

# 2027 Code & International Standard Update Process: Third Consultation Phase - International Standard for Testing (IST)

Showing: All (315 Comments)

## Article 3 (5)

<div><div>NADA Austria</div><div>Dario Campara, Lawyer (Austria)</div><div>NADO - NADO</div></div>	SUBMITTED
<div>General Comments</div> <div>Article 3.1 Defined Terms from the Code that are used in the International Standard for Testing</div> <div>Wording in the IST:  <i>“Delegated Third Party: Any Person to which an Anti-Doping Organization delegates any aspect of Doping Control or anti-doping Education programs including, but not limited to, third parties or other Anti-Doping Organizations that conduct Sample collection or other Doping Control services or anti-doping Educational programs for the Anti-Doping Organization, or individuals serving as independent contractors who perform Doping Control services for the Anti-Doping Organization (e.g., non-employee Doping Control officers or chaperones).This definition does not include CAS.”</i></div> <div>Comment NADA Austria:  DTPs are frequently used for sample collection. To ensure consistent quality and compliance, it would be beneficial if WADA also audited these DTPs – similar to how NADOs are audited.  While the Testing Authority is currently responsible for ensuring that a DTP conducts testing in accordance with the ISTI, in practice, many DTPs are reluctant to fully disclose their internal procedures and regulations to the Testing Authority. Therefore, to enhance transparency and maintain high-quality standards across all sample collection activities, WADA oversight through audits of DTPs would be a valuable addition.</div> <div>Wording in the IST:  <i>“In-Competition (IC): [...] Provided, however, WADA may approve, for a particular sport, an alternative definition if an International Federation provides a compelling justification that a different definition is necessary for its sport; upon such approval by WADA, the alternative definition shall be followed by all Major Event Organizations for that particular sport.”</i></div> <div>Comment NADA Austria:  It would be helpful if WADA provided an accessible overview – either on its website or within ADAMS – listing all sports in which an alternative definition (e.g., of "in-competition") is in effect.  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.</div>	

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)  
NADO - NADO

General Comments

Article 3.6: SIA reinstates its previous feedback in relation to UARs being uploaded into ADAMS for RTP & TP Athlete attempts. SIA has concerns that there are no other references in the ISTI relating to uploading UARs into ADAMS (e.g. timeframes to do so, actions as a result), and particularly given that Article 3.6 states “such report shall be filed in ADAMS in accordance with requirements outlined in the International Standard for Testing”.

SIA is seeking further clarification about these requirements, including information on the expected timeframes, the level of information required, and any potential consequences for the failure to upload UARs. SIA notes that ADOs will need to be fully informed of the requirements for uploading UARs to be able to satisfy any requirements.

Moreover, to understand the purpose of this requirement, SIA is seeking further information from WADA as to what WADA propose to do with the UARs. For example, does WADA propose to review them and use them to consider suitable Testing Pools and/or potential Whereabouts Failures?

Suggested changes to the wording of the Article

See above.

Reasons for suggested changes

Multiple global stakeholders have requested changes to this definition for a variety of reasons. SIA requests that a comment be included in the IST or guidance material outlining any steps that WADA expects an ADO to take in response to such an UAR, as well as any action WADA may take. For example, will an ADO be required to explain why the test was not pursued? Is WADA likely to request an ADO to pursue the test? SIA is seeking clarity and guidance on the consequences of this new requirement to ensure the impact of this change (including any administrative burden) is fully understood.

Marjorit Elorinne, Quality Manager (Suomi)  
NADO - NADO

General Comments

FINCIS proposes that the term "**sport nationality**" be formally defined within the IST to ensure clarity and consistency across ADOs. Currently, there is inconsistency in the interpretation and application of this term among ADOs, which poses practical challenges, particularly when inputting and managing data within the ADAMS system.

Without a clear and standardized definition, discrepancies in understanding "sport nationality" can cause challenges for example related to coordination and information sharing between ADOs. Clear definition would support more efficient and accurate use of ADAMS.

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

#### General Comments

N/A

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

##### Article 3.6

**Recommended Change:** Remove entirely “Such report shall be filed in ADAMS in accordance with requirement outlined in the *International Standard for Testing*.”

#### Reasons for suggested changes

##### Article 3.6

**Reason:** ADOs use many different paper or paperless systems and there is not a universal system for managing UARs. Or WADA needs to have a free API in place to collect and upload UARs into ADAMS as this addition will result in a *significant* administrative burden on ADOs and no clear understanding of how this data may be used or support anti-doping efforts.

#### Anti-Doping Norway

SUBMITTED

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

NADO - NADO

#### General Comments

##### Re. 3.6: Definitions: Unsuccessful Attempt Report (UAR):

It is unclear to us whether SCAs need to write a UAR for each test-attempt made outside of the 60 min timeslot? And if this UAR automatically will trigger that a possible whereabouts failure will have to be opened in ADAMS. If so, we are skeptical given the onerous procedures in and generally slow functioning of ADAMS.

#### Article 4 (3)

##### ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

#### General Comments

ICSD supports the overall principles of Article 4 regarding the conduct of testing, including ensuring that the process is fair, respectful, and protects athlete rights. For Deaf or Hard of Hearing athletes, it is critical that the testing process be conducted in an accessible manner, with accommodations provided where necessary to enable full understanding and participation.

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

Testing procedures should incorporate accessibility accommodations where needed to ensure athletes with disabilities — including communication accessibly especially for Deaf or Hard of Hearing — can fully understand and participate in the process

#### Reasons for suggested changes

Without clear expectations for accessibility accommodations, Deaf or Hard of Hearing athletes may encounter barriers during the testing process, including not understanding instructions, their rights, or how to comply properly with DCO requests. Adding this clarification promotes fairness and protects athlete rights

**NADA Austria**

SUBMITTED

Dario Campara, Lawyer (Austria)  
NADO - NADO

**General Comments**

Article 4.3 Defining International-Level and National-Level Athletes4.3.1 & Comment to 4.3.1

**Wording in the IST:**

*“4.3.1.: Code Article 5.2 gives different ADOs authority to conduct Testing on potentially very large pools of Athletes. However, in recognition of the finite resources of ADOs, the Code definition of Athlete allows NADOs to limit the number of Athletes who will be subject to their national anti-doping programs (in particular, Testing) to those who compete at the highest national levels (i.e., National-Level Athletes, as defined by the NADO). It also allows International Federations to focus their anti-doping programs (in particular Testing) on those who compete regularly at the international level (i.e., International-Level Athletes, as defined by the International Federation).”*

*“Comment to 4.3.1: Nothing prevents an International Federation from testing an Athlete under its authority who is not an International-Level Athlete, if it sees fit, e.g., where they are competing in an International Event. Furthermore, as set out in the Code definition of Athlete, a NADO may decide to extend its anti-doping program (including Testing) to Athletes under its authority who are not National-Level Athletes. However, the main focus of an International Federation's TDP should be International-Level Athletes, and the main focus of a NADO's TDP should be National-Level Athletes and above.”*

**Comment NADA Austria:**

If a NADO limits its testing program solely to athletes competing at the highest national levels, there is a significant risk that certain international-level athletes may not be adequately tested. This includes athletes who regularly compete internationally but rarely participate in national-level events and are also not included in the IFs Whereabouts Pools – often because they are not among the absolute elite in their sport.

As a result, these athletes may fall outside the scope of both national and international testing programs, creating a blind spot in the overall testing system.

4.3.2 a)

**Wording in the IST:**

*“Comment to 4.3.2 a): The Code requires each International Federation to publish in clear and concise form the criteria it uses to classify Athletes as International-Level Athletes, so that it is clear to everyone where the line is drawn. For example, if the criteria include competing in certain International Events, then the International Federation shall publish a list of those International Events.”*

**Comment NADA Austria:**

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. This information is currently difficult or, in some cases, impossible to find on IF websites. 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.

Annex E.4 RequirementsE.4.6

Wording in the IST:

*“E.4.6: When the Athlete is able to provide an additional Sample, the procedures for collection of the Sample shall be repeated as prescribed in Annex C - Collection of Urine Samples, until a sufficient volume of urine will be provided by combining the initial and additional Sample(s).”*

Comment NADA Austria:

**Example 1:** If the athlete provides 60 mL of urine initially, which appears to have a very high specific gravity (i.e., it is very dense), and then 80 mL of urine, which appears to have a very low specific gravity (i.e., it is very diluted), should all of the 80 mL be used and combined with the first sample? Alternatively, should only 30 mL be used from the second sample? What is the best approach: to prioritize a higher total volume or to focus on obtaining a denser sample?

**Example 2:** If the athlete provides 70 mL of urine with a very high specific gravity (dense) initially, and then 100 mL of urine with a very low specific gravity (diluted), should all 100 mL be used and combined with the first sample? Should only 20 mL be used from the second sample? Or should only 80 mL be used from the second sample? Again, what is better – to achieve a higher total volume or to use a denser urine sample?

These questions pertain to balancing the need for sufficient volume with maintaining the integrity of the sample’s quality. Which approach is preferred for achieving the most reliable results?

iNADO

Alex Brown, Campaigns and Membership Coordinator (Germany)  
Other - Other (ex. Media, University, etc.)

SUBMITTED

General Comments

Code Art. 5.3 / IST art. 4. IFs tend to expand the number of events they will recognize as „International Level Event“. This may be over and beyond their capacity to provide doping control activities, which is unfair towards the respective NADO. This section could benefit from greater detail to coordinate planning between IFs and NADOs, e.g. timely (deadline?) and mandatory notice to NADOs, so that they can either be commissioned the doping control activities for the event (and plan accordingly), or plan for testing under their own jurisdiction.

Article 4.2 (6)

International Paralympic Committee

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

SUBMITTED

General Comments

Articl 4.2.1a

IPC supports this article,regarding the inclusion of sports and/or disciplines for athletes with impairments in the ADOs risk assessment.

## Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

### General Comments

4.2. h) The current scoring system for quantitative criteria (scale 1-5) and the use of a Total Risk Score threshold (e.g., 22–25 points for classification as a high-risk sport) is problematic. Internationally we see different solutions to solve these problems like changing the score, adding more categories e.g. which is generally problematic for a harmonized approach. To give a practical example: sports like marathon running or weightlifting are clearly high-risk disciplines, primarily due to high endurance or strength requirements respectively. However, under the current model, these sports would need to score at least a 2 in the opposite characteristic (e.g., strength for marathon) to qualify as “high-risk,” even if they score the maximum in all other criteria. A suggestion is to focus on physiological factors that could be provided by WADA and /or add national risk categories.

## NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

### General Comments

Article 4.2 Risk Assessment4.2.1 h)

### Wording in the IST:

*“h) Data analysis of the sport/discipline including but not limited to performance of the nation within the sport/discipline at an international level, e.g., number of Athletes who achieve podium finishes or an increase in international rankings.”*

### Comment NADA Austria:

#### Access to Data for Risk Assessment:

The current expectation places higher workloads and costs on many ADOs, particularly when comprehensive data analysis is required. While excellent commercial tools such as “Gracenote” (by Nielsen) exist, they are often prohibitively expensive. It may be worthwhile for WADA to consider establishing partnerships or licensing agreements with such providers and offering access to these tools for ADOs who require them. Alternatively, WADA could take a central role in analyzing data and providing sport- or athlete-specific statistics and recommendations to support ADOs in conducting risk assessments.

### Scoring Methodology in the WADA Risk Assessment Template:

The current scoring system for quantitative criteria (scale 1-5) and the use of a Total Risk Score threshold (e.g., 22–25 points for classification as a high-risk sport) is problematic. For example, sports like marathon running or weightlifting are clearly high-risk disciplines, primarily due to high endurance or strength requirements respectively. However, under the current model, these sports would need to score at least a 2 in the opposite characteristic (e.g., strength for marathon) to qualify as “high-risk,” even if they score the maximum in all other criteria. This logic is flawed, as strength and endurance are inherently opposing traits and cannot both be highly expressed in the same sport. This creates distortions in the final classification.

### Consideration of National Relevance:

In addition to sport-specific risk characteristics, national relevance should be taken into account. A sport may show high-risk features globally but have little domestic importance – e.g., due to a lack of a professional league

or very limited athlete participation. The inclusion of national indicators, such as the number of licensed athletes or clubs, would provide a more realistic and practical risk profile for each country.

### **Sport vs. Athlete-Level Risk:**

A final point for clarification concerns the prioritization between sport-level and athlete-level risks. For example, how should an ADO proceed if a high-risk sport includes predominantly low-level athletes, while a medium-risk sport includes a few top-tier, high-profile athletes? Clearer guidance from WADA on how to weigh the general risk of the sport versus the risk level of individual athletes would be highly beneficial for strategic test planning.

### **Additionally, we also want to refer to the comment of the Council of Europe:**

*“4.2. h) The current scoring system for quantitative criteria (scale 1-5) and the use of a Total Risk Score threshold (e.g., 22–25 points for classification as a high-risk sport) is problematic. Internationally we see different solutions to solve these problems like changing the score, adding more categories e.g. which is generally problematic for a harmonized approach. To give a practical example: sports like marathon running or weightlifting are clearly high-risk disciplines, primarily due to high endurance or strength requirements respectively. However, under the current model, these sports would need to score at least a 2 in the opposite characteristic (e.g., strength for marathon) to qualify as “high-risk,” even if they score the maximum in all other criteria. A suggestion is to focus on physiological factors that could be provided by WADA and /or add national risk categories.”*

#### **NADA**

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

#### **General Comments**

Comment to Art. 4.2 h)

It is problematic to rate high risk disciplines with a high risk using the current scoring system.

The solution for many ADOs is to add other categories or change the scoring system to rate disciplines as high risk disciplines.

We suggest to weather focus on the physiological factors that are generally the same world wide for the specific sports or to add a sentence that gives the possibility to add other categories such as national risk factors e.g. just to harmonise the approach of risk assessment

#### **Swiss Sport Integrity**

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

#### **General Comments**

##### **4.2.1**

Not knowing the considerations of WADA's Human Rights Senior Independent Expert, we have no understanding for the addition in lit. a). The explicit mentioning of "sports and/or disciplines for Athletes with impairments" alone could be deemed discriminatory as it implies that the latter cannot be regarded as and therefore subsumed under "Sports" and "Disciplines".

**NADA India**

SUBMITTED

NADA India, NADO (India)

NADO - NADO

**General Comments**

Agreed

**Article 4.5 (4)****Japan Anti-Doping Agency**

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

**General Comments**

<I am submitting his comment below on behalf of SEA RADO because he submitted their comments before adding this comment and could not add anymore>

**4.5.1**

The need for an additional witness to protect the Doping Control Officer (DCO) during open category testing. This is particularly important when the DCO may encounter individuals with regards to gender issues as stated above. Having a second observer, similar to the protocol for minor athlete sample provision.

**NADA India**

SUBMITTED

NADA India, NADO (India)

NADO - NADO

**General Comments**

Agreed

**Anti-Doping Norway**

SUBMITTED

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

NADO - NADO

**General Comments**

*4.5.2 iv: Even if National Level Athletes are not residing or training within the NADO's country, it is still that NADO's responsibility to ensure those Athletes are subject to testing abroad. The fact that an Athlete resides or frequently trains abroad is not a valid reason not to test them.*

It should be clarified if this also applies to athletes within team sports, i.e. where a player is playing as part of a team in a league of a foreign country.



## SEARADO

SUBMITTED

Gobinathan Nair, Director-General (Singapore)

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

### General Comments

Regarding sample provision utilizing an external prosthetics (e.g. STP packer) via a harness or medical grade glue in open category/transgendered.

Example, a born female who hasn't undergone full gender reassignment surgery competing in a male gendered event or gender-neutral sport (Equestrian).

### Suggested changes to the wording of the Article

Sample witnessing process need to be more clear, example, do we request the athlete to pass urine without external prosthetics or allow the use of external prosthetics and document it.

