

2027 Code & International Standard Update Process: Third Consultation Phase - International Standard for Education (ISE)

Showing: All (237 Comments)

Article 1 (7)

Council of Europe (CoE)

SUBMITTED

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

General Comments

Art. 1.0 - Introduction and Scope

[Suggested rewording: “Education should equip athletes with the tools they need to develop the behaviors required to train and compete clean.”]

[Clarify what is meant by “high-quality education.” - define or explain criteria used.]

[Reframe or delete negative-leaning language such as “doping scandals tarnish reputations...” to maintain a positive tone.]

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)
NADO - NADO

General Comments

1.0 Introduction and Scope
-Supporting Athletes

Please clearly indicate the entity responsible for defining “high-quality education” and the methods used to do so.

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)
NADO - NADO

General Comments

1.0 Supporting Athletes. Reinforcement of values, awareness of the rules, access to information, and participating in high-quality Education can equip Athletes with the behaviors they need to train and compete clean, in line with the anti-doping rules and minimize their risk of unintentional doping.

FEEDBACK 1.0

we see two points in the above paragraph that could be clarified:

1. Suggested rewording for the sentence starting with “Supporting Athletes”:
Instead of:

“...Education can equip Athletes with the behaviors they need...”

We suggest:

“Education should equip athletes with the tools they need to develop the behaviors required to train and compete clean.”

2. What is “high-quality education”?

This term is vague—who defines what qualifies as high quality? We recommend specifying the criteria or standards used to determine this.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

General Comments

N/A

Suggested changes to the wording of the Article

SSI suggests some rewording, focusing on the support of athletes. „Education should equip athletes with the tools they need to influence behaviors needed to train and compete clean.“ or „Reinforcement of values, awareness of the rules, access to information, and participating in high-quality Education can equip Athletes with the behaviors they need to train and compete clean, in line with the anti-doping rules and minimize their risk of unintentional doping.” And add “to change behavior” after equipped. If wording is kept, identify who and how “high-quality education” is defined.

Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

General Comments

AFLD wishes to recognize and thank the ISE drafting team for their work in reviewing and considering all the comments received and for their efforts in updating the first draft.

USADA

SUBMITTED

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

NADO - NADO

General Comments

- Supporting Athletes
 - suggested rewording: “Education should equip athletes with the tools they need to influence behaviors needed to train and compete clean.” Or “Reinforcement of values, awareness of the rules, access to information, and participating in high-quality *Education* can equip *Athletes* with the behaviors they need to train and compete clean, in line with the anti-doping rules and minimize their risk of unintentional doping.” And add “to change behavior” after equipped. Recommend changing to not intentional doping to be clear and consistent with Article 10.2 of the Code.
 - If wording is kept, identify who and how “high-quality education” is defined.
- Merge “earning public trust” and “building a clean sport reputation” as they feel very similar and can be consolidated.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

In the sentence “*Education can equip Athletes with the behaviors they need to train and compete clean...*”, we recommend replacing the word “*behaviors*” with “*tools*”. The term “*tools*” more accurately reflects the role of education in providing Athletes with knowledge, skills, and resources to make informed choices and comply with anti-doping rules.

Article 2 (7)

ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

General Comments

ICSD supports the aims and objectives of anti-doping education as outlined in Article 2 of the ISE. However, we recommend that WADA explicitly acknowledge that **these objectives can only be fulfilled when education is inclusive and accessible** to all athletes — including those with disabilities such as Deaf athletes.

Suggested changes to the wording of the Article

To fulfill the objectives of education, Anti-Doping Organizations should ensure that all educational content is accessible to athletes with disabilities. This includes providing sign language, captions, plain language summaries, and visual formats where needed

Reasons for suggested changes

Deaf athletes are often unintentionally excluded from anti-doping education due to inaccessible delivery. Without clear, adapted education, athletes may not be fully protected or informed — which is counter to the intent of the ISE. WADA’s explicit commitment to accessibility at this early stage of the ISE would strengthen its overall impact and ensure equal understanding and engagement

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

General Comments

Article 2.2

The sentence “Anti-doping programs should be balanced – ‘support and prevent’ as much as ‘catch and punish’.” could be rephrased. Considering the Purpose and Scope of the World Anti-Doping Program and the given definition of prevention, “catch and punish” is not on the same level as “support and prevent”. As the majority of athletes and ASP is clean, the catch and punish approach is only for very few persons. In addition the whole testing system is

not there to “only” catch and punish athletes but to have a wide range of other effects as well (prevention, confidence in the system, clean sport reputation, deterrence, ...). That said, maybe balanced is not the right word here.

Please Note: This comment is also agreed upon the CEADO Education Managers and the PEERS group.

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)
NADO - NADO

General Comments

2.2 Key Principles

- *Anti-doping programs should be balanced – ‘support and prevent’ as much as ‘catch and punish’.*

FEEDBACK 2.2

If we acknowledge that the vast majority of athletes wish to compete clean, have no intention of using prohibited substances or methods, and have the right to a level playing field, then we believe the phrasing of the key principle—balancing “support and prevent” with “catch and punish”—does not align well with this understanding.

Suggestion:

Delete the last sentence to maintain consistency with the positive assumption about athletes’ intentions.

Sport Ireland

SUBMITTED

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

General Comments

N/A

Suggested changes to the wording of the Article

2.2

Reframe of the sentence to something like; Anti-Doping programs should focus on 'support and prevent' as opposed to 'catch and punish'

Rephrase to: This is why values based education and scenario based sessions should be included in addition to knowledge-focused Education Programmes.

Reasons for suggested changes

"catch and punish" sounds quite sinister which is language we're trying to move away from

"not sufficient" is quite negative, but the rephrasing above gives value to the values based education and scenario based learning

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

General Comments

2.2- 3rd bullet: the language “Anti-doping programs should be balanced – ‘support and prevent’ as much as ‘catch and punish’”. Balanced implies these two should be on the same level, and in reality, catch and punish should not be equal to, support and prevent’. Suggested language is: *“emphasis should be placed more on support and prevent versus catch and punish”*

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

Overall, we are supportive of the changes to this article.

Suggested changes to the wording of the Article

In 2.2, we are not certain there is evidence to support the statement that **“Athlete Support Personnel have the most influence of athlete behavior.”** As such, we would propose this is changed to **“Athlete support personnel influence athlete behavior”**

An additional point / key principle to be added after **“Athlete should be educated... One Education session does not constitute an ‘educated athlete’”**. We recommend adding to this so it reads: **“Receiving Education does not constitute an ‘educated athlete’. Evaluation is required to demonstrate an athlete or ASP has been educated.”**

Reasons for suggested changes

For the first suggestion, we don’t believe there is evidence to show ASP are the most influential. For instance, in some circumstances their peers may have a greater influence.

For the second suggestion, we think it is important to reinforce the need for evaluation to show education has taken place.

Huw Roberts, Of Counsel (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

N/A

Suggested changes to the wording of the Article

2.2

The AIU suggests adding the words “in isolation” at the end of the sentence: “*This is why knowledge-focused Education Programs are not sufficient **in isolation***”.

Article 3 (2)

ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)
Sport - IF – IOC-Recognized

General Comments

ICSD supports WADA’s emphasis on effective implementation and monitoring of anti-doping education. However, we recommend that WADA acknowledge the need to adapt implementation expectations and monitoring criteria for **small, event-based, or disability-specific ADOs** like ICSD

Suggested changes to the wording of the Article

In applying implementation and monitoring processes, WADA should take into account the structure, size, and target population of the ADO. This includes providing flexibility or support for ADOs with limited resources or those working in disability sport contexts, such as Deaf sport

Reasons for suggested changes

ICSD delivers education primarily during major Deaf events and does not have full-time anti-doping staff. Compliance with every aspect of the ISE may not be possible without adapted tools or support. Acknowledging this in Article 3 would help ensure fair monitoring while still encouraging improvement and alignment with the Code

Council of Europe (CoE)

SUBMITTED

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

General Comments

In Art. 3.1

[Replace “clean sport environment” in Art. 3.1 with “clean sport culture” to reflect the need for an internalized and collective sense of responsibility.]

Article 4 (7)

ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)
Sport - IF – IOC-Recognized

General Comments

ICSD supports the requirement that ADOs must provide targeted anti-doping education to various athlete groups. However, we are concerned that Article 4 **does not reference accessibility or inclusion** of athletes with disabilities — particularly Deaf athletes — in the design and delivery of education programs. WADA should explicitly require that

education be adapted to ensure it is understandable and effective for all, regardless of disability or language access needs

Suggested changes to the wording of the Article

Education programs must be accessible and inclusive of persons with disabilities. This includes delivering content in appropriate formats for Deaf athletes, such as sign language interpretation, captioned videos, plain language resources, and visual learning tools, as needed.

Reasons for suggested changes

Deaf athletes continue to be excluded from standard anti-doping education because materials are often delivered in audio-only formats or complex written language. Without accessibility, education efforts fail their purpose and create an unfair risk of violations. As a small ADO representing a linguistic minority, ICSD asks WADA to require accessible education delivery as part of ADOs’ minimum obligations under Article 4

Council of Europe (CoE)

SUBMITTED

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

General Comments

Art. 4.0 – Overview

[Add definition for "evidence-based theories" and include examples in the Guidelines.]

[Recommend changing phrasing from "shall take into consideration" to "should consider" in cultural/context-specific areas.]

[Add a bullet such as "Consider the resources available" to acknowledge varying capacities among ADOs.]

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)
NADO - NADO

General Comments

4.0 Overview

- 3rd paragraph: Recommend that a definition for “Evidence-based theories” and examples be added to the guidelines.
- In order to ensure that there is a common understanding among stakeholders including athletes and ASPs, we would like to see the details or definition of “learner-centered approach” clarified in the ISE or guidelines.
- Is "type of education" different from "education activity"?

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)
NADO - NADO

General Comments

There should be some clarification what “vulnerable” means, either here as a footnote or in the definitions.
Suggestion: “individuals or groups of athletes who, due to age, environment, lack of education, or external pressures, are at greater risk of engaging in doping intentionally or unintentionally”.

Sport Ireland

SUBMITTED

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

General Comments

Not sure what is meant by evidence-informed and theory based Education? Is this from published research? From anecdotal/informal research/reviews carried out within the NADO? More clarity on this is needed

USADA

SUBMITTED

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

General Comments

- Recommendation is to change ‘address’ to ‘consider’: The sentence “Signatories shall develop, document and deliver the Education Program to address the following” should be changed to “Signatories shall develop, document and deliver the Education Program that considers the following”.
- 3rd paragraph: Recommend that a definition for “Evidence-based theories” and examples be added to the guidelines.
- There should be some clarification of what “vulnerable” means, either here as a footnote or in the definitions. Perhaps identify who is most vulnerable.
 - Suggestion: “individuals or groups of athletes who, due to age, environment, lack of education, or external pressures, are at greater risk of engaging in doping intentionally or not intentionally”
- Define ‘curriculum’ in this context.
- Recommend that the Evaluation of the Education Program “should be ongoing and evidence based.”

University of Birmingham

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

We are not convinced in-person delivery can be virtual.

Suggested changes to the wording of the Article

We suggest replacing “in-person” with “facilitated real time”

Reasons for suggested changes

True in-person delivery likely brings benefits beyond live facilitation by an educator online.

ICSD

Mark Kusiak, ICSD Anti-Doping (Canada)
Sport - IF – IOC-Recognized

SUBMITTED

General Comments

ICSD supports the creation of an Education Pool to deliver targeted education. However, the structure and obligations under Article 5 assume ADOs have **centralized testing or whereabouts systems** that include all relevant athletes. For Deaf sport, this is not always possible. ICSD recommends that WADA include **flexibility and specific guidance** for small or event-based ADOs whose athletes are not in ADAMS or national RTPs

Suggested changes to the wording of the Article

Add the following clarification to the Comment section of Article 5:

Where athletes are not part of formal testing pools or ADAMS, ADOs may define an event-based or sport-specific Education Pool to fulfill these obligations. ADOs should also consider including athletes with disabilities in the EP and ensure the delivery of education is accessible to all members.

Reasons for suggested changes

ICSD’s Education Pool is often based on Deaflympics or regional championship participation, rather than ongoing RTPs. Requiring a year-round pool structure may not be feasible. Additionally, if accessibility is not built into the EP model, Deaf athletes may again be excluded. By clarifying that flexibility and inclusion are allowed, WADA can support equal implementation without penalizing smaller ADOs

Council of Europe (CoE)

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

SUBMITTED

General Comments

Art. 5.0 - Sport System Assessment

Define “those most vulnerable and at risk” in Section 17.3 or reference the Guideline.
[Proposed definition: Athletes at greater risk due to age, environment, education gaps, or external pressure.]

[Ensure consistent naming (analysis vs. assessment). Recommend separating NADO and IF guidance more clearly.]

NADA Austria

Dario Campara, Lawyer (Austria)
NADO - NADO

SUBMITTED

General Comments

The word “vulnerable” is mentioned a couple of times in the ISE but there is not definition of vulnerability or criteria that would make an assessment of it easier. A Definition or a reference to the Guideline might help.

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)
NADO - NADO

General Comments

5.0 Sport System Analysis

- The criteria and definitions of ‘vulnerable’ may differ between countries and cultures. The definition of vulnerable should be added in the ISE (and Code). The guidelines need to include an explanation of the concept of vulnerability (e.g. the difference between vulnerability and risk) and examples of items. It is particularly difficult for countries where English is not the first language to accurately understand the term ‘vulnerable’
- It would be helpful for ADOs if "National Teams" is defined in ISE. National Teams is diverse and different among country (for example, Team Japan competing at Major Event, or delegation athlete competing at International Event, etc.)

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)
NADO - NADO

General Comments

5.0 Sport System Assessment, *First Section: In addition, Signatories shall identify those most vulnerable and at risk of doping.*

FEEDBACK 5.0

- We take the liberty of restating this comment:
The principle is sound and important. However, the term “*those most vulnerable and at risk*” is very broad and lacks sufficient explanation, clear definitions, practical guidelines, or references to specific target groups.
- We suggest that a clear definition of “*those most vulnerable and at risk of doping*” be included under Section 17.3 (Defined Terms Specific to the International Standard for Education).
- We propose a definition:** “*Those most vulnerable and at risk*”: Individuals or groups of athletes who, due to age, environment, lack of education, or external pressures, are at greater risk of engaging in doping—intentionally or unintentionally.

NADA India

SUBMITTED

NADA India, NADO (India)
NADO - NADO

General Comments

Agreed

Canadian Centre for Ethics in Sport Bradlee Nemeth, Manager, Sport Engagement (Canada) NADO - NADO	SUBMITTED
<div>General Comments</div> <div>Article 5.0</div> <div>The CCES notes that a standardized definition for or criteria to identify “those most vulnerable and at risk” would help Signatories prioritize those learners in our education pools and education plans.</div>	

International Testing Agency International Testing Agency, - (Switzerland) Other - Other (ex. Media, University, etc.)	SUBMITTED
<div>General Comments</div> <div>Regarding the final sentence: “<i>In addition, Signatories shall identify those most vulnerable and at risk of doping,</i>” we recommend revising it to: “<i>In addition, Signatories shall identify those groups most vulnerable and at risk of doping through the Sport System Analysis described in Article 5.1.</i>” This revision clarifies that the expectation is not to assess individual risk, but rather to identify vulnerable groups within the broader sport system, ensuring a more structured and evidence-based approach.</div>	

Bird & Bird LLP Huw Roberts, Of Counsel (United Kingdom) Other - Other (ex. Media, University, etc.)	SUBMITTED
<div>General Comments</div> <div>N/A</div> <div>Suggested changes to the wording of the Article</div> <div>The AIU suggests adding in 5.0 the words “within this environment” at the end of the sentence. “<i>Signatories shall identify those most vulnerable and at risk of doping within this environment</i>” and then at the end of 5.1 “<i>The high-risk sports and their disciplines (as relevant) or countries for doping</i>”.</div>	

Article 5.1 (6)

Japan Anti-Doping Agency Chika HIRAI, Director of International Relations (Japan) NADO - NADO	SUBMITTED
<div>General Comments</div> <div>5.1 Conducting a Sport System Analysis</div> <div>- It seems that 5.1. is more focused on the national level (although the wording sometimes tries to include IFs as</div>	

well). We suggest separating this article to have clearer language on what is expected from which type of signatory.

NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

General Comments

Comment to Art. 5.1

The term "national team" is not clear in the sense of existing definitions (National Level, International Level Athletes)

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

General Comments

The article states the identificatioin of competitions / events of 'national teams'. Due to the broad variety of sports and different levels, this has to be more specific.

Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

General Comments

Article 5.1

The CCES would suggest removing, “identification of competitions or Events where national teams participate” as an example. The other examples effectively outline the relevant national context, and the creation of this list would be potentially burdensome to capture all competitions for all national teams.

USADA

SUBMITTED

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

NADO - NADO

General Comments

- 5.1- Define “national teams” - description is vague
- It seems that 5.1. is more focused on the national level (although the wording sometimes tries to include IFs as well). We suggest separating this article to have clearer language on what is expected from which type of signatory.
 - Building off the existing PEERS feedback draft “5.1. is more focused on the national level (although the wording sometimes tries to include IFs as well)” regarding separating the article based off what type of signatory:

Include IFs in the section that refers to other organizations that may have a role in supporting Education Programs.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

We support the principle that ADOs should develop a contextual understanding of their operating environment to inform the design and delivery of effective education programs. However, we have concerns about the feasibility of the current formulation of Art. 5.1 for both IFs and NADOs.

In particular, it may be unrealistic to expect NADOs to provide detailed sport-specific analysis across all disciplines within their jurisdiction. Likewise, IFs may face challenges in gathering in-depth national-level information that lies outside their direct scope. To ensure that this requirement remains meaningful and implementable – and does not become a procedural, “tick-the-box” exercise – we recommend clarifying that the Sport System Analysis should be conducted *“within each organization’s respective ambit of authority and jurisdiction,”* meaning it should remain relevant and proportionate to their roles and areas of activity. We recommend clearly differentiating the areas of focus for NADOs and IFs to reflect their distinct responsibilities and capacities.

Additionally, we suggest reconsidering the inclusion of the following elements, which may pose implementation challenges and raise confidentiality concerns:

“How sport is funded” – This aspect is often complex and multifaceted, involving both national and international funding streams. IFs and NADOs may not have comprehensive visibility into these structures.

“High-risk sports or countries for doping” – This topic involves sensitive and confidential information that is typically addressed through the Risk Assessment required under the IST. We recommend directly referencing the IST Risk Assessment within Art. 5.1 as a general complementary tool to inform the Sport System Analysis from multiple angles – such as identifying high-risk groups, prioritizing target audiences, and understanding sport-specific vulnerabilities, without requiring direct transposition of its content into the Sport Analysis under the ISE.

“Identification of competitions or events where national teams participate” – This requirement is not feasible at least for IFs, as they do not typically manage national team participation.

With regard to the Comment on Art. 5.1, while the inclusion of guidance and the indirect reference to the IST Risk Assessment is appreciated (and, as noted above, we recommend reinforcing this directly within the article), it may not sufficiently address scenarios where NADOs could attempt to rely excessively on IFs to obtain extensive sport-specific information. To avoid misaligned expectations and potential friction between stakeholders, it is essential to clearly differentiate the scope and responsibilities of NADOs and IFs in conducting their respective Sport System Analyses.

Article 6 (12)

ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

General Comments

ICSD strongly supports the call for collaboration among ADOs. For Deaf athletes, effective education is often only possible through **cooperation between ICSD, NADOs, National Deaf Sports Federations, and Local Organizing Committees (LOCs)**. We encourage WADA to specifically recognize the need for **collaboration with disability-specific ADOs** to ensure full education coverage and accessibility

Suggested changes to the wording of the Article

Where athletes are served by disability-specific or small ADOs, NADOs and other stakeholders should collaborate with these ADOs to provide consistent and accessible anti-doping education. Collaboration should also ensure the delivery of adapted content for athletes with disabilities, including Deaf athletes.

Reasons for suggested changes

ICSD often does not have access to national RTPs or education platforms, which limits our reach. In many countries, Deaf athletes receive no anti-doping education unless ICSD or a Deaf sports federation intervenes. Collaboration — particularly through major events — is the only practical way to ensure consistent education. Acknowledging this in Article 6 would help WADA promote a more inclusive, joined-up system

International Paralympic Committee

SUBMITTED

Jude Ellis, Head of Anti-Doping (Germany)

Sport - IPC

General Comments

Under the new ISE the Education Pool is no longer a targeted group of individuals but is instead incredibly wide. For example, for MEOs it appears that essentially everyone now needs to be included (as 6.1.2 requires all athlete participants to be included, and 6.2.1 requires all accredited athlete support personnel to be included). When reading the ISE as a whole, we now find the purpose of having an Education Pool (and what it means to be included in an Education Pool) quite unclear/confusing.

The Education Pool under the new ISE is also extremely fluid, where parents of minors, coaches, medical personnel, major event participants, minor athletes and even international level athletes can and will change from year to year, or even more often. This fluidity presents a significant challenge to ADOs to identify individuals in these groups, let alone ensure they are 'educated regularly' (if at all in any given year).

Given the now expansive requirements for education pools, the comment to Article 6.1.2 needs to be amended to remove the reference to people/groups being 'educated regularly'. There is no such requirement in the Code/Standards for regular education, and nor do we consider such a requirement to be at all realistic for small ADOs given the now expansive Education Pool. We would suggest the following wording for the comment:

[Comment to Article 6.1.2 - It should be noted that the mandatory inclusion in an Education Pool does not mean that every single person in these groups will be required to receive a certain educational activity in a given year. Rather, such groups of individuals shall be actively identified and included in a Signatory's Education Plan with specific targeted education activities to ensure that, within a Signatory's means, they are appropriately educated.]

Suggested changes to the wording of the Article

Comment to Article 6.1.2

It should be noted that the mandatory inclusion in an Education Pool does not mean that every single person in these groups will be required to receive a certain educational activity in a given year. Rather, such groups of individuals shall be actively identified and included in a Signatory's Education Plan with specific targeted education activities to ensure that, within a Signatory's means, they are appropriately educated.

Chris Bold, Assistant Director, Anti-Doping Policy (Australia)
Public Authorities - Government

General Comments

We express strong support for the use of “access to education” as opposed to “being educated”. This change reinforces the autonomy and responsibility of athletes.

Amandine Carton, Deputy head of department of ethics, integrity and prevention policies
(FRANCE)
Public Authorities - Government

General Comments

In addition to the persons listed in Article 6, it would be useful to stipulate that members of disciplinary panels should be part of the education group. They are not necessarily anti-doping professionals, and this would help to maintain a high level of knowledge of anti-doping rules and their proper application.

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

General Comments

Art. 6.0 - Education Pool

Express strong support for “access to education” vs. “being educated.” Reinforces autonomy and practical responsibility.

[Clarify the impact of changing “shall” to “will” and assess if it reflects obligation.]
[Add language acknowledging that duplication of efforts between NADOs and IFs should be minimized. Define who leads on ILA education responsibilities.]

Christine Helle, CEO (Sweden)
NADO - NADO

General Comments

ADSE supports the change of wording in Article 6.0 from “are educated” to “have access to education”, as it goes in line with the clarification comment in Article 6.1.2 that a mandatory inclusion in the education pool does not mean that every single person in these groups will be required a certain education activity.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)
NADO - NADO

General Comments

In general, we would like to see the “Target groups” remaining and feel it is important to not have to ‘prioritise all groups’ in the Education Pool but still have groups that are ‘target’ for us with and have an education pathway, but not top priority of an Education Pool.

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)
NADO - NADO

General Comments

- a. 6.0 Establishing an Education Pool, second paragraph:** *A core principle of the International Standard for Education is that Athletes have access to education from the ‘Playground to the Podium’. The establishment of Clean Sport Behaviors underpinned by values is a key outcome of any Education Program.*
- b.** *Consequently, both Athletes and Athlete Support Personnel will form part of the Education Pool.*

FEEDBACK/COMMENT 6.0

- a. We are very positive about the change in wording from “Athletes are educated” to “Athletes have access to education.”

This shift acknowledges that while it is important to provide quality education, it is ultimately the responsibility of athletes to engage with it. The new wording better reflects the reality of differing circumstances and respects athletes’ autonomy, while still emphasizing the duty of organizations to ensure education is available, accessible, and well-structured.

In addition, this supports the comment to Article 6.1 and Article 6.2.1, which highlights the need to include a broader target group in our education pools. While it is acknowledged that reaching every individual may not always be possible, the updated wording reinforces the importance of ensuring that as many relevant groups as possible have access to education.

The wording has been changed from “shall” to “will”. What is the significance of this change? Does it imply a shift from obligation to intention or expectation?

NADA India

SUBMITTED

NADA India, NADO (India)
NADO - NADO

General Comments

Agreed

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

General Comments

- In general, we would like to see the “Target groups” remaining and feel it is important to not have to ‘prioritise all groups’ in the Education Pool but still have groups that are ‘target’ for us and have an education pathway, but not top priority of an Education Pool.

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

General Comments

The revision from “are educated from” to “have access to education” is a very welcome improvement.

In regard to the sentence: "Consequently, both Athletes and Athlete Support Personnel will form part of the Education Pool", the effort to provide greater clarity on the level of obligation is appreciated. However, the use of "will" is inconsistent with the general practice in the ISE and other Standards, where "will" is almost never used to establish obligations. We recommend opting for "should" which in this case seems appropriate.

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

We generally support the changes, but there are some specific elements we would refine further.

Suggested changes to the wording of the Article

6.1.1 A rationale should have to be provided for inclusion of “other” athletes in the education pool and the type of education activities they receive. At the moment this is required for mandatory athlete groups, but not for the other athletes.

First change to 6.2

Athletes values and behaviours to foster anti-doping attitudes should be changed to **Athletes values and behaviours to promote clean sport.**

Second change to 6.2

The most influential athlete support personnel should be given priority should be changed to **the athlete support personnel working most closely with athletes should be given priority.**

Remove comment to 6.2.1 or add the need to document all efforts to contact and educate parents/guardians.

Reasons for suggested changes

6.1.1 – it is important for signatories to show the reasoning that underpins decisions on which groups to include in the education pool, and why specific types of education have been selected.

The first change to 6.2 - The ultimate goal is to promote clean sport, rather than change attitudes. Further, anti-doping attitudes are not defined.

The second change to 6.2 - influential is too subjective and our change to ‘working most closely’ is more directive.

Comment to 6.2.1 - the addition of this comment potentially dilutes the obligations of the ADO.

Article 6.1 (16)

World Rugby

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)

Sport - IF – Summer Olympic

General Comments

Article 6.1.1 - The wording of this article could be clearer in terms of how it would be expected that athletes ‘*receiving notification of potential Anti-Doping Rule Violations*’ should be included in an education pool? It's not obvious as to how/when this would be expected to work in practice.

International Paralympic Committee

SUBMITTED

Jude Ellis, Head of Anti-Doping (Germany)

Sport - IPC

General Comments

Article 6.1.1

IPC believes that when an athlete receives a notice of a potential ADRV is not the opportune time to engage them in education (indeed it is arguably too late). The athlete will likely be under some stress.

IPC suggests athletes who are subject to the results management process and either receive a reprimand (no sanction) or are found to have not committed as ADRV as an alternative to this. These athletes would be targeted for education at the conclusion of the results management process, where they would be more receptive to education (and possibly quite motivated to avoid a repeat of the experience they have just been through). This would also avoid those instances where cases are closed after the athlete has received the notice due, for example, to a TUE or permitted route.

Article 6.1.2

Please refer to our comment to Article 6.

Comment to Article 6.1.2

Please refer to our comment to Article 6.

Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

General Comments

In **Art. 6.1.1**, the inclusion of “Athletes receiving notification of potential ADRV” in the Education Pool raises practical concerns.

[This group may be more appropriately combined with “Athletes serving/returning from a period of Ineligibility.”]

Additional guidance is needed for what education this group should receive.

[Suggest including emotional, legal, and procedural support in addition to education.]

“Talented-level Athletes” is not defined in the appendix, unlike “International-level” and “National-level” Athletes.

[Either define or remove the term.]

Art. 6.1.2:

Requiring Minors to be in the Testing Pool is difficult for NADOs who may not know where or when International Testing takes place.

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

General Comments

Comment to 6.1

This comment is very important and should ease the fear of many ADOs not being able to comply with the requirements of the ISE. That said, this comment should be raised to a higher level, not remain a mere comment.

However, if the approach expressed in this comment is valid, this could create some issues as well. Sometimes a 100% fulfilment of education activities is required (e.g. completing an e-learning course before an international event). If the IF wants to know from the NADO if every participant of the country has been educated, gaps are not acceptable in this case.

For IFs it might not be acceptable to hear from a NADA that a workshop was offered for the national team and 75 % participated and were educated. From a program perspective the national team was educated and had access to the relevant information. That said, maybe it is worth clarifying that this comment it intended to aim at ISE-compliance / CCQ level questions.

Article 6.1.1

The requirement “Minors competing at International Events where Testing takes place.” is very difficult to fulfil for some ADOs. E.g. NADOs cannot know if and where Testing takes place at an International Event. There are currently 121 signatories of the Code who potentially have international events. Some of them will have minors at international events we don’t know at all.

With the current information policies of international federations, it is impossible to know or find out which events are international events. Some federations publish the relevant information on their website, many don’t. Since this is an important information that has many implications there should be a central database that has all the information easily accessible.

We fully agree with the principle to educate minors competing at international Events, but it will be a challenge to reach 100% here. This will need much support from the National and/or International Federation.

We fully agree with the principle to educate minors competing at international Events, but it will be a challenge to reach 100% here. This will need much support from the National and/or International Federation.

On the other hand, even IF sometimes can also not know where testing takes place (e.g. in the event they delegated this to a service provider or the NADO requests to test at an International Event in a shorter notice).

An ADO cannot always know where testing takes place (e.g. target testing due to intelligence, short term decisions to conduct testing to keep the number of involved persons as low as possible – no advance notice, short term requests from an ADO to test at an international event, doping controls because of a national / international record).

Due to that reason it is not always possible to deliver “Education at Events where Testing takes place” so this needs reconsideration / rewording.

Article 6.1.2

The requirement “Parents/Guardians of Minors competing at International Events where Testing takes place.” is very difficult to fulfil for some ADOs. E.g. NADOs cannot know if and where Testing takes place at an International Event. There are currently 121 signatories of the Code who potentially have international events. Some of them will have minors at international events we don’t know at all.

With the current information policies of international federations, it is impossible to know or find out which events are international events. Some federations publish the relevant information on their website, many don’t. Since this is important information that has many implications there should be a central database that has all the information easily accessible.

We fully agree with the principle to educate parents / guardians of minors competing at international Events, but it will be a challenge to reach 100% here. This will need much support from the National and/or International Federation.

On the other hand, even IF sometimes can also not know where testing takes place (e.g. in the event they delegated this to a service provider or the NADO requests to test at an International Event in a shorter notice).

An ADO cannot always know where testing takes place (e.g. target testing due to intelligence, short term decisions to conduct testing to keep the number of involved persons as low as possible – no advance notice, short term requests from an ADO to test at an international event, doping controls because of a national / international record).

Due to that reason “Parents/Guardians of Minors competing at International Events where Testing takes place” needs reconsideration / rewording.

Please Note: These comments are also agreed upon the CEADO Education Managers and the PEERS group.

NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

General Comments

Comment to Art. 6.1:

In the latest drafting version, ISE 2027 still does not entirely clarify the implications for the Education Pool.

For signatories it is not clear if the Education Pool is a wider population (as previously defined as Target Group) or a group of individuals (similar to Testing Pool).

The explanation of the Comment to Article 6.1 (under 6.1.2) is not sufficient.

