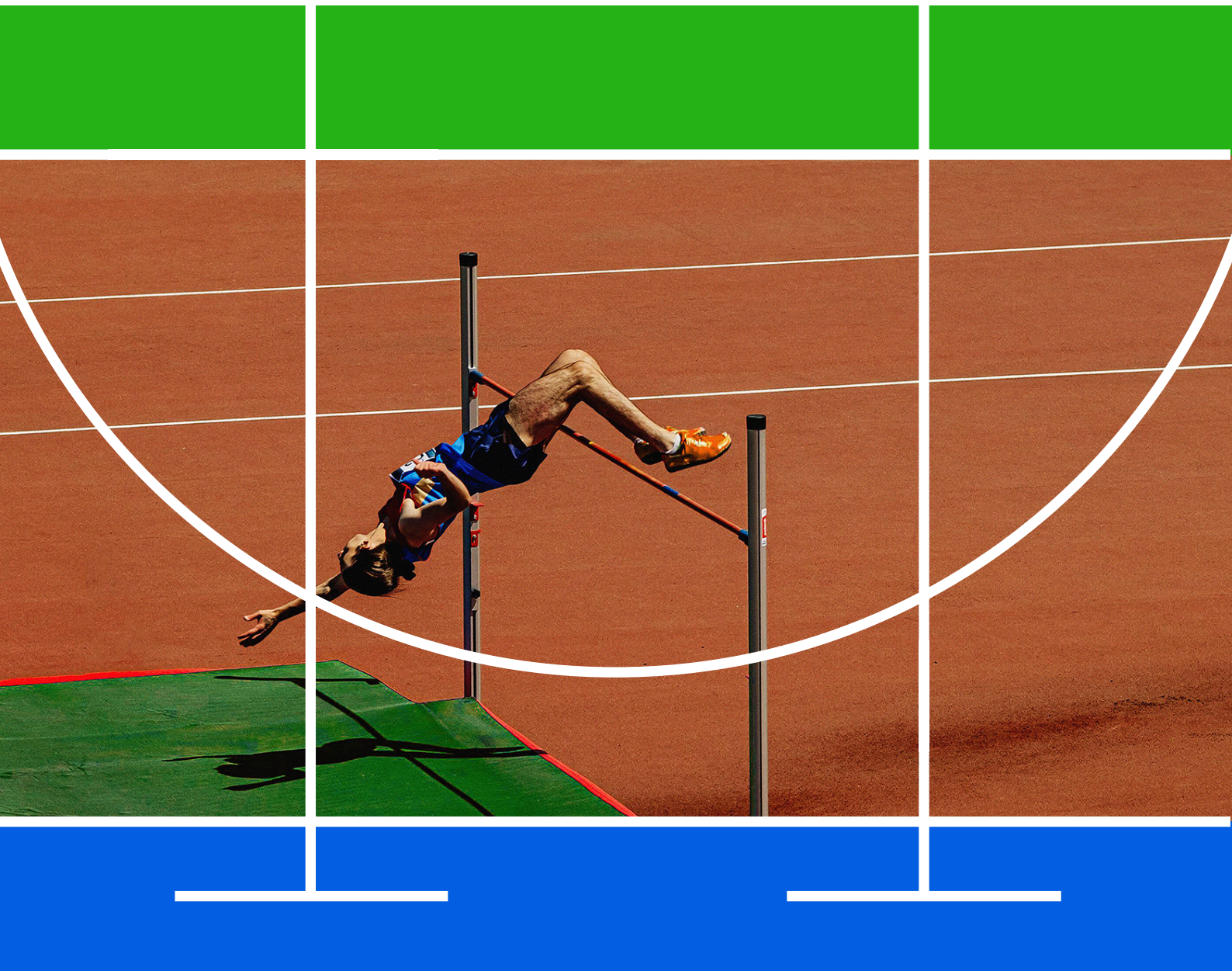# Report of the
INDEPENDENT OBSERVERS

3rd European Games
Kraków-Małopolska 2023

world
anti-doping
agency

Table of content

1. Acronyms and Abbreviations

Acronym/Abbreviation	Full Name
ADAMS	Anti-Doping Administration and Management System
ADCOM	Anti-Doping Communication (Communication Platform by the ITA with external stakeholders)
ADRV	Anti-Doping Rule Violation
BCO	Blood Collection Officer
COMPASS	Paperless Testing Platform by the ITA
CCC	Code Compliance Centre
CCQ	Code Compliance Questionnaire
DBS	Dried Blood Spot
DCC	Doping Control Coordinator
DCCC	Doping Control Coordination Centre
DCF	Doping Control Form
DCO	Doping Control Officer
DCS	Doping Control Station
EG	European Games
EG2023	European Games 2023
EOC	European Olympic Committee
IC	In-Competition
iDCO	international Doping Control Officer
IF	International Federation
IO Team	Independent Observer Team
ISE	International Standard for Education
IS	International Standards
ITA	International Testing Agency
LOC	Local Organizing Committee
LTU NADO	Lithuanian Anti-doping Organisation
MedComAD	Medical Commission and Anti-Doping
MEO	Major Event Organizer
NADA Germany	National Anti-Doping Agency of Germany
NADO	National Anti-Doping Organisation
NOC	National Olympic Committee
POLADA	Polish Anti-Doping Agency
RA	Risk Assessment
RMA	Results Management Authority
RTP	Registered Testing Pool
SCA	Sample Collection Authority
SCP	Sample Collection Personnel
TA	Testing Authority
TDP	Test Distribution Plan
TP	Testing Pool
TUE	Therapeutic Use Exemption
TUEC	Therapeutic Use Exemption Committee
UA	Unsuccessful Attempt
WADA	World Anti-Doping Agency
WADC	World Anti-Doping Code

2. Introduction and Acknowledgements

The Independent Observer (IO) Team, appointed by the World Anti-Doping Agency (WADA), upon the European Olympic Committee's (EOC) invitation, attended the third edition of the European Games (EG) in Krakow, Poland, and the regions of Małopolska, Poland from 21 June to 2 July 2023.

The IO Team programme was established by WADA to enhance athletes' and the public's confidence at major sporting events by monitoring and reporting on all phases of the doping control processes and education activities in an objective manner. The IO Team, through its observations, assesses whether procedures are in line with the World Anti-Doping Code (WADC) and relevant International Standards and provides onsite advice, guidance, and assistance to the body in charge of delivering the doping control programme.

The IO Team wishes to extend its gratitude to Mr Steve Scott, EG Liaison Officer, EOC; the Medical Commission and Anti-Doping (MedComAD) and in particular, Prof Dr Klaus Steinbach, Chair of the MedComAD; Mr Mark Stuart, Pharmacist, Member of the MedComAD from the International Testing Agency (ITA), Polish Anti-Doping Agency (POLADA) and the Local Organizing Committee (LOC) of the European Games 2023 (EG2023). In particular, the IO Team extends its gratitude to Mr Matteo Vallini, ITA Head of International Federations & Major Events, Mr Gianluca Siracusano, ITA Head of Regulatory Compliance, Mrs Kate Kurylenkava, ITA Major Events Project Manager, Mr Jake Shelley, ITA Testing officer, Mr Lucas Combebias, ITA Testing officer, and Ms Stella Kapreli, ITA Regulatory Compliance Officer, Mr Damien Rhumorbarbe, ITA Data Analytics Manager for their support and cooperation before and during the Games. Special thanks are extended to Mr Michal Rynkowski, POLADA's Director and his team, for the warm welcome, constant support and availability throughout the entire Games. Last, the IO Team thanks Ms Magdalena Zmuda-Palka, LOC, Anti-doping Manager for her contribution.