If the use of external prosthetics is allowed, do we apply modification and request the athlete to clean the device before sample provision and document it, e.g. like the use of used urine catheter in urine provision by athletes with impairments

### Reasons for suggested changes

The existing IST does not address such situations

## Article 4.6 (7)

## ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

### General Comments

ICSD welcomes the inclusion of Article 4.6 and its reference to respecting the needs of athletes with disabilities. However, we strongly recommend that WADA explicitly reference **communication accessibility** in this paragraph, as communication barriers are a primary issue for Deaf athletes during testing

### Suggested changes to the wording of the Article

The Sample Collection Authority shall conduct Sample Collection in a manner that respects the needs of the Athletes being tested, including the needs of athletes with disabilities include Deaf. This includes providing appropriate **communication accessibility** (such as sign language interpreter), and, where applicable, taking into account gender identity considerations

### Reasons for suggested changes

Many DCOs are unaware that communication barriers require accommodations beyond physical accessibility. Deaf athletes face significant risk of procedural unfairness if communication accommodations are not provided. Explicitly including this in Article 4.6 will help ensure compliance and equal treatment

**General Comments**

4.6.1.1 (a) - Resubmitted comment – UKAD has previously proposed that flexibility is provided to ADOs where they can seek an exemption from conducting In-Competition testing. UKAD understands the rationale for this Article and that, in the main, both In-Competition and Out-of-Competition testing should be conducted across sports. However, due to the differences in resources and opportunities between NADOs and IFs, UKAD proposes that our comment is reconsidered but for NADOs only.

This is because NADO testing programmes capture multiple sports and disciplines, and pending their Risk Assessment and available resources, some sports may have extremely low levels of tests assigned e.g. less than 10. NADOs can also have limitations for In-Competition testing opportunities at an appropriate athlete level within their national programme. Therefore, we propose that in these instances, and in good faith, NADOs can be afforded the opportunity to apply for an exemption from In-Competition testing.

4.6.1.1 (c) - Resubmitted comment – Article 4.6.1.1 (c) provides IFs the flexibility to seek an exemption from doing Out-of-Competition testing, however this has not been extended to NADOs. It is unclear as to why NADOs are not also able to seek an exemption.

As per UKAD's comment to 4.6.1.1 (a), NADO testing programmes capture multiple sports and disciplines, and pending their Risk Assessment and available resources, some sports may have extremely low levels of tests assigned e.g. less than 10. Therefore, for these sports where the primary risk is In-Competition, UKAD believes NADOs should be allowed to apply for an exemption from conducting OOC testing.

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

4.6.1.1 (a) - UKAD proposes the following changes, by either adding to 4.6.1.1 (a) or creating a new article to stipulate that:

Very exceptionally, i.e., in the small number of sports and/or disciplines where there are limited resources and/or national IC events and where the athlete pool is tested IC by the IF, the NADO can opt to prioritise their resources solely towards OOC for sports/disciplines. In these circumstances, the NADO shall apply to WADA to seek an exemption from IC Testing in accordance with any protocol issued by WADA.

4.6.1.1 (c) - UKAD proposes the following changes:

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

**Reasons for suggested changes**

4.6.1.1 (a) - UKAD is seeking some flexibility for NADOs who encounter different resource and prioritisation challenges to IFs when considering IC testing.

4.6.1.1 (c) - UKAD is seeking to ensure NADOs are included within this article and ensure consistency in approach between IFs and NADOs.

#### General Comments

Comment to Art. 4.6.1.3

The current wording would not allow the collection of samples for the hematological module of the ABP from capillary blood vessels.

We suggest to reword at this point to enable the collection of samples for the hematological module of the ABP from capillary blood vessels.

#### NADA India

SUBMITTED

NADA India, NADO (India)

NADO - NADO

#### General Comments

Agreed

#### Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

#### General Comments

##### 4.6.1.3

Art. 4.6.1.3, footnote to lit. a): What is the reasoning behind the renaming of 'venous samples' to 'whole blood samples'? We fear that that new definition will cause confusion as the use of 'whole blood' samples as a distinction from 'serum' samples is widely accepted in the AD community. The addition of 'venous' seemed to be perfect to distinct these samples from DBS samples.

In any case, the definition of a 'whole blood sample' is too relevant (for the understanding of many following articles) to just mention it in a footnote to this article. Please consider adding a Definition under Article 3 of the IST, as the case may be.

#### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

#### General Comments

##### Article 4.6.1.1.c

For clarity, WADA should include details for the process for where and how to apply for an exemption for out-of-competition (OOC) testing. It would also be helpful to have additional clarity confirming if only international federations (IF) can apply for this exception or if national anti-doping organizations (NADO) are able to as well.

#### Article 4.6.1.3.a

Considering the introduction of dried blood spot (DBS) testing, the CCES would suggest removing the reference to “venipuncture” and updating this section to “collection of whole blood and analysis of.”

#### USADA

SUBMITTED

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

NADO - NADO

#### General Comments

N/A

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

##### Article 4.6.1.1.c

Recommended Change: Change in bold. “Very exceptionally, i.e., in the small number of sports and/or disciplines where it is determined in good faith that there is no material risk of doping during OOC periods, there may be no *OOO Testing*. In these circumstances, **an ADO** the International Federation shall apply to *WADA* to seek an exemption from *OOO Testing* in accordance with any protocol issued by *WADA*.”

##### Article 4.6.1.3.a and in footnote

Recommended Change: Change in bold. “Collection of whole blood ~~by venipuncture~~ and analysis of:”

##### Comment to Article 4.6.1.3. a

Recommended Change: Change in bold. “For the analysis of serum, whole blood shall be collected in serum tubes (containing a clotting **agent factor**) as outlined in Article 6.3.4 t) or for plasma, whole blood shall be collected in EDTA tubes as outlined in Article 6.3.4 s). ”

#### Reasons for suggested changes

##### Article 4.6.1.1.c

Reason: This should not be specific to only IFs but NADOs should be allowed and provided with the same ability to apply for an exemption from OOC testing. As NADOs conduct a much higher volume of OOC tests and oversee a wider range of sports, it would position NADOs to allocate resources more efficiently and provide the ability to manage testing more proportionately for higher risk sports.

##### Article 4.6.1.3.a and in footnote

Reason: Recommend removing venipuncture to allow for microcapillary collections in the future.

##### Comment to Article 4.6.1.3. a

Reason: Agent is a more accurate word.

#### Article 4.7 (4)

#### World Rugby

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)

Sport - IF – Summer Olympic

#### General Comments

**Article 4.7.3:** We fear with regards to article 4.7.3 (and to some extent 4.8.5), this this is something of a stray into unchartered territory for the Code and Standards by mandating ADOs to allocate resources to two particular ‘top tier’ events, creating a mandatory (pre-determined outcome) for its risk assessment and TDP in the years that these competitions are taking place. It is also unclear what 'sufficient resources' would be, and who determines this.

We are 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.

**International Paralympic Committee**

SUBMITTED

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

**General Comments**

Article 4.7.3

IPC supports Article 4.7.3 requiring ADOs to monitor athlete who may qualify for the Olympic or Paralympic Games

**NADA India**

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

**General Comments**

Agreed

**Bird & Bird LLP**

SUBMITTED

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

**General Comments**

4.7.3

The AIU supports the new requirements as they apply to the Olympic Games but considers that they should also apply to senior World Championships (rather than just be considered as ‘best practice’); or at least the IST should state that IFs may extend the principles to their World Championships at their discretion.

**Article 4.8 (20)**

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

### General Comments

Article 4.8.2 - The objective is to ensure that communication reaches the RMA/TA promptly, enabling timely feedback to be provided to the lab. At present, notifications are sent to the ICC via automated prompts in ADAMS, but these prompts are very generalized in the title and do not highlight the urgency or significance of the communication from the lab. As a result, important messages can easily be overlooked.

It is recommended that WADA consider more efficient ways for labs to alert ADOs to ensure timely responses.

Article 4.8.5 - The fast turnaround suggested in this article is not feasible when additional analysis (e.g., ERAs, GHRH, or GHRF) is required.

### World Rugby

SUBMITTED

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

### General Comments

**Article 4.8.3 (also applies to 4.7.3)** We support the principle of requiring TAs to ensure expedited turnaround prior to major events but we remain disappointed that this article remains limited only to the Olympics and Paralympics.

The comment to article 4.8.3 also places the responsibility on the TA to find an alternative laboratory when capacity is full. It would seem to be far more efficient (and appropriate for the elevated status that the Code is now giving to these events) for labs to communicate with a central co-ordinating body (such as the pre-Games taskforces/teams?), or to put this information into a central repository in ADAMS to provide an idea of availability/capacity to ADOs, whether for the purposes of planning pre-Games tests during this period or otherwise. Testing takes time to plan, and having to consult various labs to check availability and athlete participation level will waste time at a period of highly intensive work prior to these major Games.

We also consider that further development should take place in ADAMS to allow TAs to clearly indicate on Testing Orders which samples belong to an athlete competing in the Olympics or Paralympic Games to allow laboratories to prioritise samples being received from multiple ADOs.

**Article 4.8.4.** Though we support the intention of this article, our experience with using multiple SCAs worldwide would suggest the 5-day timescale is wholly unrealistic in cases where SCA use paper forms and/or do not provide a DCF-entry service to the TA. This also applies to article 9.4.1. Unless a wholesale change in SCA and DCO efficiency occurs (which we appreciate this is trying to achieve by raising standards), this will most likely result in reduced testing as ADOs avoid certain service providers in order to avoid failing to meet this timeline. We're not suggesting that this should not be the aspiration, but it may be premature to include in this iteration of the IST until all test data is collected electronically into ADAMS.

**Article 4.8.6:** We have some concerns with the potential unintended consequences of this article which though well-intentioned seems nevertheless to inadvertently advertise the period of the Games as the optimum time to dope for non-Olympic/Paralympic athletes due to the absence of lab availability.

It is also the case in practice during the period in the lead-up to these Major Events that priority for analysis is typically given by a laboratory to samples collected by the NADO (of the same country in which the laboratory is based). Though not unreasonable, this often affects an IF's ability to meet its own testing targets in that country. Such a bottleneck may be unavoidable, but the likely outcome of this in most cases is that ADOs will look to test athletes further out from the start of the event. A system is needed to incentivise testing close to the event by making it easier to find a laboratory with capacity (and perhaps by testing costs being lowered to offset increased

shipping costs for the TA in finding a laboratory overseas from the country of collection). Our comment to 4.8.3 is also relevant here.

## International Paralympic Committee

SUBMITTED

Jude Ellis, Head of Anti-Doping (Germany)

Sport - IPC

### General Comments

Articles 4.8.3, 4.8.5 & 4.8.6

IPC supports this change. However, despite article 4.8.5, we acknowledge that where a fast turnaround on results is required to receive the results this would likely impact the testing conducted by ADOs simply due to the budget limitations of their testing programmes - especially for smaller ADOs.

Regardless of this, what is important to IPC is that ADOs are tracking and informing IPC of pending results in the 20 days prior to the Games starting.

## Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

### General Comments

4.8.3. There is a concern that the additional costs linked to this article will lower the number of tests shortly before the Games/Major Events. Guidance on which type of analysis need to be expedited would help labs and ADOs to prioritize resources effectively, since some methods take more time than others. Furthermore, if a lab can't meet the request for prioritized analysis, the Testing Authority is expected to find and use another WADA-accredited lab. It's not clear, though, who is responsible for organizing and paying for the additional transport – this should be clarified. Additionally, the shipment to another laboratory needs to be considered carefully to not cause problems for the integrity of the sample.

## NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

### General Comments

## Article 4.8: Sample Analysis

4.8.3

### Wording in the IST:

*“4.8.3: Where a Sample is collected from an Athlete within twenty (20) days prior to the Athlete’s first competition at the Olympic or Paralympic Games for which an Athlete has qualified or is likely to participate, the TA shall request the Laboratory to prioritize such Sample(s) for expedited analysis and, where possible, results shall be reported at the latest seventy-two (72) hours prior to the Athlete’s first Competition. The TA in collaboration with the Laboratory shall use ADAMS to request and manage such prioritized analyses.*

**Comment to 4.8.3:** *The objective of prioritized analysis during this twenty (20)-day period is to where possible ensure that any Athletes participating in the Olympic or Paralympic Games have analytical results reported at the*

*latest seventy-two (72) hours prior to Athlete's first Competition) to protect the integrity of the event, and the results of the Competition. Where a Laboratory is unable to meet the TA's request for prioritized analysis, the TA shall contact an alternative Laboratory. For other International Events outside of the Olympic and Paralympic Games, it is considered a best practice to follow these principles."*

#### **Comment NADA Austria:**

We understand and support the idea behind expedited analyses before Major Events like the Olympic and Paralympic Games. However, we would like to point out a few practical and financial challenges:

#### **Costs and Resources:**

Expedited analyses are much more expensive than regular ones. For many ADOs with limited budgets, this could mean fewer tests overall in the lead-up to the Games, as it's not always possible to afford expedited services.

#### **Responsibility for Using Another Lab:**

If a lab can't meet the request for prioritized analysis, the Testing Authority is expected to find and use another WADA-accredited lab. It's not clear, though, who is responsible for organizing and paying for the additional transport – this should be clarified.

#### **Late Athlete Qualifications:**

In many sports, especially team sports, athletes may qualify at the last minute (e.g., as replacements due to injury). In those cases, samples may have already been collected without expedited analysis because the athlete hadn't yet qualified. This timing issue should be considered in the requirement.

#### **Access to Athlete Qualification Lists:**

It would help if WADA could work with the IOC and IPC to make lists of qualified athletes available – ideally in ADAMS – so that ADOs can plan better, especially where communication with NOCs/NPCs is limited.

#### **Clear Prioritization Needed:**

It would be useful to have clear guidance on which types of analyses need to be expedited, since some methods take more time than others. This would help labs and ADOs prioritize resources effectively.

#### **Scalability Concerns:**

In some cases, large numbers of samples might be collected in a short period before the Games. It won't always be possible to expedite all of them. For this reason, we suggest changing the wording from "shall" to "should" or "may" to reflect that this is a recommendation, not a strict requirement. A risk-based approach could also help – only requiring expedited analysis for samples from higher-risk sports or athletes.

#### **Additionally, we also want to refer to the comment of the Council of Europe:**

*"4.8.3. There is a concern that the additional costs linked to this article will lower the number of tests shortly before the Games/Major Events. Guidance on which type of analysis need to be expedited would help labs and ADOs to prioritize resources effectively, since some methods take more time than others. Furthermore, if a lab can't meet the request for prioritized analysis, the Testing Authority is expected to find and use another WADA-accredited lab. It's not clear, though, who is responsible for organizing and paying for the additional transport – this should be clarified. Additionally, the shipment to another laboratory needs to be considered carefully to not cause problems for the integrity of the sample."*

#### **UK Anti-Doping**

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

#### **General Comments**



4.8.3 - UKAD is supportive of this Article, however, wishes to seek clarification for NADOs who may test athletes of a different sport nationality.

This scenario would most commonly be faced within team sports e.g. rugby union, football., where athletes from several countries compete within a national league and are subject to testing by the NADO. It would not be feasible for a NADO to monitor or know of an Athletes selection for the Olympic or Paralympic Games when testing an Athlete of a different sport nationality. For example, if UKAD tested a French rugby 7s athlete who was competing in a national league in the UK, we would not reasonably know if that athlete would be in the final selection for France at an upcoming Olympics. This would become particularly burdensome for a NADO to manage and monitor.

Equally it would not be reasonable to place the expectation upon the other NADO (who has no control/oversight) of another NADO's testing programme to enforce and may not have access to the relevant testing information.

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

4.8.3 - UKAD proposes a comment is provided to Article 4.8.3:

"Where the TA is a NADO, this shall apply to Athletes that fall under their respective National Olympic and Paralympic teams. The NADO is not required to monitor this for Athletes who compete for another Country. Where possible, NADOs should monitor the testing of their Athletes by another NADO so that expedited analysis can be arranged."

Alternatively (or in addition), it would be helpful if there was a functionality within ADAMS that could create a 'flag' for the applicable Athletes to more easily identify which samples may require expedited analysis.

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

4.8.3 - To mitigate the potential monitoring and implementation challenges for NADOs who may test athletes of a different nationality and are not sighted on Olympic and Paralympic team selections.

