

Article 3 (10)

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

General Comments

1) 3.1 - 'Registered Testing Pool' and 'Testing Pool' definitions have been amended to say that Athletes included within these respective pools 'shall be subjected to at least three planned Out-of-Competition tests (one for Testing Pool Athletes) per year'. We are supportive of this but wish to confirm our understanding is correct, in that unsuccessful attempts will be included in the reporting/checking of testing coverage on Registered Testing Pool and Testing Pool athletes i.e. it is not restricted to collected tests only.

2) 3.1 - The comment to 'Sample or Specimen' definition states that 'it has sometimes been claimed that the collection of blood samples violates the tenets of certain religious or cultural groups'. UKAD has previously experienced a matter where an Athlete claimed that the full observation of witnessing urine provision violated the tenets of their religion. UKAD therefore proposes extending this comment to capture the collection of urine and blood samples.

3) 3.1. - In the first round of consultation, UKAD had proposed that 'Sport Nationality' be made a defined term in the IST to provide greater clarity on how it should be used to grant jurisdiction and ADAMS access. This was not implemented but UKAD wishes to resubmit because there is inconsistency in application across ADOs and this presents challenges when using ADAMS.

3.6 - The definition of an 'Unsuccessful Attempt Report' has the amendment stating, 'Such report shall be filed in ADAMS.' UKAD has concerns about this on a practical perspective due to challenges with the functionality of ADAMS. UKAD proposes that this is not included until further assurances have been given that ADAMS functionality meets the requirements and does not pose an administrative burden to ADOs or impact the speed and functionality of the ADAMS system.

Suggested changes to the wording of the Article

- 1) 3.1 - No wording change required.
- 2) 3.1 - UKAD proposes the following changes to the comment to 'Sample or Specimen' definition: [Comment to Sample or Specimen: It has sometimes been claimed that the collection of urine and blood Samples violates the tenets of certain religious or cultural groups. It has been determined that there is no basis for any such claim.]
- 3) 3.1 - UKAD proposes the following new definition for Sport Nationality:

Sport Nationality (individual Athlete) – the Sport Nationality for an athlete who competes in an individual sport should be the country which they represent or would represent internationally. For example, an Athlete in the sport of athletics from the United Kingdom who competes for Great Britain at the World Championships, would be assigned 'United Kingdom' as their Sport Nationality and Nationality, irrespective of whether they trained and lived outside of this country.

Sport Nationality (Team Sport Athlete) - the Sport Nationality for an athlete who competes in a Team Sport should be the country in which they play the Team Sport professionally. For example, a Spanish footballer who plays in the English Premier League would have the 'United Kingdom' as their Sport Nationality. Their Nationality would remain as the country which the Athlete represents or would represent internationally (in this example this would be Spain).

3.6 - UKAD proposes the following sentence to be deleted from the 'Unsuccessful Attempt Report' definition: '~~Such report shall be filed in ADAMS.~~'

Reasons for suggested changes

- 1) 3.1 - Seeking clarification in our understanding of the definitions and practical application in the testing programme.
- 2) 3.1 - Following a recent testing incident.

3) 3.1 -These definitions would bring greater consistency in application across ADOs and would ensure all relevant ADOs have appropriate ADAMS access.

3.6 - UKAD has concerns with regards to practical implementation.

USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

General Comments

General Comment: There are several instances (22) where the word “venous” has been inserted before the word “blood”. Venous blood is currently the default blood matrix and implied in all instances as liquid blood which can either be analyzed as whole blood or as serum or plasma fractions. It is clearly distinguished from dried blood spots which are referred to as DBS, therefore does not need to be explicitly named.

Recommended Change (22 instances): Removal of all references to “venous” blood.

Reasons for change: New advancements and published research in athlete-friendly and non-invasive non-venous blood collection show great promise for the use of capillary liquid blood as a replacement to venous blood samples for whole blood and serum. Microcapillary serum and EDTA tubes have been shown to be comparable for all the assays currently performed with BD vacutainer tubes. Several Labs and NADOs have recently published research demonstrating the potential for micro capillary collection using FDA and EU approved devices that are less invasive and more athlete friendly than traditional venipuncture. Removing the word venous from the IST and other international standards allows potential for flexibility to introduce capillary liquid blood in the future, pending the continuing required validations without having to go through a lengthy consultation and IST re-approval process resulting in unnecessary delays. The specific details of blood collection are contained in the relevant ABP Guidelines and TD which offer more opportunities for change in the future if warranted.

Suggested changes to the wording of the Article

Article 3.1 – *Competition*

Recommended Change: Changes in bold. “A single race, match, game, singular sport contest, officially sanctioned **friendlies that are listed on a team’s competition schedule or Code Signatory sanctioned event.**”

Article 3.6 – *Unsuccessful Attempt Report*

Recommended Change: Remove entirely “Such report shall be filed in ADAMS.”

Reasons for suggested changes

3.1, Reason: Friendlies and scrimmages can be defined differently and need specific language to determine if they are to be considered as IC events subject to in-competition analysis menus. Specific examples we have come across include: 1) A water polo athlete who wanted to return from retirement to compete in the Olympics had to compete in friendlies so coaches could evaluate her. We consulted WADA and were made aware that this level of event is considered a *Competition*, therefore, the athlete had to submit an Article 5.6.1 exemption application. Friendlies are not clearly defined as a *Competition*, and the level of impact on a team or individual player can vary greatly from sport to sport. The athlete would have met the 6-month requirements for the Olympics, but did not have the opportunity to make the team because the exemption to the 6-month rule was declined. This level of friendlies is different than soccer friendlies where it is listed on a website and it is a calendar event and should not be considered a *Competition* per the Code, whereas a soccer friendly that counts towards the team’s overall rankings should. 2) We started an attempt on an athlete who was competing later that afternoon in an event that was sanctioned by a non-Code Signatory. We did not know if this was IC or OOC and had difficulty in determining if it was a *Competition* to determine the screens.

3.6, Reason: ADOs use many different paper or paperless systems and there is not a universal system or APIs in place to collect and upload Unsuccessful Attempt Reports into ADAMS this addition will result in a significant administrative burden on ADOs. Recommend tabling this until such time it is easier to enter this information in an automated fashion.

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

General Comments

The following points are supported:

- The requirement for an ADO to use its risk assessment when determining the athlete whereabouts pool;
- The requirement for RTP and TP athletes to submit their training locations and relevant timeframes instead of their regular activities;
- The requirement for TP athletes to be subjected to the same pre calendar quarter submission deadlines as RTP athletes whilst maintaining flexibility to have additional filing timeframes during the quarter as currently exists;
- The requirement that blood ABP Doping Control Forms be entered in ADAMS within 5 days (instead of the 21-day deadline for urine, venous blood, and dried blood spot samples);
- The requirement for laboratory-related documentation to arrive at the laboratory either before or with sample delivery;
- The requirement for ADOs not to stockpile urine samples prior to shipping to the laboratory;
- The requirement that trainee Doping Control Officers (DCOs) be permitted to observe an athlete while also being observed by a trainer DCO;
- The requirement for Blood Collection Officers (BCOs) and chaperones to receive enhanced training; and
- Enhanced criteria for dried blood sport (DBS) sample collection equipment.

#### Not Supported

- *The requirement that phone calls to athletes (outside their permitted use 5 minutes before the end of the 60-minute time slot for RTP athletes) only be permitted, when all other whereabouts locations are exhausted and only in exceptional circumstances based on a specific set of scenarios;*

We are not sure what it is meant by 'all other whereabouts locations are exhausted'. We find it as a waste of resources that the DCO should wait until five minutes before the end of the 60 minute slot to call the athlete if the DCO is not able to get in contact with the athlete through other means e.g. ringing the door bell. '

#### Dopingautoriteit

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

SUBMITTED

#### General Comments

3.1 Atypical finding: ...or as directed by WADA..

Suggested changes to the wording of the Article

3.1 Atypical Finding: A report from a WADA-accredited laboratory or other WADA-approved laboratory which requires further investigation as provided by the applicable International Standards (including related Technical Documents or Technical Letters), WADA stakeholder notice, or as directed **notified** by WADA, prior to the final determination about the finding (i.e., the establishing, or not, of an anti-doping rule violation).

Reasons for suggested changes

3.1 Atypical finding Wording directed leaves no room for any interpretation. Directed should be more specified.

CHINADA

MUQING LIU, Coordinator of Legal Affair Department (CHINA)  
NADO - NADO

SUBMITTED

General Comments

Article 3.1 Definition of Athlete

The International Standard for Testing defines Athlete as “any Person who competes in sport at the international level or the national level”; and defines National Event as “A sport Event or Competition involving International- or National Level Athletes that is not an International Event”. These circular definitions do not provide clear guidance to National Anti-Doping Organizations (NADOs) in identifying national-level Athletes. Therefore, we recommend that these definitions be clarified in the new Code or the International Standard for Testing.

Article 3.6 Definition of Unsuccessful Attempt Report

The change to this definition requires ADOs to file the unsuccessful attempt reports in ADAMS, but it does not specify the exact requirements for filing the reports (e.g., time, language, etc.). It is recommended that the specific requirements, such as the deadline for filing such reports, be clarified.

Suggested changes to the wording of the Article

Article 3.1 Definition of Athlete

We recommend that the definitions of Athlete and National Event be clarified in the new Code of the International Standard for Testing.

Article 3.6 Definition of Unsuccessful Attempt Report

We recommend that the specific requirements, such as the deadline for filing such reports, be clarified.

Reasons for suggested changes

Article 3.1 Definition of Athlete

The International Standard for Testing defines Athlete as “any Person who competes in sport at the international level or the national level”; and defines National Event as “A sport Event or Competition involving International- or National Level Athletes that is not an International Event”. These circular definitions do not provide clear guidance to National Anti-Doping Organizations (NADOs) in identifying national-level Athletes.

Article 3.6 Definition of Unsuccessful Attempt Report

The change to the definition of Unsuccessful Attempt Report requires ADOs to file the unsuccessful attempt reports in ADAMS, but it does not specify the exact requirements for filing the reports (e.g., time, language, etc.).

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

General Comments

General Comments to Article One

1.0 Introduction and Scope

Consider use of gender inclusive terminology, such as “their” instead of “his/her” to comply with gender inclusivity norms.

Comments to Article Three

3.4 Defined terms from the International Standard for the Data Protection.

Update title wording to remove “the” before data. Hold over from ISPPPI.

3.6 Defined terms specific to the International Standard for Testing

Consider updating the title wording to align with Articles 3.2-3.5: “specific to” to “from the.”

In the definition of “Unsuccessful Attempt Report” consider removing “from an athlete in a Registered Testing Pool or Testing Pool” as UAR reports are beneficial for non-RTP athletes and can be relied upon to add someone to an RTP.

Consider including a definition for “General Pool.”

*Proposed Wording:* The pool of *Athletes* that the International Federation or *National Anti-Doping Organization* considers to be lower risk than those *Athletes* in the Registered Testing Pool & *Testing Pool* and who are not required to provide whereabouts information as outlined in the *International Standard for Testing* and who can be subject to at least one planned *Out-of-Competition* test per year.

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

General Comments

FURTHER CLARITY

Article 3.6

SIA agrees with the added requirement for an Unsuccessful Attempt Report to be filed in ADAMS. However, SIA would like to understand WADA’s intentions upon receipt of UARs filed in ADAMS.

For example, if the UA does not relate to an apparent Whereabouts Filing Failure or Missed Test will the ADO be required to provide information on what follow up actions, if any, were pursued by the ADO? What, if any subsequent action may be undertaken by WADA in response to an UAR?

Suggested changes to the wording of the Article

SIA is seeking clarity on any action WADA may take in relation to an UAR filed in ADAMS which does not relate to an apparent Whereabouts ADRV.

SIA suggests that a comment be included in the IST or guidance material outlining any steps that WADA expects an ADO to take in response to such an UAR, as well as any action WADA may take. For example, will an ADO be required to explain why the test was not pursued? Is WADA likely to request an ADO to pursue the test?

Reasons for suggested changes

SIA is seeking further clarity and guidance on the consequences of this new requirement to ensure the impact of this change (including any administrative burden) is fully understood.

Jono McGlashan, GM Athlete Services (New Zealand)  
NADO - NADO

General Comments

- We wish to suggest the removal of 'venous blood' and replacement with 'blood' in the 2027 WADA Code documents and International Standards. This suggestion is due to the emerging research involving capillary blood analysis. While further research and investigative work is required, this method of blood analysis would continue and expand on the athlete-friendly collection method utilised by Dried Blood Spot.

*“This feedback was endorsed by the Athlete Commission of the Sport Integrity Commission Te Kahu Raunui.”*

Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

General Comments

The addition to the definitions for RTPs and TPs are good for clarity.

Chair

SUBMITTED

Athlete Council, WADA (Canada)  
Other

General Comments

Definitions: Suitable Volume of Urine for Analysis

We urge the drafting team to look into whether the minimum volume of 90ml is absolutely necessary for analysis. Any reduction in volume would be welcome by athletes. The minimum of 90ml leads to discomfort, long waiting times, partial samples, and over hydration.

Stakeholder Engagement Concept #7: Reporting of ADO Testing Statistics by Athlete

We endorse the concept of reporting ADO Testing Statistics by each athlete.

Article 4 (2)

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

General Comments

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

- 4.10.6.2 (c) - UKAD supports the change in this article from 'regular activities' to 'training locations'. However, UKAD is not comfortable with the requirement of 'general timeframes' that are to be submitted by the Athlete. UKAD proposes that specific times are entered to support the information provided.
- 4.10.6.2 (e) - UKAD is against the inclusion of the requirement for Athletes to submit an accurate passport style photograph to support the identification requirements at notification (see also comments submitted for Article 5.3.4). UKAD proposes this is removed due to the concerns regarding the validation of the photo, frequency of updates and potential impact on the speed of ADAMS. As a maximum, UKAD would propose it is optional and not made mandatory.
- 4.10.6.2 (g) - UKAD has some general practical concerns with article 4.10.6.2 (g) because written notice is deemed to have been received within 7 days after it was deposited in the mail and immediately when notification of an email is sent.
- When issuing whereabouts failures for failing to submit their whereabouts submission, Athletes are provided with 48 hours to submit before a subsequent whereabouts failure is issued. Therefore, sending a notice via letter becomes redundant since this timeframe will have already elapsed.

There is an intention to propose a change in the ISRM with regards to this 48-hour window to submit (B.3.2.d), potentially to 5 working days but consideration will need to be given to what is stipulated with regards to receipt of written notice.

It could be considered that written notice should be given via email wherever possible so that it can be deemed as immediate and that via letter is when email is not a possibility but should be via a system which enables receipt within 2-3 working days?

Comment to 4.10.6.2 - This comment allows ADOs to request additional information from Athletes, however, failure to file or update additional whereabouts information would not be subject to a Filing Failure. It is unclear that if submission of this additional information is inaccurate, if a Filing Failure can be issued given its drafting ('*However, if such information is filed then the Athlete should keep it accurate and up to date*'). In the absence of a Filing Failure, yet the statement that this information should be kept accurate and up to date, consideration should be given to how ADOs should manage consequence for failing to file/update any additional whereabouts requirements. UKAD proposes clarification is provided to this comment as to whether a Filing Failure can be issued if this additional information is inaccurate.

4.10.7.1 (h) - UKAD does not support the proposed change to article 4.10.7.1 (h) stipulating that '*as a last resort the DCO **should** phone the Athlete (unless the Testing Authority instructs otherwise)*'. This is a change from the 2023 ISTI which stipulates that the '*DCO **may** (but does not have to).*'

This change suggests that phone calls are the standard and not an exception and UKAD proposes that this should still be considered as an exception determined by the Testing Authority.

#### Suggested changes to the wording of the Article

4.10.6.2 (c) - UKAD proposes the following changes to 4.10.6.2 (c): 'For each day during the following quarter, the name and address of the training location(s) where the Athlete will train as well as the ~~general time frames~~ **typical start and end times** for such training activities (morning, afternoon, evening);'

4.10.6.2 (e) - UKAD proposes the complete deletion of 4.10.6.2 (e).

4.10.6.2 (g) - As this is captured within Article B.3.2.d of the 2027 ISRM, UKAD proposes to delete the following in article 4.10.6.2 (g):

~~'Any notice or other item mailed to that address will be deemed to have been received by the Athlete seven (7) days after it was deposited in the mail and immediately when notification of a sent e-mail receipt is generated/obtained (subject to applicable law);'~~

Comment to 4.10.6.2 - 'However, if such information is filed then the Athlete should keep it accurate and up to date. **Any pattern of behaviour relating to the provision of inaccurate or misleading information should be investigated as a possible anti-doping rule violation of evading Sample collection under Code Article 2.3 or Code Article 2.5. It may also prompt additional Target Testing of the Athlete.**'

4.10.7.1 (h) - UKAD proposes the following changes to Article 4.10.7.1 (h): 'Where an Athlete has not been located despite the DCO's reasonable efforts, and there are only five (5) minutes left within the 60-minute time slot, then as a last resort, **and only at the instruction of the Testing Authority, may a DCO phone the Athlete...**'.

#### Reasons for suggested changes

4.10.6.2 (c) - To avoid potential ambiguity and inconsistencies for whereabouts failure reviews as well as to better assist and enable test planning.

4.10.6.2 (e) - Potential administrative burden on ADOs and lack of clarity on the validation of the photos and how this will be managed and potentially open to manipulation by a doping Athlete e.g. changing it frequently/at the last minute.

4.10.6.2 (g) - To bring alignment across the IST and ISRM and timeframes provided to athletes to correct the whereabouts submissions.

Comment to 4.10.6.2 - Ensures it is clear for all ADOs and Athletes and ensures consistency in application.

4.10.7.1 (h) - To avoid phone calls being considered the normal standard.

#### International Testing Agency

International Testing Agency, - (Switzerland)

Other - Other (ex. Media, University, etc.)

SUBMITTED

#### General Comments

General comment applicable to several provisions in the IST:

The introduction of new reporting requirements in ADAMS (e.g., 4.10.2c, 11.3, 4.10.12.2, 4.9.2, etc.) is welcome, but it underscores the need for APIs and other integration tools to prevent these changes from imposing inefficient burdens on ADOs and avoidable manual work, allowing them to focus on more critical tasks.

Article 4.2 (5)

International Paralympic Committee

SUBMITTED

Phillip Riemann, IPC Anti-Doping Manager (Germany)  
Sport - IPC

General Comments

4.2.1 h) It is not clear what is required here - it should be made clear in the article what the performance changes in a sport refer to

NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)  
NADO - NADO

General Comments

4.2.1. f) We suggest to not limitate the use of information for the risk assessment to raw information with regard to its defintion. Any Information may add value and might differ from country to country.

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

General Comments

4.2.1 - UKAD is supportive with separating out the Athlete and Sport risks.

4.2.1 (h) - UKAD is supportive of the inclusion of data analysis of a sport when conducting a risk assessment. However, UKAD wishes to seek greater clarity as to what is expected with the inclusion of the criteria relating to utilising data analysis of the sport (h). It is currently a little vague (limited to rankings) and UKAD is unclear as to what would be expected. Assessing sport performance changes can be challenging, depending on the nature of the sport. For example, assessing international ranking changes in a team sport may be quite simple but potentially more challenging in an individual sport (e.g. Cycling). Therefore, UKAD wishes to seek clarity on how this should be applied and ask for more detail in terms of the factors that should be considered.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.9 - UKAD is supportive of some strengthening of the requirements in relation to training activities to enable improved whereabouts submission in this area. However, the proposed changes - whereby Athletes are required to submit information for every day in their whereabouts (for non-training days they should be marked as rest days) - seems excessive for an Athlete and would be a big administrative burden upon them which UKAD believes is disproportionate. UKAD suggests this is reviewed to find a better balance and a more proportionate way to obtain this information without placing too much additional requirement upon Athletes.

Additionally, there may be some ADAMS system changes that could better enable ADOs to monitor, report and act upon Athletes who do not submit any form of training information. Presently this is challenging and inhibits the ability to enforce Filing Failures upon Athletes in a fair and consistent way. UKAD believes a system should be in place whereby an Athlete who fails to submit any information without valid reason and/or provides information with clear inaccuracies (e.g. training location inputted has been closed down for 3 months, or information has been obtained to indicate that the Athlete has never trained or not trained there for a long period of time) should be subject to a Filing Failure.

Furthermore, this article needs to acknowledge the differences between sports for this particular whereabouts provision and potential fluidity that may be applied. Some guidance for sports such as road running and cycling are provided within the drafting (as examples) but there are other sports where other considerations are needed. For e.g. Tennis where Athletes are regularly travelling and may not have one set training pattern for certain periods of the year.

UKAD is also concerned that by being unclear and open on 'general timeframes' an Athlete is training, could lead to inconsistencies in application of issuing of Filing Failures by ADOs.



Furthermore, there appears to be the assumption that an Athlete's training location won't be used for the 60-minute timeslot, however UKAD has experience of some Athletes utilising their training location as their 60-minute timeslot.

#### Suggested changes to the wording of the Article

4.2.1 (h) - UKAD is not proposing any wording change but seeking clarification and more detail from WADA. Perhaps this could be achieved through a comment to 4.2.1 (h) or alternatively developed in WADA's 'Guidelines for Implementing an Effective Testing Program'.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.9 - UKAD proposes to delete the following wording from article 4.10.9.1:

The provision of an Athlete's training location(s) where an Athlete trains and/or practices their sport is a mandatory part of their Whereabouts Filing and is a location(s) where Anti-Doping Organizations will likely attempt Out-of-Competition Testing when Testing the Athlete outside the of their nominated 60-minute time slot.

UKAD proposes a revision to article 4.10.9.1 (a)-(d) to lessen the administrative burden on the Athlete. For example:

a) Athlete's must submit details of the training location(s) used for their training and the typical days of the week and approximate times that they train at those location(s) for that quarter. If an Athlete's training location(s) changes to one that they regularly use, then the Athlete is required to update the name and address of the new training location(s) and the days of the week and approximate times they typically train at that location(s). A failure to update the change of training locations shall be pursued as a possible Filing Failure; Comment to 4.10.9.1 (a) - Athletes are not required to update this information if it is a one-off/temporary measure for a period less than X weeks.

b) If the Athlete does not have a fixed location in which they conduct their training activities such as road cycling or road running, then the Athlete is required to include the address of the location where the Athlete will start and finish the training activity as well as the general timeframes.

c) If the Athlete is not currently training or will not train for a period of more than X week(s) during the quarter, they shall specify that in their Whereabouts Filing and detail whether it is a rest day, travel, vacation, injured or other. Comment to 4.10.9.1 (c) - In the event it is identified that an Athlete has declared that they are not regularly training and this is inaccurate, a Filing Failure may be issued.

d) In the case of a Team Sport or other sport where competing and/or training are carried out on a collective basis, the Athlete's training activities are likely to include most, if not all, Team Activities.

To acknowledge sports that may not be captured in the above, UKAD proposes that consideration is given to utilising the same principles applied in Comment to 4.10.6.2 e.g., **Comment to 4.10.9: An Anti-Doping Organization may request an Athlete to provide additional training information as part of their Whereabouts Filing.**

#### Reasons for suggested changes

4.2.1 (h) - UKAD is unclear as to the expectations for criteria (h) and how it can be applied within a sports risk assessment when taking into consideration the variations between sports.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.9 - To reduce the administrative burden on Athletes and make it more proportionate to the use of this information by ADOs. To find the right balance to better enable ADOs to obtain this information from Athletes and more consistently identify and issue Filing Failures for clear failures to provide and/or clear inaccuracies to the regular training information provided.

#### SA Institute for Drug-Free Sport

khalid galant, CEO (Souoth Africa)  
NADO - NADO

SUBMITTED

#### General Comments

The 20 day period should apply to all Continental, World Championships and not only Olympic, Paralympic Games. All sport codes are not Olympic or Paralympic sport codes

## General Comments

## FURTHER INFORMATION

SIA has no comment. However, SIA would like to know if WADA will continue to provide a risk assessment template for ADOs to use?

## Article 4.5 (4)

## UK Anti-Doping

## General Comments

4.5.5 - UKAD had previously proposed that further guidance was provided in the IST with regards to testing overnight (i.e. between 11p.m. and 6 a.m.), to provide ADOs with greater confidence and direction to testing overnight. This could include examples of what would be deemed 'valid grounds' for testing overnight. No amendments were made in the draft 2027 ISTI and UKAD wishes for this to be reconsidered. UKAD understands that this might be a guidance consideration for WADA's 'Guidelines for Implementing an Effective Testing Program'.

Furthermore, UKAD understands that in some countries legislative pre-approval is required for testing overnight, which contravenes the no-advance notice principle, and can lead to delays and missed testing opportunities. Therefore, UKAD would welcome consideration within the IST drafting (or Code) to ensure/stipulate that legislative pre-approval should not be required to be sought.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

Comment to 4.10.10.1- UKAD supports the concept that Athletes should update competition/event schedule (and related travel plans) as soon as possible (for all Whereabouts Filings as captured in the comment to 4.10.11.2), however, it is practically not possible for ADOs to enforce and monitor.

UKAD therefore seeks clarification on the expectations of ADOs with regards to this article and if Filing Failures are expected to be issued should it be identified that an Athlete has not updated as soon as possible or update on the day of the Competition. Furthermore, are ADOs expected to issue Filing Failures where competitions are not entered? Again, this is not practical to enforce on a consistent basis due to the range of level of the events that an Athlete may compete in nationally and internationally and an ADOs ability to track and monitor this. Further guidance should be provided which does not result in an administrative burden on ADOs but provides clarity and consistency in the application of Filing Failures.

No proposed wording but clarification is being sought and the subsequent amendment should be reflective of that.

4.10.11.2 and associated comment - UKAD's feedback on article 4.10.11.2 and associated comment is focussed on the first paragraph of this article where it stipulates that; *'The Athlete shall file the update as soon as possible after they become aware of the change in circumstances, and in any event prior to their filing for the relevant day for e.g. prior to the 60-minute time slot.'*

To emphasise the importance of the need to update as soon as possible, UKAD proposes that this forms the main content of Article 4.10.11.2.

## Suggested changes to the wording of the Article

4.5.5 - UKAD is not proposing any wording change but seeking further guidance from WADA.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.11.2 and associated comment - UKAD proposes the **following** change to article 4.10.11.2 and associated comment:

*'Where a change in circumstances means that the information in a Whereabouts Filing is no longer accurate or complete, the Athlete shall file an update so that the information on file is again accurate and complete. The Athlete must always update their Whereabouts Filing to reflect any change in any day in the quarter in question in particular;*

a) In the time or location of the 60-minute time slot;

b) In the place where they are staying overnight;

c) The training location(s); and

d) The Competition/Event schedule.

The Athlete shall file the update as soon as possible after they become aware of the change in circumstances, and in any event prior to their filing for the relevant day for e.g. prior to the 60-minute time slot.'

Therefore, UKAD proposes the text highlighted would then be deleted from the comment to 4.10.11.2.

#### Reasons for suggested changes

4.5.5 - To provide greater clarity for ADOs and to protect the no-advance notice principle and potential delays with testing plans.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.11.2 and associated comment - To ensure the importance of updating as soon as possible is highlighted.

#### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

#### General Comments

**Article 4.5.3.b:** Although there is no change, we are reiterating our comments from the last Code review. Consider adding “inconsistent performances” in addition to “sudden major improvements in performance.”

#### Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

#### General Comments

##### Articles 4.5.2 and 4.5.3

The current drafting appears to require an ADO to include an Athlete in a Whereabouts Pool if the ADO considers the Athlete should be Target Tested in accordance with the requirements of this Article.

We are seeking clarification this is the correct interpretation of this provision.

If this interpretation is correct, SIA is concerned that the requirement to include the Athlete in the Whereabouts Pool may not be required if the TA does not need to rely on Whereabouts information to easily locate the Athlete.

#### Suggested changes to the wording of the Article

##### Articles 4.5.2 and 4.5.3

We suggest this Article be redrafted to exempt the ADO from including an Athlete in a Whereabouts Pool where the ADO can easily locate the Athlete relying on other information that is not Whereabouts information.

#### Reasons for suggested changes

##### Articles 4.5.2 and 4.5.3

It is not necessary to increase the regulatory burden on Athletes and ADOs by including an Athlete on a Whereabouts Pool where the ADO considers the Athlete should be subject to Target Testing but can be easily located relying on information other than Whereabouts information.

#### International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

## General Comments

### 4.5.2(a)

It may not be necessary to specifically emphasize athletes from higher-ranked nations. The point is already made that the focus should be placed on athletes competing at the highest level. In some cases, it may even be more appropriate to consider athletes from lower-ranked nations who are performing at an unusually high level relative to their nationality. Therefore, it may be worth reconsidering the specific mention of higher-ranked nations in parentheses to avoid any unintended bias.

## Article 4.6 (4)

### NADA India

NADA India, NADO (India)

NADO - NADO

SUBMITTED

## General Comments

We agree and endorse this feature.

### UK Anti-Doping

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

SUBMITTED

## General Comments

4.6.1 (a) - UKAD had previously proposed that flexibility is provided, or that ADOs (IFs and NADOs) can seek exemption from WADA, where testing can either be solely In-Competition or Out-of-Competition in certain sports (due to risk assessment outcomes, limited resources and potential opportunity for In-Competition testing at an appropriate level). Article 4.6.1 (a) (iii) partially addresses this by providing IFs the flexibility to seek an exemption from doing Out-of-Competition testing, however this has not been extended to other ADOs nor to In-Competition testing.

A further amendment was made to 4.6.1 (a) (i) to state that In-Competition shall still take 'to deter doping, to protect the integrity of the Event and the results of the Competition'.

UKAD would propose further amendments made to extend 4.6.1 (a) (iii) to all ADOs and to include flexibility for this for In-Competition testing.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.12.2 - UKAD is supportive of the concept of one of the three tests on a Registered Testing Pool athlete being conducted outside of the 60-minute time slot (as per article 4.10.12.1), however, UKAD believes that article 4.10.12.2 is too prescriptive and should be deleted and considered as a best practice recommendation within WADA's 'Guidelines for Implementing an Effective Testing Program'.

UKAD understands the need and encouragement for ADOs to consider all whereabouts information that Athlete's provide and agree that it needs to be varied. However, by stipulating that the attempt shall not take place one hour before or after an Athletes' 60-minute time slot, this could potentially create a 3-hour window where an Athlete knows they potentially won't get tested. Furthermore, UKAD believes there is value to testing an athlete just before or after the 60-minute time slot, as a doping Athlete may select a time slot to maximise the opportunity for not testing positive.

There are also numerous practical considerations given Athletes have the flexibility to update their whereabouts up to the last minute, which UKAD believes makes it unfeasible to implement, e.g. what if an Athlete's 60-minute time slot is at training, what if the Athlete updated their 60-minute time slot on the day of a test and the test subsequently occurs an hour before or after the new 60-minute time slot?

If article 4.10.12.2 were to remain, clarification is required as to whether this applies to all tests outside of the 60-minute time slot or just one.

## Suggested changes to the wording of the Article

UKAD proposes the following changes to Article 4.6.1 (a):

4.6.1 (a) (i). 'In sports and/or disciplines that are assessed as having a high risk of doping during Out-of-Competition periods, Out-of-Competition Testing shall be made a priority, and a significant portion of the available Testing shall be conducted Out-of-Competition. In-Competition Testing

shall still take place, **in line with the Risk Assessment and available resources**, to deter doping, to protect the integrity of the Event and the results of the Competition. **Very exceptionally, i.e. in a small number of sports and/or disciplines, where there is a low number of tests assigned e.g. less than 20, and/or there is coverage In-Competition of the athlete pool by the IF or NADO, the ADO can opt to prioritise the resources solely towards Out-of-Competition for these sports.** Out-of-Competition testing should be targeted across different periods of the year including but not limited to the period leading up to an Athlete's major Event, and during the Athlete's off season. Out-of-Competition Testing should not be focused solely on the period immediately prior to an Event when Athletes arrive where the Competition is being held and are more accessible to the Testing Authority.'

4.6.1 (a) (iii). 'Very exceptionally, i.e., in the small number of sports and/or disciplines where it is determined in good faith that there is no material risk of doping during Out-of-Competition periods, there may be no Out-of-Competition Testing. In these circumstances, the ~~International Federation~~ **ADO** shall apply to WADA to seek an exemption from Out-of-Competition Testing in accordance with any protocol issued by WADA.'

Alternatively, UKAD proposes the removal of the line above; '~~In these circumstances, the ADO shall apply to WADA to seek an exemption from Out-of-Competition Testing in accordance with any protocol issued by WADA.~~'

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.12.2 - UKAD proposes to delete article 4.10.12.2.