Chika HIRAI, Director of International Relations (Japan)
NADO - NADO

General Comments**6.1.1 Requirements for all Signatories**

- **Minors competing at International Events where Testing takes place**
- **Athletes receiving notification of potential Anti-Doping Rule Violations**

Both should move down to "In addition, Signatories should consider other Athletes who are part of their Athlete Pathway and those who are subject to their anti-doping rules for example:"

Reasons for "Minors competing at International Events where Testing takes place"

- We fully support the idea of putting the focus on minors. However, for some ADOs, it is difficult to include them in the educational pool and consider educational strategies even if the approach is not in person.
- NADOs cannot know if and where Testing takes place at an International Event. On the other hand, IFs are sometimes unaware of where testing takes place (e.g., in the event they delegated this to a service provider or the NADO requests to test at an International Event in a shorter notice).
- With the current information shared by international federations, it is not always easy to determine which events are international events. Some federations publish the relevant information on their websites, but this is not standard practice for all.

Reasons for "Athletes receiving notification of potential Anti-Doping Rule Violations"

- After receiving notification, athletes may or may not ultimately become ADRVs, making it difficult to determine the timing and learning objectives for them.
- Of course, in some cases, it may be possible to set an appropriate timing. so it is operationally appropriate to include them in the scope of "shall consider" so that education can be provided at the discretion of the ADO.
- In addition, there are concerns about conflicts of interest arising from ADO contacting athletes prior to the hearing.

Suggested changes to the wording of the Article**6.1.1**

Talented-level Athletes -> Talented-level Athletes (as defined by a specific sport);

Comment to Article 6.1

Request to delete the phrase "fully aware of".

Reasons for suggested changes**6.1.1 Talented-level Athletes**

Since the "Talented-level" varies depending on the sport, it is preferred to add "as defined by a specific sport" as with master athletes.

Comment to Article 6.1

It is difficult to guarantee that something is "fully" compliant, and it is questionable whether this can be achieved through the provision of information on a website.

Ernst König, CEO (Switzerland)
NADO - NADO

General Comments

The comment added under 6.1.2, clarifying 6.1, that the athletes included do not have to be educated but it has to be ensured to have access, is contradictory to compliance requirements.

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

General Comments

6.1.1 Requirements for all *Signatories*

All Signatories shall include the following Athletes in their Education Pool: There is an additional group to be included in the Education Pool.

- *"Athletes receiving notification of potential Anti-Doping Rule Violations".*

FEEDBACK 6.1.1:

An additional group has been added to the Education Pool: *"Athletes receiving notification of potential Anti-Doping Rule Violations."*

We suggest clarifying what kind of education these athletes should receive at this stage. Is the goal to help them understand the Results Management (RM) process? Additionally, this situation may require broader support beyond education alone—such as emotional, legal, or procedural guidance.

Anti-Doping Sweden

SUBMITTED

Christine Helle, CEO (Sweden)

NADO - NADO

General Comments

Comment to Article 6.1.1 regarding the new mandatory target group "Athletes receiving notification of potential Anti-Doping Rule Violation":

ADSE request further clarification and guidance to what kind of education should be offered to this target group. We support education covering information about the legal process and the suspension rules (what the athletes can do/not do during their suspension). Further we support education covering the whereabouts system and whereabouts rules for athletes receiving their first and second whereabouts failure, but that would be in an earlier stage, before they receive their notification of an ADRV. In our opinion all other education topics than those mentioned above, are too late to be given to athletes already receiving notification of potential ADRV and should be given to the athletes at an earlier stage.

For information, in the current education program at ADSE athletes returning from a sanction, are included in this target group. The athletes are notified about the mandatory eLearning before returning to sports. We also offer the athletes an interview after they receive their notification of ADRV, in which they can ask questions and get more information on how to avoid the same mistake again, if they want to.

Furthermore, ADSE suggest a change in the wording of "Talented-level Athletes" regarding the new target group that we should consider in our education pool, see suggested change and reason for change below.

Comment to Article 6.1.2 regarding Requirements for Specific Signatories:

ADSE welcomes the first part of the below Comment to Article 6.1 which clarifies that we do not need to educate, register and follow up every single person in the mandatory education pool. That said we suggest a change in the wording of the comment, see suggested change and reason for change below.

Suggested changes to the wording of the Article

Article 6.1.1:

In addition, Signatories should consider other Athletes who are part of their Athlete Pathway and those who are subject to their anti-doping rules for example:

- Children and Youth;
- Talented-level Athletes;
- University sport Athletes;
- Recreational Athletes; and/or – Masters Athletes (as defined by a specific sport);

Article 6.1.2, Comment below:

It should be noted that the mandatory inclusion in an Education Pool does not mean that every single person in these groups will be required to receive a certain educational activity in a given year. Rather, such groups of individuals shall be actively identified and included in a Signatory's Education Plan with specific targeted education activities to ensure that they are educated regularly and have access to the relevant information ~~and are fully aware of their responsibilities under the Code.~~

Reasons for suggested changes

Article 6.1.1:

As the athlete group "Talented-level Athlete" is not defined in the appendix, the way International-Level and National-Level Athletes are, we suggest removing the word "level". Or otherwise, define this group of athletes in the appendix.

Article 6.1.2, Comment below:

The last part of the comment "and are fully aware of their responsibilities under the Code" contradicts the first part of the comment. The current writing could be interpreted as such that we still should follow up each person and do an examination to see if they are fully aware of their responsibilities under the Code.

Sport Ireland

SUBMITTED

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

General Comments

6.1.1

Athletes receiving notification of potential ADRVs

Not sure what is meant by this here? If the athlete is receiving a notification of a potential ADRV does it mean to educate the athlete around the practicalities of serving a ban?

UK Anti-Doping

SUBMITTED

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

General Comments

6.1.1 - UKAD has some concerns regarding the inclusion of 'Minors competing at International Events where Testing takes place'. It should be clarified that this is a role for the International Federations, as this would be challenging for NADOs to track and enforce via National Federations, based on the ISE definition of International Event on p27. This comment is based on the assumption that minors competing at International Events would be classified as International Level Athletes. If this is not the case and NADOs are expected to include in their Education Pool, this will have significant implications for the education plan and the associated monitoring and evaluation processes. If this remains in the list of requirements for all Signatories, support should be provided in terms of lists of International Events which are included.

UKAD proposes that this group ('Minors competing at International Events where Testing takes place') is moved to the 'Signatories should consider' paragraph below.

With reference to the inclusion of 'Athletes receiving notification of potential ADRVs'. General Anti-Doping education may not be appropriate at this point, covering all mandatory topics, therefore it may be beneficial to provide further clarity of the specific requirements of education at this point.

UKAD requests that further information is provided in the Guidelines for Education as to what might be suitable to provide athletes at this point. This will help provide clarity and further guidance for Signatories.

6.1.2 - UKAD have some concerns regarding the expectation that **all** National Level Athletes are included in the Education Pool. Depending on the definition adopted by the NADO, this could include a significant number of athletes at lower levels of the performance pathway.

Recommendation that NADOs have some discretion regarding which groups of NLAs are selected within their Education Pool.

If 6.1.2 remains with all National Level Athletes being included in the Education Pool, this also has significant implications for the numbers of associated ASP (coaches and medical personnel at a minimum) that are associated with NLAs and therefore must also be included. This has implications for capacity in terms of the education activities in addition to the M&E requirements.

Recommendation that NADOs have some discretion regarding which ASP roles (linked to NLAs) are selected within their Education Pool (over and above coaches and medical personnel).

Reasons for suggested changes

6.1.1 - This does not assist in minimising duplication between Signatories and will lead to operational concerns for NADOs being able to meet this requirement.

6.1.2 - There will be implications for the inclusion of all NLAs and also ASP linked to NLAs within the Education Pool. Including significant additional numbers of athletes and ASP, which may be beyond the resource capacity of some NADOs.

Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

General Comments

Article 6.1.1

The CCES recommends considering the removal of “Athletes receiving notification of potential ADRVs” from the athletes that shall be included in the education pool. The intent of capturing this group may be covered already by “Athletes serving/returning from a period of Ineligibility.”

Additionally, the CCES recommends defining or providing additional context for “talented-level” athletes.

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

NADO - NADO

General Comments

- 6.1.2 Minors competing at International Events where Testing takes place
 - The requirement “Minors competing at International Events where Testing takes place.” is very difficult to fulfil for some ADOs. For example, NADOs cannot know if and where Testing takes place at an International Event. On the other hand, IFs are sometimes unaware of where testing takes place (e.g., in the event they delegated this to a service provider or the NADO requests to test at an International Event in a shorter notice, or a world record...this is last minute. No advanced notice testing doesn't catch this clause).
 - It is also difficult for some ADOs to know which minors are competing there without support from the National or International Federation.
 - With the current information shared by international federations, it is not always easy to determine which events are international events. Some federations publish the relevant information on their websites, but this is not standard practice for all.
 - We fully support the idea of putting the focus on minors. However, this needs some rethinking. If this approach is upheld, WADA must outline the process for easily identifying the regulations ILA (important for TUEs, Testing, Education, RM, etc.) and consider providing a database.
 - The code has 121 signatories, but not all ADOs cover every signatory. So whose responsibility are the athletes outside of the ADO responsibility?
 - Could this be a risk assessment? A “should” here would be far more supportive, but a shall is really hard, even when thinking outside of the box, by several large NADOs we cannot come to a solution to reach all of these athletes.

Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

General Comments

6.1.1 Requirements for all Signatories

"Minors competing at International Events where Testing takes place;"

We fully acknowledge the crucial importance of educating minors. The fact that all signatories shall include “Minors competing at International Events where Testing takes place” could create potential duplication of education and potential confusion among signatories with regards to roles and responsibilities.

Perhaps the Guidelines for education could explain the rationale behind the requirement for all signatories to include “Minors competing at International Events where Testing takes place” in their Education pool and provide examples of good practice of cooperation between signatories to clarify roles and responsibilities and avoid duplication of education.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

Article 6.1.1

Regarding the requirement for minors competing at international events, as previously highlighted, it is both impractical and, in many cases, impossible for IFs to pre-identify these athletes. This creates a significant risk that the requirement will remain unenforceable, leading to a situation where ADOs are forced to adopt a reactive approach instead of being proactive. We recommend removing or revisiting this requirement.

Regarding the addition of the requirement for athletes who have received notification of a potential ADRV, we strongly recommend removing this new group for several reasons:

The information may be confidential under the ISRM, and it is not advisable to promote its further dissemination;

It is unclear which specific notification under the ISRM should trigger this requirement;

At this initial stage, it is not even certain whether the ADRV will be confirmed, and therefore it is difficult to determine what, if any, educational needs should be addressed.

Regarding the comment on Article 6.1.1, while the first part is appreciated, there seems to be some inconsistency between the two sections. The first part softens the expectations, but the second part is quite detailed in the concrete requirements and appears to undermine the flexibility suggested in the first part.

Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

General Comments

Is the intent of the changes to Article 6.1.1, in practice, to educate athletes following their notification of a potential ADRV? Is this not too late and might the time and resource required to include this group as a pool be better spent focusing on the emerging youth?

In respect of the Comment, the AIU suggests emphasizing the importance of proactive collaboration between IFs, NADOs, and MEOs to ensure athletes are suitably and regularly educated across the board.

Article 6.2 (7)

International Paralympic Committee

SUBMITTED

Jude Ellis, Head of Anti-Doping (Germany)

Sport - IPC

General Comments

Article 6.2.1

Please also refer to our comment to Article 6.

Article 6.2.2

We support the inclusion of a reference to athletes with intellectual impairments. However, the drafting feels quite clunky and we would prefer for it to be included in the list of ASPs as follows:

As defined in the Code, the following Athlete Support Personnel should be considered for inclusion in the Education Pool: trainers, managers, agents, team staff, officials, parents/guardians, those supporting Athletes with intellectual impairments who are competing internationally, or any other Person working with, treating or assisting an Athlete participating in or preparing for sports Competitions or Events.

Please also refer to our comment to Article 6.

Suggested changes to the wording of the Article

As defined in the Code, the following Athlete Support Personnel should be considered for inclusion in the Education Pool: trainers, managers, agents, team staff, officials, parents/guardians, those supporting Athletes with intellectual impairments who are competing internationally, or any other Person working with, treating or assisting an Athlete participating in or preparing for sports Competitions or Events.

Sport Integrity Australia

SUBMITTED

Chris Bold, Assistant Director, Anti-Doping Policy (Australia)

Public Authorities - Government

General Comments

Identifying and reaching parents of minors at international events where testing takes place is often impractical.

Suggested changes to the wording of the Article

Suggest amending [Comment to 6.2.1]: It is acknowledged that it may be difficult to reach Parents/Guardians, however, it is strongly recommended that efforts are made to educate them as per Article 9.2 to support the protection of minors. **It is also acknowledged that signatories may not always know events at which testing will take place.**

Reasons for suggested changes

The noted difficulties of reaching parents and uncertainty around the inclusion criteria of events pose a significant challenge for all signatories.

Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

General Comments

Art. 6.2.1:

Identifying and reaching parents of minors at international events is often impractical.
[Suggest acknowledging that even IFs may not always know when/where testing will occur due to late requests or confidential targeting.]

[Suggest requiring federations to provide contact information where possible / Suggest creating a central database to track international events and testing locations, accessible for everyone – ideally integrated into ADAMS or made available on WADA's website.]

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

General Comments

6.2.1

- Parents/Guardians of Minors competing at International Events where Testing takes place;

The definition of “Guardians” should be clearly stated in the Appendix.

Suggested changes to the wording of the Article

At a minimum this ~~shall~~ should include coaches and medical personnel of the groups of Athletes listed in 6.1.1 and 6.1.2.

Specifically, Signatories ~~shall~~ should include the following Athlete Support Personnel in the Education Pool:

Reasons for suggested changes

6.2.1 Requirements for all Signatories

- Coaches and medical personnel

The "coaches" and "medical personnel" are very large and unidentifiable groups. For example, the "coaches" include everything from national team coaches to private coaches for individual athletes. In the case of "medical personnel", there is a wide range from doctors who accompany national teams to athlete's personal doctors. It is not realistic to provide education to athletes' personal doctors.

- Parents/Guardians of Minors competing at International Events where Testing takes place

We fully support the idea of putting the focus on Parents/Guardians of minors.

However, ADOs don't have contact information from parents and we are assuming that even many federations don't have this information. Same concept for minors applies to parents and guardians. This group is also hard to reach. This should be a should.

USADA

SUBMITTED

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

NADO - NADO

General Comments

6.2.1:

- First bullet: The requirement “Parents/Guardians of Minors competing at International Events where Testing takes place” is very difficult to identify and requires education for some ADOs (see comment on 6.1.2).
- ADOs don't have contact information from parents and we are assuming that even many federations don't have this information.
- We fully support the idea of putting the focus on Parents/Guardians of minors. However, this needs some rethinking. If this approach is upheld, WADA must outline the process for easily identifying the regulations ILA (important for TUEs, Testing, Education, RM, etc.) and consider providing a database.
- This would also need a requirement for national federations to provide the contact information of Parents/Guardians to ADOs.

- Can there be a minimum level definition for coaches and medical personnel? If this is national team members this will be easy to capture, if this is others, like personal coaches or dermatologists, that will be more difficult.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

Article 6.2

As a minor comment, we recommend clarifying or offering guidance - either through a comment or within the Guidelines - on how to determine who qualifies as the 'most influential' ASP.

Article 6.2.1

While we fully support placing greater emphasis on ASP and we welcome the addition of Comment to art. 6.2.1, it is crucial to maintain a realistic scope of application that is feasible for IFs and NADOs. As previously noted, it can be challenging for ADOs to establish a direct jurisdictional link to ASPs. If it is already difficult to identify all athletes who fall into the categories outlined in Arts. 6.1.1 and 6.1.2 (as highlighted also in the Comment to Article 6.1.1), it will, by extension, be even more challenging to identify the ASPs of those athletes.

For this reason, we recommend that the scope of this provision remain enforceable by, for example, at least, extending the Comment to Article 6.2.1 to include ASPs, in addition to parents/guardians, so that the inherent challenges in identifying these individuals are acknowledged.

Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

General Comments

The reference to '*most influential ASP*' should be as determined by the relevant ADO.

Article 6.3 (2)

Ministry of sports

SUBMITTED

Amandine Carton, Deputy head of department of ethics, integrity and prevention policies
(FRANCE)

Public Authorities - Government

General Comments

Rather than including these individuals in the ADO's education group, it would be preferable to amend this article to indicate that the ADO's educational activities may also target the individuals listed. The education group forms part of an ADO strategy for individuals within its jurisdiction. However, most of the individuals listed in this article do not fall within the ADO's direct jurisdiction, meaning it has no authority to 'impose' educational activities on them.

USADA

SUBMITTED

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

General Comments

- 6.3 - Change last sentence “Deemed by Signatory” to “NADO.”

Article 7 (7)

ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)
Sport - IF – IOC-Recognized

General Comments

ICSD often does not have access to national RTPs or education platforms, which limits our reach. In many countries, Deaf athletes receive no anti-doping education unless ICSD or a Deaf sports federation intervenes. Collaboration — particularly through major events — is the only practical way to ensure consistent education. Acknowledging this in Article 6 would help WADA promote a more inclusive, joined-up system

Suggested changes to the wording of the Article

In evaluating the resourcing of education programs, WADA should consider the operational structure and available capacity of the ADO. Smaller ADOs or those in disability sport may need tailored support or guidance to prioritize their education efforts effectively within limited means.

Reasons for suggested changes

Without acknowledging these differences, the same resource expectations may be unfairly applied across all ADOs. ICSD often lacks the ability to maintain year-round programming, and depends heavily on Deaflympics or regional games to reach athletes. Recognizing this in the ISE would promote fairness, encourage improvement, and support targeted investment in inclusive education delivery

Council of Europe (CoE)

SUBMITTED

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

General Comments

Art. 7.0:

Athlete involvement as Educators is welcomed, but ASP (particularly Coaches) should also be acknowledged due to their strong influence and experience.

NADA India NADA India, NADO (India) NADO - NADO	SUBMITTED
<div>General Comments</div> <div>Agreed</div>	

Sport Ireland Cólleen Devine, Director of Anti-Doping & Ethics (Ireland) NADO - NADO	SUBMITTED
<div>General Comments</div> <div>Would suggest including ASP as well as athletes in this as a consideration as Educators</div>	

Canadian Centre for Ethics in Sport Bradlee Nemeth, Manager, Sport Engagement (Canada) NADO - NADO	SUBMITTED
<div>General Comments</div> <div>Article 7 The CCES notes that the independent development of a curriculum can be a heavy lift for under-resourced or less-developed Signatories, and WADA has access through the global anti-doping community to significant curriculum development expertise. We therefore recommend developing a universal curriculum template that demonstrates minimum standards and including it in the guidelines or its appendices, with a reference in the notes to Article 7.</div>	

University of Birmingham Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom) Other - Other (ex. Media, University, etc.)	SUBMITTED
<div>General Comments</div> <div>We are generally supportive of the changes. Some further revisions are proposed.</div> <div>Suggested changes to the wording of the Article Reaccreditation should be changed to reaccreditation Consider including guidance on desired educational/experiential background for educators.</div> <div>Reasons for suggested changes Suspected typing error</div>	

In the ISE impact evaluation project, there were differences of opinion on what the ideal background for an educator should be. For instance, some proposed DCOs make good educators, whereas others said they should come from an education background.

International Testing Agency

SUBMITTED

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

General Comments

We recommend replacing the term “*in-person*” with “*face-to-face*” throughout the document to avoid ambiguity. The current wording in other provisions (for instance in Arts. 7.2, 9.2, 12.2, etc.) create confusion, as “in-person” is commonly understood to mean physical presence and in some provisions it's listed as an alternative to virtual activities, whereas the intention here appears to include both physical and virtual formats. Alternatively, we suggest aligning with the terminology used in Article 12.1, which clearly defines this as “*in-person sessions (physical or virtual)*.”

Article 7.1 (6)

Council of Europe (CoE)

SUBMITTED

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

General Comments

Art. 7.1–7.3 – Educators

[Request early publication of the “Professional Standard for Educators.”]

[Consider including a note on matching educator profiles with the specific target group, to support relevance and effectiveness of the education provided.]

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)
NADO - NADO

General Comments

Comment to Article 7.1.

Since the recruiting, training, assessment, accrediting and reaccreditation of educators is a crucial element of every Education Program, we strongly encourage to publish the “Professional Standard for Educators” as soon as possible.

Please Note: This comment is also agreed upon the CEADO Education Managers and the PEERS group.

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)
NADO - NADO

General Comments

7.1 Recruitment of Educators

In order for ADO to begin operations when ISE comes into effect in 2027, it will not be possible to prepare in time if the professional standards are released in January 2027. We would like to receive a draft or key points at least six months in advance.

USADA

SUBMITTED

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

General Comments

- Seems prescriptive, this needs to include “relevant education experience or equivalent”
 - Nobody new would ever get hired if it were purely educational experience
- Remove the comment as it makes it feel like a draft.

Agence française de lutte contre le dopage

SUBMITTED

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

General Comments

We appreciate the importance of education experience for educators, including for clean sport education. However, in our experience, some individuals, including athletes (cf. article 7.0 of the ISE: “Signatories should consider involving Athletes in the delivery of Education Activities where appropriate, including training them as Educators.”), have a perfect profile to be Clean Sport Educators, without having formal education experience.

Suggested changes to the wording of the Article

*Signatories should have a process in place to recruit Educators with **education and/or relevant experience** and the ability to engage learners, ideally in line with the Professional Standard for Educators.*

Reasons for suggested changes

Cf. General comments.

Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

Resubmitted from Draft 1 comments: the AIU welcomes an increasing emphasis on recruiting, training and deploying quality educators, as set out in the new Article 7. To promote best practice and a consistency in approach, the AIU would encourage the WADA Education/Code drafting team to prepare standardized supporting documentation, templates and tools that might facilitate the management of educators.

Article 7.2 (4)

World Rugby

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)
Sport - IF – Summer Olympic

General Comments

While the content of this is good, the drafting could do with some work. The bullet points are not all worded appropriately for the heading. Also with regards to the final point, we would suggest adding the term 're-assess' as for example: *"signatories should identify appropriate personnel (ie educator trainers) to train and asses/re-assess Educators"*.

Council of Europe (CoE)

SUBMITTED

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

General Comments

Art. 7.2 and 7.3: Greater detail is needed for Educator Trainers.

[Consider adopting a multi-year reaccreditation cycle (e.g., 2-4 years)]

[Replace "in-person" with "face-to-face" education for broader inclusion of virtual learning.]

Some people, including athletes, could have a great profile to be Clean Sport Educators, without having education experience

[Clarify that requirements for Educators should allow for equivalent relevant experience, not just formal education.]

Suggested changes to the wording of the Article

[Suggest to reword the article: "Signatories should have a process in place to recruit Educators with relevant education and/or experience.]

NADA

SUBMITTED

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

General Comments

Comment to Art. 7.2

Replace ‘in-person’ with ‘face to face’ education (virtual sessions possible)

Comment to Art. 7.2, Art.8.1.1, Art. 9.2.1

There is still the reference to "all topics outlined in Code Article 18.2." which is a wrong reference, as the mandatory topics moved from the WADC to the ISE.

USADA

SUBMITTED

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

NADO - NADO

General Comments

- Replace ‘in-person’ with ‘face to face’ education because face-to-face includes virtual and in-person education.
 - Change throughout ISE

Article 7.3 (7)

Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)

NADO - NADO

General Comments

N/A

Suggested changes to the wording of the Article

~~Reaccreditation~~ Reaccreditation

Reasons for suggested changes

typo

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

General Comments

According to G.5.3 of the IST Sample Collection Personnel their “Accreditation shall only be valid for a maximum of two (2) years.” We see no reason why the ISE should not also have some kind of maximum for the

accreditation of Educators. Two years seems a good maximum since anti-doping rules change often and a longer time for mandatory reaccreditation might lead to lack of essential knowledge.
That said, if the intention is not to accrediting Educators for lifetime the “should” can be transformed to a “shall” here because if you it is mandatory to have an accreditation process and the accreditation is limited, you also need a reaccreditation process as well.

Please Note: This comment is also agreed upon the CEADO Education Managers.

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

General Comments

7.3 Accrediting and Reaccreditation of Educators

it is agreed that accreditation period should be specified, but for more universally standardized and quality controllable, it is recommended to add on the maximum period (for example 10 years or the end of each edition of ISE) in "comment".

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

General Comments

UKAD proposes to change the title to either; "Accreditation and Reaccreditation of Educators" or "Accrediting and Re-accrediting of Educators", for consistency. This will need to align with the wording on the 'Table of contents' page.

UKAD would also like to propose greater detail to be added to 7.3 in line with Annex G.5.3 of the International Standard for Testing. So that the accreditation and reaccreditation of SCP aligns more with Educator standards, and to bring Educator status in line with SCP. Areas to consider for inclusion could include ID badges, performance monitoring, a code of conduct, as well as a process and criteria for revoking accreditation. Also, specifying a length of time for accreditation, rather than leaving this open for signatories to determine.

The quality of the Educator training is determined by the trainer delivering the Educator Training. Therefore, UKAD believes greater detail and criteria is required in the ISE and guidelines for Education regarding the profile of an Education Trainer to role model sound pedagogical and facilitation skills training.

Reasons for suggested changes

This will support Signatories who are looking to engage Education Trainers to deliver Education training on their behalf. And also ensures greater alignment of the management of Educators and bringing standards more in line with SCP management.

Sport Ireland

SUBMITTED

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

NADO - NADO

General Comments

It would be good to standardise the length of time for accreditation and reaccreditation of Educators within the ISE

USADA

SUBMITTED

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

General Comments

- Develop consistency with the term “accredited” and “authorized”. Refer to IST where the authorization/accreditation of DCOs is also inconsistent.

Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

Will guidance be given (e.g. in Guidelines?) on appropriate time periods and accreditation criteria?

Article 8 (5)

ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)
Sport - IF – IOC-Recognized

General Comments

ICSD supports the annual reporting requirement. However, we request that WADA ensure the reporting tools or templates **allow for event-based education delivery models**, such as those used at the Deaflympics and regional Deaf events. We also encourage WADA to include **optional fields to track the accessibility** of education materials (e.g., use of sign language, captions, or plain language), which would support inclusive reporting and future benchmarking

Suggested changes to the wording of the Article

Reporting templates should accommodate flexible education formats used by smaller or disability-specific ADOs, and allow for optional data on accessibility practices to promote inclusion.

Chika HIRAI, Director of International Relations (Japan)
NADO - NADO

General Comments

8.1 Curriculum
As written, it reads as if all signatories are developing their own curriculum, and this seems like duplication of efforts in addition to a large task for less resourced ADOs, and it would be helpful to provide a baseline framework, for example in the guidelines, to ensure that everyone has a common starting point

8.1.1 Mandatory Topics
- Risks of unintentional doping, including supplement use;
What does “unintentional doping” under 8.1.1 include? ? Recommend changing to not intentional doping to be clear and consistent with Article 10.2 of the Code.

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

General Comments

- We suggest changing the “shall” into a “should” here: “Signatories shall use their Sport System Assessment as described in Article 5 and the Education Pool as established in Article 6 to determine the program objectives of the Education Program. The Education Program shall be evidence informed and based on Education theory.”

Huw Roberts, Of Counsel (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

Will support be offered to lesser resourced Signatories for the expertise required to meet these requirements?

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

We are generally supportive of the changes. Some further revisions are proposed.

Suggested changes to the wording of the Article

Change “Risks of unintentional doping, including supplement use” to “Behaviors that increase the risk of unintentional doping, including supplement use”

8.3 comment

“Signatories should take note of Article 19 Research of the Code” potentially rewrite needed here as it reads as if Article 19 is titled Research of the Code

Reasons for suggested changes

Supplement use is not a risk of unintentional doping, but a behavior that increases the risk of unintentional doping.

We can’t find Article 19, so we are not sure this has been referred to accurately.

Article 8.1 (11)

World Rugby

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)

Sport - IF – Summer Olympic

General Comments

Article 8.1.1, We are unsure as to what 'governance of the anti-doping system' would entail as a mandatory topic? We consider that the mandatory curriculum topics should be focused on only those items critical for athletes to know, and we would suggest that if this topic is included, that the ISE guidelines make clear that it aims to educate only on governance items directly related to helping an athlete compete clean (and not items such as the location of WADA headquarters etc.).

Sport Integrity Australia

SUBMITTED

Chris Bold, Assistant Director, Anti-Doping Policy (Australia)

Public Authorities - Government

General Comments

The wording in this section reads as if ADOs should have a full curriculum covering all topics tailored to each group in the Education Pool. This would be a burdensome activity if ADOs are required to include all relevant groups in the Education Pool. It is our understanding that this is not the intent of the ISE.

Suggested changes to the wording of the Article

SIA suggests removing wording as directed below:

The curriculum ~~identifies the learning outcomes for each group in the Education Pool and~~ states at a minimum what the learner should be ‘aware of’, ‘understand’, and ‘be capable of doing’ for each topic.

Reasons for suggested changes

SIA believes it would be too onerous to develop a full curriculum tailored for every group included in the Education Pool. An alternative could be for the ADO to specify key learning objectives for each group in the Education Pool as part of their Education Plan.

Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

General Comments

1. Art. 8.1:

Developing a curriculum from scratch is burdensome for smaller NADOs.

[Develop a template or minimum framework, in addition to the ISE, for instance in the guidelines.]

[Reinforce that lack of standard curriculum creates consistency and feasibility challenges for low-resource signatories.]

[Remove wording as directed below: The curriculum identifies the learning outcomes for each group in the Education Pool and states at a minimum what the learner should be 'aware of', 'understand', and 'be capable of doing' for each topic.]

2. Art. 8.1.1:

Clarify what falls under "unintentional doping" and consider changing "report doping" to "report potential ADRVs."

[Add a definition of Unintentional Doping to the Code definitions]

[Provide examples of unintentional doping like contaminated medication or TUE miscommunication in the definition or supportive documentation.]

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

General Comments

Article 8.1.

Since the "The focus of the curriculum shall be on the establishment of Clean Sport Behaviors" these Clean Sport Behaviours need to be defined somewhere (see other comments on this topic).

Article 8.1.1

Since the topics were deleted in the latest version of the WADC, a reference to "Code Article 18.2." is not feasible.

The sentence "Support available to share concerns and report doping" could be changed to "Support available to share concerns and report potential ADRVs".

Please Note: These comments are also agreed upon the CEADO Education Managers.

NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

General Comments

Comment to Art. 7.2, Art.8.1.1, Art. 9.2.1

There is still the reference to "all topics outlined in Code Article 18.2." which is a wrong reference, as the mandatory topics moved from the WADC to the ISE.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

General Comments

What does "unintentional doping" as introduced in 8.1.1. include? More specific definition needed.

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

General Comments

8.1 Curriculum

As written, it reads as if all signatories are developing their own curriculum, and this seems like duplication of efforts in addition to a large task for less resourced ADOs, and it would be helpful to provide a baseline framework, for example in the guidelines, to ensure that everyone has a common starting point

8.1.1 Mandatory Topics

- Risks of unintentional doping, including supplement use;

What does "unintentional doping" under 8.1.1 include? ? Recommend changing to not intentional doping to be clear and consistent with Article 10.2 of the Code.

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

General Comments

8.1 Curriculum Signatories shall use a curriculum that includes all mandatory topics as listed below. The curriculum should align the topics and level of content to the Athlete pathway so that it is appropriate for the stage of development and the level of participation/competition.

The curriculum identifies the learning outcomes for each group in the Education Pool and states at a minimum what the learner should be 'aware of', 'understand' and 'be capable of doing' for each topic. The focus of the curriculum shall be on the establishment of Clean Sport Behaviors.

FEEDBACK 8.1

Sometimes it feels like a duplication of efforts that each organization develops its own curriculum from scratch. This is a significant task, especially for less-resourced NADOs. It would be helpful to provide a minimum curriculum framework — for example, in the guidelines—to ensure that all organizations have a common starting point and baseline to build from.