3. WADA Independent Observer Team (IO Team)

The WADA IO Team consisted of:

1. Mr Stefan TRINKS (Chair): Director, Testing Program, NADA Germany
2. Ms Olympia KARAVASILI: Deputy Director, Stakeholder Engagement and Partnerships, WADA
3. Ms Ruta BANYTE: Director, Lithuania (LTU) NADO
4. Mr Ivan Ćosić: Member, WADA Athlete Council

4. Games Overview

The EG are a multi-sport event taking place every four years and the games in Poland were the third edition of such games: the "EG2023". The EG are owned, regulated and organized by the EOC. The Athlete Village welcomed the first athletes on 18 June 2023, the opening ceremony took place on 21 June 2023 and the closing ceremony on 2 July 2023. Competitions took place from 20 June to 2 July 2023. Approximately 7,000 athletes competed in 29 disciplines and 253 medals were awarded at 25 competition venues in 13 cities/towns across the Malopolska region of which Krakow is the capital. Athletes competed in 26 sports and in total 29 disciplines, 19 of those offered qualifications for the Olympic Games 2024 in Paris. The EG2023 were also considered the European Championships for twelve sports/disciplines.

The full list of sports/disciplines is as follows: 3x3 Basketball, Archery, Artistic Swimming, Athletics, Badminton, Beach Handball, Beach Soccer, Boxing, Breaking, Canoe Slalom, Canoe Sprint, Fencing, Cycling BMX Freestyle, Cycling Mountain Bike, Diving, Judo, Karate, Kickboxing, Modern Pentathlon, Muaythai, Padel, Rugby Sevens, Shooting, Ski Jumping, Sport Climbing, Table Tennis, Taekwondo, Teqball, Triathlon.

With respect to the anti-doping programme implemented at the games, 1,240 out-of-competition (OOC) and in-competition (IC) samples were planned to be collected. A total of 60 Doping Control Officers (DCOs) operated during the Games.

The IO Team visited 12 out of 13 cities/towns, where Doping Control Stations (DCS) were installed, including all competition sites, and observed IC and OOC testing. The IO Team also visited the Doping Control Command Centre (DCCC), which was centralised and located at the Hotel Premier, Krakow, Poland.

4.1 Key Players and Organisation

The EOC is the governing body of the EG and a signatory of the WADC. While the EOC, as the signatory to the WADC, remained responsible from a WADC compliance perspective for all aspects of doping control[1] conducted at the Games, the EOC had delegated the management of its anti-doping program to the ITA. Specifically, the ITA was acting as the Doping Control Coordinator (DCC) and as per the Appendix I "Delegation of Responsibilities & Specifications" of the agreement between the EOC and the ITA was in charge of: the establishment of the LOC's Anti-Doping functions and protocols by advising the EOC, training of Sample Collection Personnel (SCP), assisting the EOC with its response to WADA's Compliance Monitoring program, set up and input of data into WADA's Anti-Doping Administration and Management System (ADAMS), Risk Assessment (RA), Test Distribution Plan (TDP), coordinating sample collection during the EG2023, Therapeutic Use Exemptions (TUEs), Results Management, Education, and Long-Term Storage & Further Analysis.

POLADA was acting as the Sample Collection Authority (SCA) in close cooperation with the ITA. Additionally, POLADA was responsible for the organization and training of additional phlebotomists, the procurement of the sample collection equipment in sufficient quantity, Chaperone training (with the ITA), the management of the roster and scheduling of SCP, storage and security of samples, transport of samples, securing and dispatch of sample collection documentation to the ITA.

The LOC was in charge of the preparation, delivery and security of Doping Control Stations (DCS) in accordance with the requirements of the WADA International Standards and pursuant to the instructions of the ITA and ensuring that the number of Chaperones needed was available from the Volunteers participating at the EG2023. Additionally, the LOC was also responsible for securing the necessary working facilities (e.g., offices) as well as transportation for SCP and staff, including the ITA and POLADA.

The LOC and POLADA planned a ground transport system for the IO Team, called "*T3-Pool Cars with Drivers*". This transport system would have been very helpful to the IO's ability to move around to the various venues and villages, unfortunately the transportation system, except on a few rare occasions, did not function well for most of the Games period. Therefore, it was quite challenging for the IO Team to visit the various competition sites and DCS. Transport requests for T3 transportation had to be submitted 24 hours in advance and despite this being done in time, the requests remained most of the times unanswered or when answered and confirmed failed to deliver. The T3 did not cover Intercity Transfers, so the IO Team tried to use another system put in place by the LOC, called the "*TA - Shuttle Buses*". In some cases, the Shuttle Buses, which were buses offered for athletes and athletes support personnel, left immediately after the last flower ceremony at the competition venue. As doping control was not completed by the time the buses departed the venue, this was not a viable option for the IO Team. Regarding observations that took place outside of Krakow, the IO Team tried to organize other transportation, but unfortunately this was not possible. In the end the IO Team had to arrange transportation on a day-to-day basis by its own means. While this posed a daily challenge, the IO Team would like to extend its gratitude to POLADA who, to the extent possible, supported the IO Team by

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[1] As per the WADC definition of the Doping Control.

providing two cars (from those allocated to the DCOs), in order for the IO Team to be able to visit competitions which were taking place outside of Krakow.

#1. Recommendation for the EOC and the LOC: The IO Team highly recommends that for future EG, a more efficient transport system (especially for inter-city transfers) and options for overnight stays in remote cities where competitions take place, are put in place. Better coordination and more proactive communication should be established ahead of the Games to ensure that the transport requirements of the IO mission are understood and can be met, as best as possible, to ensure a successful mission during the Games.

5. Pre-Games Initiatives with WADA and WADA IO Team

In advance of the Games, the ITA was responsible for developing the RA and TDP on behalf of the EOC. Additionally, the ITA, on behalf of the EOC, completed the WADA Code Compliance Questionnaire (CCQ), following which all corrective actions that were raised through the CCQ were resolved prior to the start of the Games.

While both the RA and the TDP were submitted and reviewed by WADA via the CCQ, the latest and most up-to-date versions were also provided to the IO Team ahead of the Games. The TDP included flexibility to adjust testing and/or to define Target Testing during the EG2023, which was also observed in practice by the IO Team.

Additionally, the ITA shared a meeting plan with the IO Team which included three meetings between the MedComAD, ITA, POLADA, LOC and the IO Team as well as frequent meetings with the ITA, including "*in focus*" meetings on specific areas of interest (e.g., Results Management, TUEs, Education, Intelligence, and Investigations).

The ITA gave the IO Team access to an online ticket system called "Anti-Doping Communication" (ADCOM). In addition to the frequent meetings, the system facilitated the IO Team's sharing of its observations and/or questions to the ITA in a quick and efficient way. The response time by the ITA for requests by the IO Team was efficient. Any documentation requested by the IO Team was also shared promptly by the ITA using a secured file-sharing system.