#### Reasons for suggested changes

4.6.1 (a) - UKAD is seeking flexibility because subject to the Risk Assessment some sports are assigned low levels of testing and therefore UKAD would want to prioritise all resources into the priority area (e.g. Out-of-Competition) and not spread the testing resources too thinly. Additionally, it can be challenging to test In-Competition in some sports/disciplines when events are limited/not available in that country to test at. For example, National Championships which are not attended by targeted athlete pool for testing, or some sports where National Championships are limited and/or are held overseas. Furthermore, some athletes are tested by the IF In-Competition, and therefore through collaboration with the IF provides UKAD with the comfort and assurance that this area of risk is being managed.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.12.2 - Article is too prescriptive and to provide ADOs with more autonomy on testing outside of the 60-minute timeslot, UKAD proposes to delete 4.10.12.2. However, if the article were to stay UKAD would suggest the following rewording:

'An Anti-Doping Organization's attempt to Test the Athlete outside of the 60-minute time slot **should consider utilizing** the Athlete's training location(s) before an attempt is made at the Athlete's overnight residence (unless the Testing Authority advises otherwise). If the Athlete cannot be located, the DCO shall file an Unsuccessful Attempt Report and the Anti-Doping Organization shall determine whether a subsequent attempt is made outside the 60-minute time slot or during the Athlete's 60-minute time slot as soon as possible in the case the Athlete may be aware of the unsuccessful attempt.'

#### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

#### General Comments

**Article 4.6.1a.iii:** For clarity WADA should include details for the process for where/how to apply for an exemption for OOC testing. It would also be helpful to have additional clarity confirming if only IFs can apply for this exception or if NADOs are able to as well.

#### International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

#### General Comments

4.6.1 a) i)

We suggest the following addition:

Out-of-Competition testing should be targeted across different periods of the year **as identified by the Risk Assessment undertaken in connection with the relevant sport/sport discipline**, including but not limited to, the period leading up to an Athlete's major Event, and during the Athlete's off season. Out-of-Competition Testing should not be focused solely on the period immediately prior to an Event when Athletes arrive where the Competition is being held and are more accessible to the Testing Authority.

#### Article 4.7 (9)

## General Comments

We endorse this proposal and there will be requirement of comprehensive TDP before any major International event to cover the list of participating athletes in major events.

As a practice and collaboration of external agency responsible for implementing pre games testing, NADA India ensures to test sufficiently Indian players selected to participate in major games before departure.

## UK Anti-Doping

## General Comments

4.7.3 - Article stipulates that it is critical for ADOs to monitor Athletes who may qualify or qualify for International Events and conduct testing accordingly.

The definition of an International Event is; An Event or Competition where the International Olympic Committee, the International Paralympic Committee, an International Federation, a Major Event Organization, or another international sport organization is the ruling body for the Event or appoints the technical officials for the Event.

Given the remit this covers, this will be impractical for an ADO to monitor across all sports/disciplines and across all Athletes. Whilst an Athlete's qualification or attempted qualification to International Events is a very important factor when considering test planning, given the critical nature of this article, UKAD proposes this article is made more specific to a small number of events, similar to that for the analysis of samples where it focuses on Olympic and Paralympic Games as a minimum and best practice for others.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.13.1 - UKAD proposes that the requirement for providing a mailing address and email address is included in the filing requirements for Testing Pool athletes.

## Suggested changes to the wording of the Article

4.7.3 - 'In advance of ~~International Events~~ **an Olympic and Paralympic Games (excluding Youth Olympic Games) and World Championships (or equivalent)**, it is critical that Anti-Doping Organizations monitor those Athletes who may qualify for or have qualified for ~~such International Events~~ and conduct Testing on such Athletes in accordance with a comprehensive Risk Assessment. Anti-Doping Organizations shall allocate sufficient resources to Test such Athletes and where appropriate include them in a Whereabouts Pool.

[Comment to 4.7.3: Anti-Doping Organizations should consider and implement any Testing recommendations they may receive from external expert groups leading up to ~~International Events such as~~ the Olympic and Paralympic Games to ensure that a focused and robust Testing program is applied to those Athletes that are likely to participate.]

**The objective is to where possible ensure that any Athletes participating in the Olympic or Paralympic Games or World Championships (or equivalent) have been subjected to a comprehensive testing programme in the build up to the Games. For other Major Events outside of the Olympic and Paralympic Games or World Championships (or equivalent), it is considered a best practice to follow this principle.**

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.13.1 - UKAD proposes the following addition to Article 4.10.13.1:

'The whereabouts pool below the Registered Testing Pool is the Testing Pool and shall include Athletes whom the Anti-Doping Organization plans to test at least once per year Out-of-Competition. The whereabouts information shall include an overnight address, Competition/Event schedule, training locations and Team Activities or training activities. **An Athlete shall also provide a complete mailing address and personal email address where correspondence may be sent to the Athlete for formal notice purposes.**'

## Reasons for suggested changes

4.7.3 - Concerns over practical implementation for an ADO given the scope of International Events across all sports/disciplines and number of Athletes.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.13.1 - To ensure that ADOs have a mailing address and email address for formal **notices** and it is consistent with Registered Testing Pool athletes.

### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

#### General Comments

**Comment to Article 4.7.3:** The use of “International Events” is quite broad. Consider applying this only to major multi-sport events. (e.g. Pan-Am Games)

### Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

#### General Comments

SIA agrees with the addition of new Article 4.7.3. However, SIA suggests that International Events could be too broad and have concerns if the intent is to mandate testing leading up to potentially all international events or events outside Major Events. However, SIA supports that ADOs make all efforts to conduct testing where crucial and practical and suggest the comment should be drafted that ADOSs consider implementing recommendations they may receive from external expert groups leading up to international events ...**Unless otherwise agreed between the ADO and the external expert group**. It should also be noted that any decisions regarding such recommendations must be documented.

We suggest further guidance, or a definition be provided to confirm ‘external expert group’.

#### Suggested changes to the wording of the Article

SIA suggests amending the new comment to new Article 4.7.3 to read:

“**Unless otherwise agreed between the ADO and an external expert group**, Anti-Doping Organizations **should** consider and implement any Testing recommendations they may receive from external expert groups leading up to International Events such as the Olympic and Paralympic Games to ensure that a focused and robust Testing program is applied to those Athletes that are likely to participate.”  
**Any decision taking in response to such recommendations must be documented.**

#### Reasons for suggested changes

To ensure a focused and robust testing program, the recommendations of the external expert group must be considered, implemented and the outcome documented unless the parties agree to alternative action that may be appropriate in certain circumstances.

### Sport Integrity Commission Te Kahu Raunui

SUBMITTED

Jono McGlashan, GM Athlete Services (New Zealand)  
NADO - NADO

#### General Comments

- Regarding testing recommendations from external expert groups, we are supportive of the concept, but we are mindful of the resources required to implement recommendations that may exceed a NADOs capability.

***“This feedback was endorsed by the Athlete Commission of the Sport Integrity Commission Te Kahu Raunui.”***

### Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

#### General Comments



4.7.2: Sufficient resources for the TDP are without a doubt important. However, it must be noted that many of the newly added provisions in the IST will heavily increase a ADO's administrative overhead and, given the limited resources of every ADO, will therewith reduct resources from the TDP.

4.7.3: Given the definition of International Events, this is provision will potentially lead to IFs dictating a NADO's TDP. Either reconsider the definition of an International Event or limit this provision to Competitions where the International Olympic Committee or the International Paralympic Committee is the ruling body for the Event.

#### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

##### General Comments

Re Test Distribution Planning and resources, it must be noted that lesser resourced NADOs will struggle in this area.

#### Chair

SUBMITTED

Athlete Council, WADA (Canada)  
Other

##### General Comments

##### Test Distribution Plan

We endorse Article 4.7 which requires ADOs to develop a Test Distribution Plan (TDP)

starting with a risk assessment (Article 4.2) through to prioritizing between different types of testing and analysis of samples (Article 4.6). This promotes strategic testing rather than box-ticking.

#### International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

##### General Comments

4.7.2

We suggest the following addition:

*An Anti-Doping Organization* shall allocate sufficient resources to be able to implement its Test Distribution Plan **in accordance with the outcome of its Risk Assessment.**

### Article 4.8 (15)

#### World Rugby

SUBMITTED

David Ho, Senior Manager Anti-Doping Operations (Ireland)  
Sport - IF – Summer Olympic

##### General Comments

World Rugby supports the principal of encouraging expedited analysis in some cases, but (despite our acknowledgement of the feedback as stated by WADA in this stage of the review) we consider that this should also be applied to all major events and IF designated world championships. The creation of a tiered system of events where only two major events demand such focus risks downgrading the importance of expedited analysis for other major events and world championships. We would welcome some consideration being given to adding further content to this section which requires a NADO to incorporate expedited analysis to its resource planning for pre-event testing in a year where their national team or athletes are competing in a major event or world championships.

World Rugby is unclear what 'proactively collaborate' is intended to consist of in this context. We consider that WADA should continue to work towards a universally accepted, simple and clear process in place for the TA in ADAMS that categorically confirms to the recipient laboratory that expedited analysis is required.

We also consider that in order to better facilitate consistency within pre-major event expedited analysis, WADA should aim to work towards standardised timing protocols for expedited analysis which should be met by all laboratories. Without this the lottery remains for ADOs on how quickly a positive finding could be reported in connection with an event."



## International Paralympic Committee

SUBMITTED

Phillip Riemann, IPC Anti-Doping Manager (Germany)  
Sport - IPC

### General Comments

4.8.2 IPC strongly supports the requirement to expedite analysis of samples collected within 20 days of the Paralympic Games and reported 72 hours prior the athletes' first competition.

## NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)  
NADO - NADO

### General Comments

4.8.2 Depending on the number of samples the cost can be quite high to prioritize all samples and some ADOs might not be capable of doing so. We suggest to change the "shall" to a "may". We also suggest to make clear that this paragraph only refers to the standard analysis menu. Depending on the number of samples it might be impossible to secure the further analysis of all samples taken 20 days ahead of the games and guarantee a report latest 72 hours prior to the athletes first competition. We suggest to not make it mandatory but preferable.

## NADA India

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

### General Comments

The current protocol aligns with India-NADA's practices, which include routine laboratory follow-ups conducted before the participation of athletes in significant international events like the Olympics & Paralympics Games etc.

It is worth emphasizing the need for a clear and standardized process for implementing the prioritized sample analysis system within ADAMS.

We endorse the WADA proposal to implement a prioritized sample analysis system within ADAMS (Anti-Doping Administration & Management System) and establish a follow-up mechanism through ADAMS as well."

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

### General Comments

4.8.2 - UKAD supports article 4.8.2 being limited to the Olympic and Paralympic Games. UKAD would welcome clarity as to whether this includes the Youth Olympic Games. UKAD proposes that it excludes Youth Olympic Games.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.13.6 - As per article 4.10.5.2 - UKAD had proposed that the IST stipulated a minimum set of criteria which should be included when writing to an athlete to remove them from a Registered Testing Pool and Testing Pool. This hasn't been included in the draft and UKAD wishes for this to be reconsidered.

As per comments to article 4.10.5.2, in further communications with WADA (in relation to UKAD's submission), UKAD had also suggested to include wording to advise that ADOs should communicate potential changes to other ADOs with jurisdiction before removing an athlete from their Registered Testing Pool / Testing Pool. This would allow another ADO to add them to their pool with no break in whereabouts.

4.10.13.7 - As per comments to article 4.10.6.2 (e), UKAD is against the inclusion of article 4.10.13.7. UKAD proposes the removal of this article due to the concerns raised regarding the validation of the photo, frequency of updates and potential impact on the speed of ADAMS.

Therefore UKAD proposes Article 4.10.13.7 is deleted.

4.10.18 - Article 4.10.18 relates to general coordination of activities with other ADOs beyond whereabouts, whereas article 4.10 is specifically in relation to Whereabouts information. UKAD therefore proposes article 4.10.18 is separated from article 4.10.

#### Suggested changes to the wording of the Article

4.8.2 - 'Where a Sample is collected from an Athlete within 20 days of the Athlete's first competition at the Olympic or Paralympic Games (excluding Youth Olympic Games) for which an Athlete has qualified or is likely to participate, such Sample(s) shall be prioritized for expedited analysis and, where possible, results shall be reported at the latest 72 hours prior to the Athlete's first Competition.'

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.13.6 - UKAD proposes the following changes to 4.10.13.6:

'Athletes in a Testing Pool shall be notified in writing by the International Federation or National Anti-Doping Organisation when they no longer meet the applicable criteria and are removed from a Testing Pool and as a minimum should inform them that:

- The Athlete may be in another ADO testing pool and they should check/continue to provide whereabouts to that ADO (and where applicable, confirming who the whereabouts custodian shall be).
- The Athlete is still subject to the Anti-Doping rules, if they have not retired, and can still be tested.'

Furthermore, UKAD proposes the following new article (4.10.13.8):

'Anti-Doping Organisations should communicate removals from their Testing Pool with other Anti-Doping Organisations prior to giving the Athlete written notice so that it can be confirmed if the Athlete will be included (or retained) on their Registered Testing Pool or Testing Pool and agree who shall become the whereabouts custodian.'

4.10.18 - UKAD proposes to change Article 4.10.18 to Article 4.11.

#### Reasons for suggested changes

4.8.2 - To provide clarity on the Games which this Article must be applied.

\*Below comments are for section 4.10 (however unable to upload in section as system wouldn't save comments).

4.10.13.6 - This is to ensure consistency in communication across ADOs, encourage collaboration and provide clarity to the Athletes of their continued responsibilities.

4.10.13.7 - Potential administrative burden on ADOs and lack of clarity on the validation of the photos and how this will be managed and potentially open to manipulation by a doping Athlete e.g. changing it frequently/at the last minute.

4.10.18 - To separate it from whereabouts article.

#### SA Institute for Drug-Free Sport

khalid galant, CEO (South Africa)  
NADO - NADO

SUBMITTED

#### General Comments

4.8.2 "shall" to be changed to "should". We cannot guarantee that laboratories have the capacity to fully comply or meet this priority based on the current number of accredited laboratories and their geographic distribution.

## NADA Austria

Dario Campara, Lawyer (Austria)

NADO - NADO

SUBMITTED

### General Comments

#### 4.8.2:

Depending on the number of samples, the cost of prioritizing all samples may be significantly high, and some ADOs might lack the capacity to do so. Additionally, logistical challenges may arise, particularly if samples are collected only a few days before the games, and several ADOs require expedited analyses. We propose changing the term "shall" to "should" or "may," thereby making it a recommendation rather than a requirement. Alternatively, decisions on prioritization could be based on a Risk Assessment, with only samples from high-risk sports requiring prioritization.

Moreover, we recommend clarifying that this provision applies solely to the standard analysis menu, as certain additional analyses may require more time for laboratories to complete.

## RUSADA

Viktoriya Barinova, Deputy director (Russia)

NADO - NADO

SUBMITTED

### General Comments

**4.8.2** Where a Sample is collected from an Athlete *within 20 days of the Athlete's first competition* at the Olympic or Paralympic Games for which an Athlete has qualified or is likely to participate, such Sample(s) shall be prioritized for expedited analysis and, where possible, results shall be reported at the latest 72 hours prior to the Athlete's first Competition. The Anti-Doping Organization in collaboration with the Laboratory shall use ADAMS to request and manage such prioritized analyses. - **Is it correct to understand that the rule is 20 days before the start of first competition of the Games? Probably need to re-phrase just for accurateness of translations to other languages.**

## Canadian Centre for Ethics in Sport

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

SUBMITTED

### General Comments

**Article 4.8.2:** Consider changing the prescribed timeline to 20 days prior to the opening of the Village.

## Sport Integrity Commission Te Kahu Raunui

Jono McGlashan, GM Athlete Services (New Zealand)

NADO - NADO

SUBMITTED

### General Comments

- We are supportive of the concept, but there are considerations for us operationally.
- The potential cost of testing in the suggested window is a concern and expediting results has increased lab costs.

***“This feedback was endorsed by the Athlete Commission of the Sport Integrity Commission Te Kahu Raunui.”***

## Korea Anti-Doping Agency

Unseon Ji, Senior Testing Manager (South Korea)

NADO - NADO

SUBMITTED

### General Comments

Regarding the article 4.8, some laboratories may not have the capacity to perform expedited analyses, and ADOs may find it difficult to bear the additional costs associated with expedited analysis. Therefore, this article may be challenging to implement. If such an article is to be included, it should contain measures to alleviate the

burden on ADOs. Additionally, the ISL should include an article ensuring that laboratories meet the required reporting deadlines when expedited analysis is requested.

#### Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

##### General Comments

**4.8.2 please consider to apply this rule only in case the athlete is tested Out of Competition or targeted during a competition, and these tests are organized by the relevant NADO or the IF : for instance, if a French athlete participate in a competition in the US and he/she is tested by USADA, USADA does not know that the athlete is going to compete in Olympics for France and AFLD does not know that this athlete was tested in US. At the opposite, foreigners athletes, specially students in France or professional athletes, could be tested by the French NADO which ignores if he/she was selected by his/her NOC for the Games. In these cases, it is not materially possible to follow up unless WADA upgrades ADAMS with a function allowing to trace the tests performed on athletes competing in the Games, alerting the Testing authorities which have the custody of the athlete.**

#### Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

##### General Comments

4.8.2: Whereas the general principle of this provision is uncontested and the amendments made after the first consultation phase are appreciated, the use of ADAMS to request and manage such prioritized analyses is unacceptable as it leads to a de facto constraint to use ADAMS for the mission planning and management.

Also, the provision should take into account that, especially a NADO, may (randomly) test foreign athletes at National Events, for which it cannot know if they will likely participate in the Olympic and Paralympic Games. In such cases, the provision shall not apply for reasons of practicability. Otherwise, it could create an incentive to intentionally not test foreign athletes in the 20 days before the Olympics which would be contradictory to the basic idea of the provision.

#### Anti-Doping Norway

SUBMITTED

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)  
NADO - NADO

##### General Comments

##### ***Comment to art. 4.8.2.:***

For NADOs with very few athletes eligible for the Olympics it could be very easy for the lab to identify the athlete who sample shall be prioritized. The use of ADAMS Sample Management need to be educated to the ADOs and Labs.

#### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

##### General Comments

The adjustment for expedited analysis prior only to Olympic and Paralympic Games is noted. However, the additional financial burden to pay for such services by lesser resourced NADOs is to be considered.

### Article 4.9 (17)

#### World Rugby

SUBMITTED

David Ho, Senior Manager Anti-Doping Operations (Ireland)  
Sport - IF – Summer Olympic

##### General Comments

World Rugby are supportive of the changes to Article 4.9 however note that ADAMS must be further developed if ADOs and Laboratories are to accomodate such changes.

#### International Paralympic Committee

SUBMITTED

Phillip Riemann, IPC Anti-Doping Manager (Germany)  
Sport - IPC

##### General Comments

4.9.1) Anti-Doping Organizations shall put a Sample into long term storage if an APMU requests them to do so - IPC agrees with this addition.

#### NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)  
NADO - NADO

##### General Comments

4.9.1 Depending of how many samples the APMU request it becomes a matter of costs and may not be possible. We suggest to change it to a "may"

#### NADA India

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

##### General Comments

Strategy for Long Term Storage of samples and its further analysis is already adopted by NADA India. With the new requirement of using the ADAMS portal for implementation, ADOs shall be required to use the ADAMS Sample Management application and actively collaborate with the laboratory to manage and request the long-term storage of samples within the minimum sample storage period based on the type of sample, as outlined in ISL Article 5.3.7.

We endorse the WADA proposal.

#### USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

##### General Comments

Article 4.9.2: USADA supports recording in ADAMS samples marked for long term storage, however, ADAMS must be updated to accommodate this. Also, putting a sample into long-term storage is meaningless unless there is some intention to re-analyze the samples. It would be prudent to do an analysis of how often samples in long-term storage are actually re-analyzed and for what substances/methods. This is necessary to determine the cost-benefit analysis of long-term storage. Very few organizations have the technical expertise or resources to dedicate to sample re-analysis.

##### Suggested changes to the wording of the Article

Article 4.9.1

Recommended Change: Changes in bold. "Anti-Doping Organizations **shall consider** putting a Sample into long term storage if an APMU requests them to do so.

##### Reasons for suggested changes

4.9.1, Reason: ADOs resources can often be limited and an APMU does not have insight into in an ADOs resources requesting samples be put into long term storage can often be taken advantage of leading to significant extra costs. At times, the sample may be at a laboratory where there is no existing long terms storage arrangement between the TA and the lab, placing additional financial and logistical constraints on the request.

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

### General Comments

4.9.1 - UKAD is supportive of the amendments, however, UKAD believes some flexibility should be considered with regards to requests from APMUs for storage and potential escalation route provided if there is disagreement between the ADO and the APMU. UKAD accepts that in the majority of cases, the APMU recommendation would be accepted, however, consideration needs to be given to varying resources and capacity across ADOs to store samples.

UKAD also proposes that the comment to article 4.9.1 is removed and considered for WADA's 'Guidelines for Implementing an Effective Testing Program' as an example/consideration. This is currently too prescriptive within the IST.

4.9.2 - UKAD understands the rationale for recording the information centrally within ADAMS. The current functionality of the long-term storage module in ADAMS, would make this administratively burdensome for ADOs, therefore, if this was to remain, UKAD would request that a bulk upload/validate option is available. Otherwise, until that point, UKAD suggests this amendment is not made until this functionality is available.

### Suggested changes to the wording of the Article

4.9.1 - UKAD proposes the following addition to 4.9.1:

'Anti-Doping Organizations shall develop a written strategy for retention of Samples and the documentation relating to the collection of such Samples so as to enable the Further Analysis of such Samples at a later date in accordance with Code Articles 6.5 and 6.6. Such strategy shall comply with the requirements of the International Standard for Laboratories and the International Standard for Data Protection and shall take into account the purposes of analysis of Samples set out in Code Article 6.2. Anti-Doping Organizations shall put a Sample into long term storage if an APMU requests them to do so. **In the event an ADO disagrees with an APMU's request and an agreement cannot be made between the ADO and APMU, the ADO shall escalate the matter to WADA for review and final decision.**'

UKAD also proposes the deletion of the comment to Article 4.9.1.

However, if the comment to Article 4.9.1 remains, UKAD proposes the following amendment:

'[Comment to Article 4.9.1: Anti-Doping Organizations shall consider allocating sufficient resources to the annual Testing budget, **for example**, by including a contingency number of Samples within their Test Distribution Plan so that their retention and Further Analysis strategy for Samples can be monitored and fulfilled.]'

### Reasons for suggested changes

4.9.1 - To provide flexibility since there is a cost/resource implication for ADOs to store samples.

4.9.2 - No amendments to wording but would propose this is put 'on hold' and/or revisions to the functionality of ADAMS are made before putting in place. Concerns over the administrative burden upon ADOs to record this within ADAMS presently.

## Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

### General Comments

#### Articles 4.9: Retention of Samples and Further Analysis

*In this respect, ADOs shall be required to use the ADAMS Sample Page 4/8 2027 Code & IS Update Process:*

*Management application and actively collaborate with the laboratory to manage and request the long-term storage of samples within the minimum sample storage period based on the type of sample, as outlined in ISL Article 5.3.7.*

To foster efficient administration a notification system notifying labs through ADAMS should be implemented, when samples are requested for LTS.

## NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

### General Comments

#### 4.9.1:

The number of samples requested by the Athlete Passport Management Unit (APMU) can significantly impact costs, potentially making it unfeasible for certain Anti-Doping Organizations (ADOs).

## Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

### General Comments

4.9.1: APMUs are contractors and shall in no case have the power to require an ADO to put a sample into Long Term Storage. As outlined in the next paragraph of this article, ADOs shall consider putting a Sample into long term storage if an APMU recommends them to do so.

4.9.2: APMUs are contractors and shall in no case have the power to require an ADO to put a sample into Long Term Storage. Also, this provision leads to a de facto constraint to use ADAMS for mission planning and management and is therefore unacceptable.

## RUSADA

SUBMITTED

Viktoriya Barinova, Deputy director (Russia)

NADO - NADO

### General Comments

**4.9.2** It would be useful for ADO to have relevant information on sample validity for further analysis/analyses (e.g. volume remaining, etc) available in ADAMS

## Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

### General Comments

**Comment to Article 4.9.1:** Remove the word “consider” following “shall” to solidify this requirement.

### Suggested changes to the wording of the Article

*Proposed Wording:* Anti-Doping Organizations shall allocate sufficient resources to the annual Testing budget by including a contingency number of Samples within their Test Distribution Plan so that their retention and Further Analysis strategy for Samples can be monitored and fulfilled.

## Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)

NADO - NADO

### General Comments

SIA suggests this Article be expanded to allow any ADO with jurisdiction over an Athlete to be able to request long term storage.

SIA asks WADA to consider making enhancements to ADAMS to allow for: bulk requests for long term storage to be uploaded and released by any party exercising jurisdiction over the Athlete.

### Suggested changes to the wording of the Article

SIA suggests the wording of Article 4.9.2 be expanded to read:

**"Long term storage requests may be made by any relevant TA, ADO, or APMU who has jurisdiction over the Athlete. Samples that a TA, ADO, or APMU requests the Laboratory to place into long-term storage after the Sample has been analyzed shall be recorded in ADAMS by the TA, ADO, or APMU when they request such storage or within the minimum Sample storage period based on the type of Sample as outlined in the International Standard for Laboratories. ~~The same applies for sample(s) that an APMU requests the Testing Authority to put into long term storage.~~ Once the request has been made by the TA, ADO, or APMU, the Laboratory shall confirm in ADAMS that the Sample(s) have been placed into long-term storage along with any applicable information regarding the Sample(s)**

#### Reasons for suggested changes

SIA suggests this Article be expanded to ensure that long-term storage is not limited to the TA to ensure that other ADOs and the APMU are able to directly request the laboratory to secure long-term storage where there is information or other factors warranting such action which are not known by the TA.

#### Finnish Center for Integrity in Sports FINCIS

SUBMITTED

Marjorit Elorinne, Quality Manager (Suomi)  
NADO - NADO

#### General Comments

4.9 Retention of Samples and Further Analysis:

Would it be information to be added to testing statistics how many LTS samples has been re-analysed annually as re-analyzing samples will need resources but if negative are not visible by any means?

#### Anti-Doping Norway

SUBMITTED

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)  
NADO - NADO

#### General Comments

##### *Comment to art. 4.9.1.*

It may be a concern to let the APMU control the resources to the ADO. What if the ADO does not agree with the APMU recommendations? ADOs and Lab need training into the Sample Management System. Regarding resources, the summary says shall, however the IST says shall consider.

#### Anti-Doping Sweden

SUBMITTED

Jenny Schulze, Testing and Science Manager (Sweden)  
NADO - NADO

#### General Comments

#### Articles 4.9: Retention of Samples and Further Analysis

If making it mandatory to use ADAMS for Long Term Storage management, WADA must ensure that the sample management system allows easy transfer of current LTS data into ADAMS. The current SM does not seem to be fit for purpose. For ADOs (such as ADSE) that already have a satisfactory LTS management in place (and have invested a lot of resources into implementing it) it would be desirable to continue using our system while the laboratory may upload CSV files of stored samples in ADAMS so that the APMUs can access this information as well.

4.9.1) "Anti-Doping Organizations shall put a sample into LTS if an APMU requests them to do so": We suggest replacing shall with should, and/or that the ADO shall document the reasoning for not storing the sample in ADAMS.

#### Suggested changes to the wording of the Article

Anti-Doping Organizations should put a Sample into long term storage if an APMU requests them to do so. If the APMU recommendation is not followed the ADO shall document the reasoning in ADAMS for not storing the sample.

#### Reasons for suggested changes

ADSE tests many low level and recreational level athletes where it is highly unlikely that we can perform follow-up tests if the APMU suggests doing so (i.e. criteria 4.9.1a+b). We believe that the ADO has the better knowledge to make an informed decision whether the sample should be stored or not.



## Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

### General Comments

The condition presupposes that funding will be available for long term storage etc.

## International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

### General Comments

4.9.2

Consider adapting the wording or adding a comment to regulate LTS recording in ADAMS where samples are stored in another Fit-for-Purpose facility in accordance with ISL 5.3.7.1; and reflecting the laboratory's obligations in the ISL.

## Article 4.10 (29)

## World Rugby

SUBMITTED

David Ho, Senior Manager Anti-Doping Operations (Ireland)  
Sport - IF – Summer Olympic

### General Comments

With regards to the comment to 4.10.4.2, World Rugby consider that further clarity should be provided on who would have access to the disclosure around those athletes included in the RTP and criteria for inclusion. We would also have concerns around the general implications of this requirement in circumstances where one ADO may not want another to be aware of the reasons for an athlete, group of athletes or team's inclusion due to an ongoing investigation.

Furthermore though we fully see the value of WADA being able to challenge the absence of an athlete or group of athletes from the RTP, this should only apply where there is clear negligence on the part of the ADO or in cases of exceptional circumstance. To manage this process correctly, there should either be a route devised for an independent view to be provided (such as by an approved panel of auditors or 3 x ADO Testing Managers) in cases where the ADO disputes WADA's determination and can demonstrate sound logic and good reason for its decision.

In addition, we consider that the wording of this comment should be qualified to demonstrate the particular circumstances where WADA consider it may need to intervene as the current wording, where "...WADA is not satisfied that the criteria used by the Anti-Doping Organization is sufficient and proportionate to the Risk Assessment undertaken" is too broad given that this may go down to a matter of interpretation or opinion.

Re Testing Pool - World Rugby does not support the changes in article 4.10.13.4 which makes filing in ADAMS mandatory for Testing Pool athletes. We see no need for this to change, given that one of the key distinctions between the RTP and TP is the flexibility not to use ADAMS and to design a system that best suits the need of the sport/country/ADO. From our own position as a team sport, we consider that unfortunately ADAMS as a system is not currently fit for this purpose and remains some distance from having the capacity or design to effectively accommodate team whereabouts without significant impact in terms of time and resources for the athlete, club/team and responsible ADO.

## International Paralympic Committee

SUBMITTED

Phillip Riemann, IPC Anti-Doping Manager (Germany)  
Sport - IPC

### General Comments

4.10.2 Include the start date as to when an Athlete enters the Registered Testing Pool or Testing Pool and end date when they no longer meet the criteria and are removed from such pool as outlined within Articles 4.10.5.1 and 4.10.5.2 for Athletes in a Registered Testing Pool or Articles 4.10.13.5 and 4.10.13.6 for Athletes in a Testing Pool. - IPC agrees to this.

4.10.6.1 b) IPC agrees to this.

## International Tennis Integrity Agency

SUBMITTED

Nicole Sapstead, Senior Director, Anti-Doping (United Kingdom)

Sport - Other

### General Comments

Article 4.10.2 (c) - Whilst the ITIA do not disagree with the concept behind this requirement, we are concerned that, with the size of RTP/TP that ADOs have, this exercise will be time consuming at the start and will create an additional step (in an already time-consuming process) when including/removing athletes from RTP/TP. Perhaps consideration could be given into how ADAMS could assist in streamlining this process.

Comment to Article 4.10.4.2 - The ITIA is concerned that this process will not only be extremely time-consuming, but are also unclear as to why this has been added ie what does it achieve and for whom? There are a multitude of reasons a player is included in a RTP and this requirement appears to place an unnecessary administrative burden on the ADO. Further if athletes know this is produced they could ask for this information under a subject access request or similar which is information that an ADO might not wish to be known (e.g. based on intelligence or a suspicious ABP).

Article 4.10.6.1.b - The ITIA is concerned that ADOs already set 'informal' deadlines prior to the formal cut-off (at which point a failure to submit would lead to a Filing Failure) and so by bringing the formal deadline forward ADOs will then impose even earlier 'informal' deadlines. This would necessitate athletes inputting the required information almost a month in advance of a quarter starting. We already know that athletes struggle with identifying where they will be for a quarter but now this is effectively being extended to a third of a year. It does not help in gaining athlete buy-in to the whereabouts system. The concern here is that compliance with these 'informal' deadlines would be reduced and lead to a significant increase in Filing Failures for late submissions as athletes will wait until the very last minute. Whilst the ITIA are in favour of a 'formal' deadline prior to the first day of the quarter, we believe that the current proposed deadline is too far in advance of the preceding quarter and should remain within the discretion of the ADO. For the reasons set out the ITIA's comments regarding Art 4.10.6.2 c the ITIA think it important that the type of deadline being proposed is a challenge for sports such as tennis with scheduled that change at very short notice unlike team sports for example with fixed schedules.

Article 4.10.6.2.c & Article 4.10.9 - The ITIA feel that there is a need for consideration for sports that travel and compete on such a regular basis that regular training activities are almost non-existent. As is the case in top-flight Tennis, athletes compete in different locations on a weekly basis and so do not have a regular time, location, or period that they participate in training. Moreover, with no formally recognised 'off-season', there is no period where all players in the RTP/TP would be in an 'off-season' state and in regular training at the same times and locations on a daily/weekly/monthly basis. ITIA would ask that consideration be given to such sports/situations as the ITIA would not wish to see players falling foul of requirements imposed upon them that were impossible for them to meet.

Article 4.10.6.2.d - The ITIA does not dispute this requirement; however, we would request that WADA give some consideration to allowing an API to help aid athletes with inputting their Competition schedule in sports other than team sports. This would be especially helpful in sports that regularly have periods of Competition, and such periods can last for an unpredictable amount of time, i.e., knockout Competitions. It would help if the relevant body (in this case the applicable Tennis Tour) could cascade the relevant competitions into the athlete's whereabouts.

Article 4.10.7.1.h - The ITIA would strongly suggest that this provision should not just be limited to the athlete's personal phone number provided in their Whereabouts Filing, but should also include any other phone numbers provided in their Whereabouts Filing, within reason.