We take the liberty of restating this comment: we find this requirement to be a significant burden for smaller signatories. To ensure consistency and feasibility, there is a strong need for either a template curriculum or very clear, detailed guidelines to help signatories meet these requirements effectively.

8.1.1 Mandatory Topics - Signatories shall include the following topics in their Education Program as also outlined in Code Article 18.2. Topics and content should be adapted and tailored to meet the needs of the learner.

- a. *Risks of unintentional doping, including supplement use;*
- b. *Support available to share concerns and report doping;*

FEEDBACK 8.1.1

- a. The phrase “*risks of unintentional doping, including supplement use*” is too vague. There needs to be clarification on what other risks are included under “unintentional doping” besides supplement use (e.g., contaminated medication, miscommunication about Therapeutic Use Exemptions), to ensure clear understanding and proper athlete education. Please also be aware that a clear definition is needed for use in other articles, such as Article 11.0.

We suggest that the wording “report doping” is changed to “report potential ADRV’s”, as this is more accurate.

NADA India

SUBMITTED

NADA India, NADO (India)
NADO - NADO

General Comments

Agreed

USADA

SUBMITTED

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

General Comments

- As written, it reads as if all signatories are developing their own curriculum, and this seems like duplication of efforts in addition to a large task for less resourced ADOs, and it would be helpful to provide a baseline framework, for example in the guidelines, to ensure that everyone has a common starting point
- What does “unintentional doping” under 8.1.1 include? Recommend changing to not intentional doping to be clear and consistent with Article 10.2 of the Code. Which topics within this definition need to be covered? Contamination by meat? Contamination via intimate contact? Sabotage?

International Testing Agency

SUBMITTED

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

General Comments

Article 8.1.1

To enhance clarity and consistency, we recommend that the Guidelines include specific criteria outlining what constitutes “unintentional doping”, as the term may currently be interpreted too broadly or inconsistently.

Article 8.4 (4)

Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

General Comments

Art. 8.4:

The shift from requiring a published summary to recommending it is welcomed

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

General Comments

8.4 Documenting the *Education* Program

It is recommended that a summary of the *Education* Program be published on *Signatories’* website.

FEEDBACK 8.4

We welcome the change from “*a summary shall be published*” to “*it is recommended*”. This provides greater flexibility for Signatories while still encouraging transparency.

USADA

SUBMITTED

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

NADO - NADO

General Comments

- Suggest “a summary of the education program shall be published” be changed to “a summary of the education program is recommended”

International Testing Agency	SUBMITTED
International Testing Agency, - (Switzerland) Other - Other (ex. Media, University, etc.)	
General Comments The revision from a mandatory to a recommended publication of the summary of the education program is a welcome improvement.	

Article 9 (4)

World Rugby	SUBMITTED
Ross Blake, Anti-Doping Education Manager (Ireland) Sport - IF – Summer Olympic	
General Comments General: We would consider that some work may be needed on the drafting of this article as there's a lot of duplication (see 9.1 and 9.4 which effectively say the same thing).	

Japan Anti-Doping Agency	SUBMITTED
Chika HIRAI, Director of International Relations (Japan) NADO - NADO	
General Comments 9.0 Delivering Education Programs - The re-inclusion of a WADA Education Plan template would be welcome.	

USADA	SUBMITTED
Allison Wagner, Director of Athlete and International Relations (USA) NADO - NADO	
General Comments ▪ Based on guidelines in 9.0, the re-inclusion of a WADA Education Plan template would be welcome	

University of Birmingham	SUBMITTED
Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom) Other - Other (ex. Media, University, etc.)	
General Comments	

We are generally supportive of the changes. One further revision proposed.

Suggested changes to the wording of the Article

Define in-person sessions.

Reasons for suggested changes

Earlier it seems online sessions may be included in the definition. We believe true in-person education and facilitated online education are qualitatively different. This applies throughout the ISE when this term is used.

Article 9.1 (3)

Council of Europe (CoE)

SUBMITTED

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

General Comments

Art. 9.1: [[Reinstate WADA Education Plan template reference for alignment and support.](#)]

Anti Doping Denmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)
NADO - NADO

General Comments

9.1 Developing the Annual *Education Plan*

Signatories shall document their *Education Activities* through an annual *Education Plan*. The *Education Plan* shall state measurable program objectives, learning outcomes, topics and timelines related to the activities for the *Education Pool*, those responsible for delivering the *Education Activities* and the monitoring procedures for recording the *Education Activities*.

FEEDBACK 9.1

The reference to WADA providing an annual Education Plan template has been removed. We would welcome its re-inclusion, as such a resource supports consistency and practical implementation across Signatories.

Anti-Doping Norway

SUBMITTED

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

General Comments

The proposed phrasing – in particular related to requirements of timelines related to activities, those responsible for delivering Education Activities and monitoring procedures will be a challenge for ADOs with extensive education programs, where a lot of the learning activities are carried out on an ongoing basis, and with the involvement of national federations and clubs.

Article 9.2 (5)

International Cricket Council

SUBMITTED

Vanessa Hobkirk, Anti-Doping Manager (United Arab Emirates)
Sport - IF – IOC-Recognized

General Comments

Could ADAMS be used as a platform in support of the requirement on ADOs to share education details of athletes to avoid duplication and if so, can this be included in the article?

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)
NADO - NADO

General Comments

Article 9.2.1

Since the topics were deleted in the latest version of the WADC, a reference to “Code Article 18.2.” is not feasible.

Please Note: This comment is also agreed upon the CEADO Education Managers and the PEERS group.

NADA

SUBMITTED

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

General Comments

Comment to Art. 7.2, Art.8.1.1, Art. 9.2.1

There is still the reference to "all topics outlined in Code Article 18.2." which is a wrong reference, as the mandatory topics moved from the WADC to the ISE.

USADA

SUBMITTED

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

General Comments

- 9.2.1 - “anti-doping topics as listed in Code Article 18.2 and Article 7.1.1” it is Article 8.1.1 not 7.1.1, and there are no longer topics referenced in Code Article 18.2

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

As a matter of consistency, we recommend incorporating the references to activities mentioned in this article into the definition of *Education Activities* in the definitions section. For example, materials such as leaflets, websites, and apps are cited here as possible educational activities but are not reflected in the definition provided in art. 17.3. Including these examples there as well would be helpful.

Article 9.4 (4)

Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

General Comments

N/A

Suggested changes to the wording of the Article

Art. 9.4:

[Rephrase to match section 6.0's emphasis on accessibility – e.g., “Which Education Pool groups have access to, and may eventually receive, the Education Activities.”]

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

General Comments

9.4 Documenting the *Education Plan*

Which *Education* Pool group(s) the *Education Activities* will be delivered to;

FEEDBACK 9.4

To align with the terminology used in section 6.0, where it is stated that athletes should *have access to* education, the wording here could be adjusted for consistency.

We suggest:

“Which Education Pool group(s) have access to, and may eventually receive, the Education Activities.”

This phrasing better reflects the intent that education should be made accessible to all relevant groups, even if not all individuals are directly educated.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

We recommend revising the sentence 'Which Education Pool group(s) the Education Activities will be delivered to' to instead refer to the groups being 'given access to' the activities, for more consistency with other ISE provisions.

Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

General Comments

There is provision in 9.4 for 'monitoring procedures and data', but what about monitoring the effectiveness / impact of an Education Plan, how will that aspect be evaluated e.g., as to whether execution of the plan made a difference?

Article 10 (3)

ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

General Comments

ICSD supports WADA's commitment to monitoring education program implementation. However, we ask WADA to ensure that monitoring criteria **account for differences in ADO size, structure, and target population**. Disability-specific ADOs like ICSD face resource constraints and deliver education through adapted, event-based models

Suggested changes to the wording of the Article

WADA should apply monitoring criteria proportionally, recognizing the operating realities of small or disability-specific ADOs. Monitoring should also include the evaluation of whether accessible formats were used to reach athletes with communication-related disabilities, such as those who are Deaf

Reasons for suggested changes

ICSD may not meet standard year-round delivery metrics, but its targeted, accessible programs fulfill the ISE's intent. A flexible, proportional monitoring approach would ensure fairness and improve education quality across diverse ADOs

General Comments

Regarding the addition: "*Signatories should be aware of other relevant Signatories' plans when considering Education Activities for International-Level Athletes.*" While the principle of cooperation is fully supported, the sentence as currently phrased lacks clarity and practical guidance. It is unclear what is concretely expected from Signatories, and fulfilling this could place a significant resource burden on IFs, particularly in attempting to track the plans of all other NADOs and NOCs across sports and athlete groups.

Additionally, the term "*plans*" is not capitalized or defined, which further adds to the ambiguity around its intended meaning. Given that the first sentence in this section already conveys the principle of coordination, we suggest either removing this sentence or rephrasing it to offer more specific and actionable guidance.

General Comments

We are generally supportive of the changes. Some further revisions proposed.

Suggested changes to the wording of the Article

10.3 - “Acknowledging prior learning”. What is described currently appears to be acknowledging prior education activities, not learning. To acknowledge prior learning, evidence of learning outcomes being achieved is needed. As such, we suggest making reference to evaluation that supports learning outcomes being achieved.

10.3 – “The quality of the Education Activity” should be changed to “The quality and evaluation of the Education Activity”.

Reasons for suggested changes

Learning needs to be evidenced through evaluation, which supports the quality of the learning experience. Making these changes would reiterate the importance of evaluation.

Article 10.1 (2)

General Comments

The publication of the Education Plan is a high burden for ADOs, as it is constantly being adapted and updated. The Education Program however is more suited for publication and less frequently updated.

Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

General Comments

The reference to ‘records’ in the second bullet point of 10.1 is not a defined term and it is suggested that examples be given of what records should be kept and shared, and in what form. Alternatively, cross-reference to section 12 below.

Article 10.2 (1)**Bird & Bird LLP**

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

General Comments

10.2

Should the two paragraphs below not start with ‘Signatories shall..’ or ‘Signatories should...’?

"Agree in advance on the roles and responsibilities for the delivery of Event-Specific Education where applicable. This should be done in accordance with the roles and responsibilities as outlined in Articles 13 and 10.4".

"Coordinate with governments or other Public Institutions and National Federations as outlined in Article 14".

Article 10.3 (14)**World Rugby**

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)

Sport - IF – Summer Olympic

General Comments

Though we support the aims of article 10.3 and WADA's work to improve this area (challenging as it is), we're still not sure that we have reached a satisfactory position and indeed how straightforward it will be to ensure that *"the Education Activity has been delivered as per Article 9.2"*. Within a system where each ADO can design and deliver its own programme (within the constraints of compliance with the ISE), acknowledgment/mutual recognition will never quite be automatic, as for the sake of consistency and the protection of athletes, some element of a review of quality and content is necessary. This is to avoid the risk of two athletes from two countries at the same level being subject to significantly different programmes.

Furthermore, with regards to the point *"The quality of the Education Activity remains the responsibility of the Signatory delivering the Education Activity, not the Signatory acknowledging the Education Activity"*, this is an interesting addition but in practice makes little difference as for an IF, as it remains their responsibility to ensure that a group of international athletes from different countries are educated to the same level. Putting the responsibility on the NADO (for example) does little to help the IF or the athlete if poor education contributes to an ADRV at an event.

Regrettably, we're not really coming to this review with a solution (sorry), and we know if there was an easy one, it would be in the Standard, however it would seem that some sort of peer review (with peers not chosen by the ADO themselves) of a programme and materials would help solve the problem to some degree of ‘quality-

checking' education activities. The education community is a collaborative one and most would welcome feedback on their output. Being able to list a programme or materials as having been peer-reviewed would provide a very basic quality assurance and would potentially help to raise standards. WADA oversight or management of this system would provide some credibility.

International Paralympic Committee

SUBMITTED

Jude Ellis, Head of Anti-Doping (Germany)

Sport - IPC

General Comments

IPC believes recognition of prior learning is very important. To reduce duplication for athletes and to increase efficiencies for ADOs. We recommend recognition of prior learning be highlighted and reinforced throughout the standard, where relevant (not just limited to section 10.3).

Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

General Comments

Art. 10.3:

“Provided that the Education Activity has been delivered as per Art. 9.2” is difficult to verify.
[Suggest revising to “is in line with Article 9.2.”]

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

General Comments

10.3 Acknowledging Prior Learning

Unclear how we can acknowledge education activities delivered by other signatories. In order to ensure feasibility of its operation, WADA should illustrate some examples in Guideline.

It says “provided the education has been delivered per 9.2” how would we know if it has been delivered.

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

General Comments

The part with “provided that the Education Activity has been delivered as per Article 9.2.” is hard to assess for a acknowledging ADO. We suggest to write “provided that the Education Activity is in line with Article 9.2” or "aligned with article 9.2"

Please Note: This comment is also agreed upon the CEADO Education Managers and the PEERS group.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

General Comments

Acknowledgment of prior learning is still not a streamlined process. Especially comparing to TUEs that are automatically recognized, it should be the same process for code compliant ADOs.

NADA India

SUBMITTED

NADA India, NADO (India)

NADO - NADO

General Comments

Agreed

Sport Integrity Commission Te Kahu Raunui

SUBMITTED

Toby Cunliffe-Steel, Athlete Commission Chairperson (New Zealand)

NADO - NADO

General Comments

We, the Athlete Commission to New Zealand's NADO, support our NADO's submission on Article 10.3 Acknowledging Prior Learning

NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

General Comments

Comment to Art. 10.3

„Acknowledging Prior Learning“:

Signatories are obliged to acknowledge education activities of other signatories. However, they are not obliged to acknowledge the completion of these activities. This should also be recorded by changing a "should" to a "shall". The remaining paragraphs of the article must be adjusted accordingly.

"Signatories shall acknowledge Education Activities of other Signatories and shall acknowledge the completion of such Education Activities by learners (in their Education Pool), provided that the Education Activity has been delivered as per Article 9.2." ...

Sport Integrity Commission Te Kahu Raunui

SUBMITTED

Jono McGlashan, GM Athlete Services (New Zealand)

NADO - NADO

General Comments

We support the intention of Article 10.3 to reduce duplication and acknowledge prior learning. However, we seek clarity on which signatory is responsible for verifying alignment with Article 9.2. Without this, the burden of evaluation may remain unchanged and could lead to inconsistent application.

We have consulted with the Commission's Athletes Commission who are supportive of this submission.

USADA

SUBMITTED

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

NADO - NADO

General Comments

- Consider changing in the 1st paragraph “provided the education has been delivered per 9.2” to “is aligned with article 9.2” as we might not know if it has been delivered.
- Process for acknowledging prior learning should be streamlined. For example, a shared digital platform, standardized criteria for Signatories to agree on, prioritizing eLearning recognition, automating communication and notifications when education occurs, and clearly defining Signatory responsibilities for quality assurance of education activities.

Anti-Doping Norway

SUBMITTED

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

NADO - NADO

General Comments

We support the new terminology related to acknowledging prior learning, which better accommodate for differences in the organizational context of ADOs.

Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

General Comments

Is it a requirement of the ISE for Signatories to produce such certificates (learner's certificates)?

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

The updates to this provision are welcome, as they provide greater clarity.

Article 11 (7)

World Rugby

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)

Sport - IF – Summer Olympic

General Comments

Article 11.1.3 – As per our comments on the IST, we remain concerned that a two tier system appears to be in the process of being created in the new draft Code and Standards, where the Olympic and Paralympic Games take prominence over World Championships in testing and education. Both Games are rightly recognised as key events in the sporting calendar, and any self-respecting ADO with participating athletes would ensure their athletes are both effectively tested and educated prior to those events, but to make these more important than others and indirectly define World Championships as second class events would seem to go very much against the egalitarian and harmonised principles of the Code.

NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

General Comments

Comment to Art. 11:

Event-specific Education encompasses both Pre-Event Education (Education that takes place prior to an Event) and Event-Based Education.

"Event-specific" and "Event-based" create confusions and are not distinctive enough.