#### **Japan Anti-Doping Agency**

SUBMITTED

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

#### **General Comments**

##### **4.8.2**

JADA support this addition.

#### **Agence française de lutte contre le dopage**

SUBMITTED

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

#### **General Comments**

4.8.3 Impossible for a NADO to know when a potential Olympians or paralympians athlete is tested in competition outside of the country

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

where a sample is collected from an athlete by the NADO of the country for which the athlete will compete....

### **Bermuda Sport Anti Doping Authority**

SUBMITTED

Duncan Barclay, Results, Compliance Manager (Bermuda)

NADO - NADO

#### **General Comments**

Some clarity is needed on whether the comment to 4.8.1, requiring prior arrangement with the lab, is referring to all samples or just those the ADO would like more extensive analysis performed on.

If prior arrangement is required for all samples then some further clarity and best practice is needed on whether this arrangement is test by test, or standing order for a bulk number of samples.

### **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 4.8 Sample Analysis

### **NADA**

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

#### **General Comments**

Comment to Art. 4.8.3, 4.8.4 and 4.8.6:

It is of major importance to us to inform the laboratory about the olympic and paralympic samples and to ask for a fast analysis. But we are concerned that due to budget issues ADOs will lower the number of samples.

As well, in consultation with the laboratories there needs to be more clarification on the obligatory analysis especially looking at additional analysis. Due to our experience additional analysis is problematic or not possible the closer the opening ceremony gets as it is taking a longer time than standard analysis. We are concerned that additional analysis might be avoided due to the time and cost factor, but we think it is very relevant.

We suggest to change the wording to a "may". Additionally there is a concern on the sentence regarding the sending of samples to another laboratory if the laboratory that was chosen first is not able to analyse the samples in time. The shipment to another laboratory needs to be considered carefully to not cause problems with the integrity of the sample. We suggest to erase this sentence on choosing another laboratory and instead make sure that the late analysis is documented well.

## Sport Ireland

SUBMITTED

Áine Hollywood, Science Officer (Ireland)

NADO - NADO

### General Comments

#### 4.8.1

Sport Ireland seeks clarification on what constitutes advance arrangements of services with a Laboratory.

i.e. does a contract with a designated laboratory suffice? in the case of use of a service provider for sample collection outside of the ADO country, does the ADO/TA need to notify whichever laboratory is selected for analysis in advance of sample delivery or can the service provider do this?

## Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

### General Comments

#### Article 4.8.3

The CCES would suggest considering changing the prescribed timeline to 20 days prior to the opening of the Village, to outline a single deadline.

## Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

### General Comments

#### 4.8.3

Whereas we welcome the general principle of expedited analysis prior to Olympic or Paralympic Games, the article should additionally address the fact, that a TA is not always aware of an athlete's participation in the latter, in particular for international athlete. This could be addressed by the following amendment: "Where a Sample is collected from an Athlete who is known to participate at the Olympic or Paralympic Games, and the Sample is collected twenty (20) days prior the the Athlete's first competition for which an Athlete has qualified or is likely to participate, the TA shall (...)".

We strongly urge WADA to remove the requirement to use ADAMS for the request and manage prioritized analysis. Whereas an International Federation may be using ADAMS anyway, a NADO, who usually only works

with one laboratory, has different, well-established means to communicate with the laboratory (and the lab may not even consider the information in ADAMS when receiving the sample). If this information must additionally be managed in ADAMS, this will only create administrative workload.

### Sport Integrity Commission Te Kahu Raunui

SUBMITTED

Jono McGlashan, GM Athlete Services (New Zealand)

NADO - NADO

#### General Comments

We agree with this change, however we are concerned that other NADOs intentionally won't test during this time-period in the lead up to the games due to the cost of expediting results.

*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

#### Article 4.8.3

**For comment:** This is already a common practice for USADA, therefore, we are in support of this addition. USADA also supports extending this to ensure that no athlete attending an Olympic or Paralympic Games has any pending results, as in the case of Kamila Valieva.

### Anti-Doping Norway

SUBMITTED

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

NADO - NADO

#### General Comments

#### Re. art. 4.8.1:

Comment to 4.8.1: The rationale and requirements for the ADO when making arrangement with laboratories in advance of sending samples to laboratories is unclear. E.g. how should these arrangements with the labs be done? And should arrangements be done separately for each individual Testing Order?

#### Re art. 4.8.3.:

While we understand the rationale, we wonder how the athlete's anonymity can be maintained when notifying the Laboratory of the samples which need prioritization? In particular in countries with only few Olympic athletes in a given sport-discipline?

### International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

#### General Comments

### Article 4.8.3

The latest changes to the provision are fully supported.

#### Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

##### General Comments

#### 4.8.3

Re-submitted from draft 1: The AIU understands that there is no stakeholder consensus to extend the application of this article beyond the Olympic Games, but individual sports should be able to put in place the same or similar arrangements for sample analysis prior to their own World Championships.

### Article 4.9 (11)

#### International Cricket Council

SUBMITTED

Vanessa Hobkirk, Anti-Doping Manager (United Arab Emirates)

Sport - IF – IOC-Recognized

##### General Comments

Article 4.9.5 - The sample storage request function in ADAMS is not working as intended. Labs do not receive long-term storage requests through ADAMS, which forces ADOs to email labs separately and then manually record the storage in ADAMS.

It is recommended that WADA ensure ADAMS is able to support ADOs in meeting compliance of Article 4.9.5.

#### International Paralympic Committee

SUBMITTED

Jude Ellis, Head of Anti-Doping (Germany)

Sport - IPC

##### General Comments

#### Article 4.9.5

IPC supports this change. However, when an ADO with jurisdiction over an athlete requests that a sample collected under the authority of another ADO be placed in long term storage, if and how the respective responsibilities change are unclear, raising further questions.

Does ownership of the sample also (automatically) transfer to the ADO requesting long term storage? If not, what responsibilities does the ADO that collected and owns the sample have with regards to a sample requested to be placed in long term storage by another ADO.

Can the ADO that owns the sample discard it without consulting the ADO that requested the long-term storage (prior to the 10-year storage period)? Or can only the ADO that requested the long-term storage discard the sample?

Can any ADO that has jurisdiction request further analysis of a sample kept in long term storage, regardless of which ADO owns the sample and which ADO requested (and pays for) the long-term storage?

Which ADO is responsible for any results management required as a result of further analysis – the ADO that requested the analysis or the ADO that owns the sample (if they are different)?

IPC assumes that it is the ADO requesting the long-term storage is responsible for those costs (this is not explicit).

## Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

### General Comments

4.9.1-4 There is a concern that ADAMS is not fit for purpose to document LTS to ensure it is practical and user-friendly for operational use. There is a concern that the documentation on samples not being stored on the request of the APMU and the documentation for reasons to not analyse samples will raise cost and administration work, especially for those ADOs that store a bigger number of samples. There is the suggestion to change the "shall" to a "should" or "may", to enable reasons for group of samples (for examples for a group of samples of one year) or to change the documentation for the samples not being analysed to those being re-analysed.

## NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

### General Comments

## Article 4.9: Retention of Samples and Further Analysis

### 4.9.2

#### Wording in the IST:

*“4.9.2: [...] If it is agreed with the APMU that the Sample will not be stored, the reasons for not storing the Sample shall be recorded in ADAMS by the ADO.”*

#### Comment NADA Austria:

Where should this information be recorded in ADAMS? If it is to be recorded through the new LTS module in ADAMS, significant adaptations will be required in collaboration with ADOs and laboratories to ensure it is practical and user-friendly for operational use.

### 4.9.4

#### Wording in the IST:

*“4.9.4: Samples put into long term storage which are discarded by the ADO without Further Analysis being conducted prior to expiry of the 10-year storage period shall have the reasons for discarding recorded in ADAMS.”*

#### Comment NADA Austria:

Where should this information be recorded in ADAMS? If it is to be recorded through the new LTS module in ADAMS, significant adaptations will be required in collaboration with ADOs and laboratories to ensure it is practical and user-friendly for operational use.

Furthermore, this would result in considerable administrative work, particularly for ADOs, who store many samples in long-term storage due to potential intelligence they may receive. WADA might consider requiring a comment in ADAMS for samples that are re-analyzed, explaining the reason for re-analysis. This approach could be more meaningful and relevant, as specific intelligence may be available in these cases, whereas for samples that are discarded, there is typically no new intelligence to justify the action.

**Additionally, we also want to refer to the comment of the Council of Europe:**

*“4.9.1-4 There is a concern that ADAMS is not fit for purpose to document LTS to ensure it is practical and user-friendly for operational use. There is a concern that the documentation on samples not being stored on the request of the APMU and the documentation for reasons to not analyse samples will raise cost and administration work, especially for those ADOs that store a bigger number of samples. There is the suggestion to change the "shall" to a "should" or "may", to enable reasons for group of samples (for examples for a group of samples of one year) or to change the documentation for the samples not being analysed to those being re-analysed.”*

**NADA India**

SUBMITTED

NADA India, NADO (India)

NADO - NADO

**General Comments**

Agreed

**NADA**

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

**General Comments**

Comment to Art. 4.9.4

Long term storage has a huge deterrence effect if analysed or not. Depending on the amount of samples in long term storage costs might be too high to analyse all of the samples. There as well needs to be more clarification on the fact that an ADO has to give a reason for not re-analysing. If in practical in ADAMS ADOS need to type in a reason for each sample we fear that this will raise the adminstration work to a high extent.

We suggest that there is a possibility to give a reason for a group of samples. There is as well the concern that ADAMS is not fit for purpose to document LTS to ensure it is practical and user-friendly for operational use

**Swiss Sport Integrity**

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

**General Comments**

**4.9.4**

This provision will cause a massive administrative burden and therewith potentially deter ADOs to put samples into Long Term Storage. The relatively high cost for storing samples requires an active management of the LTS stock, incl. discarding samples on a regular basis. We, as many other ADOs, do not only put Samples into LTS upon an APMU request (which we only get very rarely, by the way) but based on our very own LTS strategy. This provision is contradictory to WADA's ongoing promotion of using the LTS as, amongst other things, a mean for deterrence, as it punishes ADOs that are willing to allocate resources to this undoubtedly powerful instrument. We strongly urge WADA to get rid of this requirement, or to limit it to samples put into LTS upon an APMU's request.

## Finnish Center for Integrity in Sports FINCIS

SUBMITTED

Marjorit Elorinne, Quality Manager (Suomi)

NADO - NADO

### General Comments

Clarification of APMU Role in Long-Term Storage Recommendations would be appreciated. Specifically, we seek to understand whether this language implies that an APMU can directly indicate in ADAMS that a Sample should be placed into long-term storage, or whether the recommendation must always be communicated to the Testing Authority, which would then provide direction to the Laboratory.

## USADA

SUBMITTED

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

NADO - NADO

### General Comments

N/A

### Suggested changes to the wording of the Article

#### Article 4.9.4

Recommended Change: Change in bold. "*Samples* put into long term storage which are discarded by the ADO without Further Analysis being conducted prior to expiry of the 10-year storage period shall have the reasons for discarding **recorded in ADAMS**."

### Reasons for suggested changes

#### Article 4.9.4

Reason: This would require functionality to be built out in ADAMS to accommodate this requirement. In addition, this leads to **significant** administrative burden and samples potentially being held for over 10 years to avoid administrative work. This also does not prevent an ADO from destroying samples even if a reason is provided. This administrative burden also disincentivizes ADOs from keeping samples for long-term storage if it is going to be yet another basis for WADA to find non-compliance.

## International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

### General Comments



#### Article 4.9.2

We support the revised wording of this provision but recommend removing the phrase *“If it is agreed with the APMU that the Sample will not be stored”* and retaining the rest. While consultation with the APMU is important and the rationale for not storing a Sample should be documented in ADAMS, the current wording suggests that the APMU must agree with the decision. This is too strong, given that the APMU may not have full context, and the ADO may be limited in the information it can share to avoid unnecessary sharing of personal information.

#### Article 4.9.4

We suggest revising the wording to allow for recording the reasons *“in ADAMS or through another secure method. If documented outside of ADAMS, the ADO shall provide the information to WADA upon request.”* This change would help avoid duplication of work and reduce the growing administrative burden associated with manual data entry in ADAMS. It would also promote consistency across the IST, as this possibility is reflected elsewhere (e.g. Comment to Article 4.10.12.8).

#### Article 4.9 comment

For consistency with the ISL, In Comment to 4.9 we suggest clarifying that ADOs shall be responsible for the cost of long-term storage, other than in cases where the samples are stored on the initiative of the laboratory (cf. art. 5.3.7.2 of the 2027 ISL).

#### **Bird & Bird LLP**

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

#### **General Comments**

##### 4.9.4

The AIU questions the practicability of this requirement for ADOs with a significant number of samples kept in long term storage and in circumstances where a vast majority of ADOs do not have an effective Retention and Retesting programme in place. Administration of an LTP programme through ADAMS is currently not possible (with the same comment applying to Article 4.9.5).

#### **Article 4.10 (14)**

#### **FIFA**

SUBMITTED

Erling Bjerga, Anti-Doping Manager (USA)

Sport - IF – Summer Olympic

#### **General Comments**

#### **Article 4.10.2 – Mandatory Use of ADAMS for the Collection of Whereabouts**

While ADAMS has been instrumental in individual athlete management, the software as it stands is unsuitable for team sports and enforcing its mandatory use will lead to gaps in whereabouts information, compliance risks and increased administrative burden. Whilst we appreciate the intention to update ADAMS in line with the 2027 Code, the ‘one-size-fits-all’ approach that ADAMS and the new IST mandates does not give football ADOs the malleability to adapt to their differing requirements. Team sports are different from individual sports. At this time, we believe that ADAMS is not flexible enough to manage all the different requirements of team sports such as football.

With regards to football, players are usually included in a TP based on their team’s qualification for a competition and removed once the team is knocked out. This leads to frequent entry and exits from a TP for a large number of players, often within a short timeframe. For example, some FIFA Member Associations’ national teams will be included in pre-competition testing pools ahead of a FIFA World Cup™. This type of whereabouts structure is

paralleled by the Confederations, whose competitions include more club team participants than FIFA. In practicality, many players transition between their club and national TPs multiple times in a season. For example, whenever there is a FIFA international match window (or a EURO in UEFA, or a Copa American in CONMEBOL etc.) a player submitting whereabouts through their club will transition to submitting whereabouts through their national team for a few short weeks before submitting whereabouts through their club again when they return. This can occur multiple times throughout the year as players (male and female) transition between their international club competitions and their international nation competitions.

We believe that a requirement to physically move the players between testing pools in ADAMS (and/or transfer the Whereabouts Custodian) every time they move between club and national teams would create a nearly impossible to manage administrative burden on the football ADOs managing the movements of these players.

Currently, Team Whereabouts Managers submit the information on behalf of their players, (although players remain personally responsible for both the provision of information and the accuracy of the information provided). The teams submit team whereabouts, which can then be used for effective testing. Where a player is not with the team, the team advises us of their absence from the regular schedule and provides individualized whereabouts for the duration of the player's absence from their reported team whereabouts. This leads to an efficient system where football ADOs receive the information we need to conduct out-of-competition testing without an overly heavy administrative burden on teams and players.

In this manner, we can manage the entry and exit into tournament related testing pools for a large volume (thousands) of players per calendar year or season. Were the IST amendment to include this new requirement, it would inevitably lead to a reduction in the number of players which can be included in whereabouts pools as football ADOs would be unable to manage the administrative burden and high volume of players that we would be required to transfer between teams and testing pools and to manage on ADAMS. We feel that the result would unfortunately act contrary to ours and WADA's shared intention to monitor athlete whereabouts for protecting our sports' integrity, as it would reduce our overall reach, rather than improve it.

At this stage, we do not feel that the ADAMS system is advanced enough to justify its mandatory use. We remain open to the possibility that with advancements and improvements in the system, there may be a justification for mandating its use in the future. As of now, FIFA and our Confederations are comfortable and confident in their own systems for whereabouts collection and inventory. Despite this, FIFA is willing to collaborate with WADA to find a solution that is suitable and constructive for both sides.