Additionally, the ITIA question the need to record a Test in ADAMS as advance notice if the sample was collected after the phone call in circumstances where the athlete was located and notified immediately/shortly after the phone call was placed. It is not any different to an athlete waiting, for example, for 45 minutes to answer their home address door having heard the DCO knock/ring the bell at the start of the hour. Are these recorded as advance notice?

Article 4.10.8.1 - The ITIA is seeking clarification as to whether the requirement to provide an Overnight Address will still be waived during 'Competition' - for the record the ITIA would advocate that it should.

Comment to Article 4.10.10.1 - Whilst the ITIA do not dispute this, we would request that it is recognised that some athletes can be entered into tournaments last-minute (e.g., lucky losers) and may also travel last-minute (e.g., lose a knock-out match and fly the same evening to next tournament location).

Comment to Article 4.10.11.2 - *"For the avoidance of doubt, an Athlete who updates their 60-minute time slot for a particular day prior to the original 60-minute slot must still submit to Testing during the original 60-minute time slot if they are located for Testing during that time slot."*

Unless this is intended to have a different meaning the ITIA thinks this is obvious - if an Athlete is notified for testing (at any time, or anywhere) they must submit to Testing.

Article 4.10.12.2 - The ITIA cannot support this provision - there are sports (such as tennis) where the athletes compete and travel on such a regular basis. Prohibiting out-of-competition testing either side of the athlete's nominated 60-minute timeslot leaves little room to successfully locate the athlete for an out-of-hour, out-of-competition test. Whilst the ITIA agrees that other Whereabouts entries (e.g., Overnight Accommodation) can be used, having the ability to test either side of the nominated timeslot can increase the unpredictability of testing. The ITIA are also aware that athletes can nominate timeslots so that they maximise times between a nominated timeslot one day and the nominated timeslot for the next day. With this in mind, going immediately after the athlete's nominated timeslot may increase the chances of catching athletes manipulating the Whereabouts system to provide themselves with the largest possible window to use prohibited substances. If there are not regular training locations to use then the default becomes the overnight residence which in itself means testing out of hours becomes predictable. Consideration needs to be given to the cost of out of hours testing and the flexibility that should be afforded to ADOs to do this, when the driver is surely to collect a sample from the athlete.

## Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)

Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

### General Comments

#### 1. Art. 4.10.6.2.c) Whereabouts Requirements for Athletes

4.10.6.2 c) There is concern about whether the revised version is sufficient for test planning as the wording “name and address of the training location(s) where they will train” and broad definition of morning, afternoon and evening might cause problems especially looking at the different handling of whereabouts filing and failures. Athletes might claim, when faced with a potential Whereabouts Failure, that while they intended to train at a specific location, their plans changed due to factors such as weather or health conditions. The new wording “will train” potentially exacerbates the unequal treatment of athletes in different sports. For instance, swimmers and Judokas can easily identify and report their training locations, making them more susceptible to Filing Failures. In contrast, cyclists, triathletes, marathon runners, and Nordic skiers, who train over large areas, may struggle to provide specific locations, reducing the likelihood of Filing Failures. Consequently, the first group may face stricter scrutiny and more frequent Filing Failures, because their fixed locations and narrower time windows make it easier for them to be scrutinized and penalized, leading to an inequitable application of the Whereabouts requirements across different sports.

We suggest defining this paragraph more clearly and to not delete the regular activities (such as university courses, school hours, job hours, etc.) but keep it as well as training. There is a need for a harmonized sanctioning system if whereabouts requirements are not fulfilled.

#### 2. Art 4.10.6.2 e)

This regulation raises questions with data protection regulations in the different countries as well as questions on the practical handling.

## NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

### General Comments

4.10.6.2. c) There is concern about whether the revised version is sufficient for test planning (problems with "will train" and the broad definition of morning, afternoon and evening) and especially with regard to the different handling of whereabouts filing and failures. We suggest to define this paragraph more clearly and keep the regular activities as well as training.

4.10.6.2. e) This regulation raises questions with data protection regulations in the different countries. As well we suggest to limit the upload size to not risk downtimes on ADAMS due to data transmission problems caused by high resolution pictures.

4.10.7.1 b) It is necessary to clarify and differentiate the term “advance notice” (time stamp e.g.).

4.10.9.1 It is important to not just provide general time frames (morning, afternoon, evening) but be more specific to enable test planning. "General" should be erased and replaced by “as specific as possible”. Otherwise we would risk a lot more unsuccessful control attempts.

## Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

### General Comments

#### 4.10.4.2 e

It needs the function in ADAMS to upload the list of the criteria of RTP athletes. We have several hundreds of RTPs.

#### 4.10.9.1 b

It needs the function in ADAMS to be able to select more than one choice of training periods. Because many athletes may have the training cross the some time line(ex. morning and afternoon).

#### 4.10.6.2 e

It is unclear that the specification of photograph. It is not enough definition as "an accurate passport style photograph". Many countries, editing of photo is very common. It needs to specify the detail of specification.

### General

In the IST(2027), there is many whereabouts topics has been changed. It assumes that there will be many system changes in ADAMS. So it must finish the system change before several months of 2027 IST released. Athletes should know any system change in advance before 2027 IST released.

## NADA India

SUBMITTED

NADA India, NADO (India)

NADO - NADO

### General Comments

We agree and endorse the proposal.

## USADA

SUBMITTED

Allison Wagner, Director of Athlete and International Relations (USA)

NADO - NADO

### General Comments

Article 4.10.7.1.a: The added language requiring an Athlete to be available “for the duration of the 60-minute time slot specified . . .” conflicts with Article 4.10.7.1.d, which states that if an Athlete “becomes available for Testing later on in the 60-minute time slot, the DCO should collect the *Sample* and should not process the attempt as an unsuccessful attempt to test but should report the details of the delay in availability of the Athlete.” Article 4.10.7.1.d then suggests that a pattern of delayed availability should be evaluated under Articles 2.3 and 2.5.

Article 4.10.9.1.a, Based on athlete feedback and analyzing the additional burden placed on athletes, USADA does not believe the benefit is proportionate to the added burden. Additionally, Athlete training locations and times change frequently, and the added responsibility of updating this information could cause an increase in Filing Failures.

### Suggested changes to the wording of the Article

Article 4.10.5.1.d, Recommended Change: Changes in bold. “That their Whereabouts Filing will be shared ~~through ADAMS~~ with other *Anti-Doping Organizations* that have authority to conduct *Testing* on them and that they may be tested by other *Anti-Doping Organizations*; **and**”

Article 4.10.6.2.d, Recommended Change: Changes in bold. “The *Athlete’s Competition/Event* schedule for the following quarter, including the name of the *Competition/Event* and address of each location where the *Athlete* is scheduled to compete during the quarter and the date(s) **and time(s) at on** which they are scheduled to compete at such location(s);”

Article 4.10.6.2.e

Recommended Change: Remove entirely. “Include and upload as part of their Whereabouts Filing an accurate passport style photograph to their *ADAMS Athlete* profile page in accordance with the requirements set out in *ADAMS*, to assist with validating the *Athletes* identity when selected for a Test;”

Article 4.10.7.1.a, Recommended Change:

WADA must choose between Article 4.10.7.1.a which strongly suggests that an Athlete is subject to a Missed Test if they are not available for “the duration of the 60-minute time slot” and Article 4.10.7.1.d which strongly suggests an Athlete is not subject to a Missed Test if they are not available for the duration of their 60-minute time slot. Based on CAS jurisprudence and the wording of ISRM B.2.4 it appears that Article 4.10.7.1.d should carry the day.

Article 4.10.7.1.b

Recommended Change: Changes in bold. “The *Athlete* can choose which 60-minute time slot between 5:00a.m. and 11:00 p.m. provided that during the time slot in question they are somewhere accessible by the DCO. It could be the ***Athlete’s place of residence, or other*** overnight address, training location or *Competition*.”

Article 4.10.7.1.h

Recommended Change: Changes in bold. “If the *Athlete* answers the DCO’s call and is not at the specified location or in the immediate vicinity, and so cannot make himself/herself available for *Testing* within the 60-minute time slot, the DCO **shall** file an Unsuccessful Attempt Report.”

Article 4.10.8.1

**Recommended Change:** Changes in bold. “An *Athlete*’s overnight address is the location where the *Athlete* will stay/sleep overnight ~~and wake up in the morning the next day~~”

Article 4.10.9.1.b

**Recommended Change:** Changes in bold. Delete training requirement. If requirement is not deleted, recommend the following: “An *Athlete* is required to file general time frames for when they will conduct their training, general timeframes shall include morning (between 5:00 a.m. and ~~12:00~~ **9:00 a.m. p.m.**), **mid-day (between 9:00 a.m. and 2:00 p.m.)**, afternoon (between ~~12:00~~ **2:00** p.m. and 6:00 p.m.) or evening (between 6:00 p.m. and 11:00 p.m.).”

Article 4.10.9.1.d

**Recommended Change:** Changes in bold. “If the *Athlete* is not currently training or will not train on a particular day or days during the quarter, they shall specify that in their Whereabouts Filing ~~and detail whether it is a rest day, travel, vacation, injured or other.~~”

Article 4.10.12.2

**Recommended Change:** Changes in bold. “An Anti-Doping Organizations attempt to Test the *Athlete* outside of the 60-minute time slot shall not take place one hour before or after the Athlete’s nominated 60-minute time slot. ~~and should utilize the Athlete’s training location(s) before an attempt is made at the Athlete’s overnight residence (unless the Testing Authority advises otherwise).~~ If the Athlete cannot be located ~~at either of these locations or~~ the DCO shall”

Article 4.10.13.7

**Recommended Change:** Remove entirely.

Article 4.10.15.3

**Recommended Change:** Delete the last sentence.

**Reasons for suggested changes**

Article 4.10.5.1.d, **Reason:** As athletes file in other platforms, whereabouts information can be shared via other secured platforms, not just ADAMS.

Article 4.10.6.2.d, **Reason:** We believe requiring times that an athlete is scheduled to compete holds no significant impact on testing plans and can be overly burdensome to an athlete. For example, they may advance during a competition, or they may not. this information is also often public or available from the event organizers themselves so determining start times is not always required.

Article 4.10.6.2.e, **Reason:** Additional requirements around this during the filing period seem excessive and could be an additional burden on athletes. There still could be potential risk of a wrong photo being uploaded or purposeful plan to upload a wrong photo either of which can create confusion.

4.10.7.1.a, **Reasons for Change:**

If 4.10.7.1.d should prevail over 4.10.7.1.a, why would WADA insert the new language in 4.10.7.1.a that conflicts with the understanding that Athletes are not required to be present during the entire 60-minute time slot and create uncertainty and confusion?

**4.10.7.1.b, Reason:** Standard language needs to be used throughout the IST.

Article 4.10.7.1.h, **Reason:** This language is too restrictive and does not allow for unforeseen situations to arise when an athlete may be making their best efforts to provide a sample. For example, if a phone call is placed in the last five minutes of the 60-minute time slot and the athlete is in the immediate vicinity and has agreed to immediately report back to the location for sample collection, but runs into traffic and is 1 minute past the 60-minute time slot, this does not seem appropriate to be required to submit a Unsuccessful Attempt Report. It should be up to the ADO to make these decisions and outline internal processes.

Article 4.10.8.1, **Reason:** This language can often be interpreted in many ways. Removing language around the “morning” reduces the assumption of a specific time.

Article 4.10.9.1.b, **Reason:** Reason for deleting requirement was described above. If not deleted, then when attempting an athlete at a training location with such a large general time frame this could lead to a higher volume of Unsuccessful Attempt Reports. We recommend shortening these windows to support locating an athlete for testing. The proposed times also consider that some athletes train over the midday hours, and by providing an additional option, this prevents the need from the athlete to select two training times covering 5am to 6pm but also allows for an athlete to select two general timeframes when appropriate.

Article 4.10.9.1.d, Reason: USADA submits the training requirement should be removed, but if it remains then having an athlete state when they will not be training but again must balance the burden on athletes and what information is necessary to best conduct testing. We do not agree that this level of detail is needed when balanced against the burden on athletes.

Article 4.10.12.2, Reason: An athlete's whereabouts information and how an attempt should be conducted is multifaceted and should not be confined by such specific protocols. Simply stating that it should be based on a training location before an overnight location is too specific and too prescriptive. For example, if an athlete lists an evening training time and a morning 60-minute window, it does not make sense for the DCO to go to the training location. If the DCO has to seek approval from the TA for every nuanced situation this severely limits the DCO and adds an unnecessary administrative lift to the TA. This is something that can be described and discussed in a Guideline.

Article 4.10.13.7, Reason: Same reasons as outlined in Article 4.10.6.2.e comments.

Article 4.10.15.3, Reason for Change:

The last sentence contradicts ISRM Annex B.3.1 that describes how an ADO that discovered a whereabouts failure can conduct the results management for that failure. Having the ADO that discovers a whereabouts failure manage it is much more efficient. Thus, this sentence must be deleted because it contradicts the ISRM by stating something that is inaccurate

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

### General Comments

4.10.4.2 - The comment to article 4.10.4.2 requests ADOs to *list in ADAMS the criteria it applied for selecting an Athlete for its Registered Testing Pool*. UKAD understands there may be an intention to improve transparency, but it is unclear why this needs to be recorded in ADAMS at an Athlete level as UKAD has concerns that this could be potentially administratively burdensome on ADOs and is disproportionate to how it will be used.

UKAD notes that WADA want to review and challenge ADOs decisions but since there is access to the Athlete list in ADAMS, UKAD is unclear why including the rationale will be of benefit since information relating to why an athlete is not included will not be documented/included.

Furthermore, UKAD is concerned that ADOs would be expected to update this regularly since the rationale for retaining an athlete on a Registered Testing Pool may differ from its original reason for inclusion. For example, if the Athlete is included due to performance/ranking, they may no longer meet that criteria but are retained on the Registered Testing Pool for other reasons (e.g. Athlete Biological Passport, intelligence).

UKAD feels this may not be the best use of resources across ADOs and that this information should be documented and shared with WADA on request but not necessarily within ADAMS.

4.10.5.2 - UKAD had previously proposed that the IST stipulated a minimum set of criteria which should be included when writing to an athlete to remove them from a Registered Testing Pool and Testing Pool. This hasn't been included in the draft and UKAD wishes for this to be reconsidered.

In further communications with WADA (in relation to UKAD's submission), UKAD had also suggested to include wording to advise that ADOs should communicate potential changes to other ADOs with jurisdiction before removing an athlete from their Registered Testing Pool / Testing Pool. This would allow another ADO to add them to their pool with no break in whereabouts.

UKAD proposes these are added as new articles in the IST; 4.10.5.3 and 4.10.5.4:

**4.10.5.3 - Anti-Doping Organisations should communicate removals from their Registered Testing Pool with other Anti-Doping Organisations prior to giving the Athlete written notice so that it can be confirmed if the Athlete will be included (or retained) on their Registered Testing Pool or Testing Pool and agree which ADO shall become the whereabouts custodian.**

**4.10.5.4 - The International Federation or National Anti-Doping Organization (as applicable) shall notify in writing to each Athlete of their removal of its Registered Testing Pool and, as a minimum, include the following:**

- **The Athlete may be in another ADO Testing Pool and they should check/continue to provide whereabouts to that ADO (and where applicable, confirming who the whereabouts custodian shall be).**
- **The Athlete is still subject to the Anti-Doping rules, if they have not retired, and can still be tested.**
- **Whereabouts failures will continue to countdown but may still be counted if they are re-added to a Testing Pool**

**Where an Athlete is being removed on the basis of a retirement, the Athlete should also be notified of the following:**

- **Whereabouts failures will be paused**
- **The requirement to provide six-months written notice of intention to return to sport at a national or international level**

4.10.5.2 (b) - UKAD believes it should be clearer that the Athlete is still required to provide whereabouts information until they have received written notice from the ADO of their removal from the Registered Testing Pool.

4.10.6.2 - UKAD supports the inclusion of the Athlete needing to provide details of the block, room number, etc., for their overnight accommodation but believe this should be extended to other whereabouts requirements such as the 60-minute time slot. This could be added to specific articles or made a comment to 4.10.6.2.

#### Suggested changes to the wording of the Article

4.10.4.2 - UKAD proposes that the following is deleted in the comment to article 4.10.4.2. ~~Comment to 4.10.4.2: Anti-Doping Organizations shall list in ADAMS the criteria it applied for selecting and including Athletes within its Registered Testing Pool. WADA may undertake a review of such criteria and the Athletes that have or have not been included within an Anti-Doping Organization's Registered Testing Pool at any time. If following such review WADA is not satisfied that the criteria used by the Anti-Doping Organization is sufficient and proportionate to the Risk Assessment undertaken, WADA may request that the Anti-Doping Organization adjust its criteria and/or request an Anti-Doping Organization include certain Athletes within its Registered Testing Pool who are not currently included.~~

It could be amended to state; 'Anti-Doping Organisations shall record the criteria for an Athletes inclusion in a Registered Testing Pool and provide to WADA when requested'.

4.10.5.2 (b) - UKAD proposes the following addition to Article 4.10.5.2 (b): 'They retire from national or international level Competition in their sport in accordance with the applicable rules and give written notice to that effect to each Anti-Doping Organization that included them in its Registered Testing Pool. Athletes must continue to provide whereabouts information to the applicable Anti-Doping Organisations until they have received written notice from the Anti-Doping Organisation(s) of their removal from the Registered Testing Pool.'

4.10.6.2 - UKAD proposes the following changes to 4.10.6.2 (a) - 'for each day during the following quarter, one specific 60-minute time slot between 5 a.m. and 11 p.m. each day where the Athlete will be available and accessible for Testing during the full 60- minute time slot at a specific location (e.g., home, temporary lodgings, hotel, training location, including the house, apartment, block, room number, etc.)'

Or, UKAD proposes adding the following comment to article 4.10.6.2: - 'Athletes shall include additional details to their whereabouts filing to ensure they are accessible for testing at each location, e.g. house, apartment, block, room number, etc.'

#### Reasons for suggested changes

4.10.4.2 - To seek clarity and also minimise administrative burden on ADOs.

4.10.5.2 - This is to ensure consistency in communication across ADOs, encourage collaboration and provide clarity to the Athletes of their continued responsibilities.

4.10.5.2 (b) - To ensure that it is clear to Athletes that they must continue to submit whereabouts information until they have been informed by the ADO and avoid Athletes ceasing to submit and update information as soon as they have sent their written notice of retirement.

4.10.6.2 - To ensure that information relating to hotel/room numbers, etc are applied across all whereabouts information and not limited to the overnight address.

#### Sport Ireland

Cóleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

SUBMITTED

#### General Comments

##### 4.10.9.1 b)

- Timeframes are too broad.
- Inconsistencies in what constitutes morning, afternoon, evening may occur.



- How will filing failures be classified?
- Assumes DCOs are available for 6-hour period.
- Potential for an increase in unsuccessful attempts, resulting in an increase in costs and wasted resources for ADOs.
- Will athletes respond well to this? Will they see this as a 6-hour period where they may have to be in one location?
- Better suited to guidelines for some scenarios.

#### 4.10.12.2

- Reduces hours available for testing.
- Other regular activities may impede on available testing hours, e.g. if an athlete works 9-5 job and 60-min is either morning or evening.
- Athlete may become aware of this rule and ultimately realise, in scenario where DCO does not arrive within first few mins of designated 60-min slot this leave 2 hour window where testing **cannot** occur.
- Too much restriction.
- Better suited as a guideline.

#### 4.10.13.7

- Support better verification of athlete identity.
- However, how will this be verified? How can we guarantee it is athlete?
- Will differences in style of passport photo across countries be an issue?
- Will this become another thing for ADO to track and monitor? More admin for ADO.

#### 4.10.18.1 c)

- Is this 5 business days or including weekends and public holidays?

### SA Institute for Drug-Free Sport

khalid galant, CEO (South Africa)

NADO - NADO

SUBMITTED

#### General Comments

**4.10.2** Submitting whereabouts in ADAMS should apply to the RTP only. ADAMS whereabouts management is labour intensive. This compliance/mandatory requirement may disincentivise ADOs from creating other testing pools. The clause should rather open the flexibility for ADOs to permit the submission of whereabouts information of other testing pools through any other means that is easily accessible by athletes and easier to monitor and administer by the ADO.

**4.10.12.1** The planned. 3 tests should be conducted at any time and it should not be specified when 1 of the tests should take place. This clause is contradictory because by applying the conditions of the clause, testing will be predictable.

**4.10.12.2.** Testing outside the 60 minute slot should be allowed at any time. Applying this article allows testing to be predictable. A 60 minute slot as a default for testing is exactly that, therefore any period outside of that slot should enable an ADO to test an athlete.

### RUSADA

Viktoriya Barinova, Deputy director (Russia)

NADO - NADO

SUBMITTED

#### General Comments

**4.10.2 c)** We suggest it would be very useful to have in ADAMS the historical data on athlete's inclusion and exclusion from any Whereabouts pool

**4.10.7 b)** An Athlete is entitled to specify a 60-minute time slot during which they will be at a hotel, apartment building, gated community or other location where access to the Athlete is obtained via may be restricted due to various security measures, such as a front reception desk, or security guard. *It is the Athlete's responsibility to ensure accessibility to their selected 60-minute location with no advance warning to the Athlete.*  
- **We suggest adding that failures to fulfill this responsibility may be pursued as apparent Filing failure or (where circumstances ) Missed test.**

**4.10.7 h)** Where an Athlete has not been located despite the DCO's reasonable efforts, and there are only five (5) minutes left within the 60-minute time slot, then as a last resort the DCO *should phone the Athlete (unless the Testing Authority instructs otherwise) using the Athlete's personal phone number provided in World Anti-Doping Agency - International Standard for Testing (IST) their Whereabouts Filing to see if they are*



at the specified location. - To add comment regarding nature and implementation of this rule for ADOs and athletes: wording "should" present it as a general rule to be implements by all ADOs by default and where prohibition of such call seems to be a exception that needs good reasoning.

*[Comment to 4.10.11.2:* The Athlete shall file the update as soon as possible after they become aware of the change in circumstances, and in any event prior to their filing for the relevant day for e.g. prior to the 60-minute time slot. - **The condition that failure to timely update of whereabouts is considered if 60 minutes slot had started, is now given as example only. Need to specify the ADO actions if it has information and evidence that Athlete updated whereabouts after start of the relevant day.**

**4.10.12.2** An Anti-Doping Organizations attempt to Test the Athlete outside of the 60-minute time slot shall not take place one hour before or after the Athlete's nominated 60-minute time slot and should utilize the Athlete's training location(s) before an attempt is made at the Athlete's overnight residence (unless the Testing Authority advises otherwise). If the Athlete cannot be located at either of these locations or any other whereabouts location the Athlete may have provided, the DCO shall file an Unsuccessful Attempt Report and the Anti-Doping Organization shall determine whether a subsequent attempt is made outside the 60-minute time slot or during the Athlete's 60-minute time slot as soon as possible in the case the Athlete may be aware of the unsuccessful attempt. - **To our opinion this requirement is more related to the situation when TA instructs DCO to attempt OOC testing of the Athlete within particular period of time. If we consider it as direct instruction for ADO planning of testing activities it could limit the TA ability to test as this pattern that looks like general rule, also, it will be easily traceable by athletes. Need to specify or move it to Testing Guidelines.**

**4.10.15.5 b)**Periodically review during the year/cycle in light of changing circumstances the list of Athletes in their Registered Testing Pool and Testing Pool(s) to ensure that each listed Athlete

continues to meet the relevant criteria. Athletes who no longer meet the criteria should be removed from the Registered Testing Pool and/or Testing Pool and Athletes who now meet the criteria should be added. The International Federation and National Anti-Doping Organization shall advise such Athletes of the change in their status and make a new list of Athletes in the applicable pool available **in ADAMS**, without delay. - **Does it mean that other ways of publication of RTP/TP lists on official ADO sources will become optional/not obligatory? We suggest introducing a comment with clarification, as many ADOs are now publishing such lists.**

**4.10.17.2** We suggest that the duty of National federations of facilitating also other information on events calendars and their participants that may assist for Athlete Testing should also be added.

Suggested changes to the wording of the Article

c) Include the start date as to when an Athlete enters the Registered Testing Pool or Testing Pool and end date when they no longer meet the criteria and are removed from such pool as outlined within Articles 4.10.5.1 and 4.10.5.2 for Athletes in a Registered Testing Pool or Articles 4.10.13.5 and 4.10.13.6 for Athletes in a Testing Pool, as well as historical data of previous inclusions and exclusions from any type of whereabouts pool/pools.

Reasons for suggested changes

**4.10.2 c)** Information on athlete's inclusion in whereabouts pools is important to determine their status in many aspects, including Educational purposes, definitions of Recreational athletes, some other definitions. Looks like there are currently no such unified source where ADO could find the historical information.

**4.10.7 h)** Nowadays the policies of ADOs differ and it rises questions from athletes if they are under jurisdiction of more that 1 ADO (usually elite, international level athletes). We evaluate the proposed version positively also from the point of view of efficiency of use of resources for testing, but it is very important that there should be unified requirements for all ADOs and a uniform approach.

Bermuda Sport Anti Doping Authority

SUBMITTED

Duncan Barclay, Results, Compliance Manager (Bermuda)  
NADO - NADO

General Comments

4.10.6.2 (c)- while to ability to provide time frames of a general nature is a welcomed addition they should only be an option if the athlete is unable to provide specific times. This option would need to be included within ADAMS, similar to how an athlete currently has to check a box and provide a reason for not submitting regular activity/competitions.

The main improvement to athlete whereabouts filings would be the mandatory requirement to file LOCATIONS rather than times. The lack of regular times was always an easy option for athletes to simply not provide locations. The requirement to provided locations and times should be separated enough to allow for the mandatory input of locations and flexibility on time. Specific times should first be requested and only if specific times are not possible then the option of general time be offered.

Further consideration should also be given to stating a specific time to distinguish between afternoon and evening (eg. is it 5pm or 6pm?) as well as splitting the morning period (12am to 12pm) up into smaller periods (e.g. 12am to 6am and 6am to 12pm).

Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

## General Comments

**Article 4.10.4.1:** Clarify whether testing a RTP athlete three times out of competition is a requirement or a suggestion. As written, it may be subject to interpretation.

*Proposed Wording:* The Registered Testing Pool must include International or National-Level Athletes who are subject to the greatest amount of Testing and whom the Anti-Doping Organization shall attempt to test at least three (3) times per year Out-of-Competition. Athletes in a Registered Testing and Pool are therefore required to provide whereabouts in accordance with Article 4.8.6.24.10.6.2. Athletes in the Registered Testing Pool shall be subject to Code Article 2.4 Whereabouts Requirements.

**Comment to Article 4.10.4.2:** Clarification from WADA on the benefit of including the RTP criteria in ADAMS.

Additionally, the CCES would suggest included parameters stemming from WADA's request to include certain athletes, including the minimum time frame where an athlete would be included in the RTP.

*Proposed Wording:* After discussion and review with the Anti-Doping Organization regarding the RTP requirements, should WADA believe that an athlete should be in the ADOs RTP, WADA shall request the ADO include the athlete in the RTP [consider including time frame].

**Article 4.10.6.1.b:** The CCES agrees with the change to standardize the Whereabouts submission deadline.

**Article 4.10.6.2.c:** As outlined, the proposed wording for training schedules would not provide beneficial information. A wide range of training times where the athlete simply indicates "morning" or "evening" would not be overly helpful in locating athletes, nor in establishing a Filing Failure. The CCES preference would be to require actual training times.

*Proposed Wording:* For each day during the following quarter, the name and address of the training location(s) where the *Athlete* will train as well as the time frames for such training activities;

**Article 4.10.6.2.e:** Clarify whether a whereabouts failure can be pursued simply on the basis of an athlete's failure to upload a photo to ADAMS. This could be seen as overly prescriptive and disproportionate. Enforcement would be difficult as would validation of the photo being representative of the athlete (which would likely require cross-referencing with open-source searches). Additionally, not all ADOs provide their DCOs with access to ADAMS, meaning DCOs in the field would be unable to validate the photo compared to the athlete who may be in front of them unless the photo was provided by other means, which may be difficult depending on the systems and methods used by ADOs when issuing missions.

**Article 4.10.7.1.c:** The CCES would request clarification on if this article is required given that an athlete is already required to comply with the sample collection process until completion. Consider including clarifying elements for exceptional circumstances. As an example, should the session extend outside of the 60-minute time slot and the athlete has a flight to catch, and can provide evidence of such flight, must this be pursued as a violation to Code Article 2.3?

**Article 4.10.12.1 and 4.10.12.2:** The CCES finds these changes overly prescriptive, and notes that it may not align with intelligence or science. The CCES would ask WADA to consider changing both from **shall** to **should** or include in a Guideline instead.

**Article 4.10.13.7:** Aligned with the CCES's comment to 4.10.6.2.e, the CCES requests WADA clarify whether a Testing Pool athlete would be moved into the RTP if photo is not uploaded to ADAMS.

## Malaysia Anti Doping Agency (ADAMAS)

SUBMITTED

Muhammad Husmar Afdzal Bin Husin, Senior Assistant Director (Malaysia)  
NADO - NADO

## General Comments

Suggested for WADA to add "Abbreviation List" at the front of each International Standards.

Example:

OOCT: (Out-of-Competition Testing)

RTP: (Registered Testing Pool)

## Suggested changes to the wording of the Article

1) Suggested for WADA to rephrase the clause 4.10.1 with:

"..... 4.2 to 4.6), the Anti-Doping Organization shall then determine the Whereabouts Pool the Athlete will be included in and should use the whereabouts **recorded** by those Athletes in order to conduct No Advance Notice Testing effectively." Every Athlete must submit to **Out-of-Competition Testing** at any time and place upon request by an Anti-Doping Organization with authority to conduct Testing regardless of whether they are part of a Whereabouts Pool.

**2) Suggested for WADA to rephrase the clause 4.10.2 (a) with:**

a) Be stored ~~safely and~~ securely and maintained in strict confidence at all times, is used exclusively for the purposes set out in Code Article 5.5 and is **discarded** in accordance with the International Standard for Data Protection once it is no longer relevant;

**3) Suggested for WADA to rephrase the clause 4.10.6.2 (e) with:**

e) Include and upload as part of their Whereabouts Filing ~~an accurate~~ **a current** passport style photograph to their *ADAMS Athlete* profile page in accordance with the requirements set out in *ADAMS*, to assist with validating the *Athletes* identity when selected for a Test;

#### Reasons for suggested changes

##### 1) Clause 4.10.1

1) Suggest to change word "filed" to "recorded" for better understanding.

2) Suggest to change word "Testing" to "Out-of-Competition Testing" to avoid misunderstanding.

##### 2) Clause 4.10.6.2

A current passport style photograph more suitable if there is any changes in the athlete's appearance

#### Sport Integrity Australia

Andrew McCowan, Assistant Director Project Management Office (Australia)

NADO - NADO

SUBMITTED

#### General Comments

##### 4.10.2(c)

SIA seeks further enhancements to ADAMS to better allow for this information (about the start and end dates of an Athlete on the RTP) to be captured and not removed, written over or deleted.

##### Comment to Article 4.10.4.2

SIA suggests this Comment be redrafted to ensure that is clear that any request by WADA to the ADO to adjust its criteria and/or include certain Athletes within its RTP (who fall within the Criteria) must be complied with unless otherwise agreed between WADA and the ADO.

For example, if an Athlete satisfies the criteria but is easily located then the Athlete may not need to be included in the RTP but could be captured in a Testing Pool instead. WADA and the ADO could reach an agreement that this Athlete does not need to be elevated to the RTP.

In addition, the fact that an Athlete is not easily located could be listed as one of the Criterion under Article 4.10.4.2 for inclusion in an RTP. If the Athlete is easily located they could be included in a Testing Pool noting that the number of tests on that Athlete will be informed by a risk assessment as required under the IST.

##### Articles 4.10.6.2(c) and 4.10.9

SIA is concerned:

- The proposed requirements for athletes to provide daily training activities with corresponding times will have a significant impact on athletes and is likely to impose an unnecessary regulatory burden on both athletes and anti-doping organisations.
- It appears the attempt to provide greater clarity about 'regular activities' has resulted in more prescriptive rules which could lead to inadvertent whereabouts filing failures.
- We believe, if an Athlete is on an RTP, they should provide regular training activities and times associated with these activities. However, we suggest there still be an option to provide the location of 'another activity', such as a home or workplace, if the training location is not certain or they are not training on that day). The level of detail required must be proportionate to ensuring the Athlete can be located for an OOC test.
- Filing Failures should only be considered if it can be established the activities are not regular, e.g. multiple unsuccessful attempts at the location.
- We would suggest the IST be amended (for example Articles 4.10.6.2 and 4.10.9.1) to ensure the failure of an Athlete to provide accurate Training Locations is only used to inform an investigation of a possible ADRV and is not used as direct evidence of a Whereabouts Filing Failure or Missed Test.

##### Article 4.10.6.2(e)

SIA suggests that for clarity, a comment be included referring to the provisions addressing the identity requirements an athlete must comply with when submitting a photo to their ADAMS Athlete profile.

SIA would also like to confirm the ability for an ADO to download these images from ADAMS.