6. Pre-Games Testing Program and cooperation with International Federations and National Anti-Doping Organizations

No Pre-Games testing program was in place in the lead up to the EG2023. However, National Anti-Doping Organizations (NADOs) and International Federations (IFs) were requested by the ITA, via a general circular letter in the lead up to the EG2023, to ensure that athletes competing in the EG2023 be subjected to an effective testing program ahead of the event. Additionally, NADOs and IFs as well as NOCs were requested to share intelligence and whereabouts information.

7. Athlete's Anti-Doping Education

During the Games, while some educational material was available in some of the DCS (e.g., videos on the procedures related to dried blood spot (DBS), urine and blood sample collection procedures), nothing else in terms of education was provided during the Games.

Code article 20.6.8 cites that among other Roles and Responsibilities of the Major Event Organisations is to '*To plan, implement, evaluate and promote anti-doping Education in line with the requirements of the International Standard for Education*' and article 7.4 (i) of the International Standard on Education (ISE) cites that '*Major Event Organizations shall ensure the provision of Education activities at Events that are directly*

under their authority as per Code Article 20.6.8. Event-Based Education has the potential to reach and positively impact wider audiences, including the general public and media'.

In a joint collaboration between WADA and the EOC, WADA sent its Athlete Engagement team to the EG2023 who delivered engagement activities with the support of POLADA.

While the EOC had some educational offerings in place before the EG2023 as well as during the Games, more comprehensive education activities are identified for upcoming events based on the EOC's Education Plan.

#2. Recommendation for the EOC: The IO Team recommends that for future EG, the EOC should consider organising more Event-based educational activities as well as pre-Games initiatives that have the potential to reach and positively impact wider audiences, including the general public and media and which will ensure the requirements of the Code and ISE are fully met.

8. Whereabouts

In terms of athletes participating at the EG2023, the IFs and NADOs remained the whereabouts custodians in ADAMS for their respective athletes but access to view the whereabouts information was granted to the ITA for the athletes participating at the EG2023. This was to facilitate OOC testing. NADOs and IFs were asked by the ITA before the EG2023 to remind athletes within their Registered Testing Pool (RTP) and Testing Pools (TP) to maintain and update their whereabouts in ADAMS to ensure they remained accurate during the EG2023.

Moreover, the National Olympic Committees (NOCs) were asked to submit specific event-related location and rooming information of all athletes belonging to their delegations during the Games period. Sometimes, the NOCs were not able to provide an accurate rooming list as either there were changes amongst athletes regarding the room they were staying in or different arrangements from the hotel than initially planned or simply some athletes did not participate, which resulted in rooming changes. To simplify this process, the ITA provided a specific ITA Rooming List App which was the first time such App was used at the EGs. This resulted in more accurate NOC rooming arrangements and a high initial filing rate by NOCs and streamlines the administration when compared to paper forms and spreadsheets used in the past. The use of a rooming App should continue to be used and updated as necessary based on learnings for future EGs.

While POLADA, ahead of the Games, had asked all the hotels where athletes were staying, to accommodate SCP in case it was needed and provide them with the rooming list of the athletes, it came to the IO Team's attention that, on the first day that OOC testing started for athletics, in an accredited Games hotel where several athletes were staying, the reception staff refused to cooperate with the SCP and did not provide them with the rooming list. This made it challenging to conduct OOC as the SCP did not have a confirmed rooming list from the NOC for that mission and should the hotel reception staff call the athletes to give their consent to provide the SCP with their room number, this would be advance notice given to those athletes. The reception staff refused to cooperate with the SCP alleging data privacy laws and the right to privacy of the athletes. In response, POLADA had to call the police to intervene, in order for the SCP to be provided with the rooming list. The attempt to perform the planned OOC tests on this occasion was unsuccessful. After the intervention of the IO Team at the one hotel described above, the issue was rectified, and no additional incidents of that kind were observed at any other hotel during the EG.

#3. Recommendation for the EOC: Ensure as part of the Games rules and NOCs responsibilities, that NOCs are required to provide and maintain an updated rooming list of athletes present for the Games to the LOC. Furthermore, in the case of a failure to provide sufficient whereabout information, EOC should take appropriate consequences into consideration.

#4. Recommendation for the LOC: The IO Team recommends that the LOC in future Games requests where athletes are housed in hotels that the LOC should provide additional written information in advance of the Games to the Hotel Managers and the staff regarding these requirements to ensure that all hotel staff understand the need to access athletes within the hotel for testing with no advance notice and cooperate, so that such testing can be conducted effectively and in accordance with the International Standards.

#5. Recommendation for the NOCs: Whereas the efforts by the NOCs are appreciated to provide initial rooming lists, the IO Team recommends the NOCs ensure they provide updated rooming lists throughout the Games when there are changes to the previous list provided and update the rooming App that was put in place.

9. Test Distribution Plan

The ITA provided the IO Team with a Test Distribution Plan (TDP) and the corresponding RA prior to the start of the Games. During the Games period, the TDP was constantly monitored, revised and adapted. This was especially reasonable for Target Testing as Target Testing depended on the participation of individual athletes in (qualification) events during the EG2023. In some cases, Target Testing of individual athletes was subject to a daily or even hourly change. The IO Team was provided on request with current modifications to the TDP.

9.1   Risk Assessment and Test Distribution Planning

The RA developed by the ITA included all sports and disciplines included on the EG2023 competition schedule. The disciplines were classified in three risk categories of doping: extended (15 disciplines), intermediate (13 disciplines) and restricted (9 disciplines) risk.

The allocation of tests based on the Risk Assessment was separately performed for OOC and IC testing. The weighting for OOC testing was based on the population of athletes within the determined risk. Additionally, the quantity of samples was tiered for each risk category. In that context, "extended" risk disciplines obtained the highest relative number of tests. Disciplines with a "restricted" risk accordingly received the lowest number of tests. Similarly, for IC testing the combination of the number of events and the risk was used to allocate the testing numbers.

The risk assessment methodology consisted of three steps:

1. Definition of number of tests, sample types, and specific analysis for each discipline
2. Development of the country risk assessment for each discipline
3. Assessment of individual parameters including individual performance, individual testing history and additional information on a case-by-case basis.

The TDP for the European Games 2023 included 1,240 samples (1,008 urine, 145 blood (serum and whole blood) and additionally 87 DBS samples). By allocating samples based on the risk assessment, 553 samples (356 urine, 197 blood, including DBS samples) were planned for OOC testing (44%) and 687 samples (652 urine, 35 blood) were planned for IC testing (56%).

9.2   Out-of-Competition Testing

A total of 553 samples were planned to be collected Out-Of-Competition. However, 558 OOC samples were collected representing 43.4% of total tests at the Games. This is an increase in the number of OOC tests compared to the 2019 Games (493) as recommended in the 2019 IO report.

All 75 DBS samples were collected during OOC testing sessions. The collection of the DBS samples was performed using a filter card system requiring a prick in the athlete's finger.