### International Tennis Integrity Agency

SUBMITTED

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

#### General Comments

Article 4.10.8.1 Overnight Address

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

### SA Institute for Drug-Free Sport

SUBMITTED

khalid galant, CEO (Souoth Africa)  
NADO - NADO

#### General Comments

ADAMS must make provision to add an unsuccessful test so that it could count as one of the 3 tests towards an RTP athlete's test

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

*Comment to 4.10.4.1: The minimum number of three OOC Tests planned to be conducted on Athletes in a RTP per year shall include at a minimum the collection of a urine Sample for each SCS.]*

The above is the current comment. The suggested change should say shall include a combination of a minimum of 3 collected urine samples and/or attempted tests.

#### Reasons for suggested changes

RTP athletes are required to undergo 3 tests or have 3 tests planned. Unsuccessful and/or missed test must count towards those 3 tests. While missed test can be entered into ADAMS unsuccessful tests cannot be entered into ADAMS

#### NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)  
NADO - NADO

#### General Comments

### Article 4.10: Collecting Whereabouts Information

#### General Comments

We fully understand and agree that whereabouts are an important tool for anti-doping work. However, the whole concept needs a reconsideration. Although this is more specified in the IST, Whereabouts are also mentioned in the WADC and therefore it is worth to mention it here as well. The current rules show a couple of areas for improvement:

a) There should be more flexibility for hearing panels regarding sanctions regarding WADC 2.4. The minimum consequence of one year even though the athlete might have committed three MT /FF by “bad luck” or the lowest degree of negligence is way too much compared to other ADRVs and available reductions for specific circumstances.

We suggest setting the period of ineligibility for two years if ADOs can establish intent and potential reductions down to a minimum of a reprimand and no period of ineligibility, depending on the athlete’s degree of fault.

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

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

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

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

c) The removal of the mandatory whereabouts requirement for Registered Testing Pool (RTP) Athletes to file daily a training location and general timeframes is strongly rejected. This will lead to an even worse quality of whereabouts and less chances for intelligent testing. The idea that athletes voluntarily submit their training and/or any other alternative location/s contradicts the current reality. Even with a mandatory requirement, many athletes do not file their training or alternative locations, why should they share this information of there is no need and no consequence? We agree that there needs to be a change with the current regulation regarding training, but this is not a suitable way.

Furthermore, with the trend in doping moving toward microdosing, alternative concepts should be considered, such as a second timeslot at least a few hours before or after the other timeslot or an incentive system for athletes who provide more comprehensive entries for testing opportunities in ADAMS.

**All our following comments in this section apply to RTP and TP athletes.**

**Agence française de lutte contre le dopage**

SUBMITTED

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

**General Comments**

no changes to the wording, just being sure to provide ADAMS with the appropriate tool to make the difference between 5 minutes announced test and real announced test

**Reasons for suggested changes**

biased statistics if ADAMs is not update

**NADA India**

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

**General Comments**

Agreed

**Sport Integrity Australia**

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)  
NADO - NADO

**General Comments**

Article 4.10.1: SIA notes, and agrees with, the changes made to this Article.

Article 4.10.2: SIA seeks clarification as to the term “collection” in the context of the collection of Whereabouts Information for the purposes of Article 4.10.2. Specifically, SIA seeks clarification on the following:

Does this mean that Athletes are required to enter their Whereabouts Information into ADAMS?

Does this place any limitation or restriction on an ADO in terms of only using ADAMS, or could an ADO use another software platform to collect Whereabouts Information, for instance, and then push this to ADAMS for

Article 4.10.2 (c): SIA previously made a recommendation in respect of ADAMS, and appreciates the comments made within the 'Summary of Major Changes' document as to planned ADAMS enhancements and clarification regarding start/end dates of TP Athletes in ADAMS.

Article 4.10.8.1: SIA asks for the Drafting Team to include additional information or clarification to assist ADOs and Athletes in understanding when a Filing Failure for an overnight address applies. SIA has seen a wide variety, and a lot of inconsistency, globally, around when this may or may not be pursued as a Filing Failure. For example, if an Athlete is not home at 23:00, and no one is at home to confirm their location, should this be pursued as a Filing Failure? In SIA's view, greater clarity is needed to ensure a consistent application of the rules globally.

## Anti-Doping Norway

SUBMITTED

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

NADO - NADO

### General Comments

The Whereabouts Custodian needs to be defined in the definitions and should be handled the same way as Passport Custodian.

## ONAD Communauté française

SUBMITTED

Julien Magotteaux, juriste (Belgique)

NADO - NADO

### General Comments

Article 4.10: Whereabouts Requirements for Athletes

We do not support removing the requirement for elite athletes to communicate/disclose their training locations and/or regular activities.

This whereabouts information is generally well accepted and understood by athletes. It rarely poses any practical difficulties, it facilitates OOC testing (and sometimes, it is necessary), and it is also useful information for testing personnel for certain tests.

### Suggested changes to the wording of the Article

Not suppressing the requirement for elite athletes to communicate/disclose their training locations and/or regular activities.

### Reasons for suggested changes

The reasons are explained here above in our general comments.

## Dopingautoriteit

SUBMITTED

Robert Ficker, Compliance Officer (Netherlands)

NADO - NADO

### General Comments

1. Article 4.8.8.2(d) of the ISTI contains the requirement for RTP athletes to submit their regular activities, i.e. train, work or any other regular activity, e.g., school. This rule has been cumbersome for both athletes and ADOs to consistently comply with. The response from the IST Drafting Team has been to drop this requirement altogether.
2. The justify this radical change in course, the summary of major changes explains that under the proposed regime, athletes will have the option to submit their training and/or any other alternative location/s where they may be located for testing during the quarter. Such submission is optional and does not require updating by the Athlete if it changes. This explanation highlights the fundamental problems these new provisions will bring.
3. The proposal appears to be working from the premise that athlete will submit regular activities when they are not required to do so. Not only does the proposal assume that RTP athletes will voluntarily submit their regular activities. The proposal also assumes that RTP athletes will keep their regular activities up to date voluntarily.
4. If these assumptions are incorrect and the proposal does not expect RTP athletes to submit any regular activities, this begs the question how ADO, with only an overnight address and a 60-minute time slot, can adequately conduct No Advance Notice Testing, which is the cornerstone of both IST and Testing.
5. Cumbersome as they may be to submit, regular activities are crucial for conducting the National Testing Program efficiently and effectively. The proposed Article 4.10 will have an immediate detrimental effect on conducting each ADO's Testing Distribution Plan. It increases the predictability and unreliability of RTP athletes' whereabouts, especially when it comes to testing outside of the 60-minute time slot. The proposal saddles NADO's with the problem, leaving them with greater uncertainty in the planning phase. That is not the solution.
6. As a result of the proposal:
  - (a) the predictability of testing will increase;
  - (b) the No Advanced Notice element of Testing will decrease;
  - (c) there will be no provision in the IST available to ADOs to improve the quality of the submitted whereabouts by RTP athletes;
  - (d) will adversely affect the availability of RTP athletes outside the 60-minute times slot; and
  - (e) increase the amount of unsuccessful test attempts.

All these effects are (highly) undesirable.

7. The result of the proposal will be that the amount of unsuccessful attempts per successfully conducted test (i.e. per collected sample) will increase. This in turn will increase the price of a collected successfully collected sample. This substantial increase in costs per successfully collected sample will lead to a decrease in Testing. The costs of the National Testing Program will increase. Without an accompanying increase in the available budget, this will result in a decrease in the amount of tests under the national testing program. Less testing is bad for anti-doping. Less testing is bad for clean athletes. Proposals that negatively impact Testing Programs and that are bad for anti-doping should be treated with caution.

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

##### ***Proposal:***

-To revise the current rule regarding regular activities (Article 4.8.8.2 ISTI) and limit mandatory regular activities to training. Such a simplification is preferable to a completely illuminating mandatory regular activities altogether.

-To consider an additional consultation round for this specific aspect.

## General Comments

N/A

## Suggested changes to the wording of the Article

### Article 4.10.2

Recommended Change: Change in bold. “ADOs ~~shall~~ **should** use *ADAMS or other approved system* to conduct effective *Doping Control* including the collection of whereabouts information for *Athletes* in a *RTP* and *TP*. As a result, such information **should** be automatically available through *ADAMS* to *WADA* and other relevant *Anti-Doping Organizations* with overlapping *TA*. This information shall:”

### Article 4.10.17.1.b

Recommended Change: Changes in bold. “Share information on *Athlete* whereabouts requirements via *ADAMS or other approved system*”

## Reasons for suggested changes

### Article 4.10.2

Reason: ADOs should not be bound to solely use ADAMS as ADAMS does not fit the needs of all ADOs and athletes. USADA invests significant resources to ensure we have the proper tools that best fit the needs of our athletes, managing the volume of testing across all sports/disciplines and executing effective programs. We stand ready to receive the necessary endpoints for WADA to complete an API. As a primary example, USADA's Athlete Connect system allows for mandatory athlete education requirements to be tied to whereabouts filing deadline and new features such as TUE monitoring, SMS text updates, geo alerts, important athlete advisories, etc. are built into this single application. Further, US athletes have come to expect very quick response to technical issues, which the USADA team is best suited to handle responses to these inquiries rather than relying on WADA's ADAMS team.

### Article 4.10.17.1.b

Reason: See previous comments on requirements to only file whereabouts in ADAMS.

## ONAD RD

SUBMITTED

Milton Pinedo, Director Ejecutivo (Dominican Republic)  
NADO - NADO

## General Comments

There is something important to take under consideration.

It has been an option not mandatory the training location, that for us it is something that should be important.

There are some countries that the places where the athletes live are unsafe and are difficult to access, and this takes out the possibility to have always located the athlete even on the training venues. And because of the less information available, it might increase the possibility for the athletes to have more Whereabout Failures, more based on a location situation than on intelligence and/or test proofs.

## International Testing Agency

SUBMITTED

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

## General Comments

Article 4.10.8.1 a).

There is typo in the second part – “they” should be deleted. It should also be mentioned that this is available when a 60-minute time slot cannot be provided.

## Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

## General Comments

4.10

Athletes should have the option of specifying their 60-minute timeslot at any time of the day or night and not be restricted to 5am to 11pm. Consider removing the words “between 5am and 11pm” in 4.10.6.2(a), alternatively, give IFs individual discretion to agree to different hours in specific countries.

Re-submitted from draft 1: 4.10.6.2(c) should be amended to include reference also to an athlete’s travel to a competition, which should be updated as soon as the travel is known and not on the day of the travel or competition in question (per the comment to Article 4.10.10.1).

## Article 4.10.4 (12)

### World Rugby

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)

Sport - IF – Summer Olympic

## General Comments

**Article 4.10.4.2:** We consider the drafting of this article to be an improvement on the previous draft with regards to disclosure of the rationale for the inclusion of athletes in an RTP. However, we maintain the view from our comments on the previous draft that there should be some element of independent review introduced when WADA disputes the absence of an athlete or group of athletes from an RTP.

### International Tennis Integrity Agency

SUBMITTED

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

Sport - Other

## General Comments

Comment to 4.10.4.2

Whilst the ITIA notes that the information as to why an athlete has been included in the pool may be documented outside of ADAMS and should be provided to WADA on request, there remain legitimate concerns regarding athletes asking to see the reasons why they have been included in a RTP/TP. An ADO should not be placed in a position where they are obligated to disclose the reasons for including an athlete in a



pool - as this could be based on intelligence. ADOs should be permitted to legitimately withhold such information from athletes.

## Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

### General Comments

4.10.4.1. There is a concern that test planning is restricted if one urine sample is mandatory for RTP athletes and if there are circumstances that urine cannot be taken. There is the suggestion to allow the option of providing a reason if no urine samples is collected.

## SA Institute for Drug-Free Sport

SUBMITTED

khalid galant, CEO (Souoth Africa)

NADO - NADO

### General Comments

The athlete must only be included in 1 RTP, either the IF or NADO's RTP

### Suggested changes to the wording of the Article

***Should*** should be changed to ***shall***

### Reasons for suggested changes

It creates confusion for athletes when they are submitting whereabouts to 1 ADO but included in the RTP of an IF and NADO

## NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

### General Comments

4.10.4.1

### Wording in the IST:

***“Comment to 4.10.4.1: The minimum number of three OOC Tests planned to be conducted on Athletes in a RTP per year shall include at a minimum the collection of a urine Sample for each SCS.”***

### Comment NADA Austria:

What if exceptional circumstances arise where a urine sample cannot be collected, but, for example, a blood serum sample is taken alongside the blood ABP sample, allowing for additional analyses to be conducted?

**Additionally, we also want to refer to the comment of the Council of Europe:**

*“4.10.4.1. There is a concern that test planning is restricted if one urine sample is mandatory for RTP athletes and if there are circumstances that urine cannot be taken. There is the suggestion to allow the option of providing a reason if no urine samples is collected.”*

4.10.4.2 d

**Wording in the IST:**

*“4.10.4.2 d: Athletes in a Team Sport who are not part of Team Activities for a period of time (e.g., during the off-season);”*

**Comment NADA Austria:**

This scenario seems highly unrealistic, as it would require the inclusion of several thousand athletes from countries with strong team sports leagues into the RTP during the off-season.

4.10.4.2 e)

**Wording in the IST:**

*“4.10.4.2 e: Athletes who are serving a period of Ineligibility.”*

**Comment NADA Austria:**

In our view, this should also depend on the athlete's level. For example, if a low-level athlete was tested positive in-competition at a small, insignificant national event in a low-risk sport for a specified substance, it should be assessed whether this “recreational athlete” needs to be included in the RTP. It might be more sensible to prioritize professional athletes from higher-risk sports instead.

## **NADA**

SUBMITTED

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

### **General Comments**

Comment to Art. 4.10.4.1:

One mandatory urine sample for RTP athletes will restrict control planning and might be a problem with budget if for intelligent reasons more blood samples are needed but an additional urine sample is mandatory. What if there is a good reason not to take urine? There is the suggestion to allow the option of providing a reason if no urine sample is collected.

## **Anti-Doping Sweden**

SUBMITTED

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

### **General Comments**

4.10.4.1 The ADO shall plan to test RTP athletes at least three times per year OOC.

ADSE has experienced that some international federations implement athletes in the RTP three months prior to an international event without any intention to test them. This creates an unproportional burden to the athlete and, in many cases, the NADO, to whom the athlete turns for help. We would therefore like to suggest an addition to this article.

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

The RTP includes International or National-Level Athletes of the highest risk, who shall be subject to the greatest amount of Testing and whom the ADO shall plan to test at least three (3) times per year OOC, **where one of the tests shall be performed within three (3) months of the inclusion in the RTP.**

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

ADSE is of the opinion that if you put demands on the athletes to report WA, there should be demands on the ADO to perform testing.

### **Swiss Sport Integrity**

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

#### **General Comments**

##### **4.10.4.1**

We suggest to use the term "High Priority" instead of "High Risk" (i.e., "The RTP includes International or National-Level Athletes of the highest priority") as "high risk" somewhat prejudicates athletes enrolled in the RTP.

##### **4.10.4.2**

The right for WADA to request an ADO to adjust its RTP criteria, or even to included specific athletes in its RTP, under the guise of its compliance monitoring program, goes weigh beyond the scope of the ISCCS. Neither of the criteria for including athletes in the RTP are mandatory, but merely (and rightly so) propositions. There are many other, e.g., country-specific, aspects to consider WADA may not even be aware of. We are happy to disclose our criteria upon request, including the reasoning behind it, and discuss any potential disagreement with WADA at any time. However, in no case WADA should have the power to dictate an ADOs day-to-day operations to that level of detail.

### **Sport Integrity Australia**

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)  
NADO - NADO

#### **General Comments**

Article 4.10.4.2: SIA notes the changes made to the comment to Article 4.10.4.2.

**Spanish Commission for the Fight Against Doping in Sport (Comisión Española para la Lucha Contra el Dopaje en el Deporte - CELAD)**

SUBMITTED

Carlos Gea, Head of International Relations and Cooperation Area (España)

NADO - NADO

**General Comments**

**Article 4.10.4** states that ADO shall plan to test three times per year OOC per athlete included in the RTP. It is not clear whether the article only counts three tests conducted on the athlete or unsuccessful attempts can also be included in the reporting of testing on Registered Testing Pool athletes (not restricted to collected tests only).