##### Article 4.10.9 – Further Analysis

##### 4.10.9

While SIA acknowledges the intent to strengthen and clarify the requirements for Whereabouts Filings regarding training locations and times, we suggest the proposed intent and structure of 4.10.9 is too complex and the level of detail is likely to result in more inconsistency across sport, and more confusion for Athletes in endeavouring to comply. This may result in an increased regulatory burden that is neither proportional nor justified.

In trying to solve the issue for test planning, the changes result in more questions of how to the apply/enforce the provision from a testing perspective while also being fair to the Athlete. In addition, the change could be deemed unfair to Athletes as training times and locations can be unpredictable and modified by support personnel not just the Athlete themselves and therefore, may require an Athlete to access and change their Whereabouts location multiple times a day. This would require Athletes to have round the clock access to the system and Athletes may not be able to easily make changes to the training information once a training session has started.

The intent is to find the balance between providing sufficient up to date detail while limiting the number of updates required for an Athlete to remain compliant without needing to provide micro updates of information.

#### 4.10.9.1

#### **Suggested changes to the wording of the Article**

#### **Comment to 4.10.4.2:**

SIA suggests this Comment be redrafted to add the words ‘unless other agreed between WADA and the ADO’ (at the start of the provision) to ensure that is clear that any request by WADA to the ADO to adjust its criteria and/or include certain Athletes within its RTP is complied with unless other agreed between WADA and the ADO.

#### **4.10.6.2(c) and 4.10.9.1 (a)-(e)**

SIA does not agree with these additions. SIA feels this change is too complex/burdensome for athletes and significantly increases the likelihood of accidental Filing Failures and does not in fact assist an ADO in planning for no advance notice testing within the proposed extended time windows. We would prefer to see training times be for specific times with no potential for a Filing Failure. Instead, if an ADO was to establish repeated behaviour around misleading Whereabouts an ADRV could be pursued. An Athlete is already committed to an Overnight address location and potentially a Nominated Hour location.

#### **4.10.6.2(e)**

SIA suggests this provision be amended to read: “Include and upload as part of their quarterly Whereabouts Filing **a passport style photograph that the NADO deems to be accurate and discernible** to their ADAMS Athlete profile page in accordance with the requirements set out in ADAMS, to assist with validating the Athletes identity when selected for a Test:

#### **4.10.6.2(e)**

SIA would like confirmation that the possible consequences for an athlete whose passport photo is deemed to not be accurate nor discernible is that this amounts to a possible Whereabouts Filing Failure.

#### **4.10.11.1 and 2**

SIA suggests this provision be amended to read: “For the avoidance of doubt, an Athlete who updates their 60-minute time slot for a particular day prior to the original 60-minute slot must still submit to Testing during the original 60-minute time slot if they are located for Testing during that time slot, **and such test shall be considered a test outside their 60-minute time slot.**”

This also applies to 4.10.11.1, SIA suggests these provisions be amended to read: “**With the exception of the training location**, a failure to update may be pursued as an apparent Filing Failure...”. The definition of Filing Failure under the ISRM may also need to be similarly adjusted.

#### **4.10.12.1**

SIA suggests guidance material is provided recommending Anti-Doping Organizations should attempt to conduct at least **two** of the three (3) planned Out-of-Competition Tests on an Athlete in a Registered Testing Pool outside of the Athlete’s nominated 60-minute time slot in **an attempt** to reduce the predictability of Testing and promote greater deterrence. **At least one of these tests should be completed outside the Athlete’s 60-minute time slot.**

#### **Reasons for suggested changes**

#### **SIA Reasons for change to comment to Article 4.10.4.2**

SIA wishes to ensure it is clear that a request by WADA under this provision must be complied with. However, SIA also wishes to ensure that where there are valid reasons for not including an Athlete in a RTP this matter can be discussed with WADA and agreement reached that ensures the Athlete is subject to appropriate testing under the IST and in line with the principles supporting the Whereabouts regime.

#### **SIA Reasons for change to 4.10.11.1 and comment to 4.10.11.2:**

The reasons for adding the words ‘**with the exception of training location**’ are outlined in relation to Article 4.10.6.2(c) and 4.10.9.1 (a)-(e).

#### **SIA Reasons for change to comment to 4.10.11.2:**

In relation to the suggested addition of the words: **and such test shall be considered a test outside their 60-minute time slot**, SIA feels, for the sake of clarity, that if the athlete updates their hour time slot prior to the original hour commencing and in accordance with the IST, then if testing is attempted within the original hour time slot, that test should be considered a test outside the 60minute time slot. SIA also feels that incorrect training details should fall into a broad category that may be investigated as an apparent filing failure.

#### **SIA Reasons for change to comment 4.10.12.1:**

SIA suggests that more than one attempt to test an RTP athlete should occur outside the 60-minute timeslot. Additionally, we recommended at least one test should be completed, not attempted outside the 60-minute time slot.

#### **SIA Reasons for change to comment to Article 4.10.12.2:**

SIA suggests moving this provision to guidelines as a suggestion for, where possible, implementing an effective testing program. Now more than ever ADOs need as much flexibility to test athletes where and when we need to so we can be effective and unpredictable. SIA feels this being mandated further limits the chances of having those flexibilities and maintaining unpredictability. By having this as mandatory across the board, we are increasing the probability that over time it will be predictable. Furthermore, ADOs need the ability to test just before or more importantly just after an athlete's hour to increase strategic test timing and increase probability of detecting quick clearance substances. Furthermore, if in the scenario an athlete has already had their 1 'in hour test', has their 60mins slot at 7am, then realistically they cannot be tested for their remaining 2 x OOC from 11pm the previous night up until 8am the following morning. This limitation goes against the very nature of testing athletes at the best time / location that may be needed.

#### Sport Integrity Commission Te Kahu Raunui

SUBMITTED

Jono McGlashan, GM Athlete Services (New Zealand)  
NADO - NADO

##### General Comments

- We are predominately supportive of all these changes, however with regards to 4.10.4.2 we believe NADOs should have autonomy to develop their own processes and determine who should be on an RTP without WADAs interjection.
- Regarding 4.10.18.1c, our existing process for this is very manual, and it is unlikely we would be able to adhere to the 5-day window.

***“This feedback was endorsed by the Athlete Commission of the Sport Integrity Commission Te Kahu Raunui.”***

#### Korea Anti-Doping Agency

SUBMITTED

Unseon Ji, Senior Testing Manager (South Korea)  
NADO - NADO

##### General Comments

- Regarding Article 4.10.2.c, the improvement of ADAMS functionality should be prioritized to allow the ADO to efficiently input RTP and TP athlete inclusion/exclusion dates into ADAMS. (For example, importing RTP and TP-related data files with inclusion and exclusion dates, or an automatic function to input the inclusion/exclusion dates as the current date.)
- Regarding the Comments to 4.10.4.2, a method should be established to allow ADO to efficiently submit the required information to ADAMS, and the criteria for submission need to be specified more clearly. Additionally, due to limitations in resources such as budget and manpower, it may be practically difficult for ADO to accept all of WADA's recommendations regarding the inclusion of certain athletes.
- Regarding Article 4.10.6.1.b, we propose maintaining the current system to allow athletes sufficient time to submit their whereabouts information before the relevant quarter and to provide a grace period for a declaration of failure to submit. We do not agree with making the requirements for submitting whereabouts information more stringent.
- Regarding Articles 4.10.6.2.c-d, we agree that requiring RTP athletes to submit detailed training/competition information can increase the availability of testing. However, functional improvements to ADAMS and Athlete Central are necessary to ensure that athletes can submit this information diligently and conveniently. (For example, notifications for dates where no residence, such as an overnight location, has been submitted, reasons for no training/competition on specific dates, and automatic address entry/search functions.)
- Regarding Article 4.10.7.1.h, due to the clause stating that procedures may differ based on the TA's instructions, athletes often experience confusion when subjected to different testing procedures depending on the TA. It would be beneficial for athletes if WADA provided uniform guidelines through the IST or other documents.
- Regarding Article 4.10.12.1-2, there may be instances where, based on the ADO's testing strategy, the training location takes priority over the overnight location. Therefore, it should be implemented with more flexibility. Additionally, it would be helpful for the ADO if the reasons behind the recommendations in the IST are clearly stated, allowing the ADO to fully understand and reasonably incorporate them.
- Regarding Article 4.10.18.1.c, we agree with changing the deadline for entering ABP DCF to ensure appropriate follow-up actions. However, we hope that the entering DCF functionality in ADAMS will be improved to facilitate compliance (for example, bulk DCF import, etc.).

4o

#### NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)  
NADO - NADO

##### General Comments

##### 4.10.6.2.c:

There is concern about whether the revised version is sufficient for test planning as the wording "name and address of the training location(s) where they **will train**" and **broad definition of morning, afternoon and evening** might cause problems especially looking at the different handling of whereabouts filing and failures.

Given that NADA Austria has encountered numerous Filing Failure cases related to regular activities, there is concern about whether the revised "will train" provision is sufficiently strict.

1. • Athletes might claim (again), when faced with a potential Whereabouts Failure, that while they intended to train at a specific location, their plans changed due to factors such as weather or health conditions.
2. • Additionally, the broad definitions of morning, afternoon, and evening remain vague. How is morning defined and what happens if the athlete is not there?
3. • The new wording "will train" potentially exacerbates the unequal treatment of athletes across different sports. For instance, swimmers and Judokas can easily identify and report their training locations, making them more susceptible to Filing Failures. In contrast, cyclists, triathletes, marathon runners, and Nordic skiers, who train over large areas, may struggle to provide specific locations, reducing the likelihood of Filing Failures. Consequently, the first group may face stricter scrutiny and more frequent Filing Failures, because their fixed locations and narrower time windows make it easier for them to be scrutinized and penalized, leading to an inequitable application of the Whereabouts requirements across different sports.

Therefore, the primary objectives concerning "Whereabouts and Whereabouts Failures" should be to provide clear guidance for athletes and ADOs, achieve international harmonization across all ADOs, and ensure equal treatment of athletes across all sports.

We suggest to define this paragraph more clearly and furthermore, to ensure that regular activities (such as university courses, school hours, work hours, etc.) are not excluded but retained alongside training schedules. Including regular activities provides additional Whereabouts information, which is beneficial. Furthermore, there is a need for a harmonized sanctioning system to address instances where athletes do not fulfill their Whereabouts obligations.

Furthermore, the term "training" / "training activity" should be defined in a more concrete and legal way:

Is it only the specific exercise that is related to the sport performed by the athlete or could training also mean physiotherapy, regeneration, preparing the bike, etc.? It would be good to have some examples in the IST / WADC

#### **4.10.6.2.e:**

This regulation raises concerns regarding compliance with data protection laws in various countries, as well as practical challenges such as file upload size, potential decreases in ADAMS system performance, and other technical considerations.

#### **General Comment to 4.10**

##### ***1 Month instead of 3***

The obligation to provide information for an entire quarter in advance leads to problems in practice. Many athletes don't know where they will stay overnight or train in two or three months.

When planning doping controls, many signatories only take the next one or two to a maximum of four weeks into account. The remaining information that goes beyond this planning horizon is not relevant in practice but means effort for the athletes and carries the risk of incorrect entries due to a lack of updating.

Suggested solution: It is proposed to switch to a rolling period of 4 weeks instead of the four key dates per year on which whereabouts information must be entered for an entire quarter. This means that whereabouts information must be entered correctly at any given time for the next four weeks.

In practice, this can be ensured, for example, if athletes check on a certain day of the week (e.g. Sunday) for the next four weeks whether their whereabouts information is still correct and make adjustments if necessary.

#### **Anti-Doping Norway**

SUBMITTED

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)

NADO - NADO

#### **General Comments**

##### ***Comment to art. 4.10.2 c)***

In a training period before the athletes entering RTP the Whereabouts requirements are not mandatory, thus the Athlete does not know if every requirement is met when updating the WA. Should include a training period where the athletes get familiar with the system.

##### ***Comment to art. 4.10.4***

The proposed wording is ambiguous and could either include a requirement to include all athletes which the ADO plans to test at least three times out of competition, or a limitation that only athletes that the ADO plan to test at least three times out of competition can be included in the RTP.

We would request clarification of the intended meaning.

If the intention is the former (ie. Requirement to include), we cannot support the proposed change.

If the intention is the latter (ie. a limitation to not include anyone who is not planned to be tested at least 3 times), we can support the proposed change, but we would nevertheless request increased clarity. I.e. should some athletes we intent to test three times per year out of competition be included in the test pool? Or should all athletes we intent to test three times per year out of competition be included in the test pool?

***Comment to art. 4.10.6.1. b)***

We support the proposed amendment

***Comment to art. 4.10.6.2. a)***

It is important to state that the Athlete must be present and available the whole 60 min time slot and not just during the time slot.

***Comment to art. 4.10.6.2. c)***

If Athletes shall file training activities for each day, this will increase the burden of the athlete. Many different sports are dependent on weather conditions and where the training shall take place is not decided long time before the training starts. One concern is that this is to strict and also to time consuming for the athletes to enter and for the ADOs to monitor.

***Comment to art. 4.10.6.2.e)***

It is important that uploading of pictures do not influence the performance of ADAMS. One other concern is how the photo should be validated. How does this relate to the GDPR rules regarding biometric data? Should all SCP have access to the athletes pictures in ADAMS?

***Comment to art. 4.10.7.1***

We support also the mandatory requirement to call the athlete 5 min before the end of the 60 min time slot (IST says should)

It should be clarified whether or not calling the athlete would be a requirement for recording a whereabouts failure.

***Comment to art. 4.10.7.1. h)***

It needs to be even clearer that phone calling the is only permitted when there is only 5 minutes left of the athletes 60 min time slot. Our current experience is the some SCA are calling athletes on every test attempt if the athlete are not immediately located and notified for a test.

***Comment to art. 4.10.8.1***

The text is ambiguous: Consider using the phrase “go to bed in the evening on that given day” to avoid any misunderstanding.

***Comment to art. 4.10.9***

Extra burden on the athlete and should not be used as an additional 60 min time slot. Could be challenge to implement this as well. See also comment: 4.10.6.2 c)

***Comment to art. 4.10.12.1***

At least one OOC test outside 60 min time slot is supported.

***Comment to art. 4.10.12.2***

To completely avoid the hour before and after the 60 min time slot is not supported as this will reduce the flexibility for the ADOs to be able to collect the samples.

***Comment to art. 4.10.13***

The proposed wording is ambiguous and could either include a requirement to include all athletes which the ADO plans to test at least once per year out of competition, or a limitation that only athletes that the ADO plan to test at once per year out of competition can be included in the testing pool.

We would request clarification of the intended meaning.

If the intention is the former (i.e.. Requirement to include), we cannot support the proposed change.

If the intention is the latter (i.e.. a limitation to not include anyone who is not planned to be tested at least 3 times), we can support the proposed change, but we would nevertheless request increased clarity. i.e. should some athletes we intent to test once per year out of competition be included in the test pool? Or should all athletes we intent to test once per year out of competition be included in the test pool?

***Comment to art. 4.10.13.7***

Same concern as Art. 4.10.6.2 e): It is important that uploading of pictures do not influence the performance of ADAMS. One other concern is how the photo should be validated. How does this relate to the GDPR rules regarding biometric data? Should all SCP have access to the athletes pictures in ADAMS?

***Comment to art. 4.10.18.1 c)***

We support that DCFs from ABP blood sample shall be uploaded in ADAMS within 5 days.

***Suggested changes to the wording of the Article***

***Suggested changes to art. 4.10.7.1. a)***



An Athlete in a Registered Testing Pool shall specifically be present and available for Testing on any day for the full duration of the 60-minute time slot specified that day in their Whereabouts Filing, at the location that the Athlete has specified for that time slot.

#### Reasons for suggested changes

*Reasons for the suggested changes to art.*

We suggest specifying that it is the full duration of the 60 min timeslot to avoid misunderstanding. So clarify that the athletes shall be present at their 60 min time slot the whole hour and not using the phrase during.

#### Agence française de lutte contre le dopage

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

SUBMITTED

#### General Comments

**4.10.12.2 This proposition of article has to be removed for the following reasons:**

- 1) **It is not compliant with the article 5.2 of the code which states:**

“Any Athlete may be required to provide a Sample at any time and at any place by any Anti-Doping Organization with Testing authority over him or her”. it gives the negative perception of a “non -testing time” zone, if the test cannot be performed one hour before and after the 60 minutes slot.

- 2) **It is also not appropriate to impose to go to training locations and/or other places before making an attempt to athlete’s residence if the test is performed outside of the one-hour slot.**

#### Reasons for suggested changes

**Due to the fact that in any case the TA can give other instructions,the goal aimed by provision does not appear clearly, which could generate confusion for athletes and complexity for antidoping organisations**

#### Swiss Sport Integrity

Ernst König, CEO (Switzerland)

NADO - NADO

SUBMITTED

#### General Comments

For SSI the change to determine athletes for their pools due to the risk assessment instead of the whereabouts information needed is incomprehensible and definitely not according to the motto "Be Athlete Centered".

4.10.4.2: The provision in the comment of this article (i.e., listing in ADAMS the applied criteria for selecting Athletes that are in the RTP) will cause a massive administrative burden, especially for NADOs who deal with numerous testing pools in numerous sports. Also, WADA's right to request an adjustment of these criteria is eroding an ADO's autonomy on how to allocate its resources and cannot be accepted.

4.10.5.1: Comment to litera c): There is no need for information regarding the right to contest of Filing Failures or Missed Tests at the time of the inclusion in the RTP. It is sufficient to provide this information once a Whereabouts Failure is asserted against the athlete. Consider that additional (and irrelevant) information when including athletes in the RTP will overload the notification letter and will distract from the essential information.

4.10.6.2: The removal of the obligation to provide Other Regular Activities will make the athlete's Whereabouts much less conclusive and heavily complicate testing of athletes who are, e.g., students or scholars. Comment to litera e): Whereas the benefit of having an up-to-date photograph of the athlete is obvious, the requirements for such photo must be clearly specified (not necessarily in the IST) as well as the consequences if the athlete omits to provide a photo (e.g., will this be considered a Filing Failure?).

4.10.6.3: The need of this provision is uncontested. However, WADA should also monitor and enforce this as otherwise the provision is merely a paper tiger. We repeatedly notice that athletes in their IF's RTP are exclusively filing the 60-minute time slot - apparently without any consequences.

4.10.7.1: The level of detail in this article is disproportionate. The IST should only contain provisions that are legally relevant, instructions on how to (re)act on certain situations and best practices should exclusively go into the Guidelines for Sample Collection. Comment to litera h): This provision contradicts the overall principle of No advance testing. Even if it says "should phone the athlete", the wording implies Best Practice and, whenever DCOs did not attempted to phone the athlete, could be raised by in the athlete's defence.

4.10.9.1.b): General Time Frames should have a lower range. Otherwise this leads to more resources (working hours) being used by the DCP and the athletes being encouraged not to provide precise whereabouts information.



4.10.12.2: SSI strongly disagrees that an attempt to test the Athlete outside of the 60-minute time slot should take place at the Athlete's training location before an attempt is made at the Athlete's overnight residence. This would also be in conflict with the requirement of IST I.2.1: "Planning shall consider the Athlete's whereabouts information to ensure Sample Collection does not occur within (2) hours of Athlete's training [...] This is Best Practice at best and belongs in the Guidelines for Sample Collection.

4.10.13.1: As elaborated in the past, we do not understand why article 2.4 of the Code is not applicable for athletes in the TP!? The fact that athletes in the RTP must be tested at least 3 times a year will prevent ADOs from including athletes to their RTP. However, there is no reason why athletes in the TP should not be held accountable when not complying with the Whereabouts requirements. As article 4.10.1 states, Whereabouts information is not an end in itself, but rather a means to an end, namely the efficient and effective conduct of No Advance Notice Testing. However, if the Whereabouts requirements cannot be enforced, the inclusion into a Testing Pool is no longer a mean to this end.

4.10.14: We propose to delete this article as there is no benefit if it states that for the General Pool there are NO Whereabouts requirements. There is nothing in the IST that prevents an ADO to create other, unofficial vessels / athlete groups and if no requirements are imposed on these athletes it does not have to be in the IST.

4.10.18.1: Comment to article 4.10.18.1 c): In line with our comments to articles 4.9.1 and 4.9.2, the wording should be changed to "the respective APMU may recommend further follow up action" (and not "request")

## Finnish Center for Integrity in Sports FINCIS

SUBMITTED

Marjorit Elorinne, Quality Manager (Suomi)  
NADO - NADO

### General Comments

#### 4.10.6.2 c)

This requirement needs some clarification for several reasons:

- How this information should be used. Is this information

a) just to help a testing organisation to locate an athlete for testing without advance notice outside the 60 minute Time Slot? Which this information ( 5-7 hour time frames ) doesn't make very easy at all if DCOs should utilize this training information trying to test athlete according to 4.10.12.2 (athletes should wait/try to find athlete several hours or many athletes like long distance runners would anyway give home address as start/finish of training activity 4.10.9.1 c) and further, how does this fit with the comment to 5.3.1 requirement to visit all possible locations provided by the athlete

and/or

b) are these requirements parts of the sanctioning system for whereabouts? If an athlete is not in the location which is mentioned in the training information, is it a filing failure? If so, there will be a large inequality between athletes in different sports. It's easy to visit indoor training locations like a badminton hall or swimming pool, but not that easy to check skiing tracks in the forest or orienteering routes.

And then it would also mean that Athlete would be accountable for Filing Failure every time they depart from their previously-declared routine (contradicts the spirit of 4.10.7.1?)

**4.10.7.2 h)** Where an Athlete has not been located despite the DCO's reasonable efforts, and there are only five (5) minutes left within the 60-minute time slot, then as a last resort the DCO should phone the Athlete

--> In our protocol the DCO is not calling the athlete but it is always the authorized representative of FINCIS , thus we suggest having this added to this phrase: "... then as a last resort the DCO or authorized representative of Anti-doping Organisation should phone the Athlete..."

**4.10.12.2** An Anti-Doping Organizations attempt to Test the Athlete outside of the 60-minute time slot shall not take place one hour before or after the Athlete's nominated 60-minute time slot and should utilize the Athlete's training location(s) before an attempt is made at the Athlete's overnight residence (unless the Testing Authority advises otherwise).

--> The idea is understandable and good in principle, but in practice, this might be very challenging for DCOs and also gives athletes two hours around the time slot when testing is not conducted. Thus the wording could be changed from "shall" to "should"

Example:

Timeslot is 21.00-22.00,

DCO starts the test attempt at 17 visiting training location with time frame from 12-18 and after 18 visits home without finding athlete before 20. Then DCO have to leave and it's not possible to try to locate athlete outside the 60 min slot as the time slot ends 22 and one hour after the slot is not OK to do the test attempt...

## Anti-Doping Sweden

SUBMITTED

Jenny Schulze, Testing and Science Manager (Sweden)  
NADO - NADO

### General Comments

**4.10.2c)** Include the start date as to when an athlete enters the RTP or TP

ADSE supports entering pool start dates in ADAMS.

In addition, we would suggest an update to the ADAMS system, allowing ADOs to keep track of the history of pool changes, inclusions and exclusions.

#### 4.10.9 Requirements for providing Training Locations

ADSE supports changing Regular Activities to Training Location(s), however, we do not support to ask for mandatory daily provision of both a 60-minute time slot, overnight address AND training location 365 days per year. This is not proportional to the ADO requirement to perform three OOC tests per year and will create an unreasonable amount of stress on the RTP athletes. We suggest making it mandatory to provide a training location one day per week and narrow the time span down to when the athlete can actually be found at the training location. This would then provide us with an address where the athlete may be found also on other days of the week. If the athlete is a cross-country skier or a cyclist, there is likely at least one occasion per week where the athlete trains at a facility where doping control can be performed (i.e. not an address where the athlete starts and finishes the training activity).

We would also like to stress the importance of a system that does not punish and creates stress for the athletes who tries to lead by example by detailed reports, where a filing failure for a detailed report that is incorrect is much easier to prove compared to a filing failure for a vague report with a large time span.

Implementing filing failures for these kinds of activities (containing general timeframes where proof of filing failure is hard to find), challenges the ability of ADOs to ensure equal treatment of athletes, and will increase the administrative load substantially. It also risks to decrease the athletes' confidence in the whereabouts system, since the number of filing failures will increase significantly and most athletes are, after all, trying to do the right thing.

**4.10.9 b)** It is crucial that giving more specific time frames for Training Locations shall not lead to more filing failures (since these will be easier to prove), i.e. punishing athletes that try to do the right thing.

#### 4.10.6.2e Include and upload as part of their Whereabouts Filing an accurate passport style photograph to their *ADAMS Athlete* profile page

WADA needs to ensure that ADAMS is fit for this purpose and that the uploading of a photograph will not slow the system down even more.

### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

#### General Comments

While testing at training venues is preferred, having regular activities listed also helps as all training venues are not suitable for OOC testing and completing the related sample collection paperwork.

The inclusion of photographs is a good one.

### Chair

SUBMITTED

Athlete Council, WADA (Canada)  
Other

#### General Comments

#### 4.10.6.2 c) Athletes must include daily training locations and times in Whereabouts

#### 4.10.9 Requirements for submitting training locations

#### 4.10.9.1 d) Athletes must provide a reason for not training on given day

We do not support the proposal to require athletes to submit their daily training locations and times in their quarterly whereabouts filing because it is impossible for the large majority of athletes. Even athletes with regular (e.g. indoor facility) training locations do not typically know their schedule three months in advance. Athletes would therefore knowingly provide wrong information in order to satisfy the quarterly filing requirements, and then would need to provide constant daily (or even more frequent) updates in order to maintain accurate whereabouts. This is overly burdensome and would create a significant risk for whereabouts failures.

Under the current system, the requirement to submit "Regular Activities" is easily circumvented in ADAMS. We would be opposed to tightening this requirement for the same reasons listed above.

We do not support the proposed requirement of 4.10.9.1 d for athletes who are not training on a particular day to "detail whether it is a rest day, travel, vacation, injured or other." This requirement goes well beyond the scope of Whereabouts and constitutes an unnecessary invasion of athlete privacy.

**General Comments**

*"Name and address of the training location(s) where the Athlete will train as well as the general time frames for such training activities (morning, afternoon, evening); "*

There is concern about whether the revised version is sufficient for test planning as the wording "*name and address of the training location(s) where they will train*" and broad definition of morning, afternoon and evening might cause problems especially looking at the different handling of whereabouts filing and failures.

Given that ADOs encountered numerous Filing Failure cases related to regular activities, there is concern about whether the revised "*will train*" provision is sufficiently strict. Athletes might claim (again), when faced with a potential Whereabouts Failure, that while they intended to train at a specific location, their plans changed due to factors such as weather or health conditions. Additionally, the broad definitions of morning, afternoon, and evening remain vague.

- Athletes might claim, when faced with a potential Whereabouts Failure, that while they intended to train at a specific location, their plans changed due to factors such as weather or health conditions.

- The new wording "*will train*" potentially exacerbates the unequal treatment of athletes across different sports. For instance, swimmers and Judokas can easily identify and report their training locations, making them more susceptible to Filing Failures. In contrast, cyclists, triathletes, marathon runners, and Nordic skiers, who train over large areas, may struggle to provide specific locations, reducing the likelihood of Filing Failures. Consequently, the first group may face stricter scrutiny and more frequent Filing Failures, because their fixed locations and narrower time windows make it easier for them to be scrutinized and penalized, leading to an inequitable application of the Whereabouts requirements across different sports.

Therefore, the primary objectives concerning "Whereabouts and Whereabouts Failures" should be to provide clear guidance for athletes and ADOs, achieve international harmonization across all ADOs, and ensure equal treatment of athletes across all sports.

We suggest to define this paragraph more clearly and to not delete the regular activities (such as university courses, school hours, job hours,...) but keep it as well as training. If athletes add regular activities, that's beneficial because more Whereabouts information is available. There is a need for a harmonized sanctioning system if whereabouts requirements are not fulfilled.

Furthermore, the term "training" / "training activity" should be defined in a more concrete and legal way:

Is it only the specific exercise that is related to the sport performed by the athlete or could training also mean physiotherapy, regeneration, preparing the bike, etc.? Would be good to have some examples in the IST / WADC

**International Testing Agency****General Comments**

## 4.10.2.c)

We fully support the proposal to include the date and end date in ADAMS for the inclusion/exclusion date and details behind the inclusion/exclusion of an athlete in the RTP/TP in ADAMS. For that purpose, the ADAMS athlete profile section will require further improvements to be able to accurately document/review the history of an athlete's testing pool status, especially for athletes who have been excluded/excluded multiple times by one (or more) ADO(s).

## 4.10.4.2 (and 4.10.13.5 for TP inclusion)

To add that Athletes do not have the right to challenge or refuse their inclusion in a RTP or TP, nor do they have the right to obtain the reason why they were included in a RTP or TP. Based on our experience, more and more athletes challenge or question why they were included in a RTP/TP. Since the 2017 IST suggests to have those criteria better defined, this is likely to increase some Athletes' appetite to challenge their inclusion.

## 4.10.6.2e)

As athletes' pictures are now mandatory, ADAMS should include functionalities to verify that submitted photos meet the required standards. Additionally, consider clarifying in a comment whether the absence of a photo could result in a filing failure or be considered an inaccuracy by the TA/SCA that could prevent the test from being conducted.

## 4.10.12.1

We fully support the addition of a requirement in the IST to conduct more testing outside of the slot. In order to monitor this effectively, more accurate and reliable monitoring tools/features will need to be introduced in ADAMS to enable ADOs to monitor that testing is conducted in line with these requirements.

## 4.10.12.2

We support the principle but for the discipline around the timeframe before/after the slot consider refining the language (use of “shall not” vs other drafting options, e.g. “should not be prioritized (unless appropriate)”), to avoid creating a (short) time-frame (1h before the slot) in which athletes may infer that testing cannot happen; and to avoid excessive burdens on ADOs. Furthermore, if the distance between the 60-minute time slot, Overnight accommodation and training venues may be significant and we cannot expect DCOs to have to go to each location before issuing an UAR. Does this mean that a FF cannot be pursued unless the DCO went to all locations? A “where appropriate” could be added.

4.10.14

We strongly recommend to maintain the option for ADO to collect very limited whereabouts information from athletes included in General Pools, and also to clarify that such limited information may be collected also via third parties such as National Federations.

In its current formulation, the provision seems redundant insofar as it doesn't create any obligation for the ADO (e.g. notification of inclusion, collection of WB via ADAMS, etc.) or on the athlete (“no whereabouts requirements”); as per Code art. 5.2 ADO can test athletes at any place and time, and the current formulation is not adding any substance to the Code principle.

4.10.18.1c)

We support this but recommend to clearly specify which ABP samples the requirement shall apply to (i.e. Hematological Module, or Endocrine and Steroidal Modules too)?

#### DoCoLab - UGent

SUBMITTED

Peter Van Eenoo, Prof.Dr. / director (Belgium)

Other - WADA-accredited Laboratories

##### General Comments

§4.10.8: the timelines for entry of DCF here are way too big. they allow fraude, as laboratory results are available before this data must be entered. Hence, ADO -willing to commit fraude- can change identity easily. This is for ABP and regular samples.

##### Suggested changes to the wording of the Article

DCF shall be entered within 5 working days into ADAMS

##### Reasons for suggested changes

§4.10.8: the timelines for entry of DCF here are way too big. they allow fraude, as laboratory results are available before this data must be entered. Hence, ADO -willing to commit fraude- can change identity easily. This is for ABP and regular samples

### Article 5 (7)

#### SA Institute for Drug-Free Sport

SUBMITTED

khalid galant, CEO (South Africa)

NADO - NADO

##### General Comments

5.3.4. For a third party to identify an athlete should be sufficient.

#### UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

##### General Comments

5.3.3 - UKAD supports the amendment to the ID requirements for the SCP which makes it more aligned to the requirements of the Athlete. UKAD proposes some minor amendments to bring greater alignment as to what is allowed for an Athlete whereby an electronic copy is accepted and to include that a Testing Order is an accepted form of authorisation to test. Consideration should be given to how an Athlete with a vision impairment may be able to confirm an SCP's identification.

With regards to Athletes with a vision impairment, should brail be considered for ID and/or another alternative?

5.4.4 - UKAD has previously proposed that clarity was provided on WADA's position with respect to showers and ice baths but no amendments have been made. UKAD wishes this to be reconsidered because there are variations in applications, i.e. some ADOs permit showers and others do not, therefore Athletes are subject to different processes.

UKAD's position is that showers should not be permitted unless there is a health and safety reason or in the event where it is a blood only collection. Ice baths are considered part of an athlete's cool down and is something UKAD would permit.

#### Suggested changes to the wording of the Article

5.3.3 - UKAD proposes the following wording change to Article 5.3.3:

*Sample Collection Personnel shall have official documentation, provided by the Sample Collection Authority, evidencing their authority to collect a Sample from the Athlete, such as an authorization letter from the Testing Authority or an ADAMS Testing Order (or equivalent). This can be presented as a hardcopy or as an electronic copy. Sample Collection Personnel shall carry an identification card from the Sample Collection Authority and complementary government issued identity document that includes their name and photograph (i.e., driver's license, health card, passport or similar valid identification) and the expiry date. The Sample Collection Personnel may present an electronic version of their identity document contained on their personal device such as a mobile phone.*

5.4.4 - If included, UKAD proposes the following wording to be included as a comment to 5.4.4:

*Showers shall not be permitted/accepted as a reason for delay unless there is a health and safety concern or where it is a blood only collection. Ice baths are considered an activity as part of an athlete's warm down and may be permitted.*

#### Reasons for suggested changes

5.3.3 - Brings consistency with the requirements of an Athlete and to reflect the common form of authorisation letter (Testing Order).