9.3 In-Competition Testing

The amount of IC samples planned to be collected was set at 687 samples. In total 729 samples were collected In-Competition amounting to 56.6% of total tests. Whereas blood collections were performed IC, no DBS samples were collected during IC testing sessions. Target Testing was part of the IC TDP and based on individual performance of athletes; even more precisely on the performance during a qualification competition followed by a medal competition. Based on the quick decisions on Target Testing, the ITA managed to forward this information with short notice to the DCOs so that IC Target Testing was possible and performed in several disciplines.

#6. Recommendation for the EOC and the ITA: As observed by the IO Team, no DBS testing was performed during IC testing sessions. For future Games it is recommended to deploy all available sample matrices during IC testing, including DBS samples.

10. Long-term Storage of Samples

The EOC decided to not store any samples in long-term storage that were collected during the EG2023. The EOC provided the opportunity to the respective IFs and NADOs to request a transfer of sample ownership after the samples have been analysed for long term storage and potential further analysis at the IFs and NADOs own cost. IFs and NADOs were informed by the ITA before the Games, that samples collected during the EG2023 could be put in long-term storage upon specific request by the IF or NADO. IFs and NADOs had until the end of the regular storage policies in the labs (3 months from the reporting of the analytical result into ADAMS) to request such transfer before all samples were discarded. However, the follow up to this initial communication was only communicated to the IFs and included the athletes tested during the Games period and requesting the IF to respond with a request to the transfer of such samples given they knew which athletes the samples belonged to. While this process could be helpful to IFs and NADOs, as per International Standard for Testing and Investigations (ISTI) Article 4.7.3, the EOC must have a written strategy for sample retention and further analysis as the Testing Authority.

#7. Recommendation for the EOC: Ahead of the next EG, the EOC is required to develop and document a written sample retention and further analysis strategy (as per ISTI 4.7.3). Additionally, to the procedure observed at the EG2023, it is recommended to expand the long-term storage for future Games. For example, some other Major Event Organizers (MEO) specify a number of samples for long-term storage directly by the TA. The decision for storing samples in a long-term set up are based on the assessment of sports and disciplines, APMU recommendations and/or received Intelligence on individual athletes or the idea of protecting podium in particular for higher risk sports. This approach could provide orientation for the EOC for future European Games.

In addition, the IO Team also recommends that the EOC should proactively inform not just IFs but also NADOs at the end of the Games regarding the samples collected and analysed from athletes under their respective jurisdictions. As part of the MEO, IF and NADO cooperation, this information should be exchanged and shared in a secure manner.

11. Therapeutic Use Exemptions

Information on Therapeutic Use Exemptions (TUEs) and how to manage the TUE process (as an athlete) were provided on the EOC website. During the EG2023, the TUE management was the responsibility of the ITA TUE Committee (TUEC). In general, TUEs issued by a NADO or IF for participating athletes at the

EG2023 were automatically recognised for the EG2023. In total, 65 TUEs were automatically recognized by the ITA TUEC.

Prior to the Games, the ITA established an online support service for the TUE application which was also active during the Games. This service was accessible via the "Clean Sport Website" of the EOC and a support service for athletes without an ADAMS account was also available. Athletes with an ADAMS account were asked to upload a TUE Application Form in ADAMS or send it by e-mail to the ITA. The corresponding application form was accessible via the "Clean Sport" website as well.

During the Games period, the ITA TUEC received four (4) TUE applications. One of these TUEs was already issued by the athlete's NADO/IF before the EG2023 but had not been uploaded in ADAMS. As such, the TUE was recognized by the ITA TUEC as it was already approved by the athlete's NADO/IF. The remaining three TUEs were approved by the ITA TUEC.

#8 Recommendation for IFs and NADOs: IFs and NADOs must ensure that all TUEs either approved or recognized are entered into ADAMS to allow proper compliance review from WADA in accordance with Article 5.5 of the ISTUE and to ensure recognition for the Games.

12. Technological tools

The ITA paperless platform COMPASS was used for the hand-over of mission orders to lead DCOs and for the sample collection process. The platform is available on tablets as an application and allows the sending and adapting missions to selected lead DCOs. Furthermore, the system allows the DCO team to start a test on one tablet and continue it on another tablet. This is particularly useful during IC testing when athletes might pause the sample collection process and continue at a later stage.

Although the COMPASS system made a robust and good impression, the IO Team observed a few technical difficulties. For example, data synchronisation issues between the ITA/Lead DCO and Lead DCO/DCO were observed mainly during the first days of operations where the Chain of Custody section was not synchronized between DCO and Lead DCO. On a few occasions this required the Chain of Custody to be completed on paper. In addition, and where the internet connection was poor, data transfer took some time and also resulted in some Doping Control Forms (DCF) being completed on paper. Whilst it is acknowledged that these types of technical difficulties only occurred on a small number of occasions, when using such technology, it is important as was observed, to have paper copies of such documents on site to enable the sample collection process to continue with minimal interruption to the athlete should such difficulties arise.

From a workflow basis, the IO Team observed that during the Notification process, Chaperones and athletes signed paper forms and the information regarding the notification was copied to the paperless DCF once the athlete was ready to provide a sample. Since Chaperones must sign the paperless DCF (in the Notification Section), they needed to wait and were asked to enter the processing room at the appropriate time. This sometimes created delays to the process for both athletes and DCOs in particular when the notifying Chaperone had to be located.

It was also observed that when there were issues with COMPASS and the Chain of Custody could not be completed online, there were DCOs facing difficulties explaining to the athletes why they did not destroy the sample stickers from the sample kit boxes. Whereas it was evident that the DCO needed the stickers to complete the paper Chain of Custody, the IO Team observed on occasion some DCOs not clear on how to handle such cases.

#9 - Recommendation for the ITA: Although a poor internet connection may sometimes have no impact on the collection activity for a paperless system that can continue to work offline during the Sample Collection

and only limited impact on the overall use of the system, alternative ways for the specific area of data synchronization (especially between the Lead DCO and DCO) should be taken into consideration. With regards to the ability of paperless systems being able to work offline i.e. when there is poor or no internet connection, the sample collection information can still be collected/recorded on the device, it is important to consider how to provide the athlete with a copy of their completed DCF which would normally be emailed to the athlete via an encrypted email at the end of the sample collection session. Future paperless-systems might provide the ability to transfer the DCF information via Bluetooth from the tablet to the athlete's own device or provide QR-Code after completion of the Sample Collection Session until internet connection was available and the athlete's DCF could be uploaded and sent to the athlete. These options could enable Athletes to receive a first summary of their test information while waiting for the reception of their encrypted DCF until this is available after synchronisation procedures and avoid having to revert to the paper DCF.

#10. Recommendation for the ITA: DCOs were trained to use the COMPASS-System, and the importance of synchronizing was highlighted during the DCO training session and contacts for support were shared with the DCOs. Considering the importance of the synchronization process and because issues with the synchronisation occurred during the EG, the IO Team recommends that the ITA include as part of its training to SCP on COMPASS, what to do in situations where the synchronisation process is not working. Part of this section during the SCP training could focus on potential situations where synchronizing might be problematic, alternative solutions if synchronizing issues appear and what explanations can be provided to athletes.