We believe an Unsuccessful Attempt (UA) should be included in the definition, as an ADO has planned the test, it has used its resources and it has been the responsibility of the athlete not being at the whereabouts.

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

**Article 4.10.4 Registered Testing Pool**

**4.10.4.1** The RTP includes International or National-Level Athletes of the highest risk, who shall be subject to the greatest amount of Testing and whom the ADO shall plan to test at least three (3) times per year OOC. In this sense, plan to test is not restricted to collected tests only, but the unsuccessful attempts too. Athletes in a RTP are therefore required to provide whereabouts in accordance with Article 4.10.6.2 and shall be subject to Code Article 2.4 Whereabouts Requirements.

**Reasons for suggested changes**

As described above, the ADO is responsible to plan at least 3 tests OOC per year, but if the athletes it is not at their whereabouts, the ADO should not bear that responsibility. The ADO has made the attempt to test the athletes and this attempt should be included in the count of 3 per year.

**USADA**

SUBMITTED

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

NADO - NADO

**General Comments**

N/A

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

**Comment to 4.10.4.2**

Recommended Change: Delete duplicate word. "Following consideration of criteria in Article 4.10.4.2 a) to e) above and once the Athletes in the RTP are determined, the International Federation or the NADO shall plan, independently or in agreed coordination with other ADOs with TA over the same Athlete, to test ~~to~~ any Athlete included in the RTP at least three (3) times OOC per year."

**Reasons for suggested changes**

**Comment to 4.10.4.2**

Reason: duplicate word.

## International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

### General Comments

#### Article 4.10.4.1

The amendments made to the provision are welcomed.

#### Article 4.10.4.2. comment

From time to time, some athletes challenge their inclusion in a RTP and ask for the grounds of their inclusion. To allow ADOs to address those challenges and not to disclose sensitive information, it would be cautious to add that athletes do not have a right to challenge their inclusion or obtain a justification for their inclusion.

#### Article 4.10.4.3.

It would be useful to define the term "whereabouts custodian", along with the results management authority definition of article 7.1.6 of the Code.

## Article 4.10.5 (9)

## International Tennis Integrity Agency

SUBMITTED

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

Sport - Other

### General Comments

#### Comment to 4.10.5.1 & Comment to 4.10.5.2.a

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

#### Article 4.10.5.4

The ITIA set out the same submission it has made on this point within the actual Code:

The ITIA understands and supports the premise behind out-of-competition testing and why whereabouts is necessary in some sports to enable this to be conducted.

However, as currently drafted the IST makes no distinction between sports (other than acknowledging there is a difference between team sports and all other sports) and the specificities within these that might make providing whereabouts challenging.

The starting point for whereabouts is that it is effectively a system that is designed to enable ADOs to locate athletes for testing throughout the year when they are not competing. There should be agreement that it is not a system for catching athletes out, for punishing them for being forgetful or a system that is so onerous that the concerns should they fall foul of the whereabouts requirements create anxiety and frustration. Added to this that the large majority of athlete providing whereabouts are required to do so via ADAMS. This system

continues to be a source of frustration and discontent, it is not intuitive, user friendly and is prone to crash on a regular basis.

We understand and acknowledge the efforts WADA is taking to bring the system up to current operating standards.

The ITIA would not be advocating for more athletes to be added to a system that is not user friendly and doesn't appear to be able to accommodate the numbers that use it currently. The more athletes using it the greater the demand on its functionality and performance.

Finally, athletes placed on a pool lower than those in a RTP are likely to only be of interest to the ADO who placed them on there and the ITIA would question what benefit is to be derived from this if those using the whereabouts information is likely to be restricted to the ADO who put them in their pool.

The ITIA prides itself on the support it gives those that are on the RTP, both in terms of an induction to ADAMS and whereabouts but also ongoing support should the system go down, have questions about an entry etc. By expanding ADAMS to other testing pools, this places an additional administrative burden on the ADO. This seems counter intuitive at a time when ADOs are being encouraged to do more in the area of intelligence and investigations and research.

The ITIA are not convinced of the benefits of this and ask that this amendment ie that testing pool athletes are required to provide the same periphery information on ADAMS as those in the RTP is removed.

### Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

#### General Comments

4.10.5.2. There are comments on the use of ADAMS that does not seem to be fit for purpose to give reasons for removal. Furthermore, a function in ADAMS, allowing ADOs to keep track of the history of pool changes, inclusions and exclusions would be beneficial.

### UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

#### General Comments

4.10.5.4 (d) - UKAD agrees that the countdown of whereabouts failure shall continue when an athlete is removed from an RTP (when not in relation to a retirement), however, if an athlete is removed due to a retirement from sport, UKAD believes that the whereabouts failure should be 'frozen' and any countdown is resumed should an athlete return to sport. UKAD is seeking clarification on this point.

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

4.10.5.4 (d) - UKAD proposes adding the following wording:

Where an Athlete has retired and is being removed from the RTP the Athlete should be notified of the following;

i. the date of official retirement of the Athlete; and

ii. the requirement to provide six (6) months written notice of intention to return to sport at a national or international level.

iii. **Any active Whereabouts Failures committed will be ‘frozen’ and the countdown would resume should they return to sport (from the date of the Athlete’s notice to the ADO of their return to sport).**

#### Reasons for suggested changes

4.10.5.4 (d) - UKAD suggested change is to ensure there is no manipulation or opportunity to avoid whereabouts failures through the retirement process. This would also ensure consistency with the application of ADRVs.

#### NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

#### General Comments

4.10.5.2 a)

#### Wording in the IST:

**“Comment to 4.10.5.2 a):** *The ADO shall record the end date in which the Athlete is no longer included in its RTP in ADAMS and shall document the reason for removal either in ADAMS or in another secure way.”*

#### Comment NADA Austria:

There is a malfunction in ADAMS: When an end date is entered and the RTP checkbox is unchecked, the end date disappears. Additionally, there is no option to record the reason for the removal in ADAMS. Furthermore, a function in ADAMS, allowing ADOs to keep track of the history of pool changes, inclusions and exclusions would be beneficial.

#### Additionally, we also want to refer to the comment of the Council of Europe:

*“4.10.5.2. There are comments on the use of ADAMS that does not seem to be fit for purpose to give reasons for removal. Furthermore, a function in ADAMS, allowing ADOs to keep track of the history of pool changes, inclusions and exclusions would be beneficial.”*

#### NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

#### General Comments

Comment to Art. 4.10.5.2:

Depending on the number of test pool athletes it would help if there would be a solution in ADAMS that supports the entry of reasons in an easy and user friendly way, possibly with drop down to choose from

reasons, enabling reasons for a group of athletes that can be ticked or chosen in ADAMS. A function to keep track on the testpool history would be valuable as well.

## Anti-Doping Sweden

SUBMITTED

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

### General Comments

4.10.5.1 and 4.10.5.2 An ADO shall record the start and end date of exclusion and inclusion in a pool in ADAMS.

ADSE fully supports this, however, ADAMS should be updated to allow for start/end dates to be saved even when the tick box for the assigned whereabouts pool is opted out to allow for group management in ADAMS to be accurate. Additionally, as athletes may move between pools, the system should be updated to reflect these periods as well. (Please contact ADSE if it is not clear what we mean).

In order to reinforce the demand on the ADOs of entering the information in ADAMS in a timely manner, it could be considered to only open up the system for the athlete to submit whereabouts when the pool inclusion information and start date is entered in ADAMS. ADSE has experienced that athletes continue to report whereabouts in ADAMS to other ADOs even if they are not included in any pool.

## USADA

SUBMITTED

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

### General Comments

N/A

### Suggested changes to the wording of the Article

#### Comment to Article 4.10.5.1

Recommended Change: Remove the last sentence. "An ADO shall record the start date of when the Athlete is included in its RTP in ADAMS."

#### Article 4.10.5.1.d

Recommended Change: Change in bold. "That their Whereabouts Filing will be shared through **ADAMS or other approved system** with other ADOs that have authority to conduct *Testing* on them and that they may be tested by other ADOs."

#### Comment to Article 4.10.5.2.a

Recommended Change: Remove entirely. "The ADO shall record the end date in which the Athlete is no longer included in its RTP in ADAMS and shall document the reason for removal either in ADAMS or in another secure way."

#### Article 4.10.5.4.d

Recommended Change: Additional language in bold to be included.

Where an *Athlete* has retired and is being removed from the *RTP* the *Athlete* should be notified of the following;

- the date of official retirement of the *Athlete*; and
- any current whereabouts failures are tolled during the retirement period; and
- the requirement to provide six (6) months written notice of intention to return *to sport at a national or international level*.

### Reasons for suggested changes

#### Article 4.10.5.1.d



Reason: ADOs should not be bound to solely use ADAMS as ADAMS does not fit the needs of all ADOs and athletes. USADA invests significant resources to ensure we have the proper tools that best fit the needs of our athletes, managing the volume of testing across all sports/disciplines and executing effective programs. We stand ready to receive the necessary endpoints for WADA to complete an API. As a primary example, USADA's Athlete Connect system allows for mandatory athlete education requirements to be tied to whereabouts filing deadline and new features such as TUE monitoring, SMS text updates, geo alerts, important athlete advisories, etc. are built into this single application. Further, US athletes have come to expect very quick response to technical issues, which the USADA team is best suited to handle responses to these inquiries rather than relying on WADA's ADAMS team.

#### **Comment to Article 4.10.5.1**

Reason: This requirement was removed in the redline version 2027 IST v1 – 2027 IST v2 under Article 4.10.2.c, therefore, it needs to be removed throughout for the same reasons it was removed in that Article.

#### **Comment to Article 4.10.5.2.a**

Reason: This requirement was removed in the redline version 2027 IST v1 – 2027 IST v2 under Article 4.10.2.c, therefore, it needs to be removed throughout for the same reasons it was removed in that Article.

#### **Article 4.10.5.4.d**

Reason: This is critical information to be provided to an athlete if the athlete decides to return from retirement.

#### **Sport Integrity Australia**

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)

NADO - NADO

##### **General Comments**

Article 4.10.5.3: SIA would like the Drafting Team to consider if communications between the NADO and the IF “shall” occur, rather than “should”. In SIA's view, such communications would be beneficial for NADOs, IFs and Athletes, as they have the capacity to provide clarity and reduce confusion.

#### **International Testing Agency**

SUBMITTED

International Testing Agency, - (Switzerland)

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

##### **General Comments**

##### Article 4.10.5.2 a).

As explained under Article 4.10.4.2., the reference to “meeting the criteria for inclusion in its RTP” suggests that such criteria will be made available to the athlete and we would not believe this is wise. We would suggest to change to “they are no longer required”.

##### Article 4.10.5.4

As a minor suggestion, we recommend adding “shall include **at minimum** the following” before the list. We would also suggest removing the reference to “policy” since there is no reference to any such policy in the IST.

#### **Article 4.10.6 (18)**

## World Rugby

SUBMITTED

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

### General Comments

**Article 4.10.6.3:** With regards to this article we would question whether the fact that training location whereabouts submissions are non-mandatory for RTP athletes means that for a team sport athlete, they are actually subject to a higher administrative burden when in a TP than in an RTP, as article 4.10.12.1 (c) requires the submission of Team Activities as a mandatory requirement. As training schedules in team sports are contractual, changeable and not managed/determined by the athlete, this would seem to place much more onus on a team sports athlete in a TP to ensure the accuracy of their training information in ADAMS.

## International Tennis Integrity Agency

SUBMITTED

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

### General Comments

#### Article 4.10.6.1

Tennis feels very strongly about this change. Providing whereabouts is challenging enough in and of itself in the sport of tennis when players are in competition for 90% of the year, with often only a day in between competitions. This creates a situation when updating whereabouts almost constantly is challenging and can lead to a Filing Failure or Missed Test.

The ITIA has worked hard to provide resources and support to players in the RTP and to ensure they have filed by the deadlines we set ahead of each quarter. These are not set per se but are generally 10-14 days before each quarter. As it is, this presents a challenge as players can move from competition to competition at very short notice and without much prior planning so asking them to submit whereabouts a significant period of time before the start of the quarter essentially means that the information is rarely accurate a week later. The ITIA would like to see this provision left within the gift of the ADO requesting that whereabouts filing to determine the deadline for filing to reflect the sport specificities whilst acknowledging the need to plan tests ahead of the quarter starting. We do not believe that this would cause an issue for other ADOs accessing the whereabouts for our sport, given it is constantly changing. The further out the test is planned the more likely it will need to be amended to reflect the player's competition and travel movements.

One size does not fit all.

#### Article 4.10.6.2.c

The ITIA understand that there is significant work underway regarding ADAMS and NextGen etc. However the ITIA would request that WADA give some consideration to allowing an API to help aid athletes with inputting their Competition schedule. Given the extensive and regular competition calendar for some sports this is a tool that would assist not only a sport such as tennis but team sports too.

In addition to an API, the ADAMS usability must be improved. The current app crashes and the current web system is clunky, it is not intuitive and is administratively burdensome. Athletes cannot rely on the website as most often they do not travel with devices other than a mobile phone, for which the website is not appropriate. We appreciate the investment and work that is underway on ADAMS but a fix for the failings of ADAMS cannot continue to be promised and not delivered.

If ADAMS continues to fail the very individuals we are seeking to not only test but ultimately protect from doping then organisations who have invested in their own whereabouts systems (that are reliable and user friendly) should not be required to also use ADAMS or replace their system with ADAMS. An API that feeds into

ADAMS would surely be the most sensible solution, recognising the significant investment made by those ADOs.

## 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. 4.10.6.2. d) There are practical and technical concerns with this article. There is a concern that the large data uploaded might cause problems with the performance of ADAMS. ADAMS needs to be fit for purpose. On the practical side it is not clear on how to handle cases when no photo is uploaded, when the ID photo and the ADAMS photo do not match or other issues with the photo arise. This needs to be clarified. As well from a practical side the telephone number (similar to the mailing address and email address) should be part of the quarterly whereabouts as athlete's profiles allow a high number of telephone numbers where it is unclear which one is the current used number.

2. 4.10.6.3. There seems to be a difference in regulations between the IST und the ISRM. The ISRM seems to be very strict on handling whereabouts as well as regular activities (e.g. ISRM Comment to Article B.2.1 b) whereas the IST regulates regular activities contrary. There is consensus that certain regular activities or training locations should remain mandatory in ADAMS. However, there is ongoing discussion regarding the level of detail required – for example, whether every training session per week must be included or only one. Without sufficient information, the quality of the Whereabouts could deteriorate significantly.

## NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

### General Comments

4.10.6.2 d)

### Wording in the IST:

***“4.10.6.2 d: Include and upload as part of their Whereabouts Filing an accurate passport style photograph in accordance with the requirements set out in ADAMS, to assist with validating the Athlete's identity when selected for a Test.”***

### Comment NADA Austria:

This could result in a large volume of data being uploaded to ADAMS, potentially impacting its performance. What happens to athletes who are not part of a Whereabouts Pool but are still tested? Should the DCO take a picture with DCO Central, and will it be uploaded into ADAMS?

### We want to refer to the comment of the Council of Europe:

*“4.10.6.2. d) There are practical and technical concerns with this article. There is a concern that the large data uploaded might cause problems with the performance of ADAMS. ADAMS needs to be fit for purpose. On the*

*practical side it is not clear on how to handle cases when no photo is uploaded, when the ID photo and the ADAMS photo do not match or other issues with the photo arise. This needs to be clarified. As well from a practical side the telephone number (similar to the mailing address and email address) should be part of the quarterly whereabouts as athlete's profiles allow a high number of telephone numbers where it is unclear which one is the current used number."*

#### 4.10.6.2 e)

##### **Wording in the IST:**

*"4.10.6.2 e: A personal phone number which they can be contacted on should the ADO decide to call the Athlete within the last five (5) minutes of the 60-minute time slot in accordance with Article 4.10.7.1 I)"*

##### **Comment NADA Austria:**

This should be a mandatory field within the Whereabouts, requiring the athlete to confirm it every quarter (similar to the mailing address and email address). It should also be visible to the DCO in DCO Central.