Also, ensures consideration for Athletes with a vision impairment (in the absence of a rep).

5.4.4 - Ensures greater consistency and application with regards to showers and ice baths.

#### Agence Nationale Antidopage

SUBMITTED

Agence Nationale Antidopage Tunisie, Direction Générale (Tunisie)  
NADO - NADO

#### General Comments

Alors que l'ANAD est favorable à l'exigence de tentatives à toute localisation incluse sur les informations de localisation dans le sens où il faut consentir tous les efforts possibles pour localiser et tester sans préavis, cependant il serait aussi opportun pour des raisons de bonne gestion des aspects logistiques de limiter le nombre de localisations à tenter à une valeur et un périmètre raisonnable.

#### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

#### General Comments

**Article 5.2.d:** Although there is no change, we are reiterating our comments from the last Code review. Consider changing the wording from "...to the arrival at the designated Doping Control Station" to "to the end of Sample Collection" which will ensure, for example, that it is clear the athlete must continue to be chaperoned if they leave the doping control station to attend medal ceremony.

**Article 5.4.2.c:** Given the space limitations on paper and electronic Doping Control Forms we would suggest this is documented in a Supplementary Report

#### Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

#### General Comments

SIA suggests that WADA develop or strengthen guidance materials or procedures that improve methods of communication with athletes at notification and during doping control, who are from multicultural, transgender and gender diverse backgrounds and those athletes who are more vulnerable including minors.

This suggestion is applicable to all provisions where there is direct interaction with Athletes and other Persons under the Code and IS (for example, in particular the ISE).

USADA

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

SUBMITTED

General Comments

Article 5.2

We would like to seek clarification on what types of communication initiates notification, e.g. phone calls.

NADA India

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

General Comments

Article 5.3.3: Identification Requirements for Sample Collection Personnel

We agree and endorse the proposal of requirement of deputed DCO attempting to collect samples from athletes to carry additional govt. approved photo Id card in addition to the valid ac accreditation issued by the ADO.

Article 5.3.1 (17)

World Rugby

David Ho, Senior Manager Anti-Doping Operations (Ireland)  
Sport - IF – Summer Olympic

SUBMITTED

General Comments

World Rugby considers that some qualification may be needed here on the requirement for the DCO to visit all locations that an athlete has filed. Does it mean on that day, that week, and what happens if the locations are some distance apart? Adding a suitable qualifier such as 'within reason' would seem necessary to accommodate such extreme circumstances.

Council of Europe

Council of Europe, Sport Convention Division (France)  
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

SUBMITTED

General Comments

Art. 5.3.1 Requirements prior to Notification (Phone calls to athletes outside its current permitted use)

The definition of “advanced notice” needs a clearer definition and differentiation. When the provided locations are illogical (for example in different countries or many kilometres apart) there is no sense to visit all locations before the DCO can call the athlete.

NADA

NADA Germany, National Anti Doping Organisation (Deutschland)  
NADO - NADO

SUBMITTED

General Comments

5.3.1 The definition “advanced notice” needs a clearer definition and differentiation. When the provided locations are illogical (for example in different countries or many kilometres apart) there is no sense to visit all locations before the DCO can call the athlete.

## ONAU

JOSE VELOSO, Antidoping Medical Director (Uruguay)  
NADO - NADO

SUBMITTED

### General Comments

A DCO shall not call an athlete outside of the 60-minute time slot unless they have been instructed to do so by the Testing Authority and where the exceptional circumstances listed exist;

### Suggested changes to the wording of the Article

SUPPORTED

## NADA India

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

### General Comments

We agree and endorse the proposal of making the DCO attempt a phone call to RTP players in consultation with TA as outlined in the provision.

And as a result of following the phone call, if the attempt is successful and a sample is collected, the test shall be recorded in ADAMS as advance notice.

However, more information is needed in this type of Advance test whether it can be considered under minimum nos. of OOC tests required for RTP players under whereabouts requirement.

## UK Anti-Doping

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

SUBMITTED

### General Comments

5.3.1 - UKAD is supportive of the amendments made to clarify that In-Competition notification can take place before or after the Competition. There is a formatting error in the repetition of the word 'Normally'.

Comment to 5.3.1 - Whilst UKAD does not permit phone calls when attempting to locate an Athlete during their 60-minute timeslot, UKAD wishes to provide comments on this due to the prescriptive nature of the comment to article 5.3.1.

The comment to article 5.3.1 goes into significant detail as to the steps that a DCO should undertake prior to making the phone call e.g. *'DCO must first have visited all of the locations that the Athlete has filed as part of their Whereabouts Filing that are outside of the 60 minute time slot and attempted to locate the Athlete e.g. training location(s), overnight address and any other whereabouts locations...'*

This is impractical for a DCO to apply, for example it would not be of benefit to attempt a training venue in the Athlete's whereabouts if it is outside the venue's opening hours. There may also be significant distances to travel between each location.

UKAD has concerns that the application of this and what is deemed as '*reasonable*' will be open to inconsistencies in application by ADOs and DCOs '*...the Athlete is required to comply with the DCO's reasonable request to provide a Sample. The DCO is responsible for meeting the Athlete at their current or an alternative and agreed location within a reasonable time period to collect the Athlete's Sample... failure to comply with the DCO's request to provide a Sample and/or a failure to meet the DCO at the agreed location may be pursued (if the circumstances so warrant) as a potential anti-doping rule violation*'

UKAD would also propose a reordering since this is to be applied in specific exceptional circumstances provided and therefore these should be listed before detailing what is expected of the DCO.

### Suggested changes to the wording of the Article

5.3.1 - When considering the last sentence of article 5.3.1, the word '*Normally*' at the start of the sentence should be deleted as it is repeated later in the sentence.

Comment to 5.3.1 - UKAD proposes the following changes and reordering to the comment to Article 5.3.1:

*'A DCO shall not call an Athlete outside of the 60-minute time slot unless they have been instructed to do so by the Testing Authority and where exceptional circumstances exist.*



Exceptional circumstances shall be limited to those listed below.

i) A location where the entry to the building where the Athlete may be located (and is not a location provided in their Whereabouts Filing) has restricted access and the DCO has no other way of gaining access other than by contacting the Athlete e.g., no intercom or front desk reception or a location where the details of where the Athlete may be located (and is not a location provided in their Whereabouts Filing) is limited i.e. limited street names or house numbers are used.

ii) APMU Target Test request that is time sensitive.

iii) Follow up Test to evaluate whether the Athlete is a carrier of the EPO variant gene.

iv) Validation of a national or world record based on the rules of the National or International Federation and where there is no Sample collection taking place at the Competition where the record was achieved.

Before attempting to call the Athlete **and, where logistically possible**, the DCO must first have visited all of the locations that the Athlete has filed as part of their Whereabouts Filing that are outside of the 60 minute time slot and attempted to locate the Athlete e.g. training location(s), overnight address and any other whereabouts locations the Athlete may have provided or to which the Anti-Doping Organization may have Anti-Doping Intelligence on as to where the Athlete could be located either prior to the test attempt or which was obtained by the DCO during the attempt to Test and which are outside the Athletes whereabouts locations (where applicable). **Where it is deemed not logistically possible, the DCO shall document the reasoning for not attempting at alternative locations provided.**

If the DCO makes a call outside of the 60-minute time slot due to exceptional circumstances, and the Athlete answers the DCO's call, the Athlete is required to comply with the DCO's request to provide a Sample, **where it is deemed logistically possible by the DCO**. The DCO is responsible for meeting the Athlete at their current or an alternative and agreed location within ~~a reasonable time period~~ **XX time period OR agreed time** to collect the Athlete's Sample. **The Athlete is responsible for remaining or attending the agreed location at the agreed time.** On arrival to the agreed location where Sample collection will occur, the DCO will notify the Athlete of their selection for Testing, collect the Sample and complete the applicable documentation. A failure to comply with the DCO's request to provide a Sample and/or a failure to meet the DCO at the agreed location may be pursued (if the circumstances so warrant) as a potential anti-doping rule violation.'

#### Reasons for suggested changes

Comment to 5.3.1 - Practical concerns with implementation as well as providing greater clarity to reduce the vagueness on what is deemed reasonable, particularly, should an ADRV be pursued as a consequence.

#### Finnish Center for Integrity in Sports FINCIS

SUBMITTED

Marjorit Elorinne, Quality Manager (Suomi)  
NADO - NADO

#### General Comments

Comment to 5.3.1: A DCO shall not call an Athlete outside of the 60-minute time slot unless they have been instructed to do so by the Testing Authority and where exceptional circumstances exist.

--> general comment to this: FINCIS DCOs are never calling athletes, but in our system it will be authorized FINCIS representative (see also comment to 4.10.7.1 h)

However, before attempting to call the Athlete the DCO must first have visited all of the locations that the Athlete has filed as part of their Whereabouts Filing that are outside of the 60 minute time slot and attempted to locate the Athlete e.g. training location(s), overnight address and any other whereabouts locations the Athlete may have provided or to which the Anti-Doping Organization may have Anti-Doping Intelligence on as to where the Athlete could be located either prior to the test attempt or which was obtained by the DCO during the attempt to Test and which are outside the Athletes whereabouts locations (where applicable). Exceptional circumstances shall be limited to those listed below

--> Visiting all the locations which athlete has specified in ADAMS is not always possible or practically feasible as locations can be very far away from each other and training location information is not always very useful in this sense due to 5-7 hour time frame and without exact location (4.10.9.1 b/c)

--> It is also a bit unclear how this comment to 5.3.1 relates to athletes who are not RTP/Testing pool athletes at all as they don't provide any whereabouts information but are tested a lot as part of our national testing program and very often OOC tested at their home addresses where a family member might be present but the athlete not and then it would make sense (at least in most cases) to call athlete right away as the family member informs the athlete about the test attempt anyway?

#### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

#### General Comments

**Article 5.3.1:** Given the importance of the information, consider moving the information from the comment into its own article. Also consider including a comment stating "within reason" if, for example, the athlete has failed to update their whereabouts and lists a training



venue/accommodation that the ADO knows to be incorrect or if the athlete is travelling on the date of the attempt and some of the filed locations are impossible for the DCO to travel to.

#### Suggested changes to the wording of the Article

*Proposed Wording:* A DCO shall not call an Athlete outside of the 60-minute time slot unless they have been instructed to do so by the Testing Authority and where exceptional circumstances exist. However, before attempting to call the Athlete the DCO must first have visited all of the locations, within reason, that the Athlete has filed as part of their Whereabouts Filing for that day, that are outside of the 60-minute time slot. (e.g. training location(s), overnight address and any other whereabouts locations the Athlete may have provided). Exceptional circumstances shall be limited to those listed below.

### Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)

NADO - NADO

#### General Comments

SIA suggests this comment be amended to also allow a DCO to call where it is unreasonable to try all of the locations. For example, the locations listed or the timeslot and distance between locations may mean it is not feasible or possible for a DCO to try all locations.

As noted in relation to Article 5.0 – Notification of Athletes, and in addition to the changes outlined in 5.3.1, we suggest that WADA develop or strengthen guidance materials or procedures that improve methods of communication with athletes at notification and during doping control, who are from multicultural, transgender and gender diverse backgrounds and those athletes who are more vulnerable including minors.

#### Suggested changes to the wording of the Article

SIA suggests the Comment to Article 5.3.1 be amended to include the additional wording:

**“For tests where an Anti-Doping Organization is attempting to test an athlete outside of their designated 60-minute time slot, A DCO shall not call an Athlete outside of that 60-minute time slot unless they have been instructed to do so by the Testing Authority and where exceptional circumstances exist. Exceptional circumstances shall be limited to those listed below:**

i. A location where the entry to the building where the Athlete may be located (and is not a location provided in their Whereabouts Filing) has restricted access and the DCO has no other way of gaining access other than by contacting the Athlete e.g., no intercom or front desk reception or a location where the details of where the Athlete may be located (and is not a location provided in their Whereabouts Filing) is limited i.e. limited street names or house numbers are used.

ii. APMU Target Test request that is time sensitive.

iii. Follow up Test to evaluate whether the Athlete is a carrier of the EPO variant gene.

iv. Validation of a national or world record based on the rules of the National or International Federation and where there is no Sample collection taking place at the Competition where the record was achieved.

**v. where circumstances make it unreasonable for the DCO to visit all nominated locations in a reasonable amount of time (e.g. time of day/night and/or distance between locations)**

#### Reasons for suggested changes

SIA agrees with the starting position be that the DCO does not call the athlete unless otherwise instructed to do so. However, we suggest that if it is impractical for field staff to visit all of the locations that the athlete has filed as part of their whereabouts filing. The exceptional circumstance is expanded to include a circumstance where it is unreasonable to visit all locations and as such the ADO and can instruct the DCO for when to call an athlete based on their own assessment and circumstances.

In addition to the changes outlined in 5.3.1, SIA suggests that WADA develop or strengthen guidance materials or procedures - These guidance materials or procedures should enhance the understanding of both the athlete and sample collection personnel, which, the absence of, may otherwise lead to conflict during notification or prohibited conduct that may lead to a potential ADRV.

### Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

#### General Comments

We strongly appreciate the specifications in the comment to this article about DCOs calling the athletes. It is with great concern that we observe that some ADOs are asking the DCOs to call the athletes as part of the regular process which undermines the very idea of No Advance Notice Testing. Having said this, it is crucial that WADA will monitor and enforce this provision within the scope of its compliance monitoring program.

## Anti-Doping Norway

SUBMITTED

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)

NADO - NADO

### General Comments

We strongly support the comment that a DCO shall not call an Athlete outside of the 60-minute time slot unless they have been instructed to do so by the Testing Authority and where exceptional circumstances exist.

## NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

### General Comments

The term "advance notice" requires a clear and precise definition, including a differentiation of its specific meaning in this context.

Additionally, when the locations provided by the athlete are impractical, such as being in different countries or separated by significant distances, it may not be reasonable to visit all locations before the DCO can contact the athlete.

## Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

### General Comments

**Comment to the comment 5.3.1: it should be added the mention of “announced test” also In case there is a call to the athlete out of the 60-minutes slot.**

**As general comment, it is suggested that this level of information becomes part of a future technical document. An IS should stay a level 2 document.**

## Anti-Doping Sweden

SUBMITTED

Jenny Schulze, Testing and Science Manager (Sweden)

NADO - NADO

### General Comments

#### 5.3.1 Requirements prior to notification of athletes

**[comment to 5.3.1]** ADSE is experiencing increasingly often that the intercom to accessing apartment buildings goes directly to the athlete's mobile phone (whether they are at home or not). Therefore, we have instructed our DCOs in these cases to call them directly (instead of using the intercom) and if they are at home in their apartment, ask the athlete to stay on the phone with the DCO and come down and open the door. If the DCO keeps the athletes on the phone until they are notified, we consider this a “no advance notice”. This goes both for attempts in- and outside of the 60-minute time slot. We think that it is only a matter of time until all apartment buildings will be restricted in this way. If you agree that this is a reasonable solution, we suggest some wording around this.

**[comment to 5.3.1]** Regarding if the DCO makes a call outside of the 60-minute time slot and the DCO and athlete agrees on a location within a reasonable time period it should be clarified in this section that such a sample collection shall also be recorded in ADAMS as advance notice.

## Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)

NADO - RADO

### General Comments

In noting the inclusion of allowing phone calls to athletes, it must be considered whether the provision of the DCO visiting all filed locations is feasible /logistical possible. Further clarity might be required here.

#### WADA NADO Expert Advisory Group

SUBMITTED

Martin Holmlund Lauesen, member (Norge)

Other - Other (ex. Media, University, etc.)

##### General Comments

The definition “*advance notice*” needs a clear definition and differentiation.

When the provided locations are illogical (for example in different countries or many kilometers apart) there is no sense to visit all locations before the DCO can call the athlete.

#### International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

Other - Other (ex. Media, University, etc.)

##### General Comments

5.3.1

“Normally” is repeated

5.3.3

Clarify which identification card (Sample Collection vs ID card) the expiry date shall refer to.

#### Article 5.3.4 (13)

#### World Rugby

SUBMITTED

David Ho, Senior Manager Anti-Doping Operations (Ireland)

Sport - IF – Summer Olympic

##### General Comments

Though World Rugby supports the general principle, providing ID cards (distinct from event accreditation) may be difficult for volunteer chaperones such as those required at certain major events.

#### Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)

Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

##### General Comments

Art. 5.3.4 Identification Requirements for Athletes selected to provide a Sample for Analysis

This regulation raises questions with data protection regulations in the different countries as well as questions on the practical handling.

#### NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

## General Comments

5.3.4 The possibility that athletes can identify themselves via an electronic version generally increases the possibilities of identification and thereby also the possibility that an athlete can be identified by the Sample Collection Personnel. To minimize possible fakes only official digital documents should be accepted that are as well permitted under national law. To data protection concerns should be taken into account.

## NADA India

SUBMITTED

NADA India, NADO (India)

NADO - NADO

## General Comments

We agree to the proposal to some extent as athletes may not have such identity like accreditation card etc. during OOC test.

Presently, NADA India utilizes government-approved identity cards such as the Aadhaar card or Passport to verify athletes' date of birth when completing doping control forms. We endorse the proposal to incorporate government-issued documents containing a photograph as a means to authenticate an athlete's identity. This includes uploading the photo ID of RTP/TP athletes into ADAMS and empowering Doping Control Officers (DCOs) to capture an athlete's photograph for identity validation.

Additionally, it is suggested that NADO should have the authority to designate the accepted forms of identification for their respective countries, allowing for the use of at least two different government-issued IDs.

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

## General Comments

5.3.4 (a) - UKAD supports the amendments made to article 5.3.4 (a) which stipulates that government issued identity document should be the first and primary form of identification that should be presented by an Athlete and that it can be accepted in electronic format.

UKAD does not support the use of an Athlete's photograph submitted within their ADAMS Athlete profile as a secondary option due to practical considerations and concerns relating to how validation/verification of the photo submitted by the Athlete is conducted, how often it should be updated, and that this could potentially make this administratively burdensome for ADOs. Or is it expected the process would mirror tools used by other apps e.g. banking apps, which uses biometrics to validate? If it were to be included, reference to potential repercussions e.g. tampering ADRV, for an Athlete for failing to provide or for providing an inaccurate photo (e.g. if they submitted one of another person) should be incorporated. It should also be made clear that this cannot be updated 'last minute' e.g. as a test attempt is being made, to avoid potential manipulation by a doping Athlete. Furthermore, there are concerns of the impact of these files could have on the functioning/speed of ADAMS.

UKAD proposes that the secondary alternative in an Out-of-Competition scenario, is that the Sample Collection Personnel conducts an online verification search and documents the source and takes an accompanying photo to support the identification verification.

UKAD further proposes the removal or amendment of the wording relating to third party identification. It currently feels too open e.g. how do you determine who has a personal connection to an Athlete? UKAD proposes that the use of third-party identification is limited to an Athlete Support Personnel so that appropriate action could be taken should they falsely identify an Athlete. If the drafting were to remain the same, there should be a minimum level of information that is recorded by all ADOs to ensure consistency and enable follow-up where required.

Finally, UKAD proposes that it is amendment to 'Sample Collection Personnel' so that Chaperones can be included/used for verifying an Athletes identification.

5.3.4 (b) - Following on from comments to article 5.3.4 (a), for In-Competition settings, UKAD proposes the third option of identification is using team/shirt/race numbers against an official team sheet/start list, before the consideration of the Sample Collection Personnel conducting an online search and taking a photo.

## Suggested changes to the wording of the Article

5.3.4 (a) - UKAD proposes the following changes to Article 5.3.4 (a):

*'If the Athlete is not readily identifiable during an Out-of-Competition Test based on the above requirements, then the Sample Collection Personnel shall conduct an online search of the Athlete and take an accompanying photo. The Sample Collection Personnel shall record*

the details of the online website/address used to identify the Athlete. Failing this, an Athlete Support Personnel may be used as a third party to identify the Athlete. If a third party is available to identify the Athlete they too will be required to provide a government issued photo identity document to validate their identity, and, as a minimum, the name and role/relationship of the third party to the Athlete shall be documented. The Athlete should be reminded of their responsibility to provide ID.'

5.3.4 (b) - UKAD proposes the following changes to Article 5.3.4 (b):

*'For In-Competition Testing, if the Athlete is not able to present a government issued photo identity document, then the DCO may consider i) an official event photo accreditation badge for international sports events that the International Federation or Major Event Organizer has issued, or ii) using their shirt/race number against an official team sheet/start list. If the official event accreditation pass or the Athlete's shirt/race number are not available then iii) an Athlete Support Personnel may act as a third party who can accurately identify the Athlete shall be sought to support the Athlete's identification which shall be documented as outlined in Article 5.3.4 a).'*

#### Reasons for suggested changes

5.3.4 (a) - Concerns over the potential administrative burden and impact on function of ADAMS for using the Athlete's ADAMS profile picture, as well as potential manipulation/tampering by a doping Athlete.

Concerns over the third-party identification inclusion and inconsistencies in approach by ADOs, therefore, changes proposed should make this more manageable and enable follow-up action when required.

5.3.4 (b) - In-Competition settings provide alternative methods of identifying an Athlete.

Concerns over the potential administrative burden and impact on function of ADAMS for using the Athlete's ADAMS profile picture, as well as potential manipulation/tampering by a doping Athlete.

Concerns over the third party ID inclusion and inconsistencies in approach by ADOs, therefore, changes proposed should make this more manageable and enable follow-up action when required.

#### Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

#### General Comments

5.3.4 b .... photo accreditation badge for international sports events that the International Federation or Major Event Organizer has issued...

#### Reasons for suggested changes

5.3.4 b If a NADO DCO pass is issued an additional government identity document is also needed. Why should this extra layer not be necessary in case of an IF or MEO athlete badge?

#### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

#### General Comments

**Article 5.3.4.a and 5.3.4.b:** Change "shall" to "should, where possible" for the sentence "...the DCO shall check the *Athlete's* photograph within their *ADAMS Athlete* profile."

#### Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

#### General Comments

SIA suggests this Article be expanded to include additional circumstances and provide further examples of acceptable forms of identification both in and out of competition.

SIA suggests changing 5.3.4 to:

- a) If the Athlete is not readily identifiable, during an Out-of-Competition Test based on the above requirements, then if the Athlete is in a Registered Testing Pool or Testing Pool, the DCO shall check the Athlete's photograph within their ADAMS Athlete profile. Failing this a third party who personally knows the Athlete may be asked to identify the Athlete. If a third party is available to identify the Athlete they too will be required to provide a government issued photo identity document to validate their identity, and the details of the third party's relationship to the Athlete shall be documented. **If OOC testing is performed during a major international event (eg Olympics/World Championships) then an Athlete's official event photo accreditation badge that the International Federation or Major Event Organizer has issued may be used to validate the identity of the Athlete.**
- b) For In-Competition Testing, **An athlete may be identified using** i) an official event photo accreditation badge for sports events that the **National Federation**, International Federation or Major Event Organizer has issued, or ii) **a government issued photo identity document**, or iii) if the Athlete is in a Registered Testing Pool or Testing Pool, their Athlete profile photo within ADAMS or the Athlete's profile photo within ADAMS are not available then **iv)** a third party who can accurately identify the Athlete shall be sought to support the Athlete's identification which shall be documented as outlined in Article 5.3.4 a).

Reasons for suggested changes

SIA supports the use of a government passport style photo. However, there are also other valid forms of identification that may be more applicable depending on the circumstances of the test. We have included these examples in our suggested amendments to this clause.

**NADA Austria**

Dario Campara, Lawyer (Austria)  
NADO - NADO

SUBMITTED

General Comments

This regulation raises concerns regarding compliance with data protection laws in various countries, as well as practical challenges such as file upload size, potential decreases in ADAMS system performance, and other technical considerations.

**Finnish Center for Integrity in Sports FINCIS**

Marjorit Elorinne, Quality Manager (Suomi)  
NADO - NADO

SUBMITTED

General Comments

The Athlete may present an electronic version of their identity document contained on their personal device such as a mobile phone.

--> Clarification is needed what this "electronic version" means - is a photo taken from Passport acceptable or does this mean something else?  
As very often athletes have a photo on their mobile phone...

Would it be acceptable to use official jersey/BIB number in National level events as and ID?

**Swiss Sport Integrity**

Ernst König, CEO (Switzerland)  
NADO - NADO

SUBMITTED

General Comments

When it comes to Third Party identification, we suggest to add an intermediate step, namely that the Athlete should be identified by an ASP, as the first option. This will ensure that, in case of a (deliberately) false identification, this person is also subject to the rules. The identification by a third party other than ASP should be the last resort.

Suggested changes to the wording of the Article

5.3.4: Please change "[...] shall check the athletes photograph [...]" to "[...] should check the athletes photograph".

Reasons for suggested changes

5.3.4.a): SSI will not use Adams for testing management. So our DCOs do not have access to the ADAMS profile of the Athlete.

### Anti-Doping Norway

SUBMITTED

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)  
NADO - NADO

#### General Comments

#### **Comment to 5.3.4. a)**

Could be a (privacy) concern to give all SCP access to the athletes pictures in ADAMS.

### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

#### General Comments

Since identification requirements for athletes have been extended to include 'the use of official electronic versions', consideration should be given in the long term for mitigation against forgeries, altered or AI generated copies.

## Article 6 (5)

### Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)  
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

#### General Comments

Art. 6.3.4: Sample Collection Equipment

The expiration date (2 years) can cause problems with long term storage. As well the different expirations dates for different equipment can be a problem in practice (exception of blood tubes).

### EOKAN/HADA

SUBMITTED

Antonia Kotsia, Head of Doping Control Office (GR)  
NADO - NADO

#### General Comments

6.3.4

f)

iv) Will not degrade or lose its functionality from when the Sample is sealed within the equipment for at a minimum the statute of limitations period. Any expiry date that may be placed on external packaging or on the equipment in which a Sample shall be stored shall take this time period into consideration given Samples may be subject to long term storage. The exception being the vacuum functionality of blood tubes which assists in drawing blood into the tube at the time of collection.

Sample Collection Equipment have an expiration date of about 2 years from the time they are received by an organization.

A urine sample from an athlete needs to be stored for longer than the stated expiration date e.g. 6 years, does this will create a problem?

It needs some samples be stored in long term for about 10 years.

What exactly means the comment in that case?



Agence française de lutte contre le dopage

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

SUBMITTED

General Comments

6.3.4 f)iv

Any expiry date = differentiation by indicating 2 expiry dates is excluded

=> Interpretation mistakes of DCO’s must be anticipated or ADO’s will use material which has e.g. only an EXP period of 7 years left because they intend to use it for a mission with planned storage of only 3 months, but then e.g. APMU decides to put it into long term storage which would then be a problem.

External packaging => only containers are suitable for long-term storage. Packaging material and e.g. watertight bags, absorbers etc. cannot have such a long EXP

This time period => we would need to give an expiry date of 15 years to keep our high standard of guaranteeing 5 years EXP before use.

Blood tubes considered as exception => shorter shelf life of this component is taken into consideration but not that of other items that are equally important e.g. needle or lancet in a DBS kit or watertight bags and absorbant material for transport.

=> The interpretation of EXP is currently standardized for all products, if you open different scenarios, it becomes very complicated and a source of errors.

Suggested changes to the wording of the Article

Will not degrade or lose its functionality from when, the sample is sealed within the equipment for at a minimum 10 years after the EXP date.

Bermuda Sport Anti Doping Authority

Duncan Barclay, Results, Compliance Manager (Bermuda)

NADO - NADO

SUBMITTED

General Comments

6.3.4 (f iv) Expiry vs Functionality

Taking the wording of the article into consideration, should it not be required that all kits manufacturers ensure their integrity for a time period up to the statute of limitations if in long term storage.

If expiry dates are a factor should they be recorded on the DCF and included in 7.4.5 ?

Canadian Centre for Ethics in Sport

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

SUBMITTED

General Comments

Article 6.3.3: Although there is no change, we are reiterating our comments from the last Code review. Change the word “entitlement” to “right,” as the term “right” is more consistent with the language used throughout the IST.

Article 6.3.4 (13)

World Rugby

David Ho, Senior Manager Anti-Doping Operations (Ireland)

Sport - IF – Summer Olympic

SUBMITTED

General Comments

By specifying venous blood and DBS the wording seems to excludes collection of capillary blood beyond just for DBS. Advancements are being made in this area but do not appear to be covered under the IST as it is currently drafted.

## NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)  
NADO - NADO

### General Comments

The paragraph needs more clarification. The expiration date of 2 years might cause problems with long term storage.

## NADA India

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

### General Comments

We agree to this proposal and endorse the criteria for sample collection equipment in this article to ensure that it does not lose its functionality or expire from the point of sealing to the end of the statute of limitations period.

## Autoridade Brasileira de Controle de Dopagem

SUBMITTED

Luciana Corrêa de Oliveira, Resulta Management General Coordinator (Brazil)  
NADO - NADO

### General Comments

This paragraph states that **any** expiration date placed anywhere on a product must take the statute of limitations period into consideration. A side note is that this period and also the term “long term storage” are not defined anywhere in the IST, nor are there any references to the definitions of these terms and therefore, one must independently search for the definitions in the laboratory Standard ISL.

Since the statute of limitations period must be included in the expiry date, a kit must have an expiry date of e.g. 15 years in order to guarantee that as of receipt from the manufacturer you can use it within a period of 5 years, before it is sent to the laboratory for analysis and storage. It will become very confusing and complicated for everyone involved in handling a kit to consider that you cannot use a kit for a doping control anymore although the expiry date shows that it would still be valid for e.g. 9 years. Interpretation mistakes of DCO's must be anticipated because everyone is used to the rule that you only cannot use a kit anymore for testing once the expiry date has passed.

What could happen as well is that some Testing Authorities think that they can still use a kit with an expiry date of 3 years (originally 15 years) for a test that is only planned for a shorter storage period of 3 months. But, what would happen if they send such a kit to the laboratory and then the e.g. the APMU decides that this sample must be put into long term storage?

Blood tubes are the only exception that is mentioned in the new addition, but it will be very confusing if the expiry date must be interpreted differently according to the products. At the moment, the same rule applies to all products and this standardization prevents many interpretation errors.

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

### General Comments

6.3.4 (f) iv - Introduction of a new requirement for sample collection equipment to stipulate that any expiry date placed on packaging shall take into consideration the minimum statute of limitations period.

UKAD wishes to seek clarification as to the implications of expiry dates to avoid misinterpretation:

- Is the expiry date about when the kit is used to collect the sample as that is currently how it is applied to the equipment used i.e. must be used before the expiry. If the expiry is about storage, this has a significant impact and if this is the case, do Samples become invalidated if the expiry date passes e.g. prior to completion of analysis, samples in long-term storage?
- Should the article be phrased in a way that the duration of storage is tested and the manufacturer should guarantee the storage in their material for up to 10 years from when the sample is collected?
- Some packaging material e.g. watertight bags, absorbers etc. cannot have a long expiry date
- Exception has been applied to blood tubes but there are other items that should be considered e.g. needle or lancet in a DBS kit or watertight

bags and absorbent material for transport

- Does the expiry date need to be recorded?

Depending on the above, could result in challenges for suppliers and the current equipment and expiry dates in place.

#### Reasons for suggested changes

6.3.4 (f) iv - Ensures there is no impact on current processes, suppliers/current equipment and recording of information.

#### Canadian Centre for Ethics in Sport

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

SUBMITTED

#### General Comments

**Article 6.3.4.iv:** Clarification is needed from WADA on what the statute of limitations period is. Noting statute of limitations is not defined in the Standard or Code.

#### Sport Integrity Australia

Andrew McCowan, Assistant Director Project Management Office (Australia)

NADO - NADO

SUBMITTED

#### General Comments

Article 6.3.4.iv. SIA is seeking further clarification from WADA as to the intended purpose of this provision as we are not aware of any kit that has a 10-year expiry. Currently there is nowhere to document expiry dates of bottles in ADAMS. What is the process at the laboratory end to facilitate 10 year storage? Current bottles with 2yr expiration – to achieve 10 years the bottles will require decanting and transferring into new container? What does this do to the quality of the sample?

#### Suggested changes to the wording of the Article

The current kits and system do not support this proposed change. As such we are seeking clarification from WADA as to the intent and practical applications of the proposed changes.

SIA suggests the WADA drafting team consider clarifying to ADOs and Labs when reanalyse or disposal of the sample(s) is to occur.

#### NADA Austria

Dario Campara, Lawyer (Austria)

NADO - NADO

SUBMITTED

#### General Comments

Please take into account the original feedback from Berlinger, summarized as follows: The two-year expiration date may pose challenges for long-term storage. Additionally, the varying expiration dates for different types of equipment, excluding blood tubes, could create practical difficulties in implementation.

#### Finnish Center for Integrity in Sports FINCIS

Marjorit Elorinne, Quality Manager (Suomi)

NADO - NADO

SUBMITTED

#### General Comments

iv.