#11. Recommendation for the ITA: Recognizing the additional cost involved, the IO Team encourages the ITA to consider whether tablets can be provided to Chaperones in order for the notification process to be incorporated into the paperless system (without the need to transcribe from the paper form and without the need to have the Chaperones come into the processing room to sign the doping control form). This could reduce the length of the sample collection process for the athlete and free up Chaperones for other notifications. Alternatively, the ITA could explore whether uploading a photograph of the paper notification to the paperless system is possible.

13. Sample Collection Personnel and Training

The IO Team acknowledges that the sample collection procedures were harmonized and conducted in a professional manner as well as in accordance with the International Standard for Testing and Investigations (ISTI).

A total of 60 DCOs participated in the Games, 43 of which were 'international' DCOs and 17 'local' DCOs. While all DCOs where trained and accredited by their respective NADOs, all individuals also received training by the ITA and were certified as "iDCOs". All DCOs also completed training sessions for the use of the paperless testing software COMPASS. Additionally, all DCOs received an online briefing by POLADA before arrival. During the preparation phase, those DCOs who were not able to participate in the training sessions were offered individual training. Furthermore, ten phlebotomists were trained by POLADA to act as Blood Collection Officers during the Games.

A total of approximately 120 Chaperones were appointed by the EOC through the LOC and were specifically trained by the ITA/POLADA for the purpose of notifying and chaperoning athletes. The number of Chaperones was deemed sufficient. Additionally, the scheduling of Chaperones in terms of allocating them to the DCS or within missions was well organized and coordinated by the DCCC. The IO Team was informed that the Chaperones received ITA's online training before taking on the responsibilities of Chaperones for the event. The online training lasted three hours and the following topics were covered: working for Anti-Doping at the EG2023, notification of athletes, chaperoning and arrival at the DCS, potential situations and best practice solutions. On-site, the Chaperones received a briefing regarding the specifics of the notification process combined with an on-site review and walk through of the venue locations they needed to be familiar with for

notification and chaperoning. Volunteers who were used as Chaperones did not have any other tasks during the event and were solely deployed as Chaperones for anti-doping purposes.

The IO Team acknowledges the team of very experienced DCOs that were operating in various DCS during the EG2023 and congratulates POLADA and the ITA on the selection of DCOs and their training. In some cases, DCOs needed to improvise due to very limited resources and challenging conditions, (e.g., long shifts, many hours of travel to return samples to the DCCC, etc.). Moreover, the IO Team observed that DCOs were exhausted after a couple of days of the Games because of many factors which included: DCOs were staying in small double hotel rooms and when they were finishing late from the sample collections, the hotels did not provide them with meals which naturally impacted the way that the sample collection was conducted (e.g., due to the fatigue, sometimes the IO Team observed DCOs not properly explaining to the athletes parts of the Doping Control Form, ending up with some athletes raising questions for parts of the process that should have been explained first hand by the DCO).

The IO Team observed that some SCP were not fluent in communicating in English even though one of the requirements to be recruited as a DCO for the EG2023 was to be fluent in English.. Occasionally, a few DCOs seemed to have difficulties in explaining parts of the sample collection session properly to the athletes and in some cases, some DCOs answered questions of athletes to specific details in the sample collection session inadequately due to a lack of English.

#12. Recommendation for the ITA and LOC: Despite being fluent in English being a requirement for DCOs at such events, the ITA and/or the SCA should consider, if feasible, asking candidates to undergo an English language test in order to ensure that the level of English is adequate. If there is limited DCOs who fulfil the required English level to sufficiently conduct doping controls then DCOs could also be considered from other regions of the world.

On a more general note, the LOC is recommended to put in place for future Games a more rigorous process of selection and allocation of volunteers as Chaperones ahead of the Games (e.g., requiring some anti-doping experience, confirming well ahead of the Games that all ISTI criteria (Annex G, G.4.1 a); b) i)) which must be met in order to be a Chaperone, etc and prior to providing the volunteer lists to the ITA for training).

14. Notification Process

In terms of the notification process, the IO Team observed the lead DCOs in some DCS debriefing the Chaperones and also observed Chaperones when they were notifying Athletes IC and OCC. In particular, during the first days of the Games, the IO Team observed that Chaperones did not inform athletes about their rights and responsibilities. The IO Team provided prompt feedback to the ITA on how the notification was conducted, and the IO Team was glad to observe, afterwards, that Chaperones were provided with paper forms, with the athlete's rights and responsibilities written in different languages in order to inform the athletes properly during the notification process. Furthermore, the DCOs additionally raised specifics of the notification process during the Chaperone briefings. It was also observed following this that the DCOs tried to always be present at the zone where notification took place, which ended up, in some competitions like athletics, with a lack of DCOs in the DCS, as many were in the mixed media zone observing the Chaperones and ensuring that the notification was conducted in accordance with article 5.2 of the ISTI.

#13. Recommendation for the ITA: As the notification process is one of the most important parts of the sample collection it is of utmost importance that the notification is adequately performed. In light of what the IO Team observed in many disciplines and sports during the IO mission, the IO Team suggests that for future EG a dedicated in-person training session for Chaperones is conducted. This in person training session should ideally include a mock test of the Notification process. This mock test should also be repeated by the DCOs during the onsite briefings with the Chaperones before Chaperones start notifying Athletes.

15. Sample Collection

15.1 Doping Control Stations

The IO Team visited and observed all DCS except the DCS in Zakopane for Ski Jumping (12 out of 13 in total). Whereas most of the DCS were adequate in size and equipment, some DCS were extremely small. In some cases, when the athletes were minors, in such small DCS, the DCS became easily crowded, making it even more challenging for the DCOs to operate in such conditions. Additionally, in some cases there was only one toilet available for use for multiple processing rooms. This was the case for the DCS for the sports of Canoe, Taekwondo, Rugby and Pentathlon. Despite the individual efforts of the DCOs to split the small space provided by the LOC to be used as a DCS using plastic shelters and curtains by their own means in two processing rooms, when a higher volume of testing was requested, it remained still challenging to undergo a sample collection in an adequate way. Some of the processing rooms were so small that it made it difficult for the athlete's representative to be present. In such cases, it sometimes appeared that athletes were ready to provide a sample but given the limited number of toilets available, athletes had to wait. In some DCS where more athletes were tested, it was observed that the gender balance of DCOs was sometimes not proportionate. In some cases, only one female DCO was present, therefore when several female athletes were ready to provide a sample there was only one female DCO available to witness. On some occasions, it was observed that DCS were also undersupplied with hand sanitizers, gloves, cleaning products and garbage bags. In those cases, the DCOs brought this material themselves.

If it was not for the efforts of the SCP, some of the DCS the IO Team visited would not have met the requirements of article 6.3 of the ISTI. Therefore, it is highly recommended that the LOC collaborates with the EOC/ ITA and any future NADO involved in the organisation of such Games to ensure that DCS are adequate in size and have the ability to be restocked with supplies to enable the SCP to accomplish their mission without additional work on their part being needed to re-organize the DCS. The IO Team takes this opportunity to extend special thanks to the SCP for all their efforts in this regard.

