.<sup>3</sup>

To remain an effective tool in the deterrence and detection of doping, Whereabouts Requirements must be diligently monitored and enforced by the responsible ADO. The failure of an ADO to maintain the highest standards of compliance in Whereabouts Requirements only benefits those wishing to cheat the system. Moreover, it undermines the trust of clean Athletes.

In October 2022, Operation Carousel team members travelled to India and interviewed key NADA staff, including the newly appointed NADA Director General (the “NADA Director General”).<sup>4</sup> These interviews revealed, *inter alia*, that the supervision of Whereabouts was inadequate, that there was a lack of sufficient testing, and that NADA did not have an effective intelligence or investigative capability.

On 17 November 2022, Operation Carousel wrote to NADA and raised concerns about NADA’s capabilities and practices. More specifically, NADA’s unsatisfactory oversight and management of Whereabouts Filings, and its inadequate testing of Athletes within its RTP.

To that end, Operation Carousel revealed to NADA that of the 131 Athletes in NADA’s RTP (the “RTP

Athletes”), more than a quarter (25%) had either not made a Whereabouts Filing at the required times or had made a ‘delayed’ Whereabouts Filing (this being a practice whereby an Athlete does not file their Whereabouts until the last month of a particular quarter, meaning, for the first two months of that quarter, the Athlete makes no Whereabouts Filing). Moreover, despite the mandatory requirement to register all established Whereabouts Failures in ADAMS,<sup>5</sup> NADA had not registered a Whereabouts Failure in ADAMS against any of the identified Athletes.

Regarding the issue of sample collection, Operation Carousel advised NADA that of the 131 RTP Athletes, only 103 had been tested. In other words, as of 17 November 2022, 28 Athletes had not been tested at all in 2022.

In late November 2022, NADA reported to Operation Carousel that it had examined the Whereabouts Filings issue and initiated corrective actions, including (in some cases) notification to the Athlete of a Whereabouts Failure. NADA also reported that it was reviewing its RTP testing and would address any discovered shortcomings, including by conducting further testing.

In February 2023, NADA reported to Operation Carousel that following a review, it had discovered 41 Filing Failures and that 28 Missed Tests were now in the final stages of review. Regarding its testing of the RTP Athletes, NADA reported that following sample collections conducted in November and December 2022, every Athlete within its 2022 RTP had now been tested at least once, with 103 of those 131 Athletes having been tested at least three times.<sup>6</sup>

Moreover, from the NADA testing that had been triggered by the intervention of Operation Carousel, four Athletes had tested positive (i.e., AAF) for Prohibited Substances. Of these four Athletes, one was part of the 28 Athletes who, as of 17 November 2022, had not been tested in 2022, and one had not been tested out of competition in 2022.

In May 2023, NADA reported to Operation Carousel that ultimately, between 17 November 2022 and 16

<sup>3</sup> Per Code Article 2.4 (Whereabouts Failures by Athletes).

<sup>4</sup> The NADA Director General was appointed on 28 March 2022.

<sup>5</sup> Per Annexure “B” to the International Standard for Results Management.

<sup>6</sup> Operation Carousel has examined the data to confirm these testing figures.

May 2023, it had discovered and recorded 97 Whereabouts Failures<sup>7</sup> against 70 Athletes. Moreover, in one case, a Results Management process for a Code Article 2.4 violation (Whereabouts Failure) had commenced.<sup>8</sup>

NADA also reported that it had employed a dedicated investigator and two intelligence staff. Moreover, with the help of WADA, NADA is receiving external assistance to help develop and strengthen its anti-doping programs, including its investigative and intelligence capacities. To that end, Operation Carousel maintains an active interest in the development of an investigative and intelligence capability within NADA.

### Compliance Taskforce

In parallel with Operation Carousel, WADA issued a Code Compliance Questionnaire (the “CCQ”) to NADA on 8 March 2022. A review of which identified similar issues with testing to those identified by this report. Subsequently, on 30 June 2022, the WADA Compliance Taskforce issued a third CAR to NADA that included eight testing related corrective actions, including one concerning the inadequate testing of RTP Athletes. Going forward, the Compliance Taskforce remains well positioned to continue its close monitoring of NADA’s compliance with the Code and International Standards.

### NADA Consultation

On 5 July 2023, the Director and Deputy Director of WADA I&I met with the NADA Director General in relation to the content of this report.

In acknowledging the issues raised by Operation Carousel, the NADA Director General reported on the progress made by NADA since the intervention of Operation Carousel in November 2022. To this end, the NADA Director General reported that NADA had strengthened its testing program by improving its internal processes and bringing in resources, both human and financial. As a result, both the collection of blood samples and out-of-competition testing (urine and blood) had increased. Moreover, NADA had doubled its sample collection staff (e.g., Doping Control Officers) and made significant improvements to its whereabouts management.

More specifically, the NADA Director General reported that NADA is committed to ensuring that all Whereabouts Failures and Missed Tests are processed to ADAMS in a timely fashion. Additionally, NADA has improved its athlete support structure to better assist those within its RTP navigate their whereabouts requirements. These improvements include the introduction of a dedicated whereabouts helpline and communication network (e.g., email, WhatsApp) for athletes.

### Recommendations

It is recommended that:

1. A copy of this report be provided to the WADA Director General, President, and Chief Operating Officer for their respective information.
2. A copy of this report be provided to the WADA Compliance Taskforce and the WADA Compliance, Rules, and Standards Department and the WADA Testing Department for their respective information.
3. A copy of this report be provided to the WADA Executive Committee for its information.
4. A Copy of this report be published on the WADA website.

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<sup>7</sup> Comprised of 70 Filing Failures and 27 Missed Tests.

<sup>8</sup> The proceeding against the Athlete was commenced on 16 May 2023.