This requirement can cause problems with long term storage as the expiry dates of sealing equipment are not 10 years at the moment and often the expiry date is only placed in in external packaging (laboratory will not store the samples in original external packaging?)

## Korea Anti-Doping Agency

SUBMITTED

Unseon Ji, Senior Testing Manager (South Korea)

NADO - NADO

### General Comments

There are cases where ADOs incur damages due to manufacturing defects in sample collection equipment. Therefore, it is necessary for WADA to strengthen the requirements for sample collection equipment and manufacturers, and to establish a system that enables ADOs to verify whether the equipment and manufacturers meet these requirements.

## Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

### General Comments

There were concerns raised from Sample manufacturers regarding the newly added provisions under litera iv. Namely, it is not possible to place an expiry date on external package that takes into consideration the statute of limitations period as such expiry date does not apply to all components of the kit. E.g., for an urine test kit the expiry date would then be 15 years (5 years expiry before use + 10 years of long term storage). However, components such as the absorber pads or the glue on the sealing strip cannot have an expiry date of 15 years.

We suggest to either address this by adding additional exceptions or by a more generic solutions, e.g., by adding a comment on the external package (e.g., "Storage life of the container is warranted for at least 10 years after expiration")

## Berlinger Special AG

SUBMITTED

Vreni Müller, Head of Sales & Marketing (Switzerland)

Other - Other (ex. Media, University, etc.)

### General Comments

#### 6.3.4 f) iv.

"Will not degrade or lose its functionality from when the Sample is sealed within the equipment for at a minimum the statute of limitations period. Any expiry date that may be placed on external packaging or on the equipment in which a Sample shall be stored shall take this time period into consideration given Samples may be subject to long term storage. The exception being the vacuum functionality of blood tubes which assists in drawing blood into the tube at the time of collection."

1.Statute of limitations period => nowhere in IST defined, but necessary to check the lab standard ISL

2.Any expiry date = differentiation by indicating 2 expiry dates (one for entire kit and one for only fully closed containers) is excluded  
=> Interpretation mistakes of DCO's must be anticipated or ADO's will use material which has e.g. only an EXP period of 7 years left because they intend to use it for a mission with planned storage of only 3 months, but then e.g. APMU decides to put it into long term storage which would then be a problem

3.External packaging => only containers are suitable for long-term storage. Packaging material and e.g. watertight bags, absorbers etc. cannot have such a long EXP

4.This time period => we would need to give an expiry date of 15 years to keep our high standard of guaranteeing 5 years before use.

5.Long term storage => nowhere in IST defined, but necessary to check the lab standard ISL

6.Blood tubes considered as exception => shorter shelf life of this component is taken into consideration but not that of other items that are equally important e.g. needle or lancet in a DBS kit or watertight bags and absorbant material for transport

=> The interpretation of EXP is currently standardized for all products, if you open different scenarios, it becomes very complicated and a source of errors

#### 6.3.4. x)

Allow the collection, inspection, storage, complete drying and secure transportation of dried blood spots on absorbent Sample support that can be sealed as distinct "A" and "B" Samples (Tamper Evident kit consisting of "A" and "B" containers/sub-containers and/or storage sleeves/packages/receptacles).

1.Inspection => what inspection is meant (visual, manual etc.)? Inspection needs to be specified to find out if a kit is compliant with this requirement or not.

## Lockcon AG

SUBMITTED

Monika Egli, CEO (Switzerland)

Other - Other (ex. Media, University, etc.)

### General Comments

As a global supplier of anti-doping testing utensils and Sample Collection Equipment, we welcome the opportunity to comment on the 2027 IST Draft and would like to share with you the following considerations:

The requirements of the new IST Art 6.4.3 f (iv) foresees the assurance of functionality of the Sample Collection Equipment for a (undefined) statute of limitations period and that such expiry date should a) engulf possible long term storage and b) may be placed upon the external package, whilst the vacuum functionality of blood tubes would be excluded from such requirements.

Although the above long term functionality of the Sample Collection Equipment is already now common industry standard which usually meets or exceeds the storage term set forth in Art 5.3.7.1. of the draft 2027 ISL (International Laboratory Standards), the inclusion of such storage end term on the equipment and/or packaging as an (additional) expiry date next to the normal EXP Date (use-by-date; needed for typically enclosed accessories like sterile lancets, swipes, absorbers etc.) would likely lead to misunderstandings and handling difficulties at all user levels i.e. the TA, Sample Collection Personnel and Athletes. Furthermore and as you are aware, the current ISTI and the Draft 2027 IST require for the sampling equipment compliance with applicable medical device regulations. But since many medical device regulations worldwide require an unambiguous EXP Date on the packaging (for the shortest EXP Date of the contained items), an additional storage expiry date may likely lead to additional complications at this end.

However, to achieve the intended functionality assurance whilst maintaining the current simplicity accustomed to by everyone, and especially the Athletes and Sample Collection Personnel, as well as avoiding frictions with many medical device regulations, Art 6.4.3 f (iv) may be rephrased as follows:

iv. Will not degrade or lose its functionality from when the *Sample* is sealed

within the equipment for ~~at a minimum the statute of limitations period~~ storage term defined

in Art 5.3.7.1 of the ISL [International Standard for Laboratories];[Alternatively insert a corresponding definition in Art 3.2].

Any expiry date that may be placed on external packaging or on the equipment in

which a *Sample* shall be stored shall ~~mean the use by date for collecting the Sample~~

according to the Sample Collection Session. ~~take this time period into consideration~~

~~given Samples may be subject to long term storage. The exception being the~~

~~vacuum functionality of blood tubes which assists in drawing blood into the~~

~~tube at the time of collection.~~

**Suggested changes to the wording of the Article**

So in a clear version Art 6.4.3 f (iv) would read:

iv. Will not degrade or lose its functionality from when the *Sample* is sealed

within the equipment for the storage term defined in Art 5.3.7.1 of the ISL [International Standard for Laboratories].[Alternatively insert a corresponding definition in Art 3.2].

Any expiry date that may be placed on external packaging or on the equipment in which a *Sample* shall be stored shall

mean the use by date for collecting the Sample according to the Sample Collection Session.

**Article 7 (4)**

<b>UK Anti-Doping</b>		SUBMITTED
UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)		
NADO - NADO		
General Comments		
7.3.4 - This Article relates to prohibiting the provision and consumption of alcohol within the DCS. Clarification is required around how, and if, this applies to tests at an Athlete's home address/private addresses.		
As a minimum, UKAD proposes to include a comment to Article 7.3.4 to clarify if this is extended to Athlete's home address/private addresses.		
<b>Bermuda Sport Anti Doping Authority</b>		SUBMITTED
Duncan Barclay, Results, Compliance Manager (Bermuda)		
NADO - NADO		

General Comments

7.4.5 should expiry dates of kits be recorded on the DCF in consideration of 6.3.4 (f iv) and samples potentially going into LTS?

Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

General Comments

7.3.2 ... DCO/Chaperone shall ensure that the Athlete has been informed of their rights and responsibilities as...

Suggested changes to the wording of the Article

7.3.2 ... Chaperone **can** ensure that the Athlete has been informed of their rights and responsibilities, **the DCO shall ensure**..... as

Reasons for suggested changes

7.3.2 Ensuring athlete's rights and responsibilities belongs at DCO level.

Korea Anti-Doping Agnecy

SUBMITTED

Unseon Ji, Senior Testing Manager (South Korea)  
NADO - NADO

General Comments

Regarding Article 7.4.5.f, it is also necessary to provide an explanation regarding how to record an athlete's sport gender in the case of out-of-competition testing.

Article 7.4.5 (5)

NADA India

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

General Comments

We agree and endorse this new information to be documented in the DCF.

Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

General Comments

**Article 7.4.5.a:** Please confirm why the inclusion of the Country of test has been added. If deemed necessary, consider including both city and country.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

General Comments

The addition under litera a) of this provisions is problematic in terms of data protection and would potentially jeopardize the athlete's anonymity in the laboratory, especially in smaller countries. As an example, if a sample is collected in Liechtenstein on a male cyclist, it would be very easy for the lab to figure out who the athlete is.

We kindly ask you to reconsider this provision by gauging the benefit of having this information (we can't see any benefit apart of statistics) against the athlete's right for anonymity.

7.4.6: We suggest that every person present in the Doping Control Station and witnessing the process (e.g. Auditors, IF's representatives) should sign the Doping Control Form. In a proceeding, it could be used in the athlete's defense if there were other persons present during the process and if these persons are not captured on the DCF...

#### Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)

NADO - RADO

##### General Comments

The added clarity to this section will have a positive impact re "f) *The sport gender of the Athlete i.e. the gender of the Event the Athlete competes in*"

#### DoCoLab - UGent

SUBMITTED

Peter Van Eenoo, Prof.Dr. / director (Belgium)

Other - WADA-accredited Laboratories

##### General Comments

7.4.5 The following information shall be recorded as a minimum in relation to the Sample Collection Session

As a laboratory, we are getting a wide range of inconsistent terms/abbreviations/etc. The terms that are registered shall be MANDATORY compliant with the ADAMS codes.

This applies to e.g. TA/RMA/SCA, but also sports/disciplines, as well as requested analysis...The range of terms used in electronic forms makes it very difficult to work and generates mistakes.

Just a few examples:

-FISA is the ADAMS terminology, but some SCA use World Rowing, others FISA and some even WR...

- World Athletics - AIU is the ADAMS, term, some still use IAAF and others AIU

- we even get samples with TA indicated as ONAD or NADO...without any specification!

- the same for sports, where unknown disciplines are used, e.g. Athletics: 2 mile

Similar, for electronic DCF: the proper way to work is that the ADAMS codes are used, so that we can easily import the electronically delivered data in our LIMS and then onwards in ADAMS. Here, many times different terms are used:

IC/OOC is indicated also as in competition/out-of-competition, in-competition, etc... this may seem futile, but it means that the data needs to be manually transferred and interpreted. This is exactly what one wants to avoid when going electronic.

For some organizations, you should even 'interpret' the mission code to know if it is IC or OOC.

The same applies to the analysis requested... small peptides/GHRF/... while for ADAMS it is GH|Gnrh.

Please make sure this get's harmonized. There is only 1 standard: ADAMS!

##### Suggested changes to the wording of the Article



7.4.5 The following information shall be recorded as a minimum in relation to the Sample Collection Session. All terms used shall be compliant with ADAMS terminology

#### Reasons for suggested changes

As a laboratory, we are getting a wide range of inconsistent terms/abbreviations/etc. The terms that are registered shall be MANDATORY compliant with the ADAMS codes.

This applies to e.g. TA/RMA/SCA, but also sports/disciplines, as well as requested analysis...The range of terms used in electronic forms makes it very difficult to work and generates mistakes.

## Article 9 (15)

### World Rugby

SUBMITTED

David Ho, Senior Manager Anti-Doping Operations (Ireland)  
Sport - IF – Summer Olympic

#### General Comments

World Rugby support the proposed changes to Article 9 particularly around stockpiling of athlete urine samples

### Ministry of Sport and Community Development

SUBMITTED

Rixon Powder, Technical Administrator (Trinidad and Tobago)  
Public Authorities - Government

#### General Comments

Consider including specifically defined time limits within which urine samples can be stored before shipping to the laboratory or setting deadlines within which to ship urine samples to the laboratory after collection.

### NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)  
NADO - NADO

#### General Comments

9.3.3: It should be possible that some information about additional analyses arrives after the samples at the lab. We suggest to specifically add “information on additional analysis”

### NADA India

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

#### General Comments

We agree and endorse this new requirement.

### Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

#### General Comments

9.3.2: ADOs should be protected from having to take disproportionate measures for transporting the (urine) samples to the lab. There are logistical and/or financial limitations that need to be taken into account. We felt that the addition in the comment to this article will rather increase than relieve

this pressure. As this is legally relevant in a proceeding, consider specifying what "as soon as possible" and "minor shipping delays" mean.

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

### General Comments

Comment to 9.3.2 - UKAD supports the emphasis of the article to not unnecessarily delay samples being sent to the laboratory because of potential degradation risks, however, this comment is too vague. For example it isn't clear what would be considered stockpiling and what is deemed an unacceptable period of time. Furthermore, the article doesn't account for factors outside of ADOs control. For example, laboratories which are closed over a holiday period (e.g. Christmas/New Year) requiring ADOs/DCOs to store/retain samples for a longer period of time than usual. Additionally, the article doesn't take into consideration Major Events, whereby samples may be consolidated together before shipping to the laboratory to manage costs. ADOs may also stockpile samples from a 1-2 day period in order to manage and save on costs.

UKAD proposes that more specific detail is provided to determine timeframes for what would be considered stockpiling and allowing for flexibility to be applied in the event of factors such as planned laboratory closures and Major Event practices.

### Suggested changes to the wording of the Article

Comment to 9.3.2 - UKAD proposes the following changes to the comment to Article 9.3.2:

*Anti-Doping Organizations ~~shall~~ **should** not store or stockpile Athlete's urine Samples (beyond minor shipping delays) **for more than XX working days** prior to sending the Samples to the Laboratory. **Anti-Doping Organisations may apply flexibility to this in exceptional circumstances, e.g. accommodating for laboratory closures, coordinating shipments at Major Events, etc.]***

### Reasons for suggested changes

Comment to 9.3.2 - The Article is currently vague and open to interpretation which could present challenges at hearings and inconsistencies in application by ADOs.

## Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

### General Comments

9.3.4 .... secure electronic transmission...

### Reasons for suggested changes

9.3.4 A definition on secure electronic transmission should be given

## CHINADA

SUBMITTED

MUQING LIU, Coordinator of Legal Affair Department (CHINA)  
NADO - NADO

### General Comments

## Article 9.3.2 Prohibition of Sample Stockpiling

Article 9.3.2 does not allow ADOs to store and stockpile Athlete's urine Samples prior to sending them to the Laboratory. We believe that this Article requires further clarification and definition. In practice, the Laboratory is not always available to receive Samples throughout the day. When the Laboratory is not receiving Samples, the DCO can only send them to the Sample Collection Authority for storage to ensure the security and identity of the Samples. In

addition, some Samples need to be sent to overseas Laboratories for analysis, and the process of obtaining customs clearance for these Samples takes time, during which the Samples must also be temporarily stored at the Sample Collection Authority.

Suggested changes to the wording of the Article

Article 9.3.2 Prohibition of Sample Stockpiling

Article 9.3.2 does not allow ADOs to store and stockpile Athlete's urine Samples prior to sending them to the Laboratory. We believe that this Article requires further clarification and definition.

Reasons for suggested changes

Article 9.3.2 Prohibition of Sample Stockpiling

In practice, the Laboratory is not always available to receive Samples throughout the day. When the Laboratory is not receiving Samples, the DCO can only send them to the Sample Collection Authority for storage to ensure the security and identity of the Samples. In addition, some Samples need to be sent to overseas Laboratories for analysis, and the process of obtaining customs clearance for these Samples takes time, during which the Samples must also be temporarily stored at the Sample Collection Authority.

Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

General Comments

**Article 9.3.2:** Provide clarification on what is meant by “stockpile.” It would be helpful for WADA to establish clear criteria for how long each type of sample can be held before shipping, taking into consideration shipping logistics which may require certain samples to be held (e.g., due to the shipping company’s shipping holiday closures and holiday/weekend hours).

Agence Nationale Antidopage

SUBMITTED

Agence Nationale Antidopage Tunisie, Direction Générale (Tunisie)  
NADO - NADO

General Comments

Nous supportons toute initiative visant à améliorer les délais d'analyse après le collecte d'échantillons y compris l'expédition non groupée des échantillons collectés et sans délai de ceux prélevés en phase préparatives aux évènements sportifs majeurs. Toutefois, une telle exigence doit aussi prendre en considération la répartition géographique des laboratoires antidopage et l'accès inégal entre les différents pays.

Sport Integrity Commission Te Kahu Raunui

SUBMITTED

Jono McGlashan, GM Athlete Services (New Zealand)  
NADO - NADO

General Comments

- We are not supportive of Article 9, emphasizing that ADOs shall not store or stockpile urine samples prior to sending them to the lab.
- There is no definition for what “store or stockpile” means in the document. This would have significant financial implications if we had to send samples immediately to the Sydney lab from our DCO’s in New Zealand immediately after sample collection.

*“This feedback was endorsed by the Athlete Commission of the Sport Integrity Commission Te Kahu Raunui.”*

General Comments

Comment to Article 9.3.2

SIA is concerned this requirement is too prescriptive and prevents action being taken where warranted and required. To address future situations SIA suggests additional wording be added to this comment to allow for exceptional circumstances and where WADA approves stockpiling.

Suggested changes to the wording of the Article

Comment to Article 9.3.2

“Anti-Doping Organizations shall not store or stockpile Athlete’s urine Samples (beyond minor shipping delays) prior to sending the Samples to the Laboratory **except in special circumstances (e.g. supply chain issues and laboratory analytical issues) and where approval from WADA is sought and granted.”**

Reasons for suggested changes

Comment to Article 9.3.2

Occasionally, circumstances will cause stockpiling to occur, which will require an alternate approach.

SIA has had a recent case where we had our samples being shipped abroad because lab was closed, causing them to be stockpiled for 3-5 days and shipped in bulk.

General Comments

*Comment to 9.3.2: Anti-Doping Organizations should discuss transportation requirements for particular missions (e.g., where the Sample has been collected in less than hygienic conditions, or where delays may occur in transporting the Samples to the Laboratory) with the Laboratory that will be analyzing the Samples, to establish what is necessary in the particular circumstances of such mission (e.g., refrigeration or freezing of the Samples).* **Anti-Doping Organizations shall not store or stockpile Athlete’s urine Samples (beyond minor shipping delays) prior to sending the Samples to the Laboratory.] - We suggest to envisage the exception of this requirement, allowing ADOs which collect greater amount of samples or have complex logistics routes to the laboratory to consolidate the samples before the parcel dispatch if the delivery is arranged within reasonable time.**

Suggested changes to the wording of the Article

Comment to 9.3.2: Anti-Doping Organizations should discuss transportation requirements for particular missions (e.g., where the Sample has been collected in less than hygienic conditions, or where delays may occur in transporting the Samples to the Laboratory) with the Laboratory that will be analyzing the Samples, to establish what is necessary in the particular circumstances of such mission (e.g., refrigeration or freezing of the Samples). Anti-Doping Organizations shall not store or stockpile Athlete’s urine Samples (beyond minor shipping delays **or necessary consolidation of Samples in parcels if delivered within a reasonable time**) prior to sending the Samples to the Laboratory.

General Comments

9.3.3:

It should be permitted for information, regarding additional analyses for example, to arrive at the laboratory after the samples. We recommend explicitly adding the phrase "information on additional analysis" to clarify this possibility.

International Testing Agency

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

SUBMITTED

General Comments

9.1b)  
  
We would support the incorporation of a more definitive timeframe (e.g. as early as possible and no later than 7 days after the sample collection) in order to help ADOs enforce such requirement on SCAs.  
  
9.3.2 – comment  
  
Consider providing more detailed guidance in the newly added wording as to what constitute an acceptable delay, to avoid also paving the way to possible claims or challenges in disciplinary proceedings. Additionally, in some countries, shipping samples to overseas laboratories is only cost-effective if multiple samples are sent together. This creates a need to accumulate samples until a sufficient number is collected to fill the shipment box, potentially slightly delaying the process. As a result, meeting this requirement can be difficult unless logistical constraints are eased.

Article 11 (12)

NADA

NADA Germany, National Anti Doping Organisation (Deutschland)  
NADO - NADO

SUBMITTED

General Comments

11.4: here: BP-ID instead of ADAMS ID?  
  
11.10: paragraph needs revision as it is not clear enough  
  
11.11: There needs to be a specification on how the information sharing and testing requests should be done

UK Anti-Doping

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

SUBMITTED

General Comments

A general comment around the formatting of Article 11 and to use subheadings so that it is in keeping with other sections within the IST.

UKAD proposes the formatting of Article 11 follows that of other IST articles with the inclusion of subheadings. For example:

- i. objective
- ii. general principles (include articles 11.1, 11.4, 11.5, and 11.6)
- iii. ADO requirements (include articles 11.2, 11.3, 11.7, 11.8, 11.9, 11.10, and 11.11)

11.3 - UKAD supports the importance of undertaking APMU recommendations wherever possible, however, there are budget and resource constraints that need to be considered for ADOs. The phrasing that ‘*any request received from an APMU.....are implemented*’ suggests there is little flexibility for ADOs. We acknowledge that ADOs shall document the rationale in ADAMS for not undertaking an APMU’s request, however, UKAD thinks it could be clearer and/or acknowledge that ADOs can decline if they need to prioritise due to budget/TDP constraints.

Furthermore, these requests may be triggered by testing conducted by another ADOs and therefore, consideration should be given to providing flexibility in who should undertake the APMU request i.e. the ADO can ask the Testing Authority for the associated test to follow-up/complete the APMU request.

Suggested changes to the wording of the Article

11.3 - UKAD proposes the following changes to Article 11.3:  
  
*'The Anti-Doping Organization shall monitor and ensure that any request received from an APMU in relation to a Sample collected under the Athlete Biological Passport program for either an APMU Further Analysis (e.g., to conduct analysis such as IRMS, ERAs or hGH) or an APMU Target Test are implemented within the time frames provided by the APMU, ~~as appropriate~~ wherever possible, and where the Anti-Doping Organization was unable to carry out such requests e.g. due to budget, TDP or other reason, the Anti-Doping Organization shall document their reasoning in ADAMS.*

Anti-Doping Organisations and APMUs are encouraged to discuss and prioritise requests received to accommodate budget and TDP constraints that are received.

In the event that a request for Further Analysis or Target Test is received as a result of a test conducted by another Anti-Doping Organisation who is not the Passport Custodian, the Anti-Doping Organisation may pass on the APMU request to that Anti-Doping Organisation to implement. If they decline, the Anti-Doping Organisation (Passport Custodian) should assess if they can undertake the request and, where they deem they are unable to undertake the request, they shall document the reasoning in ADAMS.\*

Reasons for suggested changes

11.3 - To provide greater flexibility to Anti-Doping Organisations for undertaking APMU requests.

Sport Ireland

SUBMITTED

Cólleen Devine, Director of Anti-Doping & Ethics (Ireland)  
NADO - NADO

General Comments

Requirement that all APMU recommendations have to be followed does not consider budgets or costs of ADO.  
Requirement that reasoning for not carrying out recommendations be documented in ADAMS results in more admin work for ADO.  
Perhaps more education for APMU required around ADO operations and costs to strengthen recommendations and potentially avoid unnecessary action.

11.4

Process to be clearly outlined in cases where athlete has two ADAMS ID for profiles to be merged. We have requested this from ADAMS recently and have been waiting multiple weeks for completion or confirmation.

NADA India

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

General Comments

NADA India is actively implementing the ABP hematological and steroidal module as part of its routine procedures, meticulously maintaining data for timely testing within the ABP module. We fully endorse the decision to incorporate the proposed provisions related to ABP.

- Only one ABP for one athlete
- Read only access rights may only be provided to other ADOs sharing the testing jurisdiction over the athlete.
- Wait time post training/competition prior to the collection of venous blood serum sample in case of ABP endocrine module
- More information for ADO for correct use of Temp Data Logger and its compatibility for the purpose of BSS reading on ADAMS

Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)  
NADO - NADO

General Comments

11.4 Each Athlete shall only have one ADAMS ID  
11.6 .. Passport custody can also later be reassigned to the National Anti-Doping Organization of the sport nationality...

Suggested changes to the wording of the Article

11.4 Each Athlete shall only have one ADAMS ID. WADA periodically monitors and combines data concerning administrative twins.  
11.6 ....Passport custody can also later be reassigned to the National Anti-Doping Organization of the sport nationality... after consultation of the NADO in question..  
11.11 ...uct APMU Target Test or APMU Further further Analysis that may be required as a ....

Reasons for suggested changes

- 11.4 Who is responsible for the primary action to level administrative twins? Clarification needed.
- 11.6 Awareness is of importance here. :-) solved in the next articles!
- 11.11 Capital letter F causes confusion.

Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

General Comments

**Article 11.6:** Consider granting automatic read access based on sport and nationality listed. Regardless of who creates the account, custodianship should default to the NADO. For example, for an athlete with “Canada” for nationality and “cycling” for sport, UCI would automatically get read access based on the sport and CCES would be custodian based on the country. This would limit the amount of accidental duplicate profiles based on access, and inefficiencies to gain access to profiles.

Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

General Comments

Leading into Paris 2024 SIA discovered 'WADA' had created multiple athletes that were already existing in ADAMS, and possibly as a result of the Olympics. We are seeking clarification as to how this provision will be applied where this occurs and whose responsibility is it should duplicates be created when a pre-existing athlete already exists in ADAMS?

Suggested changes to the wording of the Article

SIA suggests the following words be added:

- 11.4:
- “All reasonable efforts will be undertaken by WADA and ADO’s to ensure each athlete shall only have one ADAMS ID”

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)  
NADO - NADO

General Comments

- 11.4:**
- According to Article 11.4, "Each Athlete shall only have one ADAMS ID." Therefore, the process of merging duplicate entries in ADAMS must be enhanced to ensure greater efficiency and expediency. This also relates to the BPID.
- 11.9:**
- Article 11.9 stipulates, “Where the Testing Authority is not the Passport Custodian, the Testing Authority that initiated and directed the Sample collection maintains responsibility for additional Analytical Testing or Further Analysis of the Sample unless agreed otherwise.” However, it can be the case that the Testing Authority does not have access to the passport, as it is not the Passport Custodian, and the Passport is not shared with the Testing Authority. To improve efficiency, it would be beneficial for the Testing Authority to receive a notification in ADAMS indicating when further analysis is required.



Swiss Sport Integrity

Ernst König, CEO (Switzerland)

NADO - NADO

SUBMITTED

General Comments

11.3: As outlined before, APMUs are contractors and shall in no case have the power to request an ADO (i.e., the contracting entity) to take follow-up actions. APMUs are making recommendations and the wording of all articles must be accordingly. Having said this, we agree that a ADO should capture any reasons in ADAMS why a recommendation was not followed for monitoring purpose.

11.11: We propose adding, that relevant information is shared with MEO upon request. "Prior to the Event, the Passport Custodian shall, upon request, provide relevant (...)."

Anti-Doping Norway

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)

NADO - NADO

SUBMITTED

General Comments

What happens if Passport Custodian does not follow the APMU recommendations other than unable? Seems unclear from the current wording?

USADA

Allison Wagner, Director of Athlete and International Relations (USA)

NADO - NADO

SUBMITTED

General Comments

Article 11.4

USADA strongly supports this and encourages WADA to further examine how best to manage and support ADOs when duplicate accounts have been created while also increasing communications when large data imports are made creating duplicates. Specifically, duplicates are often created before major events resulting in large problems in reporting and test planning during the critical pre games testing period. The ADAMS team must ensure such large-scale duplication does not happen again.

Suggested changes to the wording of the Article

Article 11.3, USADA supports this language. The “as appropriate” language is key: otherwise, it is unmanageable. APMU's will always make recommendations but have no insight into budget or capacity when setting these requests. Therefore, the final decision must be granted to the ADO.

Article 11.3, Recommended Change: Change in bold. “The Anti-Doping Organization shall monitor and ensure that any request received from an APMU in relation to a Sample collected under the Athlete Biological Passport program for either an APMU Further Analysis (e.g., to conduct analysis such as IRMS, ERAs or hGH) or an APMU Target Test are implemented within the time frames provided by the APMU, as appropriate, and where the Anti-Doping Organization was unable to carry out such requests the Anti-Doping Organization **shall document their reasoning in ADAMS.**”

Reasons for suggested changes

11.3, Reason: Not all reasoning is appropriate to store in ADAMS and could include sensitive intelligence or other sensitive/confidential information.

International Testing Agency

International Testing Agency, - (Switzerland)

Other - Other (ex. Media, University, etc.)

SUBMITTED

General Comments

11.7

Consider adding a comment to Article 11.7 to offer soft guidance on the relevant principles or criteria for determining the allocation of passport custody among ADOs. For example, priority to International-level athletes for IFs, etc.

11.9

Consider explicitly referencing the cost in addition to the responsibility, to ensure greater clarity.

11.10

Consider explicitly referencing the cost in addition to the responsibility, to ensure greater clarity.

11.11

It is recommended that MEOs be granted at least read-access to the passport during Major Events. Relying on the prompt actions of the (IF/NADO) Passport Custodian may not be feasible due to various factors, such as limited knowledge of athletes participating in the event, time zone differences, staff or resource constraints, and challenges in implementing data protection-compliant methods for information transmission. Moreover, providing MEOs with direct access to the Passport, but allow the MEO to gain a clearer understanding of the passport status. This will enhance their ability to prioritize correctly target testing based on the available resources, particularly when dealing with large volumes of APMU recommendations.

Moreover, providing the MEO with direct access to the passport not only enhances efficiency by eliminating the need for multiple communication channels but also ensures access to the primary source of information. This will enhance their ability to prioritize correctly target testing based on the available resources, particularly when dealing with large volumes of APMU recommendations. In addition, the APMU must also be required to provide rapid communication during Major Events to support reactive testing strategies. Alternatively, a direct line of communication should be allowed between the MEO and the APMU, due to the critical risk of time delays if the communication is only allowed via the passport custodian and MEO.

Article 12 (1)

NADA India

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

General Comments

We agree and endorse this requirement under the ISII.

Annex A (3)

International Paralympic Committee

Phillip Riemann, IPC Anti-Doping Manager (Germany)  
Sport - IPC

SUBMITTED

General Comments

A1) A reference should be included to ensuring the privacy and dignity of the athlete (similar to clause 7.1). This is particularly relevant to athletes with a disability as there is the potential to compromise the athlete’s dignity in particular, where accessible facilities may be an issue.

A4.8) Clauses should be included in line with B4.4 and B4.6. Additionally a comment should be added that, even if no representative is available, the test should still be conducted.

NADA

NADA Germany, National Anti Doping Organisation (Deutschland)  
NADO - NADO

SUBMITTED

General Comments

Annex A4.8 should be revised in line with B4.4 and B4.6.

More guidance should be included, under which circumstances the test shsould be conducted, if no representative is available.

UK Anti-Doping

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

SUBMITTED

#### General Comments

A.4.7 - This Article places the responsibility on Athletes with an impairment to provide the additional equipment for the provision of a urine sample.

UKAD agrees that this should be for medical equipment e.g. catheter, however, that this should not be extended to alternative sample collection vessels as UKAD views this as a critical piece of equipment that should be controlled and provided by the ADO/SCA. This is to protect the integrity of the sample since UKAD will not know where and how the alternative equipment has been sourced and how the DCO/Chaperone should therefore inspect and ensure it is clean/sterile.

#### Suggested changes to the wording of the Article

A.4.7 - UKAD proposes the following changes to Annex A.4.7:

*'Should an Athlete require any additional **medical** equipment in order to be able to provide a Sample, ~~including but not limited to~~ **such as** catheters and drainage systems, it is the sole responsibility of the Athlete to have the necessary equipment available for this purpose and understand how to use it. **Should an Athlete require an alternative sample collection vessel (non-medical) e.g. bedpan, to assist with the provision of their urine sample, this must only be provided for by the Sample Collection Agency. Should the Sample Collection Agency not have an alternative available, the test must proceed with the sample collection vessels made available by the Sample Collection Agency.'***

If an amendment is made to Annex A.4.7, consideration should be given to the wording of Annex C.3.2

#### Reasons for suggested changes

A.4.7 - Ensures that ADOs minimise the risk of potential tampering by a doping Athlete and/or challenge in the event of an AAF. Ensures the SCAs retains control of the sourcing and provision of sample collection vessels.

## Annex B (6)

### Council of Europe

SUBMITTED

Council of Europe, Sport Convention Division (France)

Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

#### General Comments

Annex B: Modifications for Athletes who are Minors

There needs to be a clarification in the standard on parental consent. Test without parental consent can be breach of national law in some countries.

### NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

#### General Comments

Test without parental consent can be seen as harm in some countries. There needs to be a clarification in the standard on parental consent. For the protection of minors there should be no observation procedure for very young athletes to increase the acceptance of testing in a very young age and to as well protect DCOs for accusation of pedophilia

### LTUNADO

SUBMITTED

Erika Petrutyte, Lawyer (Lithuania)

NADO - NADO

#### General Comments

There needs to be a clarification in the standard on parental consent. Test without parental consent can be breach of national law in some countries.

General Comments

**Annex B.4.4:** When testing a minor who wishes to have a representative that is not in the same geographical area we would invite WADA to consider technological means for ensuring an athlete can have a representative present.

General Comments

SIA acknowledges the critical importance of protections being in place at an early stage in the process, to ensure the protection of every minor participating in sport.

As such, we suggest that WADA consider strengthening the education of minors to ensure they must be educated prior to testing except in exceptional circumstances (i.e. for the ratification of world records and where intelligence holdings are confirmed/reliable resulting in testing prior to education). For testing of minors based on strong intelligence of doping, prior approval must be sought by WADA. Any testing of a minor prior education must be documented.

This would go above and beyond ISE article 6.1.2 Requirements of Signatories, where a minor shall be included on an Education pool if they compete at International Events where testing takes place.

Reasons for suggested changes

To ensure that minors are aware of the testing process and understand what is required of them during the witnessing of the sample. Additionally, minors and their parents are able to make more fully informed decisions regarding complying with anti-doping control and if not, the potential consequences.