#### 4.10.6.3

##### **Wording in the IST:**

*"4.10.6.3: In addition to mandatory whereabouts requirements listed in Article 4.10.6.2, Athletes in a RTP may file as part of their Whereabouts Filing their training and/or any other alternative location/s such as work or school where the Athlete may be located for testing during the quarter. If an Athlete does not have a fixed training location, the Athlete may provide the address of the location where the Athlete will start and finish their training activity."*

##### **Comment NADA Austria:**

Previously, regular activities (such as training) were a mandatory field, yet many athletes still failed to provide this information in ADAMS. If this is no longer a mandatory field, the quality of Whereabouts data will significantly decrease, leading to lost intelligence for ADOs and making Target Testing nearly impossible, as there could be more than one day between two 60-minute timeslots. Furthermore, with the trend in doping moving toward microdosing, alternative concepts should be considered, such as a second timeslot at least a few hours before or after the other timeslot or an incentive system for athletes who provide more comprehensive entries for testing opportunities in ADAMS.

There seems to be a difference in regulations between the IST and the ISRM. The ISRM seems to be very strict on handling whereabouts as well as regular activities (e.g. ISRM Comment to Article B.2.1 b) whereas the IST regulates regular activities contrary. There is consensus that certain regular activities or training locations should remain mandatory in ADAMS. However, there is ongoing discussion regarding the level of detail required – for example, whether every training session per week must be included or only one. Without sufficient information, the quality of the Whereabouts could deteriorate significantly.

Furthermore, the term "training" / "training activity" should be defined in a more concrete and legal way: Is it only the specific exercise that is related to the sport performed by the athlete or could training also mean physiotherapy, regeneration, preparing the bike, etc.? It would be good to have some examples in the IST / WADC.

##### **Additionally, we also want to refer to the comment of the Council of Europe:**

*"4.10.6.3. There seems to be a difference in regulations between the IST and the ISRM. The ISRM seems to be very strict on handling whereabouts as well as regular activities (e.g. ISRM Comment to Article B.2.1 b) whereas the IST regulates regular activities contrary. There is consensus that certain regular activities or training locations should remain mandatory in ADAMS. However, there is ongoing discussion regarding the level of detail required – for example, whether every training session per week must be included or only one. Without sufficient information, the quality of the Whereabouts could deteriorate significantly."*

**General Comments**

4.10.6.2 (d) - UKAD wishes to seek clarification on how photographs submitted by Athletes will be checked and verified e.g. quality of the photo and its accuracy. If this is the responsibility of the ADO this would be burdensome. UKAD proposes that the system would need to perform the quality and verification checks of the submitted Athlete's photograph.

4.10.6.3 - UKAD disagrees with the change to make the submission of training activities from a mandatory provision to an optional provision by RTP athletes. UKAD believes that it should not be administratively burdensome on RTP athletes to provide some basic regular activity information within their whereabouts.

UKAD is concerned that by making training activities an optional requirement there would be a significant decline in RTP athletes providing this information. UKAD is concerned about the impact this would have on the quality of OOC testing programmes on RTP athletes e.g. reduced variability relating to the time of day, location of testing., higher number of 60-minute attempts. There is a potential increased risk of unsuccessful attempts when operating off more limited information regarding athletes typical daily/weekly routines.

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

4.10.6.3 - UKAD proposes deleting 4.10.6.3 and re-adding the training provision to the mandatory requirements listed under 4.10.6.2.

UKAD proposes the following considerations for its application:

- Athletes submit training/regular activity information (the address of their primary training venue as a minimum) once as part of their quarterly submission (and should update it if it significantly changes e.g. permanent change in training location) and they re-confirm their training/regular activity information in each quarter's submission. If an athlete does not have a primary training venue e.g. cycles on roads, ADAMS should enable them to select this and provide rationale. ADAMS should enable additional information to be provided e.g. approx. training schedule.
- Definition of what is deemed regular is any training/activity an Athlete undertakes on at least a weekly basis. This would include the provision of any team activities.
- One-off changes/temporary changes do not require an update.
- Incomplete, inaccurate/false information would be considered a filing failure e.g. training venue has been closed for several months, no training information submitted for the quarter.

Should this be included, the Article removed for training detail requirements (previously 4.10.9) would need to be re-added and amended to reflect the change in guidance for training information.

**Reasons for suggested changes**

4.10.6.2 (d) - To remove the potential administrative burden placed upon ADOs to verify and check the quality and accuracy of photographs submitted by the Athlete.

4.10.6.3 - This would improve the level and quality of whereabouts information submitted, and that it is a reasonable requirement of RTP athletes. This would lead to improved OOC testing programmes e.g increased variability of testing (different venues/locations and different times of day) and lessen the risks of unsuccessful attempts, particularly when attempting to test athletes in 'daytime hours'.

## SA Institute for Drug-Free Sport

SUBMITTED

khalid galant, CEO (Souoth Africa)

NADO - NADO

### General Comments

This should not be a requirement until the ADAMS system is in a much better place to handle this capability

### Reasons for suggested changes

ADAMS at the best of time is slow, so the thought of athletes uploading their photos and accessing their profiles will result in even slower accessing times of athlete profiles.

## Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

### General Comments

#### Comments to 4.10.6.2 d:

How do you confirm the picture is taken within 2 years? If it is the Athlete's obligation to update the picture within 2 years, we can understand.

## Anti-Doping Sweden

SUBMITTED

Jenny Schulze, Testing and Science Manager (Sweden)

NADO - NADO

### General Comments

Article 4.10.6.2

ADSE fully supports the new wording of this article with the training location being optional.

## Sport Integrity Australia

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)

NADO - NADO

### General Comments

Article 4.10.6.2(c): SIA notes the removal of the requirement for Athletes to record accurate Training Locations for each day. SIA would like the Drafting Team to reconsider this decision as we believe the original concept of mandating for Athletes to provide accurate Training Locations daily enhanced our ability to conduct testing. Nevertheless, SIA agrees that non-compliance should not result in a penalty to the Athlete. That is, SIA would like to see the requirement for Athletes to enter accurate Training Locations for each day be retained, with Athletes being required to provide specific times for such activity. However, this requirement would not be associated with any consequences to the Athlete in the

form of a Filing Failure. We appreciate that including a requirement without consequences is a ‘toothless tiger’. However, if it could be presented as being more beneficial to an Athlete, for example, to allow testing to occur in the most suitable environment, then an Athlete is more likely to comply. Alternatively, it may be possible to make adjustments in ADAMS itself so as to require/encourage/make clear that such information be provided (or indicate no training sessions) before an Athlete can progress to submitting their whereabouts in ADAMS, SIA would support this.

SIA has previously expressed that the generic timeframes were an issue in allowing an ADO to effectively plan testing and by creating increased confusion on what may result in a Filing Failure. The information concerning Training Locations can however be vital for an ADO to be more effective and strategic with test planning, specifically by limiting an ADOs ability to plan testing away from their overnight address and/or nominated 60-minute location as recommended by the new IST. SIA notes the IST requires ADOs to increase their efforts in monitoring Whereabouts, and we feel the removal of this requirement is contrary to what Whereabouts seeks to do.

4.10.6.2 (d) (Comment) - SIA still seeks information on the consequences to an athlete who does not meet this requirement

Article 4.10.6.3: See commentary regarding Article 4.10.6.2(c) above. SIA strongly suggests that Athletes in a RTP “shall” be required to file accurate Training Locations.

## NADA

SUBMITTED

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

### General Comments

Comment to Art. 4.10.6.2 d):

There needs to be clarification on practical issues such as how should the process of matching a photo be implemented in practice by doping control officers? How can doping control officers ensure that the correct athlete is present when photos on ID documents are significantly older than the image in ADAMS and individuals have changed? How is the process handled if no photo is uploaded or uploaded photos are more than two years old? As well there is the concern that ADAMS will not be able to process that amount of data and slow down.

Comment to Art. 4.10.6.3:

There seems to be a difference between the Standard for Results Management and the IST2027. The regulations on regular activities seem to be different between both standards. We suggest to include regular activities as mandatory to still enable target testing. Without sufficient information, the quality of the Whereabouts could deteriorate significantly.

## Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

### General Comments

#### 4.10.6.2

We express our great concerns about the reduction of the mandatory Whereabouts requirement and the suggested handling of phone calls for RTP athletes:

- Given the lack of other information, testing will predominantly take place in (or immediately around) the 60-minute time slot which is contradictory to the statement in IST art. 4.10.7.1: "Testing (...) should be as

unpredictable as possible."

- One of the fundamental principle of the Whereabouts captured in IST art. 4.10.10.1 will be undermined, namely "(...) to locate the Athlete for Testing (...) including but not limited during the 60-minute time slot".
- The one required test outside the 60-minute time slot (art. 4.10.11.1) will either be attempted immediately around the time slot (which will only aggravate the above-mentioned concern), or will result more often than not in an Unsuccessful Attempt which is nothing else than a waste of an ADO's resources.
- The focus on the athlete's 60-minute time slots, that are predominantly set early in the morning or late in the evening, will heavily reduce flexibility for making (successful) testing attempts, and therewith the efficient use of an ADO's resources given that attempts without reliable Whereabouts information will result in Unsuccessful Attempts. This will most likely result in a decline of testing numbers.
- The "promotion" of phoning the athletes may be reasonable from an efficiency perspective, but heavily thwarts the fundamental principle set out in the comment to article 5.3.1: "No Advance Notice Testing of Athletes is one of the fundamental principles of testing."
- All the effort an ADO is required to invest in its Risk Assessment and TDP are foiled to a great extent when there is no reliable basis for conducting unpredictable and intelligence-led testing.

#### 4.10.6.3

To make the indication of additional information optional, and to merely "encourage" athletes to update the information is somewhat naive, as in our experience, athletes only indicate the required minimum information. Also, missing updates will lead to even more Unsuccessful Attempts based on outdated information, and therewith to a waste of an ADO's resources.

#### Bermuda Sport Anti Doping Authority

SUBMITTED

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

##### General Comments

The removal of the requirement to file regular activity seems counterproductive to testing and its preferred unpredictability. Regular activity was essentially always optional, as the athlete could opt out by providing a reason, which was mainly based on time irregularity.

It is preferred that, at a minimum, athletes are required to file the training location(s). This information at least helps to paint a picture of where an athlete might be, which is particularly helpful when attempting to test outside of the 60-minute slot.

We need to find ways to get athletes to provide more information rather than less. The reality is 60-minute time slots are filed first thing in the morning, meaning overnight accommodation and 60-minute slots are essentially one entry. This makes the unpredictability referred to in 4.10.7.1 more difficult to achieve. All athletes should be able to provide training locations even if the time is irregular and cannot be provided.

There is added concern about how this might affect testing cost and budget as the probability of an unsuccessful attempt increases. The majority of our athletes provide regular activity and can be successfully located at those locations. Even during unsuccessful attempts at regular activity locations, useful information can be gathered for anti-doping purposes.

#### USADA

SUBMITTED

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

##### General Comments



#### Article 4.10.6.1

For Comment: USADA has for some time had the deadline of the 15th of each month preceding the start of a calendar quarter. USADA did this to ensure everyone would file by the 1st of the quarter and not receive whereabouts failures. This approach has been successful.

With the proposed change by WADA, however, USADA will now be required to issue a filing failure if whereabouts are not filed by the 15th. In Q1 of this year USADA had 95 RTP athletes file between the 15th and the 1st of the month and for Q2 that number was reduced to 37. Either way, there is a significant number of athletes not making the cutoff of the 15th who would, based on WADA's change, now be subject to filing failures. USADA suggests that the ISRM (or best practices guidelines) have ADOs set a submission date of the 15th but not issue filing failures until the 1st. The whereabouts system is onerous enough without raising the bar even higher for clean athletes' quarterly filings.

#### Article 4.10.6.2.d and Article 4.10.12.1.d

For Comment: USADA supports the idea of including an accurate passport style photograph as part of an athlete's Whereabouts Filing. However, as previously stated, ADOs must not be mandated to only use ADAMS. USADA advocates for athletes to be able to use Athlete Connect for this requirement while highlighting that implementing this additional requirement will necessitate technology development by WADA, including further development of an API to guarantee that these photographs are accessible through ADAMS if required.

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

##### Article 4.10.6.2.c

Recommended Change: Change in bold. "The *Athlete's Competition/Event* schedule for the following quarter, including the name of the *Competition/Event* and address of each location where the *Athlete* is scheduled to compete during the quarter and the date(s) at which they are scheduled to compete at such location(s), **including any travel related to their participation in such *Competition/Event*.**"

##### Article 4.10.6.2.e

Recommended Change: Change in bold. "A personal phone number and **the preferred service method (WhatsApp, Signal, Wire, etc.)** which they can be contacted on should the *ADO* decide to call the *Athlete* within the last five (5) minutes of the 60-minute time slot in accordance with Article 4.10.7.1 I);"

##### Article 4.10.6.3

Recommended Change: Change in bold. "Article 4.10.6.2, Athletes in a RTP may file as part of their Whereabouts Filing their training and/or any other alternative location/s such as work or school where the Athlete may be located for testing during the quarter. **The training and/or any other alternative location(s) such as work or school should only include the address of the location, excluding days of the week and times. If an Athlete does not have a fixed training location, the Athlete may provide the address of the location where the Athlete will start and finish their training activity.**

~~Comment to 4.10.6.3: Given the provision of this additional information is not mandatory, if the Athlete files additional whereabouts information listed in Article 4.10.6.3 but does not update such information or does not file any additional information, the Athlete shall not be subject to a Filing Failure. However, if such additional whereabouts information is filed and there is a change to this information during the quarter, the Athlete should be encouraged to update their Whereabouts Filing."~~

#### Reasons for suggested changes

##### Article 4.10.6.2.c

Reason: As per Article 4.10.9.1 it specifically states that any travel related to an athlete's participation in a Competition/Event must be provided. This additional language allows for a clear understanding of an athlete's requirements.

##### Article 4.10.6.2.e

Reason: Athletes traveling internationally may not have cellular service through their provider while they are abroad. In these cases, they may rely on services available over Wi-Fi (e.g., WhatsApp) to make and receive phone calls. A call placed to an athlete without service will not be received, so having the ability to specify the preferred service method would provide the DCO with additional information about how to best contact the athlete, when possible. However, an Athlete cannot be permitted to only rely on WiFi apps only available on certain systems (e.g., FaceTime).

##### Article 4.10.6.3

Reason: Typical training locations should be made a requirement as a general entry (i.e. no days or times required). The reason for this is to provide Sample Collection Personnel (SCP) an additional location to attempt to locate an athlete without the use of a phone call, while not placing undue burden on the athletes. The concern with making training completely optional/not requiring that it be accurate or updated is that it could quite easily create conflicting information within the days it is listed, which will be very confusing for SCP to sort through and will likely be confusing for athletes as well. By requiring typical training locations without days/times, we hope to strike the balance between what SCP need to make a reasonable attempt and what is required of athletes.

### **Finnish Center for Integrity in Sports FINCIS**

SUBMITTED

Marjorit Elorinne, Quality Manager (Suomi)

NADO - NADO

#### **General Comments**

Although we support the removal of requirement to file regular activities and time frames for those, we would find it very useful if RTP/TP athletes would still indicate their training locations as part of their whereabouts without being required to include specific times.

Knowing the athlete's regular or typical training location, even without exact timeframes (and especially if they have no obligation to keep those updated) can still provide valuable information when conducting OOC testing outside the 60-minute time slot.

In addition, we would like to highlight a contradiction between IST Article 4.10.6.3 and ISRM Article B.2.1(b).