To clarify, "Event-bases Education" could be defined as "On-Site Education" or similar.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

General Comments

Adding more specific terms did not help for a clean understanding of the article, especially for communication amongst ADOs. Rephrasing would be appreciated.

NADA India

SUBMITTED

NADA India, NADO (India)
NADO - NADO

General Comments

Agreed

UK Anti-Doping

SUBMITTED

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

General Comments

11.1.3 - Based on the definition of International Events, UKAD recommends that the second sentence which relates to delivering Pre-Event Education for Continental Games, World Championships etc, should be changed to 'shall' for consistency with 6.1.1.

11.1.5 - UKAD questions as to whether this should be a 'shall' instead of 'should' in this sentence, given the principle of Education first.

Suggested changes to the wording of the Article

11.1.3 - "Signatories ~~should~~ shall deliver Pre-Event Education for Major Events such as Continental Games, World Championships, and other multi-sport Events."

11.1.5 - "International Federations and Major Event Organisations ~~should~~ shall deliver Event-Based Education where Testing takes place to reach those in their Education Pool."

Reasons for suggested changes

11.1.3 - This will ensure consistency, alignment and clarification of what which groups of athletes are a 'should' or 'shall'.

11.1.5 - To align with the core principle of Education before Testing.

University of Birmingham

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

We are generally supportive of the changes. One further revision proposed.

Suggested changes to the wording of the Article

11.0 – “Education that takes place prior to an Event” should be changed to “Education is linked to and takes place prior to a Specific Event”.

Reasons for suggested changes

Prior to – could refer to any education that takes place before a non-specified event

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

Please refer to our comment to art. 8.1.1 on the need to better define the expected perimeter of unintentional or unintended doping.

We welcome the removal of the reference to needle policies.

Article 11.1 (7)

International Paralympic Committee

SUBMITTED

Jude Ellis, Head of Anti-Doping (Germany)

Sport - IPC

General Comments

Article 11.1.5

While education at events is certainly useful in having a captured audience, it is too late (under the education first principle) for athletes who may be tested for the first time at that event. The type and timing of education activities is also important, as athletes are primarily focused on their competition and generally have little energy or attention for other things.

IPC considers that for events involving a high proportion of youth or developing athletes it can be more appropriate to focus exclusively on education at that event (instead of testing). This can be more effective in supporting the education first principle. We recommend including a comment to this effect in the ISE.

Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

General Comments

1. Art. 11.1.2:

Pre-event education for international event participants should not be required before each event.
[Recommend clarifying that pre-event education must be completed within a suitable timeframe, not per event.]

2. Art. 11.1.5:

[Propose changing “should deliver” to “should consider delivering” and distinguishing IFs vs. MEOs in scope and expectation.]

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

General Comments

Event-based education where testing takes places is too late. The athletes need to be educated in advance, especially for in-comp prohibited medication where a TUE is required. Please reconsider this concept!

Anti Doping Denmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

General Comments

11.1.2 Athletes and Athlete Support Personnel participating at International Events should receive Pre-Event Education.

FEEDBACK 11.1.2

Many athletes and Athlete Support Personnel (ASP) participate in multiple international events each year, for example, in event series such as World Cups.

We suggest clarifying that it is not the intention for education to be delivered before each individual event, but rather that athletes/ASP should have completed relevant Pre-Event Education within an appropriate timeframe prior to participation in such events.

11.1.5 International Federations and Major Event Organizations should deliver Event-Based Education where Testing takes place to reach those in their Education Pool. This should be done in cooperation with Signatories and other relevant organizations.

FEEDBACK 11.1.5

a. This represents a significant requirement for International Federations (IFs), especially those that organize numerous international events, often taking place in multiple locations simultaneously.

We recommend changing the wording from “*should deliver*” to “*should consider delivering*” to better reflect the practical limitations and allow for flexibility.

b. We recommend distinguishing between International Federations (IFs) and Major Event Organizations (MEOs) in this requirement. It is more realistic to expect Event-Based Education at all MEO events, given that they are fewer in number and typically more centralized, compared to the broader and more dispersed event calendars of many IFs.

Anti-Doping Sweden

SUBMITTED

Christine Helle, CEO (Sweden)

NADO - NADO

General Comments

Comment on Article 11.1.5 regarding the recommendations that IF and MEO deliver Event-Based Education at International Events where Testing takes place to reach those in their Education Pool.

ADSE commented on the ISE in the engagement phase of the Code revision that event-based education activities held at an International Event, such as a plenary lecture for athletes, could be disturbing for athletes wanting to concentrate on their performance during a competition. Also, the recommendation to hold education activities during an event could be contradictory to the principle that athletes should be educated before competing internationally.

To the 2nd draft of the ISE we suggest to include a comment with a recommendation that giving a plenary lecture to athletes during an ongoing International Event is not an effective or proper education activity if the **competing athletes** are the main target group of the education activity. Instead IF and MEO should make sure that the **competing athletes** are educated prior to the event with reference to Article 11.1.2 - 11.1.4.

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

General Comments

11.1.1 - UKAD would like to propose adding further clarity to this article, making the link to 10.3, as we can foresee this causing operational challenges for NADOs ahead of a Major Event. If IFs and MEOs can define the education requirements, NADOs could exacerbate the problem of education fatigue if an IF/MEO are mandating a WADA ADEL course but athletes have already completed the NADO's own eLearning course (or equivalent). NADOs will need to work with multiple IFs/MEOs to either show their eLearning is equivalent and/or know as far out from the Major Event what their requirements are going to be for a particular event.

Suggested changes to the wording of the Article

"International Federations and Major Event Organisations shall have the authority to determine mandatory Education requirements for Athletes and Athlete Support Personnel participating at their respective events. Where a NADO has eLearning equivalent to that being required by the IF or MEO, this shall be accepted."

Reasons for suggested changes

This will help avoid education duplication and/or education fatigue in athletes.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

Article 11.1

Overall, the updates to this provision provides more clarity. However, we suggest that it may be beneficial to separate the content into two distinct sections: one focused on MEOs and the other on IFs. This would help reduce confusion, as the roles, operational contexts, and practical considerations of MEOs and IFs can differ significantly.

In particular, it's important to acknowledge that athletes may compete in numerous IF-organized international events throughout a single season. Requiring Pre-Event Education before each of these events would not only be impractical, but also potentially counterproductive - repeated exposure to the same information could diminish engagement or lead to frustration among athletes. Instead, it may be more effective for IFs to provide education at the beginning of the season or at strategically chosen intervals. This approach also facilitates more efficient collaboration with NFs and NADOs, reducing the burden on all parties involved.

In light of this, separating the provisions for MEOs and IFs would help to better reflect the different operational realities and educational strategies required for each. Finally, the use of “shall” vs “should” across the provision should also be streamlined.

Article 11.1.2

As noted in our comment to 11.1, it is important to clarify that the expectation is not for athletes to receive Pre-Event Education *each time* they participate in a major event. To avoid misinterpretation, we recommend explicitly stating this in the provision. Additionally, we propose modifying the definition of *Pre-Event Education* to reflect a more flexible and practical application (especially in cases where there is no particular event-specific information in relation to a specific event).

Current definition:

Pre-Event Education: Delivering tailored Education Activities to prepare Athletes and Athlete Support Personnel for an Event with the aim of sharing the specific anti-doping requirements related to that Event and developing any associated clean sport behaviours.

Proposed revision:

*Pre-Event Education: Delivering tailored Education Activities to prepare Athletes and Athlete Support Personnel for an Event, with the aim of sharing the specific anti-doping requirements related to that Event **or applicable across multiple Events or similar contexts within the sport.***

We also recommend removing the final part: “and developing any associated clean sport behaviours”.

Article 11.1.3

We strongly recommend replacing “shall” with “should” in this section of art. 11.1.3: “Pre-Event Education ~~shall~~ **should** be coordinated between Signatories and other relevant organizations”.

Article 11.1.5

We recommend revising the wording from “should deliver” to “should consider delivering” in the sentence: “*International Federations and Major Event Organizations should deliver Event-Based Education where Testing takes place to reach those in their Education Pool.*”

This change would better reflect the practical realities faced by many Signatories. In many cases, resource constraints, limited athlete availability, and varying levels of engagement make it challenging to implement Event-Based Education effectively at every event where testing occurs. Allowing for consideration, rather than expectation, would give organizations the flexibility to prioritize Pre-Event Education where it is more feasible and impactful.

Article 11.2 (1)

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

General Comments

11.2.1 Signatories *should consider Event-Specific Education for national or domestic Events.*

FEEDBACK 11.2.1

This should be further clarified, as the potential scope is either very broad or very limited. It would be helpful to indicate whether certain types of events should be prioritized over others, e.g., based on athlete level, risk profile, or event significance.

Article 12 (2)

University of Birmingham

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)

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

General Comments

Based on our impact evaluation of the ISE, there is frequent conceptual confusion over the terms monitoring, evaluating, education plan, and education program. To assist with clarity, we recommend some title changes and reordering of information presented in Article 12. Monitoring and Evaluation are two separate things; at the moment monitoring sits within Evaluation. To help clarify and distinguish between the two, it may be beneficial for Monitoring and Evaluation to be separated into two articles. However, we appreciate at this may be less than ideal given there will be no further opportunities for consultation with stakeholders. Alternatively, within Article 12.0 "Monitoring and Evaluation", there could be separate sub-sections on "Monitoring the Education Plan" and "Evaluating the Education Program". Further, some elements of "Determining Impact" appear relevant to "Evaluating the Education Program". As such, it would make sense to incorporate "Determining Impact" within "Evaluating the Education Program". This would also help provide a clear rationale for "Determining Impact".

Suggested changes to the wording of the Article

Specifically, we propose:

- 1) Change the title of 12.0 from "Evaluating the Education Program" to "Monitoring and Evaluation".
- 2) Have a section 12.1 for "Monitoring the Education Plan" and a section 12.2 for "Evaluating the Education Program".
- 3) As Section 12.2 "Education Records" is a form of Monitoring, change this subtitle to 12.1.1.
- 4) As Section 12.3 "Assessing Learning" is a form of Evaluation, change this subtitle to 12.2.1.
- 5) As Section 12.5 "Determining Impact" is a form of Evaluation change this subtitle to 12.2.2.

12.3 Assessing learning should come under 12.4. A program including the objectives, which would be your learning, which is then assessed. Also, the "Learning experience" is not the same as learning. At the moment learning experience gets more coverage than learning outcomes, when for us it is determining learning has taken place that should be emphasized. Based on what is referred to here (e.g., learner satisfaction, engagement), learning experience falls more under monitoring than evaluation, perhaps with the exception of confidence to apply what has been learnt.

12.5 Intention to complete clean - is there currently a measure to evaluate intention to complete clean?

Proposed Structure:

12.0 Monitoring and Evaluation

12.1 Monitoring the Education Plan

- 12.1.1 Education Records

12.2 Evaluating the Education Program

- 12.2.1 Assessing Learning
- 12.2.2 Determining Impact

Reasons for suggested changes

Based upon the findings from our ISE evaluation, ADOs often see monitoring as evaluation. As such, it is important to clearly differentiate between the two at all times. Evaluation is distinct from monitoring. For example, reporting the number of Athletes attending a webinar, broken down by demographic measures, does not constitute evaluation; it is purely a monitoring exercise. Monitoring involves collecting and tracking information over time to assess delivery of the education plan, whereas evaluation goes further by analyzing relevant data to understand the effectiveness of the education program and achievement of state learning outcomes. It is this evaluation that should then be used to inform the future education plan and program of an ADO. We believe the more a distinction can be made between monitoring and evaluation within the ISE, the more likely it is both will be addressed.

Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

12.3

Will WADA produce guidelines to provide support on how to develop and interpret these assessments?

12.5

Specify that the 'number of Missed Tests and/or Filing Failures' criterion should only apply to RTP athletes (national or international).

Suggested changes to the wording of the Article

12.0

The AIU suggests adding 'an Education Program': "The purpose of monitoring and evaluating **an Education Program** is to measure progress..."

Article 12.2 (3)

World Rugby

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)
Sport - IF – Summer Olympic

General Comments

We consider that this is good progress (the ideal of mandating the keeping of education records) however it should remain our long-term objective to have a centralised system. It seems odd that investment is being made into ADAMS to accommodate teams sport Testing Pools (which work fine as they are) when adapting ADAMS (or Adel) to manage education records alongside testing records would fulfil a far more pressing and obvious need in the worldwide fight against doping.

Anti-Doping Sweden

SUBMITTED

Christine Helle, CEO (Sweden)

NADO - NADO

General Comments

Comment to Article 12.2 regarding Education Records.

ADSE supports the Article 12.2. We also support the phrase "Signatories shall ensure that this is conducted in line with the requirements of the International Standard for Data Protection" but for the ISE Article 12.2 and ISDP to correspond we suggest clarifying the text in ISDP Annex A RETENTION TIMES for Module/Record Category #8 Education. We suggest that the text in the table column "data" is expanded to: Courses and **education in anti-doping (including eLearning courses and other education activities)** completed, dates of completion, final score, role as a learner (Athlete, coach, etc.).

Anti-Doping Norway

SUBMITTED

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

NADO - NADO

General Comments

We are concerned about the level of detail required for maintaining education records. While we do have event-based open access education activities, most of our learning is targeted to some extent. Over the last 5 years, the year we had most learning interactions with athletes (including face-to-face and e-learning but excluding our doping as a public health issue-portfolio) we had roughly 34.000 interactions with learners. If we included the doping as a public health issue-portfolio, which includes antidoping activities in the school system, we reached another 10.000 people.

We used to maintain records of the individuals we reached in face-to-face activities, but the amount of information collected was deemed disproportional to the purpose of the collection and processing of data – in particular because it was not used for anything once collected.

We would therefore recommend that the requirement is either removed or reduced significantly – one way could be to keep records over the target group rather than the individual learners.

Furthermore, we would suggest that the purpose of collecting and processing said data is better described with a view to ensuring documentation of the proportionality (keeping in mind the ISDP and national data protection requirements).

Article 12.3 (1)

USADA

SUBMITTED

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

NADO - NADO

General Comments

A clarification or reference to a guideline document is needed to capture what needs to be evaluated. CCQ questions and other tools that are used by WADA to gather data could be compiled into this guideline so signatories know what to expect

Article 12.5 (4)

Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

General Comments

- Currently, the draft includes multiple variations that appear to express similar concepts — e.g., “behaviours to foster anti-doping attitudes,” “behaviours that foster and protect the spirit of sport,” “the behaviours they need to train and compete clean, in line with the anti-doping rules and minimize their risk of unintentional doping,” “behaviours in line with the spirit of clean sport,” and “ethical behaviour related to doping.” To improve clarity and consistency, we suggest replacing these with the unified term “Clean Sport Behaviours,” where applicable.
- Clarify the definition of “Clean Sport Behaviors.”
- Suggest new language: “practical actions, choices, and attitudes... to protect and promote fair, ethical, and doping-free sport.”
- Avoid treating Clean Sport Behaviors as a directly measurable indicator; use it as an overarching goal reflected by other metrics.
- Add “number of medication requests” as an impact metric.
- Highlight that data from app usage related to medication/supplements can also inform impact assessments.

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

General Comments

We suggest to avoid treating Clean Sport Behaviors as a directly measurable indicator. This should be used as an overarching goal reflected by other metrics.

Please Note: This comment is also agreed upon the CEADO Education Managers.

Anti Doping Denmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

General Comments

12.5 Determining Impact Signatories should attempt to determine the impact of their Education Program and possibly the wider anti-doping program through the monitoring of wider anti-doping data such as:

1. The incidence of Clean Sport Behaviors;
2. The use of batch-tested supplements;

FEEDBACK 12.5

We welcome the focus on evaluating the impact of education programs.

1. However, when it comes to 'Clean Sport Behaviors', this remains a very undefined parameter. The indicators listed under Article 12.5 are useful and relevant for evaluating the impact of education efforts. However, we believe that Clean Sport Behaviors themselves should not be treated as a measurable indicator, but rather as the underlying goal that the other indicators can help point toward or reflect.