General Comments

Th removal of the requirement for the TA to confirm parental consent is welcomed for the easier conducting of the sample collection process with the relevant modifications for minors in place.

Annex C (3)

General Comments

C.3.2 - As per submissions in relation to Annex A.4.7, UKAD proposes that additional equipment required for sample provision for athletes with an impairment should be limited to medical equipment only (e.g. catheters) and should not include sample collection equipment such as sample collection vessels. Therefore subject to amendments made to Annex A.4.7, amendments should be made to Annex C.3.2.

In addition to this, UKAD requests clarity as to what is required for what SCP should be inspecting, e.g. for catheters. Whilst the comment to Annex C.3.2 was added to the IST draft which stipulates ‘*For further guidance on additional or other equipment that Athlete’s may use as part of the Sample collection process, please see WADA’s Guidelines for Sample Collection*’, given these guidelines are yet to be updated it is challenging to comment further on this guidance.

Additionally there is a formatting error to the comment to Annex C.3.2 as it states ‘C.4.2’ instead of ‘C.3.2’.

Suggested changes to the wording of the Article

C.3.2 - Subject to amendments made to Annex A.4.7, relevant amendments should be made to Annex C.3.2.

Furthermore, UKAD requests whether WADA can provide further information as to what the guidance is within 'WADA's Guidelines for Sample Collection' and/or if there are intended changes being made.

Reasons for suggested changes

C.3.2 - Formatting and amendment to link to possible amendments to Annex A.4.7.

Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

General Comments

**Annex C.2:** The Scope in Annex C is incorrectly listed as D.1. Should be C.2 and following numbers update accordingly.

**Annex C.3.5:** The CCES notes that this article may contradict Annex L.4.5. As written is L.4.5, the athlete can decide at the doping control station which gender of sample collection personnel they would prefer as witness the provision of the sample as opposed to the gender of the Event the Athlete competes in.

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)  
NADO - NADO

General Comments

NADA Austria occasionally encounters situations where athletes need to defecate during the doping control process (e.g., due to diarrhea) before providing a urine sample. This raises several questions:

- In such situations, is an exception made to the observation of the athlete, or does the observer continue to monitor the athlete?
- Should a sample be collected at that time, or should the collection be deferred until the athlete next needs to urinate?
- How should the scenario be handled if an athlete claims to have diarrhea? What is WADA's stance on this matter? If athletes are not to be observed in these cases, there is a concern that this reasoning could be used as a pretext to avoid providing their first urine sample after notification.

Annex D (5)

Anti Doping Denmark

SUBMITTED

Silje Rubæk, Legal Manager (Denmark)  
NADO - NADO

General Comments

Blood and sample volume of blood tubes

To provide greater flexibility upon implementation of new sample matrices we recommend deleting 'Venous' Blood' and instead just use 'Blood' where applicable as well as deleting the volume of the tube. If this was moved to the guidelines it would be easier to implement change in the future to allow micro capillary for ABP in the future.

Examples:

t) For the analysis of Prohibited Substances or Prohibited Methods in whole blood including Athlete Biological Passport, the A and B tubes must have the capacity to contain a minimum of **3 mL of blood** and shall contain EDTA as an anticoagulant;

u) For the analysis of Prohibited Substances or Prohibited Methods in serum including Athlete Biological Passport, the A and B tubes must have the capacity to contain a minimum of **5 mL of blood** and shall contain an inert polymeric serum separator gel and clotting activation factor; and [Comment to 6.3.4 (t) and (u): If specific tubes have been indicated in the applicable WADA International Standard, Technical Document or

Guidelines, then the use of alternative tubes which meet similar criteria shall be validated with the involvement of the relevant Laboratory(ies) and approved by WADA prior to use for Sample collection.]

v) For the transport of **venous** blood Samples, ensure the storage and transport device and temperature data logger meet the requirements listed in Annex I - Collection, Storage and Transport of Blood Athlete Biological Passport Samples.

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

General Comments

D.3.1 (c) - UKAD supports the inclusion of a 60-minute wait post training/exercise for the collection of blood serum samples that are subject to a quantification procedure e.g. human Growth Hormone. However, given the potential implications for sample reanalysis, UKAD proposes that the 60-minute wait is applied to all blood serum samples collected. UKAD further proposes that it is made a requirement to record this information (similar to that for the haematological ABP).

UKAD would also welcome clarification on any implications and impact for the reanalysis of samples already collected and currently stored (given this will be a new requirement and would not have been recorded for blood serum samples collected to date).

Suggested changes to the wording of the Article

D.3.1 (c) - UKAD proposes the following changes to Annex D.3.1 (c):

*'If the Serum blood sample(s) collected from the Athlete will be analyzed by a quantification procedure i.e. human growth hormone, Endocrine and blood Steroidal Module of the Athlete Biological Passport, Sample collection shall not occur within sixty (60) minutes of the Athlete's training, participation in Competition or other similar physical activity. If the Athlete has trained or competed less than sixty (60) minutes before the time the Athlete has been notified of their selection, the DCO or other designated Sample Collection Personnel shall keep the Athlete under direct observation until this 60-minute period has elapsed.'*

UKAD also proposes the introduction of Annex D.3.1 (d):

*The DCO/BCO shall collect and record if there has been a minimum of 60-minutes since the Athletes training, participation in Competition or other similar physical activity on a supplementary form, Doping Control form or other related report form to be signed by the Athlete and the DCO/BCO.*

UKAD also proposes that a comment to Annex D.3.1 (c) is included to acknowledge/confirm any implications for reanalysis of samples and/or where a 60-minute wait has not been completed or recorded e.g. will it be invalidated?

Reasons for suggested changes

D.3.1 (c) - Ensures and minimises impact/implications for reanalysis and ensures it is recorded for reporting purposes and in the event of an AAF/ADRV.

Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

General Comments

Comment to D.3.1 c)

SIA would be supportive of the addition of a field questionnaire confirming that the 60-minute wait time prior to testing has been adhered to.

Finnish Center for Integrity in Sports FINCIS

SUBMITTED

Marjorit Elorinne, Quality Manager (Suomi)  
NADO - NADO

General Comments

Regarding the D.3.1 c) If the serum blood sample collected from the Athlete will be analyzed by a quantification procedure i.e. human growth hormone, Endocrine and blood Steroidal Module of the Athlete Biological Passport, Sample collection shall not occur within sixty (60) minutes of the Athlete's training, participation in Competition or other similar physical activity...

--> we are the opinion that it would be better ALWAYS wait for 60 minutes after training, competing or similar physical activity when the serum blood sample is collected, not only when it will be analyzed by quantification procedure. This is as sometimes there is a need to request quantitative analysis after the first qualitative analysis. Fixed 60 min waiting also enables all possible re-analyses for serum samples placed to LTS after 10 years...

And in addition "fixed procedure" regardless of the analysis is easier and clearer both from the BCO's and athlete's point of view.

Chair

Athlete Council, WADA (Canada)  
Other

SUBMITTED

General Comments

D.4 Requirements for the collection of blood samples

The drafting team could consider adding to Annex D a provision stating that the athlete may choose to lie down during the blood draw.

Annex E (1)

UK Anti-Doping

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

SUBMITTED

General Comments

E.4.4 - UKAD wishes to resubmit its previous proposal that Annex E.4.4 should be amended to enable partial sample details to be recorded by an accredited Chaperone and not just limited to a DCO.

This is in accordance with current UKAD practices (note that all UKAD Chaperones are trained and accredited accordingly) as it allows flexibility and efficiencies, and ultimately is more athlete-centred given it can reduce an Athlete's waiting time in the DCS.

Suggested changes to the wording of the Article

E.4.4 - UKAD proposes the following changes to Annex E.4.4:

*'For the first partial sample the DCO/accredited Chaperone shall record the partial Sample number and the volume of the insufficient Sample on the Doping Control form and confirm its accuracy with the Athlete. The DCO shall retain control of the sealed partial Sample.'*

Reasons for suggested changes

E.4.4 - Ensures there is flexibility and efficiencies in the process for an Athlete.

Annex F (3)

Canadian Centre for Ethics in Sport

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

SUBMITTED

General Comments

**Annex F.4.3 and Comment:** Advising an athlete they are not to hydrate may be unsafe to the athlete. Considering samples are collected until a suitable sample is provided, the CCES would suggest WADA considers rewording to specify excessive hydration.

**Suggested changes to the wording of the Article**

*Prosed Wording:* While waiting to provide a further Sample, the Athlete shall remain under continuous observation and should be advised not to over hydrate, since this may delay the production of a suitable Sample. In appropriate circumstances, excessive hydration after the provision of an unsuitable Sample may be pursued as a violation of Code Article 2.5

*[Comment to F.4.3: It is the responsibility of the Athlete to provide a Sample with a Suitable Specific Gravity for Analysis. Sample Collection Personnel shall advise the Athlete and Athlete Support Personnel as appropriate of this requirement at the time of notification in order to discourage excessive hydration prior to the provision of the Athlete's first Sample.]*



Swiss Sport Integrity

Ernst König, CEO (Switzerland)

NADO - NADO

SUBMITTED

General Comments

F.4.5: Is there scientific or statistical evidence to justify the collection of more than one additional urine sample? The collection of additional samples is a massive burden for the athlete (as well as for the DCP, the athlete's team and/or ASP) as the process can take very long.

In the spirit of an athlete-centered approach, we suggest to inverse the logic, i.e., to only collect more than one additional sample if there is reasonable suspicion that the athlete is trying to dilute the samples on purpose (there may also be specific instructions by the TA if there is other suspicion against the athlete).

Anti-Doping Sweden

Jenny Schulze, Testing and Science Manager (Sweden)

NADO - NADO

SUBMITTED

General Comments

F.4.4, F4.8 Diluted samples

ADSE maintains its opinion that when samples are diluted, only the first and the approved samples shall be securely sealed in a tamper evident kit and sent to the laboratory.

Suggested changes to the wording of the Article

Diluted samples that do not meet the criteria shall be discarded directly by the DCO (witnessed by the athlete) and not be sealed in tamper evident kits.

Reasons for suggested changes

The reasons for this are:

1) The DCO can only bring a finite number of kits to an event and with diluted samples there is a risk of running out of kits and not being able to test the intended number of athletes at an event. Sometimes we have used up to 5 kits for diluted samples from one athlete, which is extremely expensive and unnecessary.

2) the paperless system does not allow us to inform the laboratory which samples are from the same athlete and which samples should not be analyzed. This has led to many unnecessary analyses and high costs for us and more work for the laboratory.

Annex G (13)

World Rugby

David Ho, Senior Manager Anti-Doping Operations (Ireland)

Sport - IF – Summer Olympic

SUBMITTED

General Comments

World Rugby supports the changes to Annex G but feels there should also be focus on ensuring that SCAs properly staff events to ensure compliance with chaperoning requirements which are in our recent experience often put at risk by inadequate event staffing (meaning that one chaperone is expected to simultaneously notify and chaperone more than one athlete). We would propose that the IST contain minimum standards (or at the very least recommendations) for the number of SCP appropriate to notify, chaperone and process a certain number of athletes. More direction and oversight is needed in this area, and if the Standard is an appropriate method of achieving this we would request it be considered.

We support any proposal to improve DCO and SCP standards worldwide including attempts to move away from the use of volunteer chaperones.

International Paralympic Committee

Phillip Riemann, IPC Anti-Doping Manager (Germany)

Sport - IPC

SUBMITTED

General Comments

G.4.4.1) The training program for BCOs shall also include venous blood collection from athletes with an impairment.

EOKAN/HADA

SUBMITTED

Antonia Kotsia, Head of Doping Control Office (GR)  
NADO - NADO

General Comments

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

General Comments

**G.4.4.3 a**  
In the IST, there is no definition of Volunteer Chaperones. It needs to present the difference between Chaperones and Volunteer Chaperones.

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

General Comments

G.4.4.3 - UKAD is supportive of the amendments to Annex G.4.4.3 which limit the use of volunteer Chaperones (including confirming volunteer Chaperones cannot be used for witnessing urine provision) and strengthen the training requirements for Chaperones.

UKAD supports Annex G.4.4.3 (a) but proposes a change which states that training should occur prior to the Event instead of at the Event.

For Annex G 4.4.4.3 (b), whilst UKAD sees this as a positive step with regards to ensuring volunteer Chaperones have a form of accreditation, UKAD believes that it will not always be practical for the Sample Collection Authority to issue this to the volunteer Chaperones especially when it can be arranged at short notice. Furthermore, for Major Events, the volunteer Chaperones tend to be recruited by the event organisers and will receive event accreditation. UKAD also have concerns that if it were to issue temporary accreditation that this could form an official working relationship and there are potential risks and employment legislations to consider.

UKAD proposes that this is removed or amended to give flexibility to ADOs/Sample Collection Agencies e.g. they are signed off/documentation/records of sign off.

G.4.4.4 - UKAD agrees with the principle of Annex G.4.4.4 whereby Sample Collection Personnel should be adequately trained for testing Athletes who may speak a different language and for testing transgender or gender diverse Athletes. However, whilst these are important considerations it is unclear what would be deemed adequate.

For example, for Athletes who speak a different language, is it sufficient to say Sample Collection Personnel should be trained to support the Athlete in finding an interpreter, or the use of translation apps/tools to assist?

For transgender and gender diverse Athletes is this about training on the language/terminology used or procedural only?

It is suggested that this may be a consideration for 'WADA's Guidelines for Sample Collection'.

Suggested changes to the wording of the Article

G.4.4.3 - UKAD proposes the following changes to Annex G.4.4.3 (a):

*'The use of volunteer Chaperones should be avoided or limited to Events only. The volunteer Chaperones shall receive both theoretical and practical training specific to their role at prior to the Event and fulfil the requirements of G.4.2 and G.4.3.'*

UKAD proposes the following changes to Annex G.4.4.3 (b):

*'The Sample Collection Authority shall agree with the Event Organiser if any additional temporary accreditation or documentation should be issued to the Volunteer Chaperone that will accompany their event accreditation (where applicable) and their government issued photo identification when identifying themselves to the Athlete at notification. Volunteer Chaperones shall not be responsible for witnessing the provision of the Athlete's Sample; this shall be the responsibility of the DCO or accredited Chaperone.'*

G.4.4.4 - UKAD proposes the following change to Annex G.4.4.4:

*'A Sample Collection Authority that collects Samples from Athletes who are of a different nationality and who may speak a different language to its Sample Collection Personnel (e.g., at an International Event or in an Out-of-Competition context) or from transgender or gender diverse Athletes should ensure that such Sample Collection Personnel are adequately trained **on the procedures** to carry out their duties in respect of such Athletes.'*

#### Reasons for suggested changes

G.4.4.3 - Training should occur prior to the event to ensure it is completed properly and not rushed. Some practical and legislation concerns regarding the issuing of temporary accreditation by the SCA so proposing some flexibility here.

G.4.4.4 - Provides clarity on what is expected of ADOs and ensures consistency.

#### Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)

NADO - NADO

#### General Comments

G 4.4.5 .. maintain up to date records of education, training, skills, conflicts of interest and experience of all Sample Collection Personnel including any volunteer Chaperones (if applicable)..

#### Suggested changes to the wording of the Article

G 4.4.5 maintain up to date records of education, training, skills, conflict of interest and experience of all Sample Collection Personnel ~~including any volunteer Chaperones (if applicable)~~

#### Reasons for suggested changes

G 4.4.5 practical not feasible when working with limited number of volunteers.

#### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

#### General Comments

**Annex G.4.4.2:** Consider removing the requirement for a DCO trainer to observe the trainee DCO witnessing the passing of the sample. The CCES notes that a Chaperone, who has significantly less training than a DCO trainee is able to witness the provision of the sample without the DCO observing.

**Annex G.4.4.4:** Guidance would be helpful regarding what would be considered “adequately trained”.

#### Malaysia Anti Doping Agency (ADAMAS)

SUBMITTED

Muhammad Husmar Afdzal Bin Husin, Senior Assistant Director (Malaysia)

NADO - NADO

#### General Comments

1) Under Annex G.4.4.3 (b): Suggest to include definition term for “Volunteer Chaperone” and “Accredited Chaperone” in the **3.0 Definitions and Interpretation** section.

2) Under Annex G.4.4.4: Suggest to include a specific guideline or definition/technical term for “transgender” or “gender diverse Athletes” in the **3.0 Definitions and Interpretation or Annex L (Modifications for Transgender and Gender Diverse Athletes)** section.

Suggested changes to the wording of the Article

- 1) **Suggested for WADA to rephrase Annex G.4.4.1 with:**
- "Where required BCOs shall also be trained in ~~dried blood spot~~ **Dried Blood Spot (DBS) Sample** collection procedures".
- 2) **Suggested for WADA to rephrase Annex G.4.4.2 (c) with:**
- "The satisfactory performance of at least one complete *Sample* Collection Session on-site under observation by a qualified DCO trainer or similar. The requirement related to the actual passing of ~~a the~~ urine *Sample* shall be included in the on-site observations. The DCO trainer shall observe the trainee DCO witnessing the passing of the **urine Sample** but not observe the actual passing of the **urine Sample**. (according to Annex B.4.5."
- 3) **Suggested for WADA to rephrase Annex G.4.4.4 with:**
- A Sample Collection Authority that collects Samples from Athletes who are of a different nationality and who may speak a different language to its Sample Collection Personnel (e.g., at an International Event or in an Out-of-Competition context) or from transgender or gender diverse Athletes should ensure that such Sample Collection Personnel are adequately trained (**Medical Practitioner cum DCO**) to carry out their duties in respect of such Athletes.

Reasons for suggested changes

- 1) **Suggested for WADA to rephrase Annex G.4.4.1:**
- To change word “dried blood spot” to “Dried Blood Spot (DBS)” for better understanding.
- 2) **Annex G.4.4.2 (c):**
- “Trainer DCO shall observe the trainee DCO witnessing the passing of the urine Sample”. This phrase should be understand and implement according to Annex B.4.5.
- 3) **Annex G.4.4.4:**
- Medical Practitioner cum DCO* is required in accordance with the Professional Ethics.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

General Comments

G.4.4.1: The addition "Where required BCOs shall also be trained in dried blood spot Sample collection procedures" implies that DBS samples can only be collected by BCOs for whom all of the before-mentioned requirements also apply (i.e., the qualifications in conducting venipuncture). However, local legislation may allow for non-medical personnel to collect DBS samples. This requirement will hinder the implementation of DBS collection in an ADO's testing program.

Anti-Doping Sweden

SUBMITTED

Jenny Schulze, Testing and Science Manager (Sweden)  
NADO - NADO

General Comments

G.4 Qualifications and Training

**G.4.4.3** We think it is a lot to ask from the athlete to be required to pass the urine sample with an open door in order for the Sample collection authority to train their sample collection personnel.

Reasons for suggested changes

In our opinion, the training of observing the passing of the sample can be performed without involving the athlete.

Caribbean Regional Anti-Doping Organization

SUBMITTED

Marsha Boyce, Communications & Projects Coordinator (Barbados)  
NADO - RADO

General Comments

Clarity is required on what constitutes a "volunteer chaperone" (as many organizations utilize DCOs and chaperones who are essentially volunteers).

Chair

Athlete Council, WADA (Canada)  
Other

SUBMITTED

General Comments

G.4.4.3 Training of anti-doping chaperones

Insufficient education of volunteer chaperones at events is a common problem which can negatively impact the anti-doping process both for athletes and the testing authority. In addition to the training topics listed in the current article, training should also cover the significance of the chaperone role, the requirement and right of the chaperone to maintain an unobstructed view of the athlete (5.4.2 a), the reasons listed in 5.4.4 when an athlete may delay reporting to the doping control station, and the unique behavioral expectations of chaperones, such as restrictions around phone/camera use.

International Testing Agency

International Testing Agency, - (Switzerland)  
Other - Other (ex. Media, University, etc.)

SUBMITTED

General Comments

ANNEX G.4.2

We recommend adding language (or at least a comment) that requires SCAs/ADOs to maintain a written record of conflicts of interest or to document disclosed conflicts, including proactive measures such as annual questionnaires, requests to disclose potential conflicts at each appointment, and similar initiatives.

ANNEX G.4.4.3

Clarify whether the term "volunteer chaperone" is intended to mean "unaccredited/untrained chaperones," or if it refers to the legal status or remuneration of the role. If the latter, clearer wording may be necessary. This is particularly important in section (b), where it is initially stated that volunteer chaperones shall receive accreditation, leading to confusion regarding the final part, which specifies that only accredited chaperones may witness the sample collection.

Annex H (2)

NADA

NADA Germany, National Anti Doping Organisation (Deutschland)  
NADO - NADO

SUBMITTED

General Comments

The request of 35 days ahead of an event to the ruling body should be shortened or erased. Especially looking at I&I cases 35 days are far to long to be able to set a targeted test.

Canadian Centre for Ethics in Sport

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

SUBMITTED

General Comments

**Annex H.4.1:** The Ruling body should have the ability to consider a request at any point, but they would not have an obligation to consider the request if within the designated time frame. An ADO may wish to request to test at the event based on last-minute information/intelligence or registration confirmation within 35 days. The CCES would request WADA changes the "shall" to a "should" permitting more flexibility in cases of last-minute information.

Additionally, the 35-day time period may not be appropriate for all international events. The 35-day time period is acceptable for a Major Games or World Championship but is excessively long for smaller events.

Additionally, a comment could be added to clarify that if the request is within the 35 days of the event, “appealing” to WADA will not be an option.

Note - the closing parentheses is missing.

Suggested changes to the wording of the Article

*Proposed Wording:* Such request **should** be sent to the ruling body at least thirty-five (35) days prior to the beginning of the *Event* (i.e., thirty-five (35) days prior to the beginning of the *In-Competition* period as defined by the rules of the International Federation in charge of that event.)

Annex I (3)

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

General Comments

I.2.9 - UKAD disagrees with the change to move the ABP questions from the IST. UKAD is of the view that the questions for ABP should be kept within the IST and not solely within the ABP operating guidelines since these are mandatory questions that should be asked.

Suggested changes to the wording of the Article

I.2.9 - UKAD proposes the following changes to Annex I.2.9:

Delete the Comment to Article I.2.9 and re-add the questions as below:

'The DCO/BCO shall collect and record additional information on an Athlete Biological Passport supplementary form, Athlete Biological Passport specific Doping Control form or other related report form to be signed by the Athlete and the DCO/BCO that contains the mandatory questions when collecting a blood Athlete Biological Passport Sample within the corresponding WADA template and ADAMS.

(a) Has the Athlete been seated for at least ten (10) minutes with their feet on the floor prior to blood collection, as per Annex I.2.8?

(b) Was the Sample collected immediately following at least three (3) consecutive days of an intensive endurance Competition, such as a stage race in cycling?

(c) Has the Athlete had a training session or Competition in the two (2) hours prior to the blood collection?

(d) Did the Athlete train, compete or reside at an altitude greater than 1,500 meters within the prior two (2) weeks? If so, or if in doubt, the name and location of the place where the Athlete had been, and the dates and the duration of their stay shall be recorded. The estimated altitude shall be entered, if known.

(e) Did the Athlete use any form of altitude simulation such as a hypoxic tent, mask, etc. during the prior two (2) weeks? If so, as much information as possible on the type of device and the manner in which it was used (e.g., frequency, duration, intensity) should be recorded.

(f) Did the Athlete receive any blood transfusion(s) during the prior three (3) months? Was there any blood loss due to accident, pathology or donation in the prior three (3) months? If so, the estimated volume should be recorded.

(g) Has the Athlete been exposed to any extreme environmental conditions during the last two (2) hours prior to blood collection, including any sessions in any artificial heat environment, such as a sauna? If so, the details should be recorded.'

Reasons for suggested changes

I.2.9 - ABP questions are mandatory and therefore we feel it is appropriate to retain these within the IST.

General Comments

**Annex I.2.8:** Although there is no change, we are reiterating our comments from the last Code review. Add wording to allow athletes to lie down for 10 minutes, rather than only provide the option of “a normal seated position.” There are athletes who know they faint with blood collection and request to be lying down for the venipuncture procedure. To avoid moving following the 10-minute waiting period, the Annex could include that the athlete be “in a normal seated position with feet on the floor, or lying down, for at least 10 minutes...” If there are additional considerations for the waiting period for an athlete who requests to lie down during venipuncture, those could be included as well.

General Comments

ANNEX I.2.9

The right for the ADO to ask the Athlete for further information about the Athlete's answers to the mandatory questions asked in the scope of the ABP blood collection and the Athlete's obligation to reply should be added.

Based on ITA's experience, the Athlete's declarations (on altitude or sickness e.g.) as filed on the DCF are sometimes laconic or appear inaccurate. To avoid Athlete's attempting to tamper with the interpretation of their ABP values (by filing that they are staying they are at high altitude when they are not) or to provide more complete information to the Experts when they are routinely reviewing the profile of Athlete (e.g. a DCF declaration only mentions “a blood loss”), it would be useful to be able to contact Athletes to obtain clarification. Instead of having to do so once an APF has been issued. Whilst the current regulations do not prevent ADOs from doing so, putting a specific provision would be helpful.

Annex J (7)

General Comments

There is a concern, that the wording complies DBS can only be carried out in combination with Urine. DBS can perfectly be used as stand alone matrix e.g. testing minors or in phases where athletes are loosing weight and can hardly pee. It is necessary to clarify the wording and clarify that DBS is an additional matrix but can be used as stand alone matrix without urine.

General Comments

**J.3 This article should be change to let more explicit the fact that an antidoping organisation can collect DBS standalone:**

**-“When planning to collect dried blood spot Samples, ADOs shall consider the available type of analyses. DBS are complementary to existing sample collections, but it is allowed collecting DBS standalone in specific circumstances (massive campaigns for deterrence effect on amateurs, when DBS is not the only matrix collected in the testing history of the athlete, respecting the 3 OOC mandatory tests)”.**

J.5.17

For the Innovero/Tasso system, the DCO must seal the sample instead of the athlete, as it is a difficult step and not easy to explain to him how to do this. Gloves must be worn for this step to avoid exposure to blood.



J.3 “When planning to collect dried blood spot Samples, ADOs shall consider the available type of analyses. DBS are complementary to existing sample collections, but it is allowed collecting DBS standalone in specific circumstances (massive campaigns for deterrence effect on amateurs, when DBS is not the only matrix collected in the testing history of the athlete, respecting the 3 OOC mandatory tests)”.

Reasons for suggested changes

J.3-clarification of a grey zone

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

General Comments

J.3 - Clarification on the wording within this Article is required because it refers to dried blood spot Sample collections being complementary to existing Sample collections. It is unclear if this means that dried blood spot Samples cannot be collected on their own or must always be collected alongside a urine and/or venous blood Sample.

UKAD are of the view that for the implementation of dried blood spot Samples to be effective, they must be able to be collected on their own and not with other Samples as it would otherwise counteract the benefits and efficiencies that dried blood spot samples can provide. UKAD agrees it should not replace urine Sample collections and therefore would suggest that parameters are set within the IST to outline when it would be considered acceptable to conduct dried blood spot testing.

Suggested changes to the wording of the Article

J.3 - UKAD proposes the following addition to Annex J.3:

*'When planning to collect dried blood spot Samples Anti-Doping Organizations shall consider the available type of analyses. Dried blood spot Sample collections are complementary to existing Sample collections however dried blood spot Sample collections shall not replace the need for urine Sample collections as part of an effective Testing program. Dried blood spot Samples may be collected in isolation i.e. not alongside urine and/or venous blood Samples, for example, testing at recreational level, conducting large screening testing at In-Competition or at training environments etc.'*

Reasons for suggested changes

J.3 - To give greater flexibility in the use of dried blood spot testing.

Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

General Comments

SIA suggests there is no need for “medically approved” before “sample collection device”. The type of approval required varies between countries and in some countries may be not applicable at all. 6.4.3k) covers the need for applicable approvals with more appropriate wording.

Korea Anti-Doping Agency

SUBMITTED

Unseon Ji, Senior Testing Manager (South Korea)  
NADO - NADO

General Comments

The development of DBS testing requires support from WADA to lower the barriers for all countries to adopt DBS testing. (For example, assistance in the domestic introduction of upper arm DBS kits, etc.)

Anti-Doping Sweden

SUBMITTED

Jenny Schulze, Testing and Science Manager (Sweden)  
NADO - NADO

## General Comments

### J.4 Requirements for Dried Blood Spot Sample Collection Equipment

**[Comment to J.4.d]** As discussed briefly in the WADA DBS Working Group- if using a volumetric device with 50 µl spots (in this case Capitainer), it would be beneficial to be able to dissolve one 50 µl spot and use the required volume for two different analyses, instead of making it mandatory to collect one spot for each different analysis. In other words, does it have to be specified in detail in the IST, or would it be better with this kind of detail in a Technical document?

#### Reasons for suggested changes

Capitainer is an easy to use, relatively affordable, volumetric kit that are appreciated by the laboratories. We believe it will also work very well for quantitative analyses.

It would not be desirable to exclude the possibility to use it due to too detailed wording in the IST.

## Berlinger Special AG

Vreni Müller, Head of Sales & Marketing (Switzerland)

Other - Other (ex. Media, University, etc.)

SUBMITTED

## General Comments

### J.4 a)

Contain a single-use **medically approved** Sample collection device for the **puncture/incision and collection** of capillary blood at the fingertip and/or from the upper arm (alternative sites of punctures may be authorized for Athletes with physical impairments, if required). Both manual (i.e., disposable sterile lancets to be used in conjunction with absorbent material), and automatic devices (i.e. with integrated microneedle(s)/microlancet(s)) can be used. **No use of additional supports for the transfer of capillary blood (positive displacement pipettes and pipette tips, end-to-end calibrated capillaries, etc.) is permitted.**

1. Medically approved => according to which norm and in which country?

2. Puncture/incision AND collection => puncture and collection must be combined in one device which would only leave room for a solution like Tasso or a non-volumetric approach where the blood from the fingertip is applied directly to the absorbent support

3. No use of additional supports => all DBS channel collection devices which are already used in the field would no longer be permitted?

### J.4 e)

The Sample container and/or storage sleeves/packages/receptacles shall contain a desiccant to allow the spots to dry expeditiously when already sealed (**without having to wait before sealing** and without the risk of the Sample getting in contact/glueing with the surface or parts of the collection device) and offerings shall offer protection against possible premature degradation or contamination of the Sample. Dried blood spot cards/devices that can be closed/sealed as soon as sampled, should be **preferred to other cards/devices which require a minimal drying time prior to sealing/closing.**

1. First the requirement is that the samples can be directly sealed, but afterwards it says that devices that meet this criterion should be preferred over devices with a minimum drying time => is it now a must or a should that you can directly seal the samples?

## Annex K (1)

## Canadian Centre for Ethics in Sport

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

SUBMITTED

## General Comments

### General Comments to Annex K

Consider whether Annex K would be better suited as a "Guidelines for Testing during a Pandemic" rather than an Annex in the IST. Also consider changing the title to include reference to national epidemics.

### Suggested changes to the wording of the Article

**Proposed Wording:** COLLECTION OF URINE *SAMPLES* IN A VIRTUAL ENVIRONMENT DURING A PANDEMIC OR NATIONAL EPIDEMIC

## Annex L (17)

Council of Europe

Council of Europe, Sport Convention Division (France)  
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

SUBMITTED

General Comments

Annex L: Transgender and Gender Diverse Athletes and Procedures for Sample Collection

According to the current wording a minimum of two Sample Collection Personnel of different genders have to be assigned, which is a problem looking at cost. Transgender and gender-diverse athletes should be required to specify their gender on ADAMS. Athletes that are not linked to ADAMS but part of the testing system should specify through their federation. It should not be optional to choose the gender during the control process. As well it should be clear that Chaperones do not have to be of the same sex like the athlete.

NADA

NADA Germany, National Anti Doping Organisation (Deutschland)  
NADO - NADO

SUBMITTED

General Comments

According to the current wording at a minimum, two Sample Collection Personnel of different genders have to be assigned which is a problem looking at cost. Transgender and gender-diverse athletes should be required to sepcify their gender on ADAMS. Athletes that are not linked to ADAMS should sepcify through their federation. It should not be optional to choose the gender during the control process. As well it should be clear that Chaperons do not have to be of the same sex like the athlete.

Furthermore, we refer to the INADO contribution regarding Annex L of the IST.

Agence française de lutte contre le dopage

Adeline Molina, General Secretary Deputy (France)  
NADO - NADO

SUBMITTED

General Comments

L1 and L2:  
  
It is important to explicitly reference Doping Control Personnel in Annex L, ensuring their role is clear in handling transgender and gender-diverse athletes.  
  
Definitions should be clarified, specifically around the gender-diverse options WADA provides through ADAMS. It should also specify what expectations will be placed on Testing and Sample Collection Authorities regarding accommodating these options.

- The impact of the changes within Annex L on witnessing sample collection must be considered.
- The annex and its protocols should apply to all athletes, not just specific groups, to ensure inclusivity and fairness.

L.3 Responsibility:

- The primary responsibility for notifying the Testing Authority should be on the athlete.

Athletes should be given the opportunity to pre-declare their gender identity, and clear consequences for failing to pre-declare must be outlined.