### **Canadian Centre for Ethics in Sport**

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

#### **General Comments**

#### **Article 4.10.6.2.d**

The CCES would request clarification on whether a whereabouts failure can be pursued simply on the basis of an athlete's failure to upload a photo to ADAMS. This requirement could be seen as overly prescriptive and disproportionate, while creating an additional administrative burden. Enforcement would be difficult as would validation of the photo being representative of the athlete (which would likely require cross-referencing with open-source searches). Additionally, not all anti-doping organizations (ADO) provide their Doping Control Officers (DCO) with access to ADAMS, meaning DCOs in the field would be unable to validate the photo compared to the athlete who may be in front of them unless the photo was provided by other means, which may be difficult depending on the systems and methods used by ADOs when issuing missions.

### **RUSADA**

SUBMITTED

Viktoriya Barinova, Deputy director (Russia)

NADO - NADO

#### **General Comments**

We suggest to include training schedule and location into mandatory whereabouts information.

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

#### 4.10.6.2 insert new sub-article:

c) For each day during the following quarter, the time-frames and address of each location where the Athlete will train. If an Athlete does not have a fixed training location, the Athlete may provide the address of the location where the Athlete will start and finish their training activity.

4.10.6.3 In addition to mandatory whereabouts requirements listed in Article 4.10.6.2, Athletes in a RTP may file as part of their Whereabouts Filing their training and/or any other alternative location/s such as work or school where the Athlete may be located for testing during the quarter. ~~If an Athlete does not have a fixed training location, the Athlete may provide the address of the location where the Athlete will start and finish their training activity.~~

#### Reasons for suggested changes

We support expediency of non-mandatory requirement for RTP and TP Athletes to provide their regular activities such as school, work etc. as alternative location/s where the Athlete may be located for testing during the quarter as this reduces the burden on athletes. However, considering that training is a part of the athletes' sporting activity and reflects not only the location but also the athletes' training phases (which is important for testing), we believe that this information should be kept as mandatory. Particularly for RTP athletes, taking into account the new requirement to attempt at least one test outside the athlete's nominated 60-minute time slot.

In addition, in terms of organizing the doping control station and providing proper conditions for the athlete, the training venues are the most suitable.

If ADO will not have a mechanism to obtain accurate information on a place to locate athlete outside the 60-minute slot, attempting such a test could turn into fruitless trips by the DCO to all locations nominated by athlete, thus accumulating UARs and increasing testing costs to the detriment of the entire program.

Also, it may result in athletes being tested only at the athlete's overnight location.

#### Anti-Doping Norway

SUBMITTED

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

NADO - NADO

#### General Comments

##### Re. art. 4.10.6.1:

ADNO supports streamlining the deadline for filing Whereabouts on the 15th of the month preceding the start of the calendar quarter.

##### Re. art. 4.10.6.2, d):

We have taken note of the mandatory requirement to upload a photo. It is important that the additional data does not impact the performance of ADAMS, which may require a performance update.

##### Re. art. 4.10.6.3:

ADNO supports the removal of mandatory regular activities.

## International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

### General Comments

Article 4.10.6.2 d).

As previously submitted, we recommend providing clarification - if not directly in the Standard, then at least in the Guidelines – on whether the absence of an uploaded photograph in ADAMS alone would constitute a whereabouts failure. This would help ensure consistent application of this requirement globally from the outset and avoid inconsistent enforcement.

Article 4.10.6.2 f).

The wording “when notification of a sent e-mail receipt is generated/obtained (subject to applicable law)” is not in line with Article 14 of most of ADO ADR and caselaw. “Deemed notice” is usually completed once the email is sent out and is within the sphere of control of the recipient. The requirement for a “receipt of email” will create a burdensome obligation and a higher threshold.

## Article 4.10.7 (11)

### World Rugby

SUBMITTED

Ross Blake, Anti-Doping Education Manager (Ireland)

Sport - IF – Summer Olympic

### General Comments

**Article 4.10.7.1 (I)** With regards to this article, we consider that for the sake of athletes, a definitive decision needs to be made as to whether, or in what exceptional circumstances, a phone call is or is not standard procedure. The current wording risks uncertainty and inconsistency with athletes being treated differently depending on the preference/procedure of the TA, and even the behaviour/decisions of the individual DCO. Creating a guideline or flowchart could be helpful for this.

## International Tennis Integrity Agency

SUBMITTED

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

Sport - Other

### General Comments

Article 4.10.7.1 h

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

ADOs wish to collect samples from athletes and therefore if there is another way reaching the player 5 minutes before the end of the hour it should be utilised. Tennis players often believe unknown numbers calling them are spam or unwanted callers so they do not answer. Using all the numbers an athlete files would improve the chances of reaching them to facilitate a test being collected from them.

Additionally, the ITIA question the need to record a Test in ADAMS as advance notice if the sample was collected after the phone call in circumstances where the athlete was located and notified immediately/shortly

after the phone call was placed. It is no different to an athlete waiting until for example 45 minutes to answer their home address door having heard the DCO knock/ring the bell. Are these recorded as advance notice?

It may be how this clause is drafted but as it stands it is unclear as to whether a phone call made 5 minutes before the end of the 60 minute whereabouts time slot, or the phone call is made 5 minutes before the end of any other testing window, or the phone call that is made in exceptional circumstances (ie outside the normal 5 minutes before the end of the 60-minute timeslot) constitutes advance notice or if it is all of these scenarios.

That being said, it cannot surely be the intention to apply this to a 5 minute phone call before the end of the hour? Unless there is clear evidence that a test can be compromised 5 minutes before a test then this surely cannot be advance notice. This will have a significant impact on ADOs delivering no notice testing which in turn places them in jeopardy from a Code compliance perspective.

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

### General Comments

4.10.7.1 (a) - UKAD has noted a typo (relating to the capitalisation of 'Athlete') in this Article.

4.10.7.1 (f) - UKAD has noted a typo (need to change from a full-stop to a comma) in this Article.

*"If an Athlete specifies a 60-minute time slot during which they will be at a hotel, apartment building, gated community or other location where access to the Athlete may have various security measures in place, such as a front reception desk, or security guard, it is the Athlete's responsibility to ensure accessibility to their selected 60-minute location with no advance notice to the Athlete."*

4.10.7.1 (l) - UKAD is seeking clarification on the phone number(s) that DCOs should call. Some athletes provide multiple phone numbers in their whereabouts submission. Therefore, unless there will be a change to the number of phone numbers an athlete can submit, clarification is required as to whether the call is made only to the primary personal number provided or if the DCOs should make a phone call to all numbers provided.

4.10.7.1 - UKAD proposes an addition to this Article to capture expectations regarding the exceptional circumstances where an Athlete's travel means they are unable to submit a 60-minute time slot. This would bring consistency and alignment with Articles 4.10.8.1 and 4.10.10.2.

### Suggested changes to the wording of the Article

4.10.7.1 (l) - UKAD proposes that Athletes are only able to submit one personal phone number for the purposes of being contacted by a DCO in the last 5 minutes of the 60-minute time slot.

Alternatively, UKAD proposes the following changes to Article 4.10.7.1 (l):

"Where an Athlete has not been located despite the DCO's reasonable efforts, and there are only five (5) minutes left within the 60-minute time slot, as a last resort the DCO should phone the Athlete (unless exceptional circumstances exist where the TA instructs otherwise) using the Athlete's **primary** phone number provided in their Whereabouts Filing to confirm if they are at the specified location....**If an Athlete provides multiple phone numbers the DCO is only required to call the one primary number provided.**"

4.10.7.1 - UKAD proposes the following addition to Article 4.10.7.1:

"In the extremely unlikely event that an Athlete's travel results them being in transit for the entire 5am-11pm window, the Athlete shall provide their travel details as part of their Whereabouts Filing for that particular day."

### Reasons for suggested changes

4.10.7.1 (l) - UKAD seeks clarification to ensure a clear and consistent approach in the phone numbers used to contact athletes.

4.10.7.1 - To bring clarification and consistency on the expectations for Athletes whereabouts submissions when travelling for the entirety of the 5am-11pm window.

### Sport Integrity Australia

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)

NADO - NADO

#### General Comments

Article 4.10.7.1(e) to (l): SIA suggests that Article 4.10.7.1(e) through to (l) should be renumbered as 4.10.7.2 to 4.10.7.2.9 to ensure correct and consistent drafting.

Article 4.10.7.1(f): SIA asks for the Drafting Team to consider removing the ability for Athletes to have their nominated 60-minute time slot as part of their Competition Filings. SIA does not consider this to be an easily accessible location to enable no advance notice testing.

Article 4.10.7.1(l): SIA notes that the language is not consistent with the rest of the IST, in that, this Article employs the term “Himself/Herself”. SIA suggests that this term could be changed to “Athlete”.

### Sport Ireland

SUBMITTED

Áine Hollywood, Science Officer (Ireland)

NADO - NADO

#### General Comments

4.10.7.1 l)

Sport Ireland thinks greater consideration to the timeframe between the phone call and the in-person notification should be made when defining an 'advance notice' attempt.

### NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

#### General Comments

Commnt to Art. 4.10.7.1:

There is a concern that announced tests will not be recorded correctly in a hamrised way internationally in ADAMS as the defintion is not clear enough. Is a test rated as an announced test, if we have to ring the door bell because the arthlete is not informed face ro face? If the athlete opens the door 30 seconds later, is this still an announced test? Or is a test only rated as announced if a third person opens the door (flatmate, mother, door man at gated communities e.g.)? Or does this only appllies for phone calls? Or if the athlete answers the phone or is the one opening the door it is a direct information to the athlete and not rated as announced testing? There as well needs to be a clearer defintion on what exactly is a reasonable attempt.

Comment to Art. 4.10.7.1 f):

The third sentence "If an athlete..." does not make sense if the next sentence is not linked to it.

## Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

### General Comments

As a general comment, we think the level of detail of this article is not adequate to a Standard. On the one hand, the article extensively elaborates on the reasoning behind the 60-minute time slot (lit. a to d) which is inconsistent with the rest of the document. This may have been useful when the concept of the 60-minute time slot was initially introduced, but seems misplaced now that the concept is well-established. On the other hand, the very detailed description of how to deal with different scenarios not only unnecessarily repeats generally applicable principles but also contradicts the content of (superordinated) article 4.10 which is "Collecting Whereabouts Information". How a DCO should react and what information should be captured at the occasion of an attempt should be, even if only for the sake of consistency, included in a Guideline, but not in the Standard itself.

### 10.7.1

Lit. I: The addition that the DCO should phone the athlete "unless exceptional circumstances exist where the TA instructs otherwise" further limits the ADOs in the interpretation of this provision. Even though it remains a "should" provision, this addition clearly implies that the athlete should be phoned "under normal circumstances".

We urge WADA to change the wording so that the provision does not suggest to phone the athletes, but rather leaves it as an option (e.g., "(...) as a last resort the DCO is allowed to phone the Athlete (...)")

As a more general feedback to this article, we think that the level of details is disproportionate to a Standard. We ask WADA to reconsider whether it is really necessary to repeat general, and anytime applicable, principles and rules like e.g., in lit. g) or lit. j). Also, parts of this article read like Best Practice recommendations, e.g., the handling of potential phone calls, which does not reflect the overall intent of the Standards.

## Bermuda Sport Anti Doping Authority

SUBMITTED

Duncan Barclay, Results, Compliance Manager (Bermuda)

NADO - NADO

### General Comments

Unpredictability becomes harder to satisfy with the removal of regular activities. The whereabouts guide in ADAMS activity encourages athletes to file their 60-minute slot when they wake up. This essentially means overnight accommodation and the 60-minute slot are one entry and become the default location for testing.

## Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

### General Comments

### Article 4.10.7.1.c

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

## USADA

SUBMITTED

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

### General Comments

N/A

### Suggested changes to the wording of the Article

#### Article 4.10.7.1.e

Recommended Change: Changes in bold. "An *Athlete* in a *RTP* shall specifically be available and accessible for *Testing* on any day for the ~~duration of the~~ 60-minute time slot specified that day in their Whereabouts Filing, at the location that the *Athlete* has specified for that time slot.

#### Article 4.10.7.1.f

Recommended Change: Changes in bold. "The *Athlete* can choose a 60-minute time slot in accordance with Article 4.5.5 provided that during the time slot in question they are available and accessible to the DCO. The specific location could be the *Athlete*'s overnight address, training and/or other alternative location ~~or~~ ***Competition***."

#### Article 4.10.7.1.f

Recommended Change: Changes in bold. "Once the DCO has arrived at the location **at the start of the** specified 60-minute time slot, if the *Athlete* cannot be located immediately, then the DCO should remain at that location for **the remaining** ~~whatever~~ time ~~is~~ left of the 60-minute time slot and during that remaining time they should do what is reasonable in the circumstances to try to locate the *Athlete*."

### Reasons for suggested changes

#### Article 4.10.7.1.e

Reason: As worded without USADA's edit, this Article conflicts with Article 4.10.7.1.h in which the athlete is not at the 60-minute time slot for the duration of the window. USADA's edit provides much needed clarity and conforms with common practice and cases. USADA recommends further clarifying that the DCO should be present from the start of the 60-minute time slot to the end of the window.

#### Article 4.10.7.1.f

Reason: The ability for an ADO to successfully test an athlete at a *Competition* is not realistic. Gaining access to a venue with necessary credentials and testing during the in-competition period create challenges that should be avoided.

#### Article 4.10.7.1.f

Reason: Clear expectations to specify that a DCO must be present from the start of the 60-minute time slot to the end of the window should be outlined. This is only a should, so does not prevent DCOs from completing tests after the 60-minute timeslot began.

## International Testing Agency

SUBMITTED

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

### General Comments



Article 4.10.7.1 f).

In the last sentence, the reference to "in either case" seems inaccurate as it is not clear to which 2 cases the provision is referring to.

## Article 4.10.9 (5)

### Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

#### General Comments

4.10.9 b) There is a concern that giving more specific time frames for Training Locations might lead to more filing failures. It needs to be carefully considered what leads to a filing failure to avoid sanctioning athletes that try to do the right thing and to harmonize the approach internationally.

### UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

#### General Comments

4.10.9.1 - UKAD welcomes additional guidance on this article, however, believe this will still be challenging to monitor and enforce and could lead to inconsistent application across ADOs.

Clarification is also required on the expectations for travel information when in relation to Competitions/Events. UKAD supports the need to input travel information where it prevents the submission of the overnight accommodation and the 60-minute time slot as detailed in Article 4.10.8.1 and as proposed for Article 4.10.7.1. However, when in relation to Competitions/Events, as Athletes will travel varying distances and via different modes to attend a Competition/Event, and will compete at a range of National and International Competitions/Events, this does not seem to be a reasonable expectation for an Athletes whereabouts filing e.g. it would not be reasonable for an athlete to include if they are travelling less than 60 minutes to a competition. Furthermore, with the provision in Articles 4.10.8.1 (and proposed for Article 4.10.7.1), UKAD believes this will be sufficient to capture significant travel that will be undertaken by an Athlete.

Travel is also not listed as a requirement under Article 4.10.6.2, and UKAD does not believe that failure to provide travel information to attend a Competition/Event should result in a whereabouts failure. There is also a concern that athletes may leave the updating of their whereabouts until the day prior to the competition / travel. Therefore, UKAD believes the requirement for travel to Competition/Events should be removed.

UKAD is also concerned that the application of this Article will be challenging, particularly for NADOs, to monitor and implement due to the high number of Competitions/Events an Athlete may compete in.

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

4.10.9.1 - UKAD proposes reference to travel is removed from Article 4.10.9.1 and its associated comment:

"An Athlete shall file their quarterly Competition/Event schedule that they plan to compete in and update it accordingly during the quarter to ensure it remains accurate. ~~This includes any travel related to their participation in such Competition/Event.~~"

Comment to 4.10.9.1 - "An Athlete who is ~~travelling to or~~ competing in a Competition/Event which was not part of their quarterly Competition/Event schedule filing shall update their Whereabouts Filing as soon as possible

after they become aware of the change in circumstances and in any event prior to the day of such travel or the first day of the competition subject to applicable circumstances of their Competition/Event. Failure to provide complete information or to update their whereabouts prior to the first day of the competition may be considered a filing failure."

#### Reasons for suggested changes

4.10.9.1 - UKAD is seeking the removal of travel to ensure it is reasonable/proportionate for an Athletes whereabouts filing.