The above also refers to the definition suggested under the general comments:

"... Clean Sport Behaviors refer to the practical actions, choices, and attitudes that athletes and their support personnel (such as coaches, trainers, and doctors) are expected to demonstrate in order to protect and promote fair, ethical, and doping-free sport..."

2. Similarly, regarding the suggested measurement of batch-tested supplement use. In practice, this would require athletes to report whether their supplements are batch-tested — e.g., during doping control procedures. There is a need for guidance on how this information should be collected consistently, and clarification on whether such reporting will become a formal requirement or part of future evaluation efforts.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

The requirement to assess the impact of "possibly the wider anti-doping program" places an additional burden on education teams, which may extend beyond their intended scope and expertise. This responsibility might be more appropriately managed by other areas of an organization.

Additionally, several of the indicators listed - such as "the incidence of Clean Sport Behaviours" or "the use of batch-tested supplements" – are inherently difficult to measure accurately. Moreover, establishing a direct causal link between these indicators and the impact of an education program presents significant challenges.

A more focused and realistic approach to measuring education-specific outcomes would be welcomed.

Article 13 (4)

Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

General Comments

Art. 13.0 - Roles and Responsibilities of Signatories

- Clarify that HR may be responsible for workforce development, not Education; suggest using GLDF standards.
- Replace "Education Authority" with "Responsibility" or define term. Align role clarity between NADOs, IFs, MEOs.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

General Comments

The code has been adapted, the requirements for the signatories are now under Art. 18.2, not 18.1.

NADA India

SUBMITTED

NADA India, NADO (India)
NADO - NADO

General Comments

Agreed

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)
NADO - NADO

General Comments

13.0 Overview – Third paragraph: ...*In addition, Signatories should acknowledge and promote the broader role that Education can have within their organizations to advance the capability of their workforce through training and professional development initiatives...*

FEEDBACK 13.0

In many organizations, advancing the capability of the workforce through training and professional development is typically a Human Resources (HR) responsibility. Therefore, this statement may not fully align with the purpose of the ISE.

However, we recommend including a reference to the professional standards developed under the GLDF program in the Guidelines, as these can support quality and consistency in education-related roles and responsibilities across organizations.

Article 14 (4)

NADA India

SUBMITTED

NADA India, NADO (India)
NADO - NADO

General Comments

Agreed

USADA

SUBMITTED

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

General Comments

- 14.1-14.4- change the wording from “authority” to “Responsibility”.
- It says “Code Article 18.1 states...”, needs to be updated to “18.2”.

Anti-Doping Norway

SUBMITTED

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

General Comments

We are really concerned if the new definition of NADO Operational Independence does not allow for the involvement of national sports federations in the delivery of education, which would undermine the education efforts by weaken the reach and effectiveness of antidoping education.

If the requirement that a NADO “shall implement its operational activities without undue influence, interference, or involvement of a sports organization” includes all operational activities including antidoping activities such as education, then this would weaken the educational activities of NADOs with a comprehensive antidoping education program.

University of Birmingham

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

We are generally supportive of the changes. Two further revisions proposed.

Suggested changes to the wording of the Article

14.1.5 – In-person education cannot be virtual in our opinion (see earlier comments). We propose use of the term facilitated online learning for virtual education delivery by an educator.

14.3.2 Should the participating at their Events become Event-based Education given that is it the term used in Article 11.

Reasons for suggested changes

We believe there is a pedagogical need to distinguish between in-person education and facilitated online learning.

Ensuring consistency in language across articles.

Article 14.1 (7)

Brazilian Olympic Committee

SUBMITTED

André Rodrigues, Technical Scientific Coordinator (Brazil)
Sport - National Olympic Committee

General Comments

The participation of National Federations is crucial to athlete's education.

Suggested changes to the wording of the Article

14.1.5 As per Code Article 20.3.13, International Federations ~~require~~ mandate (or enforce, or oblige) National Federations to conduct Education in coordination with the applicable National Anti-Doping Organization. Where in-person (physical or virtual) Education takes place, National Federations shall use Educators.

Reasons for suggested changes

In this case, "require" is a "too soft" word . National Federations have access and are in a closer contact with their athletes, their participation is crucial to promote anti-doping education.

Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

General Comments

Art. 14.1.2:

Change “should prioritize” to “should consider prioritizing” for flexibility.

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

General Comments

14.1.6 National Anti-Doping Organizations shall cooperate with their National Olympic Committee and the National Paralympic Committee...

- Does the term “support staff” listed here refer to those who have obtained accreditation from MEOs as described in the target pool (6.2.1)? If so, it should be clearly stated as “support staff who accredited by a Major Event Organization.”

Suggested changes to the wording of the Article

14.1.2 National Anti-Doping Organizations are responsible for the Education of National-Level Athletes and their respective Athlete Support Personnel and should also prioritize educating the following in line with the Athlete Pathway:

- Talented-level Athletes, in cooperation with National Federations

Reasons for suggested changes

14.1.2 The phrase “Talented-level Athletes, in cooperation with National Federations” is preferable. Talented-level athletes (like youth athletes) also need to collaborate with NFs.

NADA India

SUBMITTED

NADA India, NADO (India)

NADO - NADO

General Comments

Agreed

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

General Comments

14.1.2 National Anti-Doping Organizations are responsible for the Education of National-Level Athletes and their respective Athlete Support Personnel and should also prioritize educating the following in line with the Athlete Pathway:

- Children engaged in sport through school and/or sports club in cooperation with public authorities.

FEEDBACK 14.1.2

We suggest revising the wording “should also prioritize educating the following in line with the Athlete Pathway” to “should consider prioritizing... ”.

This adjustment allows for greater flexibility, recognizing that not all Signatories may have the same capacity or context to apply this prioritization, while still encouraging attention to the Athlete Pathway.

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

General Comments

14.1.2 - In section 6.1.1 it states, "*Signatories should consider other Athletes who are part of their Athlete Pathway...*". This is the same group of athletes as in 14.1.2. The current wording in this section infers that Signatories *should* prioritise these groups, however for consistency with 6.1.1, UKAD proposes to include the word 'consider'.

Suggested changes to the wording of the Article

14.1.2 - "National Anti-Doping Organisations are responsible for the Education of National-Level Athletes and their respective Athlete Support Personnel and should also consider prioritising educating the following.....".

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

Article 14.1.3

In general, we welcome the changes to art. 14, which provide greater clarity to the respective roles and responsibilities of Signatories. With specific reference to art. 14.1.3, we appreciate the recognition that NADOs may also play a role in educating International-Level Athletes (ILAs), their ASP, and other relevant persons in cooperation with the appropriate Signatory. However, we believe there would be value in reinforcing this point more clearly.

Given the shared nature of athlete development pathways and the collaborative framework already encouraged in arts 14.1.5 and 14.1.6 and across the ISE, it would be helpful to include a slightly stronger reference to the possibility that NADOs *may be requested* to support education efforts for ILAs in coordination with IFs, especially in the context of major or international events (beyond the Olympic and Paralympic Games).

Clarifying this cooperative potential would help prevent gaps in education delivery and support a more unified system, particularly when athletes from various Signatories are present at high-level events. It would also provide a more practical foundation for planning and resource allocation, especially in countries where NADOs are well-positioned to support such efforts.

To that end, we suggest considering either a comment or clarification within art. 14.1.3. The comment could read along these lines:

While International Federations retain primary responsibility for the Education of International-Level Athletes, it is acknowledged that National Anti-Doping Organizations may, in some cases, be well placed to support or deliver Education to these Athletes and their Athlete Support Personnel – particularly in the context of major or international events or where cooperation with National Federations is already established. In such instances, International Federations may seek cooperation from relevant National Anti-Doping Organizations, in line with shared objectives and organizational capacities.

Article 14.1.6

We welcome the inclusion of Pre-Event Education responsibilities in arts. 14.4.2 and 14.1.6. However, we note an inconsistency with art. 11.1.3. Specifically, art. 14.4.2 states that Athletes and Athlete Support Personnel “shall receive” Pre-Event Education for any Event involving the NOC or NPC, whereas art. 11.1.3 uses “shall” only for the Olympic, Paralympic, and Youth Olympic Games and “should” for other major Events.

To ensure alignment and clarity across the framework, we suggest that art. 14.1.6 (and similarly 14.4.2) be refined to better reflect the distinctions established in art. 11.1.3.

Article 14.2 (4)

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)
NADO - NADO

General Comments

Comment to Article 14.2.7

We support the wording in the second draft rather than the first draft because there is no discrepancy between “Educators are accredited by the Signatory” .

On the other hand, what kind of activities are expected of individuals who have been trained and accredited by the NF? Is it expected that the NF will train and accredit people who will be involved in education in the future? Please explain the background of the comment in 14.2.7.

Suggested changes to the wording of the Article

Comment to Article 14.2.6 under the Article 14.2.7 should be matched with the Article # 14.2.7.

NADA India

SUBMITTED

NADA India, NADO (India)

NADO - NADO

General Comments

Agreed

Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, General Secretary Deputy (France)

NADO - NADO

General Comments

[Comment to Article 14.2.6: It is acknowledged that National Federations may train and accredit individuals who can be authorized by a Signatory as an Educator to help maintain standards of Education delivery.]

We recognize the crucial role National Federations play in clean sport education and the continued support we have received from them over the years.

The fact that National Federations would have the possibility to train and accredit educators raises concerns.

ADOs are held to high standards in order to protect clean athletes and the integrity of sport. When it comes to the delivery of Education, if we want to maintain the same high standards, ADOs have to be involved in the Recruitment, the Training and Assessment, and the Accrediting and Reaccreditation of Educators.

With regards to the suggested authorization by the Signatory, we're concerned that this process – once the educators have been recruited, trained and accredited (i.e. "officially recognized for having met a particular standard") – ends up being simply a "stamp of approval" step, which could potentially affect the quality of Education we're aiming for.

ADOs are required to monitor and evaluate their education program and plan to "measure progress, ensure continuous improvement and ultimately to determine if what was delivered is effective." In order for the suggested process to be effective, the educators trained and accredited by NFs would have to be affiliated to the ADO in order for their education activities to be recorded and the education records of learners attending in-person sessions to be shared. Otherwise data may prove difficult to compile.

Suggested changes to the wording of the Article

[Comment to Article 14.2.7: It is acknowledged that National Federations may train and accredit individuals as Educators. Where this is the case, the profiles of the Educators, the Educator trainers, the Educator training program and its content (including the accreditation and reaccreditation process), shall be approved by a Signatory to help maintain standards of Education delivery.]

Reasons for suggested changes

For quality assurance (content, training delivery, up-to-date information, etc.) as well as for monitoring and evaluation purposes.

To be consistent with articles 7.0, 7.1, 7.2, 7.3 and 14.1.1 of the second draft of the ISE.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

Article 14.2.6

"anti-doping education" is a defined term.

Article 14.3 (2)

Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

General Comments

Article 14.3

The role of the Major Event Organizations (MEO) described in this article appears to duplicate work already being completed by anti-doping organizations (ADO) and international federations (IF) during a pre-Games period. It is therefore suggested that the MEO's role be focused on the timely and clear publication of rules and guidelines to allow ADOs to adequately educate their event-bound teams prior to Games. Should this not change, the CCES would suggest emphasis on timeliness and publication of clear rules and guidelines to assist ADOs. When publication occurs after athletes begin to travel, it can pose challenges for both athletes and ADOs.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

Article 14.3.4

"delegated third party" is a defined term

Article 14.4 (2)

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

General Comments

14.4.2

We would like to see more opportunities/support/requirements given from our NOCs/NPCs to ADOs - so either

here or in event specific language that says NOCs/NPCs shall take more responsibilities and provide support and opportunities for clean sport education activities.

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

Article 14.4.2

We welcome the inclusion of Pre-Event Education responsibilities in arts. 14.4.2 and 14.1.6. However, we note an inconsistency with art. 11.1.3. Specifically, art. 14.4.2 states that Athletes and Athlete Support Personnel “shall receive” Pre-Event Education for any Event involving the NOC or NPC, whereas art. 11.1.3 uses “shall” only for the Olympic, Paralympic, and Youth Olympic Games and “should” for other major Events.

To ensure alignment and clarity across the framework, we suggest that art. 14.4.2 (and similarly 14.1.6) be refined to better reflect the distinctions established in art. 11.1.3.

Article 15 (1)

NADA India

SUBMITTED

NADA India, NADO (India)

NADO - NADO

General Comments

Agreed

Article 15.2 (3)

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

General Comments

15.2.2

14.2.7 says IF shall require the NF to use educators, it should also be mentioned in the requirements for the NF in 15.2

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

General Comments

Since IFs shall require NFs to use Educators this should be mentioned here as well.

Please Note: This comment is also agreed upon the CEADO Education Managers and the PEERS group.

USADA

SUBMITTED

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

NADO - NADO

General Comments

- Although it may not be possible to make this mandatory, but at least a strong recommendation, that National Federations should only use Educators (trained and accredited as stated in the definition) for the delivery of Education Activities would be beneficial. There might even be a statement that the International Federation may decide not to recognize activities which are not delivered by Educators.

Article 15.3 (1)

Ministry of sports

SUBMITTED

Amandine Carton, Deputy head of department of ethics, integrity and prevention policies

(FRANCE)

Public Authorities - Government

General Comments

We support this provision, which explicitly restores competence in the area of education to governments. Not all target audiences fall within the jurisdiction of ADOs, and placing excessive constraints on ADOs in terms of resources may be inappropriate. Therefore, it is appropriate for all stakeholders, particularly governments, to have a role in education.

Article 15.4 (2)

USADA

SUBMITTED

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

NADO - NADO

General Comments

- We would like to see more opportunities/support/requirements given from our NOCs to ADOs - so either here or in event specific language that says NOCs shall provide support and opportunities for clean sport education activities.

Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

General Comments

N/A

Suggested changes to the wording of the Article

The AIU suggests that the ‘should’ in Article 15.4.4 be changed to a ‘shall’.

Article 16 (1)

University of Birmingham

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

We are generally supportive of the changes. Some further revisions for the evaluation report are proposed.

Article 16.3 (2)

Council of Europe (CoE)

SUBMITTED

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

General Comments

Art. 16.3:

Point out that it currently doesn't correspond with Art. 9.4 and should be aligned.

Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)
NADO - NADO

General Comments

In our opinion, this article should correspond to article 9.4. This is not the case.

Article 16.4 (1)

University of Birmingham

SUBMITTED

Ian Boardley, Professor in Sport and Exercise Psychology (United Kingdom)
Other - Other (ex. Media, University, etc.)

General Comments

We are generally supportive of the changes. Some further revisions for the evaluation report are proposed.

Suggested changes to the wording of the Article

16.4 Evaluation Report – this includes both monitoring and evaluation, and I such we believe the title of the report should reflect this (e.g., Monitoring and Evaluation Report). Within the actual text under the heading, there is no actual reference to evaluation, and much of what is referred to is what we would call monitoring not evaluation (e.g., monitoring data, athletes and ASP educated). Assessment is mentioned, but not evaluation specifically. To make it clearer for signatories, it may be better to refer directly to evaluation. It is not clear to us what is meant by “Leaner assessment information”, either. Is this data from evaluation of learning outcomes? If so, we would recommend referring to it as such to reduce the possibility of misunderstanding. Either way, we believe it is important to make direct reference to evaluation of learning outcomes in the Monitoring and Evaluation Report. We would also recommend having separate sections for Monitoring and Evaluation, to ensure they are addressed separately.

Reasons for suggested changes

Consistent with our earlier comments, we believe it is important to distinguish between monitoring and evaluation, and to refer to them consistently throughout. It is also essential for us that evaluation of learning outcomes is included within the report.

Appendix 1: Definitions (10)

International Paralympic Committee

SUBMITTED

Jude Ellis, Head of Anti-Doping (Germany)
Sport - IPC

General Comments

Definition of Education Pool

Please refer to our comment to Article 6.

IPC finds the purpose of having an education pool (and what it means to be included in an Education Pool) as quite unclear and confusing.

The definition is not helpful. IPC suggests reinstating the word 'target' to this definition.