- Clarity is needed on data management related to pre-declaration and how this information will be handled securely.
- It is unclear whether the ultimate responsibility for assigning Sample Collection Personnel lies with the Testing Authority or the Sample Collection Authority—this needs clarification.

L.3.2: There should be guidance and minimum requirements for diversity training for Sample Collection Personnel to ensure consistent and adequate preparation across organisations.  
  
L.3.3: There should be provisions for events which do not require gender classification, such as equestrian, to clarify how Sample Collection Personnel should be assigned in these cases.  
  
L.3.4: Athletes must have a clear responsibility to inform Testing Authorities in advance, or at the earliest opportunity, about their preferred gender of Sample Collection Personnel.  
There also needs to be clarity on what constitutes the Testing or Sample Collection Authority making their "best efforts" to accommodate the athlete’s preference. Pre-disclosure would help ensure the athlete’s preference can be accommodated effectively.  
  
L.4 Requirements:  
Out-of-competition testing provisions are missing from this section. This should be addressed to ensure Annex L applies in all testing situations.  
  
L.4.1 and L.4.2: There should be additional comments offering examples of the modifications that a DCO can make. This would provide clearer guidance on practical modifications.

L.4.3: It is proposed to delete this provision, as the gender of the personnel notifying the athlete is irrelevant and unnecessary.

L.4.4: This section's language shifts from offering the athlete choice in selecting personnel to denying that choice, which could be confusing. There is no provision here for events which do not have specified gender classification.

L.4.5: To reduce the risk of manipulation or exploitation, athletes should declare their gender diversity and preferred Sample Collection Personnel at the earliest opportunity (immediately after notification and before collection). Once declared, athletes should not be allowed to change their preferred personnel.

L.4.6: Consider aligning the wording used in DCO paperwork with the language in Annex L. This should also consider the requirements for laboratory analysis.

**Japan Anti-Doping Agency**

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)  
NADO - NADO

**General Comments**

**Annex L as general**

If it will apply the modification for transgender and gender diverse athletes, it need to be clear rule for the transgender and gender diverse SCPs.

**L.3.2**

If it is required the gender diversity training for SCPs, it must have a guideline for the training. We will expect WADA to prepare the model training for NADOs.

Also, not only the training for SCPs, but also support staff for athletes (including National Federation) need to be trained and share the information.

**L3.4**

Definition of the gender diverse athlete is not clear. Not only the athlete indication, but it needs to be the objective criteria (definition).

**L3.4**

For the part of the "TA and/or the SCA should assign, at minimum, two SCP of different gender to the Sample Collection Session." it will be financially burden for NADOs, if we have to plan extra SCP for the Sample Collection Session.

**L4.5**

If athletes shall be given the option to declare their gender diversity, it should make clear that athletes voluntarily declare. If SCP has the role to check it, it would be very sensitive to ask all athletes.

**Finnish Center for Integrity in Sports FINCIS**

SUBMITTED

Marjorit Elorinne, Quality Manager (Suomi)  
NADO - NADO

**General Comments**

The following proposed procedures may cause challenges in practical doping test sessions:

L.4.3 The transgender Athlete should be notified by a Sample Collection Personnel of the same gender as the transgender Athlete, based on the gender of the Event the transgender Athlete competes in.

--> Notifying person should not have to be of the same sex as the athlete.

L.4.5 Once the gender diverse Athlete is informed of the requirements of the Sample Collection Session and upon arrival at the Doping Control Station, they shall be given the option to declare their gender diversity and the preferred gender of Sample Collection Personnel who will witness the passing of the Sample.

--> It is not a problem to give athlete the option to declare their gender diversity, but in practice it might cause challenges to have the preferred gender of witnessing person if it has not been known beforehand that the sample collection session may involve transgender/gender diverse athletes. In practice this would mean that Sample Collection personnel always include both genders which at the moment is not a case.

**UK Anti-Doping**

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

**General Comments**

General comment - UKAD welcomes the progression and the discussion on the concept of choice to ensure the sample collection process can be more inclusive. However, UKAD is of the view that further discussion and consideration is required before introducing the concept of choice to

ensure it is fair, inclusive, practical, etc., for all athlete gender groups and ensures it limits opportunity for manipulation. For example:

- Is it fair to only permit choice to transgender and gender diverse athletes and not to other athletes?
- How is the process managed for gender fluid athletes? Can athletes change their preferences? If so, measures will need to be in place to prevent manipulation e.g. we don't want to enable a situation whereby an athlete can login to ADAMS and update their preference when the ADO/SCA is making an attempt to test in order to avoid being tested/enabling them to have an avenue to refuse testing.
- An athlete shouldn't be able to change their preferred gender during a test e.g. between additional or partial samples
- Consideration for athletes from cultures where they are one gender but raised as another gender, so not a clear delineation (e.g. Pacific Islander youngest male)?

UKAD's view is that the development of this Annex does not have to align with the issuing of the 2027 IST to enable these discussions to occur. Furthermore, the sporting landscape is changing and as an anti-doping community we need to be adaptable to any changes to that and what sports decide on participation of transgender Athletes.

Other general observations include:

- Terminology – ensuring it is correct throughout the Code and International Standards as male and female is sex not gender.
- Annex L should address gender of SCP and SCP gender diversity.
- Consideration needs to be given to providing SCP with a choice e.g. if the Athlete has opposite genitalia, and SCP may not be comfortable with witnessing urine provision.
- Consideration needs to be given to if the sex of an Athlete and SCP should be incorporated e.g. what if an Athlete submits a request of a particular sex (rather than gender) of an SCP?
- Will it be a mandatory provision of information for an athlete's whereabouts filing (declaring their gender category and preference)?
- Mechanisms should be considered for athletes not on whereabouts to contact ADOs in advance i.e. athletes should be notifying in advance when possible.
- Practical considerations for how this information is submitted and then made accessible to the SCP.
- Clarification on if an athlete can refuse if they have declared preference in advance and the SCA does not have the preferred gender SCP in place? UKAD's assumption is that the athlete can refuse and/or the test would be aborted by the SCA (similar to what would occur if it was a cisgender athlete).
- Consideration needs to be given to non-gender defined sports e.g. equestrian, wheelchair rugby, and open category competitions. There is no guidance as Annex L currently stands.
- There are a range of gender diversities that are recognised, therefore, gender diversity needs to be defined along with the list of genders that can be selected/chosen by the Athlete.
- Ensure there is clarity that if Athlete's do not declare a preferred gender in advance that the process is based on the IST and ensure it is clear as to what steps/measures ADOs will apply if notified in advance

L.1.1 and comment to L.1.1 - UKAD agrees with the objective of Annex L.1.1, however, UKAD proposes that it should be made clear that the 'modifications' relate only to the provision of a urine sample and no other aspect of the process i.e. any gender Sample Collection Personnel can perform duties such as notification, chaperoning, sample division, etc. UKAD also proposes that this is extended to include the needs of Sample Collection Personnel.

In relation to the Comment to Annex L.1.1, there are different processes for transgender Athletes and gender diverse Athletes (i.e. the gender of SCP for transgender Athletes is based on the gender of the sport within which the Athlete is competing, whereas for gender diverse Athletes, the Athlete can choose the gender of the SCP). Unless there is clear rationale for the different processes, UKAD believes the process should be made the same for transgender and gender diverse Athletes. If this is retained, UKAD requests the rationale for this difference.

L.3.1 - UKAD supports Annex L.3.1 and believes that the important part of this Article is '*when possible*' because legislation in countries may not legally allow an ADO to request this information and given the scale of the athlete pool, it is not always possible to know in advance.

UKAD suggests whether it is worth considering including that the Athletes are responsible for declaring/requesting a modification/gender preference in advance of being tested? I.e. access to this information shouldn't solely be the responsibility of the TA/ADO.

L.3.2 - As referenced in Annex L.3.2, it is unclear what 'gender diversity training' would entail and UKAD proposes that examples are either added to support ADOs (e.g. awareness raising and procedural training) or further detail is provided in WADA's 'Guidelines for Sample Collection Personnel'.

UKAD further requests that clarity should be provided as to whether a SCP can proceed with sample collection should they have not received/undergone the training, particularly as there are significant practical challenges with knowing if there will be transgender or gender diverse athletes present.

L.3.3 - As per previous comments, UKAD believes that the process for transgender and gender diverse athletes should be consistent, which would impact the wording of Annex L.3.3. If however Annex L.3.3 is to remain, it should be made clear that the selection of the gender of SCP for transgender Athletes is for witnessing urine provision only.

UKAD also proposes that guidance on how the process is applied in non-gender defined/mixed sports, e.g. equestrian, wheelchair rugby, and open category competitions. Would this be managed through enabling the athlete to choose the gender of SCP (if available), or gender they identify as?

L.3.4 - UKAD disagrees with Annex L.3.4 because it is impractical for the TA/SCA to have information in relation to the athlete being transgender or gender diverse in advance and would therefore result in a significant number of tests requiring SCP of different gender which would have prohibitive resource and financial implications. This is not a practical or viable avenue for TA/SCAs to implement.

UKAD would also want clarifications on what is expected if the TA/SCA could not resource SCP of different genders (i.e. would the test have to be cancelled?)

UKAD is of the view that the responsibility should be on the Athlete to notify the TA/SCA in advance so that modifications can be planned and arranged in advance.

Comment to L.3.4 gives protection to the ADO against Athletes being able to refuse a test on the basis that an SCP of their preferred gender is not available. UKAD would propose this comment is its own Article due to the significance of this in relation to a potential ADRV. It should also be extended to capture whether it applies to situations where the Athlete has declared/notified the ADO in advance.

L.4.3 - UKAD disagrees with L.4.3 as any Athlete can be notified by any gender SCP and this therefore should not be made a requirement for testing transgender Athletes. Propose the deletion of L.4.3.

L.4.4 - As per previous comments, UKAD believes that the process for transgender and gender diverse athletes should be consistent, which would impact the wording of Annex L.4.4. If however, Annex L.4.4 is to remain as is, guidance would be required on how the process is applied in non-gender defined/mixed sports, e.g. equestrian, wheelchair rugby, and open category competitions. Would this be managed through enabling the athlete to choose the gender of SCP (if available), or gender they identify as? Furthermore, UKAD proposes that Annex L.4.4 relates specifically to witnessing urine sample provision only and not blood sample provision.

L.4.5 - UKAD proposes that an Athlete declaring their gender diversity and preferred gender of SCP should not be restricted to 'upon arrival' at the DCS and should be completed at any time prior to sample provision. Furthermore, this would need to be done in a confidential and sensitive manner to protect the Athlete.

For example, a good opportunity may be when the SCP is outlining the Athlete's Rights and Responsibilities and they highlight/emphasise to the Athlete the points of being witnessed by the same gender of the sport/event they compete unless they request otherwise due to being transgender or gender diverse.

\*Due to word limit within section, additional comments to L.4.5 are in the 'Reasons for suggested changes' section below....\*

#### **Suggested changes to the wording of the Article**

L.1.1 - UKAD proposes the following changes to Annex L.1.1:

*'To ensure, where possible, that the particular needs of transgender and gender diverse Athletes and of Sample Collection Personnel are considered in relation to the witnessing of urine Sample provision without compromising the integrity of the Sample Collection Session.'*

L.3.1 - UKAD proposes adding wording to Annex L.3.1 to the effect of:

*'Transgender and gender diverse Athletes are responsible for declaring/requesting their preferred gender of SCP in advance of being tested.'*

L.3.3 - UKAD proposes the following changes to Annex L.3.3:

*'Where Sample collection involves transgender Athletes, the Testing Authority and/or the Sample Collection Authority shall assign Sample Collection Personnel of the same gender as the transgender Athlete, based on the gender of the Event the transgender Athlete competes in, for the witnessing of urine Sample provision.'*

Further wording would be determined by decision on non-gender defined/mixed sports and open category competitions.

L.3.4 - UKAD proposes the following changes to Annex L.3.4:

'Where **it is known in advance that** Sample collection involves gender diverse Athletes and where the gender diverse Athlete has not indicated in ADAMS their preferred gender of Sample Collection Personnel, the Testing Authority and/or the Sample Collection Authority should assign, at a minimum, two Sample Collection Personnel of different gender to the Sample Collection Session.'

UKAD proposes the following comment to Annex L.3.4 is made a new article:

*'The Testing Authority or Sample Collection Authority should make their best efforts to accommodate the gender diverse Athlete's preferred gender of Sample Collection Personnel however, a failure to provide a Sample on the basis that the gender diverse Athlete's preferred gender of Sample Collection Personnel is not available shall be pursued as a potential anti-doping rule violation.'*

This wording may need further amendment depending on whether this provision is only applicable when the preferred gender is not known in advance.

L.4.4 - UKAD proposes the following changes to L.4.4:

*'The DCO/Chaperone who witnesses the passing of the **urine** Sample shall be of the same gender as the transgender Athlete providing the **urine** Sample and based on the gender of the Event the transgender Athlete competes in.'*

Further wording would be determined by decision on non-gender defined/mixed sports and open category competitions.

L.4.5 - UKAD proposes the following changes to L.4.5:

*'**The gender diverse Athlete is responsible for declaring to the Sample Collection Personnel of their gender diversity and the preferred gender of Sample Collection Personnel who will witness the passing of the Sample at the earliest opportunity after notification and prior to providing urine Sample provision. The Sample Collection Personnel should manage this in a confidential and sensitive manner.***

***Once declared, the Athlete cannot change their preferred gender of Sample Collection Personnel during the test.***

***The Testing Authority or Sample Collection Authority should make their best efforts to accommodate the gender diverse Athlete's preferred gender of Sample Collection Personnel however, a failure to provide a Sample on the basis that the gender diverse Athlete's preferred gender of Sample Collection Personnel is not available or are not comfortable with witnessing shall be pursued as a potential anti-doping rule violation.'***

#### Reasons for suggested changes

General comment - Ensure an assessment of the risk of introducing the concept of choice is considered and not pressured by the timings of the 2027 IST.

L.1.1 - To limit modifications to the witnessing of urine sample provision. UKAD may further propose additional wording dependent on outcomes from other matters raised in UKAD's submission e.g. other athlete gender groups.

UKAD has no proposed wording for Comment L.1.1. as we are seeking rationale first and due to general comments relating to the considerations for introducing the concept of choice.

L.3.1 - Outlines what the responsibility of the Athlete is.

L.3.2 - Ensures a consistent application/standard and understanding of training expectations.

L.3.3 - Limits modifications to the witnessing of urine sample provision and to capture all sports and categories of competition.

L.3.4 - Due to resource and financial implications for ADOs.

L.4.3 - Limits modifications to the witnessing of urine sample provision.

L.4.4 - To capture all sports and categories of competition.

\*L.4.5 (comments following on from above 'General comments' section):

It would need to be made clear that this is only in the event where the Athlete has not declared/notified the ADO in advance.

Comment to Annex L.3.4 (in relation to grounds for refusing a test) should be reiterated here.

Additionally, the rights of Sample Collection Personnel need to be considered and if they can have a choice in if they are comfortable in witnessing the Athlete e.g. a Sample Collection Personnel may not be comfortable witnessing an Athlete with opposite genitalia.

L.4.5 - Ensures flexibility on when the Athlete can declare their preference and more practical for SCP.

### Bermuda Sport Anti Doping Authority

SUBMITTED

Duncan Barclay, Results, Compliance Manager (Bermuda)  
NADO - NADO

#### General Comments

The principle of Annex L is supported but requires more thought.

L 3.2 What is gender diversity training? How is this defined/ specified to ensure continuity?

L 3.4 and L4.5 The provision on SCP gender preference should be available to all athletes not just a specific group.

L 4.3 The gender of a *notifying* chaperone is irrelevant and doesn't need to be specified.

### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)  
NADO - NADO

#### General Comments

General Comments to Annex L

The CCES supports the creation of this annex, but the exact process needs further consideration to ensure practical implementation. The CCES support the comments submit by iNADO on this Annex. Given the uncertainty around this Annex consideration could be given to hold the implementation of this Annex until further review can be completed.

### Sport Integrity Australia

SUBMITTED

Andrew McCowan, Assistant Director Project Management Office (Australia)  
NADO - NADO

#### General Comments

SIA encourages that WADA drafting teams prioritise a person-centred approach when drafting changes across any international standard and the code, aiming to create a supportive, safe and inclusive environment for all athletes and sample collection personnel (SCP).

We agree with the principle of Annex L, to ensure the needs of transgender and gender diverse athletes are considered and respected. However, the annex does not sufficiently provide robust guidance to effectively protect the rights of transgender and gender diverse athletes, the rights of SCP, and to address the complexities at notification.

Notification procedures need to be clear and robust to minimise the anxiety of any athlete and SCP. Therefore, we recommend the guidance be strengthened to ensure:

- that the gender of the athlete is not inadvertently disclosed and is only disclosed to those who are required to know as part of doping control
- that SCP are well trained in the process outlined in Annex L, including the use of inclusive language and diversity training
- the approach is consistent and harmonised, providing the same safe and inclusive experience for athletes globally

Furthermore, there are potential issues regarding the handling of sensitive information specifically pertaining to transgender and gender diverse athletes i.e. gender identity, medical information related to their transition which are not specifically addressed. We recommend that the applicable articles within the relevant standards and code are strengthened to:

- minimise the risk of data breaches
- ensure the athlete's data is only accessible for the legitimate purpose of doping control
- ensure that Annex L aligns with global data protection laws, and therefore, ADOs are compliant with such laws



SIA notes that the terms himself and herself are used multiple times across multiple documents. We recommend that WADA consider replacing these with more inclusive wording such as themselves or other alternatives.

SIA acknowledges that the scope of the Guidelines for the *International Standard for Testing* (IST) could be expanded and potentially could include that ADOs should consider that sample collection personnel, educators and investigators undertake training related to basic human rights i.e. gender diversity, child safeguarding training and potentially others that could include anti-racism or anti-harassment and discrimination training. See comments to Article 13 of the ISE and 5.3 (5.3.2) of the ISII.

Feedback on the specific elements of the Annex:

L.3.1 - Responsibility: Currently, the responsibility solely sits with the ADO and Sample Collection Authority. We recommend this responsibility is shared between both the athlete and the testing authority. Where an athlete has not been previously tested, and where gender and their gender has not been pre-established, SIA recommend that the athlete also has the responsibility to inform the relevant ADO of their gender in advance.

Additionally, we recommend that WADA allow for athletes to provide their preferred pronouns. ADAMs and doping control forms, must then allow for pronouns to be captured and entered.

L.3.2 - SIA recommend that WADA provide more clarity on what standards need to be included for gender diversity training of SCP in the guidance material.

L.3.4 - SIA are seeking further clarity and guidance with regards to the notification of gender diverse athletes to ensure both the athlete and SCP meet the needs of those who are non-binary and do not fit within traditional male or female categories. Further guidance is required where the gender of the athlete has not been captured or disclosed i.e. the sport gender is then used in first instance. Additionally, SIA recommend that WADA provide seamless processes for athletes to provide updated information to ADOs through ADAMs to ensure the gender is up to date prior to doping control.

L.4.2 - SIA are seeking further clarity (either a comment to the article or in guidance material) as to what WADA consider as modifications and how best to apply them. This will ensure consistency across the standard with regards to modifications where WADA have provided examples and guidance surrounding them.

Suggested changes to the wording of the Article

L.4.5 Once the gender diverse *Athlete* is informed of the requirements of the *Sample* Collection Session and upon arrival at the *Doping Control Station*, they shall be given the option to declare their gender diversity and the preferred gender of *Sample* Collection Personnel who will witness the passing of the *Sample* at the earliest opportunity while ensuring their right to maintain their gender is not disclosed to those not required to know as part of the doping control process. Once the gender has been disclosed, the athlete cannot change their gender for the purpose of being witnessed.

Reasons for suggested changes

Ultimately, Testing Authorities will be responsible for implementing the process outlined in Annex L, for the notification, rights and data protection of transgender and gender diverse athletes. This includes ensuring the safety and well-being of athletes and doping control staff. Although the inclusion of the annex strives to address the importance of accommodating transgender and gender diverse athletes, we recommend that WADA address the concerns articulated to ensure that ADOs can effectively implement a robust, safe and inclusive process for all parties involved. WADA should also consider ongoing feedback opportunities for athletes and ADOs for continuous improvement.

Malaysia Anti Doping Agency (ADAMAS)

SUBMITTED

Muhammad Husmar Afdzal Bin Husin, Senior Assistant Director (Malaysia)  
NADO - NADO

General Comments

Under L.1 Objective:

A guideline for safety and welfare of a selected Medical Practitioner cum DCO by the athlete must be outlined for safeguarding purpose. The reason behind for this suggestion is due to selected Medical Practitioner cum DCO by the athlete may be exposed with various forms of harassments.

Suggested changes to the wording of the Article

1) Suggested for WADA to rephrase Comment to L.1 with:

[A **Transgender Athlete** is a person whose gender identity defers from the sex that was assigned at birth. Athletes may also have identities outside the binary gender system and are defined as gender diverse. **Gender Diverse Athletes** who are part of a Whereabouts Pool have the option to identify their gender diversity and their preferred gender of Sample Collection Personnel (**Medical Practitioner cum DCO**) in ADAMs.]

2) Suggested for WADA to rephrase Annex L.3.1 with:

The Testing Authority has responsibility for ensuring, when possible, that the Sample Collection Authority and/or the DCO has any information necessary to conduct a Sample Collection Session with transgender and/or gender diverse Athletes. **Therefore, transgender and/or Gender Diverse Athletes MUST provide verified document by the qualified Medical Practitioner on their sex status.**

3) Suggested for WADA to rephrase Annex L.3.2 with:

Where Sample collection involves transgender and gender diverse Athletes, the Sample Collection Authority has the responsibility to appoint Sample Collection Personnel (**Medical Practitioner cum DCO**) who have undergone gender diversity training prior to the Sample collection.

4) Suggested for WADA to rephrase Annex L.3.3 with:

Where Sample collection involves transgender Athletes, the Testing Authority and/or the Sample Collection Authority shall assign Sample Collection Personnel (**Medical Practitioner cum DCO**) of the same gender as the transgender Athlete, based on the gender of

the Event the transgender Athlete competes in.

**5) Suggested for WADA to rephrase Annex L.3.4 with:**  
Where Sample collection involves gender diverse Athletes and where the gender diverse Athlete has not indicated in ADAMS their preferred gender of Sample Collection Personnel, Athlete has not indicated in ADAMS their preferred gender of Sample Collection Personnel, the Testing Authority and/or the Sample Collection Authority should assign, at a minimum, two Sample Collection Personnel (Medical Practitioner cum DCO) of different gender to the Sample Collection Session.

**6) Suggested for WADA to rephrase Annex L.3.5 with:**  
Athletes who are Transgender and /or Diverse Gender MUST be witnessed by third party which is other Sample Collection Personnel throughout the entire Sample Collection Session. The objective is to ensure the safety of **Medical Practitioner cum DCO** and the Sample Collection Session run smoothly.

Reasons for suggested changes

- 1) **Annex L.1:** Mentioning Medical Practitioner cum DCO as option for SCP to do the procedures of the Sample Collection.
- 2) **Annex L.3.3 & L.3.4:** Add on about a proof of documents regarding the sex status.
- 3) **Annex L.3.5:** Add on about a proof of documents regarding the sex status

Anti-Doping Norway

SUBMITTED

Martin Holmlund Lauesen, Director - International Relations and Medical (Norge)  
NADO - NADO

General Comments

Comment to L.3.3.

Are there any consideration related to determining the sports gender in co-ed / mixed gender / gender neutral sports, such as e.g. cheer or equestrian?

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)  
NADO - NADO

General Comments

L.3.4:

To improve the efficiency and clarity of this process, it would be beneficial if gender-diverse athletes were required to specify their preferred gender of Sample Collection Personnel in ADAMS, rather than leaving this as an optional disclosure.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

General Comments

- L.1: It is important to explicitly reference Doping Control Personnel in Annex L, ensuring their role is clear in handling transgender and gender-diverse athletes. Definitions should be clarified, specifically around the gender-diverse options WADA provides through ADAMS. It should also specify what expectations will be placed on Testing and Sample Collection Authorities regarding accommodating these options. The impact of the changes within Annex L on witnessing sample collection must be considered. The annex and its protocols should apply to all athletes, not just specific groups, to ensure inclusivity and fairness.
- L.3: The primary responsibility for notifying the Testing Authority should be on the athlete. Athletes should be given the opportunity to pre-declare their gender identity, and clear consequences for failing to pre-declare must be outlined. Clarity is needed on data management related to pre-declaration and how this information will be handled securely. It is unclear whether the ultimate responsibility for assigning Sample Collection Personnel lies with the Testing Authority or the Sample Collection Authority—this needs clarification.
- L.3.2: There should be guidance and minimum requirements for diversity training for Sample Collection Personnel to ensure consistent and adequate preparation across organisations.
- L.3.3: This provision is obsolete as for In-Competition testing, Sample Collection Personnel is always assigned based on the the gender of the event. Therefore, there is no need to specify the process for transgender Athletes. There should be, however, provisions for events which do not require gender classification, such as equestrian, wheelchair rugby or open events, to clarify how Sample Collection Personnel should be assigned in these cases.
- L.3.4: For In-Competition testing, even if the Athlete has indicated their preferred gender of Sample Collection in ADAMS, it is impossible for a NADO to anticipate this athlete's participation in the event. This may be possible for International Federations who have direct access to the participant lists for International Events, but not for a NADO who mostly tests smaller events. For Out-of-Competition testing: Especially NADOs are

often testing athletes who do not provide Whereabouts and therewith do not even have the option to indicate their preferred gender of Sample Collection. This provision would, for both above-mentioned scenarios, require that there needs to be always SCP from both genders. Needless to state, that this would massively increase the costs and, as a consequence, heavily limit the number of tests that can be done.

L.4.3: It is proposed to delete this provision, as the gender of the SCP notifying the athlete is irrelevant and unnecessary.

L.4.5: To reduce the risk of manipulation or exploitation, athletes should declare their gender diversity and preferred Sample Collection Personnel at the earliest opportunity (immediately after notification and before collection). Once declared, athletes should not be allowed to change their preferred personnel.

L.4.6: Consider aligning the wording used in DCO paperwork with the language in Annex L. This should also consider the requirements for laboratory analysis.

USADA

Allison Wagner, Director of Athlete and International Relations (USA)  
NADO - NADO

SUBMITTED

General Comments

Annex L3.2 and L.3.4 and L.4.5

It remains unclear how a Sample Collection Authority would know in each situation whether an athlete is transgender or gender diverse, which could make these provisions difficult to follow. Guidelines should be provided to understand how a DCO, for example, gives an Athlete “the option to declare their gender diversity.” (Annex L.4.5).

Chair

Athlete Council, WADA (Canada)  
Other

SUBMITTED

General Comments

Transgender and Gender Diverse Athletes and Procedures for Sample Collection:

We endorse the comment from Sport NZ (p39 of the Stakeholder Engagement feedback):“Sport NZ recommends that WADA consult with athlete networks on this matter.” And in particular we recommend consultation with the transgender and gender diverse athlete community.

iNADO

Amy Dyer, Program Manager (Germany)  
Other - Other (ex. Media, University, etc.)

SUBMITTED

General Comments

iNADO is sharing comments and suggestion relating to Annex L following a meeting held on 17 September 2024. This meeting was attended by representatives from 13 organisations, plus an additional 3 NADOs who, although unable to attend, fully support the discussions and outcomes of the meeting.

The group emphasised their support for the Annex and view it as a positive development; however, with the introduction of ‘choice’ for gender diverse athletes and the associated implications, believe it requires further engagement with stakeholders and should not be rushed. Key areas for consideration include clarity on certain provisions and ensuring practical implementation.

We appreciate WADA’s efforts to ensure transgender and gender-diverse athletes are treated fairly and respectfully, and we hope these suggestions will help improve Annex L for practical implementation.

We look forward to continuing this important dialogue and are happy to provide further support.

Suggested changes to the wording of the Article

L.1 Objective and L.2 Scope:

It is important to explicitly reference Doping Control Personnel in Annex L, ensuring their role is clear in handling transgender and gender-diverse athletes.

Definitions should be clarified, specifically around the gender-diverse options WADA provides through ADAMS. It should also specify what expectations will be placed on Testing and Sample Collection Authorities regarding accommodating these options.

The impact of the changes within Annex L on witnessing sample collection must be considered.

The annex and its protocols should apply to all athletes, not just specific groups, to ensure inclusivity and fairness.

### L.3 Responsibility:

The primary responsibility for notifying the Testing Authority should be on the athlete. Athletes should be given the opportunity to pre-declare their gender identity, and clear consequences for failing to pre-declare must be outlined.

Clarity is needed on data management related to pre-declaration and how this information will be handled securely.

It is unclear whether the ultimate responsibility for assigning Sample Collection Personnel lies with the Testing Authority or the Sample Collection Authority—this needs clarification.

L.3.2: There should be guidance and minimum requirements for diversity training for Sample Collection Personnel to ensure consistent and adequate preparation across organisations.

L.3.3: There should be provisions for events which do not require gender classification, such as equestrian, wheelchair rugby or open events, to clarify how Sample Collection Personnel should be assigned in these cases.

L.3.4: Athletes must have a clear responsibility to inform Testing Authorities in advance, or at the earliest opportunity, about their preferred gender of Sample Collection Personnel. There also needs to be clarity on what constitutes the Testing or Sample Collection Authority making their "best efforts" to accommodate the athlete's preference. Pre-disclosure would help ensure the athlete's preference can be accommodated effectively.

### L.4 Requirements:

Out-of-competition testing provisions are missing from this section. This should be addressed to ensure Annex L applies in all testing situations.

L.4.1 and L.4.2: There should be additional comments offering examples of the modifications that a DCO can make. For example: delaying sample collection to find a suitable witness or if arranging an advance-notice test is appropriate. This would provide clearer guidance on practical modifications.

L.4.3: It is proposed to delete this provision, as the gender of the personnel notifying the athlete is irrelevant and unnecessary.

L.4.4: Consideration for the rights of the Sample Collection Personnel should also be given (e.g. do SCP feel comfortable witnessing athletes of different genitalia?). The language here shifts from offering the athlete choice in selecting personnel to denying that choice, which could be confusing. There is no provision here for events which do not have specified gender classification.

L.4.5: To reduce the risk of manipulation or exploitation, athletes should declare their gender diversity and preferred Sample Collection Personnel at the earliest opportunity (immediately after notification and before collection). Once declared, athletes should not be allowed to change their preferred personnel.

L.4.6: Consider aligning the wording used in DCO paperwork with the language in Annex L. This should also consider the requirements for laboratory analysis.

### Reasons for suggested changes

#### 1. Clear Definitions:

There is a need for clear terminology, specifically the distinction between gender and sex.

Clarification is required on which gender-diverse options will be recognised (e.g., Australia recognises 23 gender-diverse groups).

It is important to define what constitutes "best efforts" by a Testing Authority or Sample Collection Authority in accommodating gender-diverse athletes.

#### 2. Clarity on Responsibility:

Athletes should hold the primary responsibility for disclosing their gender identity and sample collection personnel gender preferences.

The roles and responsibilities of all involved parties, including the Testing and Sample Collection Authorities, must be clearly outlined.

#### 3. Data Protection, Confidentiality, and Rights:

There is a potential conflict between athlete rights and existing laws, particularly regarding the risk of unintentionally 'outing' an athlete's gender identity.

Clear guidance is needed on protecting athlete data to ensure privacy and confidentiality regarding gender throughout the anti-doping process.

Concerns regarding gender information provided for sample collection purposes being misused for eligibility monitoring.

Recognition of rights of Sample Collection Personnel (SCP) – it is important to recognise the rights of Sample Control Personnel, including considerations such as whether they should be provided with a choice, for example, if they feel comfortable witnessing athletes of different genitalia.

#### 4. Risk of Manipulation:

Consideration is required to address how athletes could potentially exploit the system to subvert the testing process.

There is also a risk that organisations could misuse gender information for competition eligibility purposes, creating an ethical challenge.

#### 5. Athlete-Centred Approach:

The approach should balance athlete rights and choices with the practical needs of doping control and sample collection personnel.

The annex currently focuses on specific groups, such as transgender athletes and gender diverse athletes. This could potentially isolate these groups and create disparity with other athletes e.g. cisgender. Furthermore, Annex L provides flexibility and choice to gender diverse athletes and not to transgender athletes, and clarification on the rationale for this would be helpful.

There is a disconnect between the flexibility offered in Annex L and the fixed requirements of the Doping Control Form (DCF), which must be addressed.

#### 6. Practical and Logistical Challenges:

The choice of Sample Collection Personnel should be carefully considered and referenced within the annex.

The time and cost implications for testing authorities adhering to the current version of Annex L are significant and may pose practical challenges, potentially making implementation impractical in its current form.

**WADA NADO Expert Advisory Group**

Martin Holmlund Lauesen, member (Norge)

Other - Other (ex. Media, University, etc.)

SUBMITTED

**General Comments**

According to the current wording a minimum of two Sample Collection Personnel of different genders have to be assigned which is a problem looking at cost.

Therefore, Transgender and gender-diverse athletes should be required to specify their gender in ADAMS. Athletes that are not linked to ADAMS, but part of the testing system should specify through their federation. It should not be optional to choose the gender during the control process. As well it should be clear that Chaperons do not have to be of the same sex as the athlete.