#14. Recommendation for the LOC and SCA: Future LOCs must ensure that DCS are of an adequate size and fit for purpose before the Games start and do not require any re-organization on the part of the DCOs. In addition, it is also important that any material needed (e.g., garbage bags, cleaning products, etc. and sample collection equipment can be easily restocked. There should also be a suitable balance in the number of male and female DCOs when a larger number of sample collections are requested for athletes of different genders.

15.2 Sample Collection Sessions

In this section of the report, a few general observations are presented, which are based on situations that occurred from time to time during the Games period. While the sample collection procedures and processes have, in general, been of a high quality, these observations are shared in the spirit of continued improvement and were shared with the ITA and optimized during the games period. The observations included:

- Last minute provision of mission details to DCOs at a time, when DCOs where about to leave or have already been on the way to their missions. It is noted that the TDP is not shared with the DCOs too far in advance to protect the confidentiality of the testing program and there will be missions set up at short notice based on intel or results during the event, however where possible DCOs should be provided with sufficient and timely information to prepare their DCS, their sample collection personnel to conduct their duties to the highest standards.
- Inconsistent explanations of the DCF "consent of research" section by DCOs. It might be useful to provide additional information to DCOs to ensure consistent explanation (e.g., regarding the consent of research, data privacy). This might enable DCOs to provide a more comprehensive and consistent answer to athletes' questions.

- In some cases, while adding urine to the refractometer, urine was spilled over the reception point of the refractometers. It might be useful to equip the DCOs with pipettes to drip drops of urine in a controlled manner onto the contact point of the refractometer instead of pouring the athlete's urine directly from the vessel onto the refractometer.
- Refractometers were in some cases not wiped with disinfectant but only cleaned with a paper tissue. It might give a more hygienic impression to implement a policy on how to clean refractometers after measuring specific gravity.
- DCOs needed to remind athletes not to use their mobile phones within the processing rooms of the DCS (unless to assist with translation issues or to call athlete support personnel to provide additional information). The provision of clear instructions from the SCP/ITA to Athletes on the use of mobile phones during the sample collection process should also be part of the Athletes' education, including when it is permitted to use their mobile phone in the DCS.

The following procedures would benefit from harmonized application by DCOs to ensure a consistent experience for all athletes:

- Wearing gloves: although that is not an obligation, some DCOs did not wear gloves during the sample collection session while some did.
- Disposal of any leftover urine after samples were sealed and the Specific Gravity was measured: this did not always take place in the presence of the athletes.
- Washing hands without soap: Athletes were in some cases not clearly informed to wash their hands without soap prior to providing a urine sample.

#15. Recommendation for the ITA: Whilst it is acknowledged that clear instructions were put in place, and shared with all DCOs it is recommended that the above-mentioned proposals are taken into account for future Games and the DCO Manual and the IDCO Guide, are updated to address some of the variations observed.

15.3 Out-of-Competition

The IO Team was able to observe OOC Testing during the EG2023. OOC Testing was performed at the athlete villages and additionally in hotels where athletes were staying. It came to the IO Team's attention that in some cases, the whereabouts information provided by the NOCs regarding the rooming list and the dates of arrival to the Games was incomplete. Furthermore, the number of scheduled tests as per TDP varied from the planned number of tests. That led in some cases to a high number of DCOs on site for a small number of tests/athletes. Furthermore, in some cases the IO Team observed that DCO Teams were prepared in number of personnel and equipment for a higher testing volume early in the morning, but the planned amount of testing did not take place. On many occasions the reason was that the athletes had not yet arrived at the designated accommodation.

DBS testing was performed during OOC missions as observed by the IO Team. DBS samples were collected on a filter-card system and the blood drops were extracted from the fingertip. With regards to DBS samples, and following feedback from athletes, it was suggested to collect DBS from the upper arm, especially in sports, where hands are important in the athlete's performance.

During some of the observed DBS sample collections, it came to the IO Team's attention, that a small number of phlebotomists (BCOs) were not very familiar with the collection of DBS samples. DCOs mentioned to the IO Team that it seemed that BCOs were not appropriately trained or very familiar with the collection of DBS samples, which was unfortunate given that it was performed at many OOC tests.

#16. Recommendations for the EOC: Whenever new sample collection methods are implemented, the IO Team recommends that additional practical training be put in place for all SCP, but especially if the BCO or phlebotomist is usually not working in the field of Anti-Doping.

In addition, and where feasible, due to different DBS collection devices available, and the impact that DBS collection from the fingertip can have on an athlete's performance at major events the use of two different DBS collection devices could be considered to cater for athletes in different sports disciplines. Athletes who rely on the use of their hands and fingertips in performing their sport like Climbing or Throwing may prefer not to be pricked in the fingers due to swelling and sensitivity post DBS collection. In those cases, a DBS collection device used on the upper arm might be a suitable alternative.

15.4 In-Competition

While visiting the DCS at competition sites and observing the preparations by the DCOs for the notification process, it came to the IO Team's attention that the access of SCP was not always granted to restricted areas crucial for observing athletes or notifying them. It seems the information provided to the competition management staff was not always consistent and DCOs often needed to clarify and discuss the access to all necessary areas where the athletes could access.

A particular situation was observed at the Silesia stadium, at the Athletics competitions. The IO Team witnessed several issues which are outlined below:

Regarding the access of SCP in the media zone and the access to the field of play: to start with, all SCP had an accreditation which allowed them to be at the field of play during the competition so as to have a full view of the athletes selected for testing. On the SCP's accreditation card was written access to all zones, including the field of play. For the sport of athletics, a European Athletics delegate was present at the stadium every day which was not the case for other sports (meaning to have an IF/ Confederation representative present in the stadium). In the Silesia Stadium, the notification was taking place next to the media zone and then the Chaperones were escorting the athletes to the DCS which was located in another part of the stadium. Once the athletes left the field of play, they were supposed to exit the stadium through the media zone, after which they were being notified by SCP. The first day the SCP, including Chaperones, had access to the media zone and were circulating freely, the second day the LOC and European Athletics restricted the area of the mixed media zone and did not allow the SCP to get down in the field of play, as they were claiming that additional accreditation was required for those SCP who needed access to the media zone. However, the SCP already had access to the field of play with their accreditation badge. The IO Team brought this matter to the ITA's attention which took immediate action and spoke with the LOC and European Athletics. Following this discussion, the days that followed, the access was even more restricted and additional accreditation stickers were given to some DCOs and Chaperones to be able to get down on the field of play through the media zone. On one occasion a DCO did not have access to the media zone, and one athlete did not exit the field of play the correct way which was through the media zone. Given the DCO did not have a clear observation point in the stadium to see where the athlete was after the competition, the athlete was not able to be located, and despite reasonable efforts from the DCO in the end the athlete was not able to be located and notified for testing.

In addition, during the first days of competition there was no issue for the DCO accredited cars to enter the VIP area next to the DCS at the stadium. Later on, during the Games, despite having EG accredited cars, the DCOs were arbitrarily refused entry to the stadium. The same happened to the IO Team, which had an EG accredited car. As a result, the DCOs had to park far away from the DCS and carry the cooling boxes with the samples quite a distance at the end of the testing session.