Council of Europe (CoE)

SUBMITTED

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

General Comments

Definitions in 17.3 should be expanded:

- o [Clean Sport Behaviors]: Expand per definition above.
- o [Education Activity]: Add formats like information leaflets, websites, apps.
- o [Vulnerable Groups]: Define or reference guideline.
- o [International-Level Athletes/Events]: Recommend WADA develop a centralized, easily accessible database (ideally in ADAMS or on WADA's website), as ILA status is often unclear and impossible to find (e.g. on the IF website), but has key implications for TUEs, testing, education, and results management. A central source would improve clarity and compliance for all stakeholders.]

o [Clarify the definition and usage of terms like "system assessment process," "curriculum," and "monitoring procedures."]

o [Add a definition of Unintentional Doping to the Code definitions and provide examples of unintentional doping like contaminated medication or TUE miscommunicationa

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

General Comments

a) Clean Sport Behaviours

Clean Sport behaviors are mentioned in the WADC and in the ISE they are even a core requirement of the curriculum according to article 16.2. However, there is no real definition with examples, what this term means. The current version of the definition is rather superficial. There is a reference to the ISE Guideline at some point, but that the Guidelines are not mandatory and not updated yet. We suggest adding "Clean Sport behaviors" to the Definitions or elaborate in them in the Introduction to the WADC or the Introduction to Part Two or define them in the ISE.

This would also harmonize the language throughout the WADC / ISE since there are many different variations that potentially mean the same:

- WADC: "behaviors that support Athletes, Athlete Support Personnel and other Persons to act in accordance with the Code", "behavior to foster anti-doping attitudes", "behaviors that foster and protect the spirit of sport, and to prevent intentional and unintentional doping"
- ISE: "behaviors to foster anti-doping attitudes", "behaviors that foster and protect the spirit of sport", "the behaviors they need to train and compete clean, in line with the anti-doping rules and minimize their risk of unintentional doping", "behaviors in line with the spirit of clean sport", "ethical behavior related to doping"

b) International Level Athlete / Event

Right now, it is hard or sometimes impossible to find out which athletes are International Level Athletes (ILA). Some federations publish it on the website in a designated anti-doping section, some in general rules, some in specific anti-doping rules, some don't publish this information at all.

Since the status as ILA has a couple of implications (TUE, Testing, Education, RM, etc.) there should be a central database that has all the information easily accessible.

It would be helpful if WADA provided an accessible overview – either on its website or within ADAMS – how every IF defines the term "International-Level Athlete" and "International Event" along with the respective inclusion criteria.

A practical solution could be to require each IF to maintain a profile within ADAMS where this information is published in a dedicated section. This section should be visible to all other ADOs.

c) Vulnerability

The word "vulnerable" is mentioned a couple of times but there is not definition of vulnerability or criteria that would make an assessment of it easier. A Definition or a reference to the Guideline might

Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

General Comments

6.2.1
- **Parents/Guardians of Minors competing at International Events where Testing takes place;**
The definition of “Guardians” should be clearly stated in the Appendix.

17.3 Defined Terms Specific to the International Standard for Education

Clean Sport Behaviors:
Given that education is emphasised as a prevention strategy in the Code, the key words of the "Clean Sport Behaviors" should be included and referred to in the Code as well as in the ISE.
And harmonize where it is used throughout the Code. "to foster anti-doping attitudes", "to foster and promote the spirit of the sport", "behaviors they need to train and compete clean" etc. all should be harmonized.

Event-Based Education:
To make clearly understanding the definition and objective of Event-Based Education, it is recommended to change the name to something relating to the timing or objectives of education. For example, as Event-Based Education is any type of activity happening "at" event, "At-event education" can be one. Another example is that as event-based education is mainly for awareness or engagement campaign of "Event-Based Education" to "Event Awareness Education" or other expressions can be fit.

NADA India

NADA India, NADO (India)
NADO - NADO

SUBMITTED

General Comments

Agreed

Anti Doping Danmark

Silje Rubæk, Legal Manager (Danmark)
NADO - NADO

SUBMITTED

General Comments

17.3 Defined Terms Specific to the *International Standard for Education*

- **Education Activity:** *Any activity that is purposefully designed and delivered to facilitate learning. Examples include eLearning, workshops, scenario-based sessions, peer-to-peer conversations, webinars, etc.*

FEEDBACK 17.3

In article 9.2 and 12.1, education activities are described as potentially including in-person sessions, scenario-based learning, eLearning, information leaflets, event-based education, websites, apps, etc.

To ensure consistency, we recommend updating the definition of *Education Activity* in section 17.3 to include the missing elements: *information leaflets, websites, and apps*.

Sport Ireland

SUBMITTED

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

General Comments

Examples of Clean Sport Behaviours would be great to be included.

Re the Education Activity, would info/resources on websites be included in this? What about infographics sent out/made available to the sector? Or leaflets/links to websites made available at event based education sessions?

Agence française de lutte contre le dopage

SUBMITTED

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

General Comments

N/A

Suggested changes to the wording of the Article

We suggest adding a definition for “unintentional doping” in the “Defined terms from the 2027 Code” section of the ISE.

Reasons for suggested changes

For clarification.

USADA

SUBMITTED

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

General Comments

- Pre-Event Education- does not provide a specific timeline. It seems feasible to define what is to be considered as Pre-Event Education and what is not.
- Awareness raising: “involves highlighting and communicating topics and issues related to clean sport to increase understanding and vigilance.”
- Education: “the process of learning to instill values...” could be more direct.
 - Proposal: “The process of learning to instill values and develop behaviors that foster and protect the spirit of sport, and to prevent intentional and not intentional doping. Core Education activities include: values-based education; awareness raising; providing information; and anti-doping education”
- *Education Pool*: Be more specific “*system assessment process*”

General Comments

Please refer to our comments on each ISE provision, where we have suggested a few proposed definition changes.

Other Comments / Suggestions (13)

General Comments

ICSD appreciates WADA’s commitment to advancing anti-doping education globally. As the international governing body for Deaf sport, ICSD serves athletes who face unique accessibility barriers and communication needs.

We strongly encourage WADA to:

- Ensure that accessibility and inclusion for athletes with disabilities — especially Deaf athletes — are integrated as a cross-cutting principle throughout the ISE.
- Recognize that small or disability-specific ADOs like ICSD may not have full-time education staff, long-term testing pools, or centralized platforms such as ADAMS, and therefore rely on event-based and volunteer-supported education models.
- Include guidance or templates that reflect the practical realities of small ADOs — especially for defining education pools, reporting activities, and ensuring fair evaluation under monitoring processes.
- Encourage collaboration with NADOs and LOCs to deliver accessible education at international events such as the Deaflympics and regional Deaf sport championships.
- Offer targeted WADA support (e.g., translated or captioned education videos, simplified guides, or adaptable templates) to better serve Deaf and hard-of-hearing communities.

ICSD remains fully committed to meeting the standards of the Code and the ISE, and welcomes further dialogue with WADA on how to make anti-doping education fully inclusive and achievable for all athletes, regardless of ability or resources.

General Comments

The International Standard for Education is very ambitious and many requirements would have significant and excessive consequences for the affected bodies. Many of our National Federations have only one person employed and they are struggling with human and financial resources, therefore some of the requirements will be virtually impossible to implement by them. The FEI proposes the widespread use of the word “should” instead of “shall” throughout the ISE. Example of the ISE requirement that will be hard to be implemented by the NFs:

14.2.7 International Federations shall require National Federations to use Educators to deliver in-person (physical or virtual) Education.

Council of Europe (CoE)

Council of Europe, Sport Convention Division (France)

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

General Comments

- A) In some parts of the ISE 2027 draft, the language used does not align with the positive tone desired. For instance, the phrase “catch and punish” (Art. 2.2) may contradict the assumption that most athletes aim to compete clean. This way of framing risks overshadows the core purpose of education, which is to support and empower clean athletes.

[Reconsider phrasing such as “balanced – support and prevent as much as catch and punish.” A clearer message would acknowledge that while deterrence is necessary for a small minority, the main focus of education should remain on supporting and protecting clean sport]

[Alternatively, suggest deleting the sentence entirely to maintain a positive assumption about athletes’ intentions.]

- B) Similarly, in Art. 2.2, the phrase “This is why knowledge-focused Education Programs are not sufficient” should be revised.

We propose: “This is why knowledge-focused Education Programs are not exhaustive and it is necessary to include scenario-based sessions and values-based activities.”

[Suggest replacing “sufficient” with “exhaustive” to improve clarity and tone.]

- C) References to Code Article 18.2 should be revised or removed since the article no longer lists mandatory topics.

[This affects Articles 7.2, 8.1.1, 9.2.1, and the definitions.]

- D) Define “Theory-Based Education” to distinguish it clearly from “Value-Based Education.”

[Recommend including a definition in Section 17.3 to align with recurring use.]

[Recommend including a definition in Section 17.3 to align with recurring use.]

- E) Smaller ADOs may struggle with increased responsibilities.

[To support them effectively, it is essential to establish early templates, minimum criteria for validating their education programs, and ensure alignment with the CCQ]

- F) ASPs face 7 of 11 ADRVs and deserve clear rights, just like athletes.

[Recommend developing an Athlete Support Personnel's Anti-Doping Rights Act.

[Align with the GLDF4CleanSport statement on shared clean sport rights.]

- G) The headings “Part Two,” “Part Three,” and “Part Four” are missing from the table of contents but still appear in the body text.

[Ensure consistency.]

VASANOC

SUBMITTED

Dave Lolo, CEO (Vanuatu)

NADO - NADO

General Comments

No comments/ suggestions.

Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)

NADO - NADO

General Comments

The titles Part Two, Three, and Four have been removed from the table of contents, but are still included in the text.

NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

General Comments

General Comment

We want to recognize and thank the drafting group for all their hard work on the ISE. We support and are encouraged by the overall direction the ISE is heading.

Some smaller ADO's will have challenges with the new ISE as they already struggle implementing the current one and the new version adds another layer of responsibility and administration. Templates, guidelines and criteria for accountability (e.g. CCQ questions) are needed at an early stage to prepare. The sooner they are available the better.

Athlete Support Personnel’s Anti-Doping Rights Act

We really appreciate all the additional wording regarding ASP in the new draft and think that this will help to raise awareness regarding the education of ASP.

We know that this may be not the right place and we already gave this input but we are strongly recommending to develop an Athlete Support Personnel’s Anti-Doping Rights Act.

Out of the 11 Anti-Doping Rule Violations, 7 also apply to ASP. ASP have roles and responsibilities in the WADC and IS and so they should also have rights. One could also argue that ASP want to work in a professional environment and have a right to participate in doping-free sport not only because they are affected by ADRVs, but also because they suffer from doping directly (e.g. because one of their athletes used doping and they did not know) or indirectly (e.g. because their athletes were not as successful as they competed against athletes who used doping).

A first step to acknowledge the importance of the role and influence of ASP would be an ASP Anti-Doping Rights Act like the Athletes’ Anti-Doping Rights Act.

This idea is already reflected in the current draft of the key purpose of Anti-Doping which was developed during the GLDF4CleanSport-project: “Promote clean sport by working collaboratively to develop and deliver a world programme which protects the right of all athletes and their support personnel to participate in a doping-free environment.”

In light of this, we welcome the new sentences “Athletes have a right to Education as identified in the Athlete’s Anti-Doping Rights Act. Athletes and Athlete Support Personnel also have a right to Education as per the UN Sustainability Goal 4 – Quality Education.” However, if, - according to this - ASP have the right to be educated – there should also be an “Athlete Support Personnel’s Anti-Doping Rights Act”.

Benefits of Education

We really appreciate the list that lists the benefits of Education. The two points “Earning public trust” and “Building a clean reputation” are related, maybe a merge to one point makes sense.

Please Note: This comment is also agreed upon the CEADO Education Managers and the PEERS group.

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)
NADO - NADO

General Comments

The mentioned templates and other relevant documents provided by WADA will have to be published and shared well in advance of the 1 January 2027 to successfully support the ADOs.

Canadian Centre for Ethics in Sport

SUBMITTED

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

General Comments

The CCES feels that the tone of the language used should reflect certain assumptions and priorities that have been expressed at prior Global Education Conferences and are supported by existing and emerging research: first, that we assume that athletes are clean and intend to train and compete clean, and second, that our role involves reducing

clean athlete anxiety by equipping them with the knowledge, tools, and resources to engage in clean sport behaviours.

Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)
NADO - NADO

General Comments

- General comments

Clean Sport Behaviors is a recurring principle mentioned in several sections of the document (e.g., Sections 2.2, Key Principles, 4.0 Overview, 6.0 Establishing an Education Pool, 8.1 Curriculum, 9.2.1 Each Education Activity). However, the term is not clearly defined.

In Section 17.3 (Defined Terms Specific to the International Standard for Education), it is defined as: Clean Sport Behaviors: *Athletes and their Athlete Support Personnel should be capable of doing in relation to mandatory topics outlined in Article 18.2 of the Code and as described in a curriculum.*

However, the definition lacks clarity about what it actually means. We suggest that the definition be expanded to include, for example:

Clean Sport Behaviors refer to the practical actions, choices, and attitudes that athletes and their support personnel (such as coaches, trainers, and doctors) are expected to demonstrate in order to protect and promote fair, ethical, and doping-free sport.

These behaviors go beyond simply refraining from using banned substances or methods — they involve actively engaging in and supporting a culture of integrity, fairness, and ethical conduct within sport.

References to Code Article 18.2 There are references to the list of anti-doping topics in Code Article 18.2 in the following sections:

- 7.2 Training and Assessment of Educators
- 8.1.1 Mandatory Topics
- 9.2.1 Each Education Activity (Anti-Doping Education)
- 17.3 Defined Terms Specific to the International Standard for Education (Clean Sport Behaviors)

However, the list of topics has been removed from WADC Article 18.2. These references should be updated accordingly to reflect this change.

UK Anti-Doping

SUBMITTED

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

General Comments

UKAD would like to acknowledge and thank the ISE drafting team for taking on board the comments and feedback from phase 2. In principle we fully support and are encouraged by the direction of travel with the 2027 ISE.

Suggested changes to the wording of the Article

'Table of contents' page - 7.3 - UKAD proposes to change the title to either; "Accreditation and Reaccreditation of Educators" or "Accrediting and Re-accrediting of Educators".

Reasons for suggested changes

'Table of contents' page - 7.3 - currently 'Accreditation' is spelt incorrectly.

ONAD Communauté française

SUBMITTED

Julien Magotteaux, juriste (Belgique)

NADO - NADO

General Comments

We refer to our general comments on the Code and Standards update process, included in the "Other comments/Suggestions" section of the Code.

More specifically, we would like to know whether the proposed changes to the ISE will have an impact on the resources of the signatories.

Suggested changes to the wording of the Article

We would like our general comments here above be taken into consideration.

Reasons for suggested changes

The reasons are explained here above and also in the "Other comments/Suggestions" section of the Code. The proposals of changes should have the least possible impact on the rules and resources of the signatories.

USADA

SUBMITTED

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

NADO - NADO

General Comments

- USADA would like to extend our sincere gratitude to the entire drafting group for their dedication and hard work on the ISE. We are encouraged by the overall direction the ISE is heading and fully support the progress made so far.
- Explain technical or process terms the first time they appear (e.g., “system assessment process,” “curriculum,” “monitoring procedures”)
- Templates and other relevant documents mentioned in the ISE must be published well in advance, to enable ADOs to be ready in time.
 - ADOs willing to help in the development of them
- International level athletes at events- there should be an overview (on AdeL, WADA website, etc.) that defines how each IF defines an international event. For ADOs to go to each signatory's website to find this is difficult and a duplication of efforts by all.
- The concept of clean sport is evolving from simply "drug-free" to a broader "cheating-free" and integrity-based perspective. Education should clarify the definition of “clean sport” to address all forms of cheating, not just substance use
 - Definition to be included in the ISE and/or the Code

General Comments

We recommend reviewing the use of "Education" and "Anti-Doping Education" throughout the Standard to ensure that each term is used accurately, withing its intended meaning.