#17. Recommendation for the EOC, LOC, European Athletics and the ITA: For future Games it is highly recommended that, the EOC, LOC and DCC agree in advance on what access requirements are needed for the SCP for each competition venue and that this is clearly communicated to all relevant IFs and any delegates that may be appointed to the competition venues before the Games start and as part of the onsite briefing so that all parties are aligned. Especially in those cases, where the European Games allow a "competition within

a competition" since this is common practice. In case of the EG2023, the above-mentioned recommendation would have been useful to been applied at the Athletics Venue for the European Athletics Team Championships on behalf of European Athletics. Ideally, the access requirements should be granted via the SCP's accreditation pass without the need for any additional permissions by competition site managers. Cases, where athletes cannot be observed post competition, due to restricted access of SCP in venue areas should not occur otherwise athletes can potentially avoid doping control.

15.5 Storage and Transport of Samples

After the completion of the sample collection session, DCOs stored the urine samples in a fridge (every DCS was equipped with one). Blood Samples were stored in a separate cooling box in order to keep the conditions for blood samples stable. A temp-logger was used to monitor the temperature in the cooling box. The temp-logger was started at least 30min before blood samples were stored in the cooling box.

Usually, DCOs would personally deliver the samples to the DCCC in Krakow after they finished their mission. However, DCOs often stayed for several days at one competition site as testing was performed over multiple days at some venues. In cases where the DCOs did not return from competition sites back to Krakow on a daily basis, the Lead-DCO handed over the sealed samples to a courier early each morning, who transported the samples to the DCCC in Krakow. The samples were then transported immediately to the WADA accredited laboratory located in Warsaw, Poland. DBS samples were sent to the WADA accredited laboratory in Cologne, Germany. The IO Team did not observe any issues with this process.

16. Results Management

The EOC tasked the ITA with all aspects of the Anti-Doping program including Results Management.

During OOC tests, the IO Team focussed on the handling of unsuccessful attempts in terms of completing an Unsuccessful Attempt Report (UAR) for athletes in different testing pools. For RTP athletes ITA´s guidelines contain precise requirements for filing an Unsuccessful Attempt Report for attempts during and outside the 1h time slot. In this context, the IO Team observed two UAs which occurred during the same day that were related to testing of two athletes OOC at a designated 1h time slot and were in line with ITA's guidelines. Those unsuccessful attempts were forwarded as UARs to the RMA (IF) for further follow up.

For athletes who are not part of the RTP but are organized in a TP, it is not mandatory to file their whereabouts in ADAMS and they are not subject to Code Article 2.4 consequences for whereabouts failures. Therefore, during Major Events, it is not obvious if athletes are part of a TP. As observed and complimenting the above-mentioned situation regarding ADAMS, the IO Team observed, that in general no information of an unsuccessful attempt of TP athletes was forwarded to the whereabouts custodian. Several discussions during and after the EG2023 between the IO Team and the ITA led to whether sharing information of unsuccessful attempts of TP athletes might be an asset or not for the whereabouts custodian. The IO Team is of the opinion, that although information to the whereabouts custodian is not necessary, it might be helpful for intelligence purposes on individual athletes. Therefore, more discussion on establishing criteria as to when UARs for TP athletes are provided to the whereabouts custodian are necessary during Major Events.

During the EG2023, the DCCC received a notice of a test attempt which was not successful, independently of RTP. This enabled the DCCC to assess in shortest time, depending on the whereabouts information of the athlete or availability of the SCP whether an attempt to test the athlete at an alternative date and time or at an alternative venue, or to request another SCP team to make the further attempt.

In terms of any hearings, the IO Team was informed that the EOC had an agreement with the Court of Arbitration in Sport (CAS) for a first instance and appeal panel and that, should a case arise during the Games, a hearing would only take place online/virtually. The IO Team received confirmation that, should an athlete

absolutely request a hearing in person or if there were other reasons that require it or if the arbitrator, for valid reasons, would prefer the hearing in person, then the ITA would try to accommodate that, which is welcomed.

No adverse analytical findings were reported during the period of the Games and therefore no hearing or results management process was observed during the Games. However, at the time of writing this report, one Adverse Analytical Finding (AAF) was reported post Games. It should be noted that the IO Team did not observe any of the results management post Games as this is handled by the EOC and the applicable IF following the Games, and this is beyond the scope of the IO Team's mandate. The monitoring of the results management process and any consequences related to any Anti-Doping Rule Violation (ADRV) will be conducted by WADA's legal department, as part of its normal compliance monitoring responsibilities.

#18. Recommendation to the EOC, ITA, ADOs and WADA: Further discussions are required around establishing criteria as to when forwarding UARs to the whereabouts custodian for TP athletes during major events is beneficial. The IO Team highlights the importance of follow-up OOC tests during Major Events and encourages, wherever possible, to maintain and intensify further attempts in the shortest timeframe possible. For efficient and same day follow-up OOC tests, it might be considered to give the DCCC access to a central accreditation system to enable SCP to recognize the precise location of athletes if entries/exits are captured within this system. In order to achieve a better understanding of which athletes belong to a TP, it might be helpful to list TP athletes clearly in ADAMS. Furthermore, there may be the need, in order to follow a pragmatic approach during Major Events, to adapt corresponding rules in the ISTI.

17. Summary of IO Recommendations

#1. Recommendation for the EOC and the LOC: The IO Team highly recommends that for future EG, a more efficient transport system (especially for inter-city transfers) and options for overnight stays in remote cities where competitions take place, are put in place. Better coordination and more proactive communication should be established ahead of the Games to ensure that the transport requirements of the IO mission are understood and can be met, as best as possible, to ensure a successful mission during the Games.

#2. Recommendation for the EOC: The IO Team recommends that for future EG, the EOC should consider organising more Event-based educational activities as well as pre-Games initiatives that have the potential to reach and positively impact wider audiences, including the general public and media and which will ensure the requirements of the Code and ISE are fully met.

#3. Recommendation for the EOC: Ensure as part of the Games rules and NOCs responsibilities, that NOCs are required to provide and maintain an updated rooming list of athletes present for the Games to the LOC. Furthermore, in the case of a failure to provide sufficient whereabout information, EOC should take appropriate consequences into consideration.

#4. Recommendation for the LOC: The IO Team recommends that the LOC in future Games requests where athletes are housed in hotels that the LOC should provide additional written information in advance of the Games to the Hotel Managers and the staff regarding these requirements to ensure that all hotel staff understand the need to access athletes within the hotel for testing with no advance notice and cooperate, so that such testing can be conducted effectively and in accordance with the International Standards.

#5. Recommendation for the NOCs: Whereas the efforts by the NOCs are appreciated to provide initial rooming lists, the IO Team recommends the NOCs ensure they provide updated rooming lists throughout the Games when there are changes to the previous list provided and update the rooming App that was put in place.

#6. Recommendation for the EOC and the ITA: As observed by the IO Team, no DBS testing was performed during IC testing sessions. For future Games it is recommended to deploy all available sample matrices during IC testing, including DBS samples.

#7. Recommendation for the EOC: Ahead of the next EG, the EOC is required to develop and document a written sample retention and further analysis strategy (as per ISTI 4.7.3). Additionally, to the procedure observed at the EG2023, it is recommended to expand the long-term storage for future Games. For example, some other Major Event Organizers (MEO) specify a number of samples for long-term storage directly by the TA. The decision for storing samples in a long-term set up are based on the assessment of sports and disciplines, APMU recommendations and/or received Intelligence on individual athletes or the idea of protecting podium in particular for higher risk sports. This approach could provide orientation for the EOC for future European Games.

In addition, the IO Team also recommends that the EOC should proactively inform not just IFs but also NADOs at the end of the Games regarding the samples collected and analysed from athletes under their respective jurisdictions. As part of the MEO, IF and NADO cooperation, this information should be exchanged and shared in a secure manner.

#8 Recommendation for IFs and NADOs: IFs and NADOs must ensure that all TUEs either approved or recognized are entered into ADAMS to allow proper compliance review from WADA in accordance with Article 5.5 of the ISTUE and to ensure recognition for the Games.

#9 - Recommendation for the ITA: Although a poor internet connection may sometimes have no impact on the collection activity for a paperless system that can continue to work offline during the Sample Collection and only limited impact on the overall use of the system, alternative ways for the specific area of data synchronization (especially between the Lead DCO and DCO) should be taken into consideration. With regards to the ability of paperless systems being able to work offline i.e. when there is poor or no internet connection, the sample collection information can still be collected/recorded on the device, it is important to consider how to provide the athlete with a copy of their completed DCF which would normally be emailed to the athlete via an encrypted email at the end of the sample collection session. Future paperless-systems might provide the ability to transfer the DCF information via Bluetooth from the tablet to the athlete's own device or provide QR-Code after completion of the Sample Collection Session until internet connection was available and the athlete's DCF could be uploaded and sent to the athlete. These options could enable Athletes to receive a first summary of their test information while waiting for the reception of their encrypted DCF until this is available after synchronisation procedures and avoid having to revert to the paper DCF.

#10. Recommendation for the ITA: DCOs were trained to use the COMPASS-System, and the importance of synchronizing was highlighted during the DCO training session and contacts for support were shared with the DCOs. Considering the importance of the synchronization process and because issues with the synchronisation occurred during the EG, the IO Team recommends that the ITA include as part of its training to SCP on COMPASS, what to do in situations where the synchronisation process is not working. Part of this section during the SCP training could focus on potential situations where synchronizing might be problematic, alternative solutions if synchronizing issues appear and what explanations can be provided to athletes.

#11. Recommendation for the ITA: Recognizing the additional cost involved, the IO Team encourages the ITA to consider whether tablets can be provided to Chaperones in order for the notification process to be incorporated into the paperless system (without the need to transcribe from the paper form and without the need to have the Chaperones come into the processing room to sign the doping control form). This could reduce the length of the sample collection process for the athlete and free up Chaperones for other notifications. Alternatively, the ITA could explore whether uploading a photograph of the paper notification to the paperless system is possible.

#12. Recommendation for the ITA and LOC: Despite being fluent in English being a requirement for DCOs at such events, the ITA and/or the SCA should consider, if feasible, asking candidates to undergo an English language test in order to ensure that the level of English is adequate. If there is limited DCOs who fulfil the required English level to sufficiently conduct doping controls, then DCOs could also be considered from other regions of the world.

On a more general note, the LOC is recommended to put in place for future Games a more rigorous process of selection and allocation of volunteers as Chaperones ahead of the Games (e.g., requiring some anti-doping experience, confirming well ahead of the Games that all ISTI criteria (Annex G, G.4.1 a); b) i)) which must be met in order to be a Chaperone, etc and prior to providing the volunteer lists to the ITA for training).

#13. Recommendation for the ITA: As the notification process is one of the most important parts of the sample collection it is of utmost importance that the notification is adequately performed. In light of what the IO Team observed in many disciplines and sports during the IO mission, the IO Team suggests that for future EG a dedicated in-person training session for Chaperones is conducted. This in person training session should ideally include a mock test of the Notification process. This mock test should also be repeated by the DCOs during the onsite briefings with the Chaperones before Chaperones start notifying Athletes.

#14. Recommendation for the LOC and SCA: Future LOCs must ensure that DCS are of an adequate size and fit for purpose before the Games start and do not require any re-organization on the part of the DCOs. In addition, it is also important that any material needed (e.g., garbage bags, cleaning products, etc. and sample collection equipment can be easily restocked. There should also be a suitable balance in the number of male and female DCOs when a larger number of sample collections are requested for athletes of different genders.

#15. Recommendation for the ITA: Whilst it is acknowledged that clear instructions were put in place, and shared with all DCOs it is recommended that the above-mentioned proposals are taken into account for future Games and the DCO Manual and the IDCO Guide, are updated to address some of the variations observed.

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In addition, and where feasible, due to different DBS collection devices available, and the impact that DBS collection from the fingertip can have on an athlete's performance at major events the use of two different DBS collection devices could be considered to cater for athletes in different sports disciplines. Athletes who rely on the use of their hands and fingertips in performing their sport like Climbing or Throwing may prefer not to be pricked in the fingers due to swelling and sensitivity post DBS collection. In those cases, a DBS collection device used on the upper arm might be a suitable alternative.

#17. Recommendation for the EOC, LOC, European Athletics and the ITA: For future Games it is highly recommended that, the EOC, LOC and DCC agree in advance on what access requirements are needed for the SCP for each competition venue and that this is clearly communicated to all relevant IFs and any delegates that may be appointed to the competition venues before the Games start and as part of the onsite briefing so that all parties are aligned. Especially in those cases, where the European Games allow a "competition within a competition" since this is common practice. In case of the EG2023, the above-mentioned recommendation would have been useful to been applied at the Athletics Venue for the European Athletics Team Championships on behalf of European Athletics. Ideally, the access requirements should be granted via the SCP's accreditation pass without the need for any additional permissions by competition site managers.

Cases, where athletes cannot be observed post competition, due to restricted access of SCP in venue areas should not occur otherwise athletes can potentially avoid doping control.

#18. Recommendation to the EOC, ITA, ADOs and WADA: Further discussions are required around establishing criteria as to when forwarding UARs to the whereabouts custodian for TP athletes during major events is beneficial. The IO Team highlights the importance of follow-up OOC tests during Major Events and encourages, wherever possible, to maintain and intensify further attempts in the shortest timeframe possible. For efficient and same day follow-up OOC tests, it might be considered to give the DCCC access to a central accreditation system to enable SCP to recognize the precise location of athletes if entries/exits are captured within this system. In order to achieve a better understanding of which athletes belong to a TP, it might be helpful to list TP athletes clearly in ADAMS. Furthermore, there may be the need, in order to follow a pragmatic approach during Major Events, to adapt corresponding rules in the ISTI.

18. Sample Collection Report and Sample Analysis

18.1 Number of Samples

Number of Samples		
Matrice	IC	OOC
Blood (Serum)	36	72
Blood Passport	1	45
Dried Blood Spot	0	75
Urine	692	366
Total	**729**	**558**

18.2 Number of Sample Analysis

Number of Analysis		
Analysis	IC	OOC
Full menu screen	692	N/A
Partial screen	N/A	366
Blood Transfusions	N/A	2
EPO	58	107
IRMS	14	5
GH	36	70
HBOCS	N/A	70
GHRF	26	76
ABP	1	45
Dried Blood Spot	N/A	75
Total	**827**	**816**