#### Japan Anti-Doping Agency

SUBMITTED

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

#### General Comments

**4.10.9 Requirements for Providing Training Location(s)**  
- We support this removal

#### NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)  
NADO - NADO

#### General Comments

4.10.9 b)

There is a concern that giving more specific time frames for Training Locations might lead to more filing failures. It needs to be carefully considered what leads to a filing failure to avoid sanctioning athletes that try to do the right thing and to harmonize the approach internationally.

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

**Additionally, we also want to refer to the comment of the Council of Europe:**

*"4.10.9 b) There is a concern that giving more specific time frames for Training Locations might lead to more filing failures. It needs to be carefully considered what leads to a filing failure to avoid sanctioning athletes that try to do the right thing and to harmonize the approach internationally."*

#### Anti-Doping Norway

SUBMITTED

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

## General Comments

Re. art. 4.10.9.1: Requirements for Providing Competition/Event Schedules:

It is unclear how information regarding travel should be updated other than by providing a new overnight accommodation and a new location for the 60-min timeslot

### Article 4.10.10 (3)

#### UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

## General Comments

4.10.10.2 (d) - As per UKAD's submission for Article 4.10.9.1, UKAD believes the provision of travel information should only apply to instances where it prevents an Athlete from providing an overnight accommodation or 60-minute time-slot.

## Suggested changes to the wording of the Article

4.10.10.2 (d) - UKAD proposes the following change:

"Travel that impacts the Athlete's availability for testing at the locations listed a)-b)"

## Reasons for suggested changes

4.10.10.2 (d) - UKAD is seeking the removal of travel in relation to a Competition/Event to ensure it is reasonable/proportionate for an Athletes whereabouts filing.

#### USADA

SUBMITTED

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

NADO - NADO

## General Comments

N/A

## Suggested changes to the wording of the Article

### Comment to 4.10.10.2

Recommended Change: Changes in bold. "The ADO collecting the Athlete's Whereabouts Filings should in addition to the Athlete filing their whereabouts in ADAMS **or other approved system**, provide appropriate mechanisms (e.g., email or SMS) to facilitate the filing of such updates in exceptional circumstances. It is the responsibility of each ADO with authority to conduct Testing on the Athlete to ensure that it checks for any updates filed by the Athlete prior to attempting to collect a Sample from the Athlete based on their Whereabouts Filing."

## Reasons for suggested changes

### Comment to 4.10.10.2

Reason: See previous comments on requirements to only file whereabouts in ADAMS.

## International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

### General Comments

Article 4.10.10.1 a).

In Comment to Article 4.10.10.1(a), to prevent any potential confusion, we recommend revising or removing the example of "running in the black forest." This example is no longer relevant, as training and regular activities are no longer mandatory under arts. 4.10.6.3/4.10.12.2 following the recent updates.

Article 4.10.10.2 comment

Considering the existence of the Central App, this tool should also be listed in the comment.

## Article 4.10.11 (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

4.10.11.1 There is the concern that the quality of Whereabouts data will significantly deteriorate, when regular activities (such as training) are no longer a mandatory field, making it much more challenging to comply with this provision.

## NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

### General Comments

4.10.11.1

### Wording in the IST:

*"4.10.11.1: ADOs shall attempt to conduct at least one OOC Test on an Athlete in a RTP outside of the Athlete's nominated 60-minute time slot unless the ADO has Anti-Doping Intelligence that suggests otherwise.*

*Comment to Article 4.10.11.1: If the DCO's attempt to collect an OOC Sample outside the Athlete's 60-minute time slot is unsuccessful, they shall submit a UAR to document the attempt made."*

**Comment NADA Austria:**

Since regular activities (such as training) are no longer a mandatory field, the quality of Whereabouts data will significantly deteriorate, making it much more challenging to comply with this provision.

**Additionally, we also want to refer to the comment of the Council of Europe:**

*“4.10.11.1 There is the concern that the quality of Whereabouts data will significantly deteriorate, when regular activities (such as training) are no longer a mandatory field, making it much more challenging to comply with this provision.”*

**CHINADA**

SUBMITTED

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

**General Comments**

Article 4.10.11.1

Article 4.10.11.1 of the IST requires Anti-Doping Organizations (ADOs) to conduct at least one OOC test on an Athlete in a RTP outside of the athlete's nominated 60-minute time slot. To ensure that ADOs can continuously monitor whether RTP Athletes are tested during their 60-minute time slots, we recommend that WADA introduce a monitoring module in ADAMS to compare the Athlete's notification time with their nominated 60-minute time slot. This module should be accessible to ADOs or, alternatively, it should be mandatory to include this information in the Doping Control documentation to help ADOs track the Testing time on RTP Athletes promptly and thoroughly, thereby ensuring compliance with this Article.

**Bermuda Sport Anti Doping Authority**

SUBMITTED

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

**General Comments**

Making an attempt to test outside the 60-minute slot becomes increasingly more difficult with the removal of regular activity. At a minimum, training locations (excluding times) should be filed.

**Spanish Commission for the Fight Against Doping in Sport (Comisión Española para la Lucha Contra el Dopaje en el Deporte - CELAD)**

SUBMITTED

Carlos Gea, Head of International Relations and Coopetation Area (España)  
NADO - NADO

**General Comments**

We believe this article should not be included in the IST and the ADO should have the flexibility to test the athlete 3 times (or plan to test the athlete 3 times per year) either within the 60 minute time slot or outside this slot. The ADO will face important challenges to test the athlete outside the 1 hour testing window because the requirements to provide the whereabouts outside this slot do not guarantee that the athlete is on that location. Many unsuccessful attempts without consequences to the athlete but the ADO would not comply with this article in the IST.

#### Article 4.10.11 Testing Outside the 60-minute Time Slot

4.10.11.1 ADOs shall attempt to conduct at least one OOC Test on an Athlete in a RTP outside of the Athlete's nominated 60-minute time slot unless the ADO has Anti-Doping Intelligence that suggests otherwise.

*[Comment to Article 4.10.11.1: If the DCO's attempt to collect an OOC Sample outside the Athlete's 60-minute time slot is unsuccessful, they shall submit a UAR to document the attempt made.]*

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

The article should be removed from the IST.

##### Reasons for suggested changes

As described above, the ADO will face the problem to not find the athlete constantly outside the testing window, using a lot of resources and planning that tests. On the contrary the athlete will not bear any responsibility as the IST does not force the athlete to be at their whereabouts outside the testing window.

#### Anti-Doping Norway

SUBMITTED

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

##### General Comments

It is unclear if all UAR for unsuccessful attempts outside the 60-minute time slot should be handled as potential whereabouts failures. We would advise against this.

#### Bird & Bird LLP

SUBMITTED

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

##### General Comments

The change to 4.10.11.1 in this second draft to include an exception "unless the ADO has Anti-Doping Intelligence that suggests otherwise" is not properly understood. The AIU remains of the view that testing outside of the slot should not be mandatory for those Anti-Doping Organisations with intelligence-based testing programs.

#### Article 4.10.12 (14)

#### World Rugby

SUBMITTED

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

##### General Comments

**Article 4.10.12:** We remain very concerned as to the change in this article which makes filing in ADAMS mandatory for Testing Pool athletes. This will have a detrimental effect on the programmes of team sports, reducing the number of athletes subject to a higher level of whereabouts, and consequently our ability to deter and detect doping in our sport. We consider that if approved, this will result in smaller pools, more

administration problems for ADOs, teams and their athletes, and an increased resource burden that will force a reduction in testing activity. This is a huge gamble on the capability of ADAMS, and a questionable use of resources given other pressures facing the industry. We remain of the opinion that this change is fixing something that is not broken and should not remain in the Standard.

## FIFA

SUBMITTED

Erling Bjerga, Anti-Doping Manager (USA)

Sport - IF – Summer Olympic

### General Comments

#### 4.10.12.1 - Mandatory Requirement of One Test per Year on TP Athletes

In most team sports, and certainly in football, the whole team is placed under whereabouts requirements so that any player from the team may be tested out-of-competition. This is necessary so that target testing can be conducted on any suspicious player on any team within a registered testing pool. One of the main benefits of this approach is that it allows us to collect whereabouts information of more players while maintaining the administrative burden of collecting that information manageable. Usually, (and sometimes also in collaboration with NADOs), **at least** one out-of-competition test per season (and oftentimes more) is conducted on the **team** but samples won't necessarily be collected from **every** player. For example, at FIFA, we aim to test every single team in our pre-competition testing pools before the tournament period. This is well understood across football, across the Confederations, and it has presented an efficient sport specific solution to whereabouts requirements in football. Every player on these teams is subject to potential OOC testing, and football ADOs under this structure have the discretion to test as many players on the team, or target test specific players on those teams as deemed necessary. The selection of players to be tested on the team is then as targeted as possible, based on risk assessment factors like intelligence, performance, testing history, injuries, ABP etc, but it also gives football ADOs a wider potential pool of targets. As outlined in the current ISTI Article 4.8.1, whereabouts information isn't an end in itself, but a means to an end, namely efficient and effective testing.

To put a mandatory minimum of one test per season on each **player** would also lead to a significant reduction in the number of players that could be included in a testing pool. Football ADOs simply would not be able to manage the volume of individual players required to be tested under this new requirement. As above, we feel that this would unfortunately act contrary to the intended effect, whereby football ADOs' ability to conduct efficient, comprehensive and intelligence-led programmes would be reduced rather than amplified.

#### 4.10.12.6 - Restrictions on TP Whereabouts Submissions

Additional restrictions on when TP whereabouts are submitted are impractical for team sports. Players are contractually obliged to follow the schedules set by their teams, (their employers), and are often not informed of their training schedules until the week before. To meet mandatory quarterly submissions, teams/players would need to submit standard (likely to change) whereabouts and update them at the last minute to address their likely changes. Quarterly submissions, intended to enable better testing coordination, would realistically lead to more last-minute updates and hastily re-planned tests. In football, requiring quarterly submissions which are not reliable will not improve our ability to effectively plan no advance notice testing ahead of time.

Whilst we understand that article 4.10.12.6 proposes that we can also ask for more regular submissions, we feel it unnecessary and inefficient to request teams to submit whereabouts information twice – both quarterly, to meet the mandatory requirements, and more regularly, to be more accurate and meet football's requirements. The teams and clubs participating at FIFA and Confederation competitions are busy and constantly moving. Their schedules are unpredictable and oftentimes determined based on weekly competition results. We believe that this additional burden proposed under the new IST will not provide a material benefit as it relates to efficiency or improved testing logistics for either the clubs or the football ADOs.

## UEFA

SUBMITTED

Rebecca Lee, Anti-Doping Team Leader (Switzerland)

Sport - Other

## General Comments

4.10.12.1 - In most team sports, the whole team is placed under whereabouts requirements, so that any player from the team may be tested out-of-competition. This is necessary so that target testing can be conducted on any suspicious player and also provides a deterrence effect for the whole team. Usually, (in collaboration with NADOs), at least one out-of-competition test per season would be conducted on the team but samples wouldn't necessarily be collected from every player.

To put a mandatory minimum of one test per season on each player would inevitably lead to a significant reduction in the number of players that could be included in a testing pool, reducing the ability to conduct comprehensive, intelligence-led programmes.

4.10.12.1a - Overnight address should not be a mandatory requirement. Sometimes an ADO would prefer a 'home address', sometimes an 'overnight address' and sometimes a home/overnight address is not necessary at all to conduct the required testing.

4.10.12.1e - Personal email address does not need to be specified. It is sufficient to just say 'a complete mailing address and email address.....'

4.10.12.5 – ADOs should be allowed to include consequences similar to 2.4 in their regulations, if they believe it necessary. If the mandatory requirements are increased, then it becomes very hard to justify why a footballer who missed three tests in twelve months would not receive the same sanction as a swimmer who did the same.

4.10.12.6 – It should not be made mandatory for whereabouts for athletes in a TP to be filed in ADAMS. To mandate ADAMS would have a huge impact on resources for ADOs coping with the administration required and also on the teams and athletes. Furthermore, each ADO has such individualised requirements, ADAMS cannot hope to function effectively for all team sports.

4.10.12.6 – There should be no additional restrictions places on when TP whereabouts are submitted. For team sports, teams often don't know their schedules until the week before (due to qualification in cup competitions etc) therefore, to meet the mandatory requirements, teams would need to submit standard (inaccurate) whereabouts and then update them at the last minute. 4.10.12.6 states that the quarterly submission is to 'enable better testing coordination', however, realistically, it would only lead to more last-minute updates and hastily re-planned tests.

Whilst we understand that article 4.10.12.6 proposes that an ADO can also ask for more regular submissions, it seems unnecessary to request teams to submit twice – both quarterly, to meet the mandatory requirements, and more regularly, to meet the ADO's requirements.

## International Tennis Integrity Agency

SUBMITTED

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

## General Comments

Article 4.10.12.9

Whilst the ITIA agree that there is a good basis for communicating the removal of athletes from the Testing Pool with ADOs who have testing jurisdiction prior to removal, the ITIA refer WADA to the views we have expressed about requiring Testing Pool athletes to use ADAMS and thus be subject to the same requirements as RTP athletes (see ITIA's comments to Article 4.10.5.4 of the IST).

The ITIA is concerned that this may become immensely time consuming and lead to significant delays to removing an athlete from the Testing Pool when no evidence has been provided that other ADOs are even bothered with testing the athletes placed in another ADO's Testing Pool.



## Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

### General Comments

4.10.12.6. There needs to be a clearer definition on non-Whereabouts test pools, like “Team Testing Pools”. It is not clear on how to handle team whereabouts in the future as the practical system in many countries seems to vary a lot from the regulations in the IST. Are all teams now required to enter their Whereabouts in ADAMS as well? For example, some teams in some countries currently submit their Whereabouts on a weekly or monthly basis via email. This approach offers a significant advantage, as the information provided is often very detailed – teams typically include screenshots from internal databases that contain a wealth of relevant data.

ADAMS needs to be fit for purpose to enable the submission of Team Whereabouts. There is a concerns that without significant improvement, it would have a huge impact on resources for ADOs coping with the administration required and also on the teams and athletes. Furthermore, given that the current processes and methods of submission that exists for Testing Pool whereabouts, is established, and it works, the change is also not considered to be one of the most pressing issues with regards to ADAMS functionality.

In most team sports, the whole team is placed under whereabouts requirements, so that any player from the team may be tested out-of-competition. This is necessary so that we can conduct targeting on any suspicious player and also provides a deterrence effect for the whole team. Team players are tested regularly but samples wouldn't be collected from every player. To put a mandatory minimum of one test per season on each player would lead to a significant reduction in the number of athletes who would be include in the testing pool which seems counterproductive.

Additionally, it is not clear on how to handle the old "other pools" and if it is still possible to collect whereabouts.

## Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

### General Comments

**4.10.12.2 The removal of the requirement for an ADO to attempt to test a RTP Athlete outside of the 60-minute time slot one hour before or after the Athlete's nominated 60-minute time slot**

- We support this removal

## NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

### General Comments

4.10.12.6

**Wording in the IST:**

**“4.10.12.6:** Whereabouts for Athletes in a TP shall be filed in ADAMS by the 15th day of the month preceding the start of the quarter to enable better Testing coordination between ADOs. An International Federation or a NADO may request whereabouts updates during the quarter with more regular deadlines e.g., weekly or monthly within their rules or procedures which better suit the needs and demands of Team Activities in the relevant sport(s).”

#### **Comment NADA Austria:**

Some ADOs have Team Testing Pools, where individual athletes are not required to file their Whereabouts, but the team itself submits their training schedules, competitions, and other activities. This is often done on a weekly or monthly basis via email, as neither the players nor the team are part of the RTP or TP, but rather in the Team Testing Pool. The advantage is that the Whereabouts from these teams are often very detailed, as they send their information directly via email with screenshots from internal databases that provide a wealth of data. What regulations or ideas does WADA have regarding teams? Will these team Whereabouts need to be submitted via ADAMS in the future?

Furthermore, It would be appreciated to have provisions regulating the consequences for teams if whereabouts are not submitted correctly.

#### **Additionally, we also want to refer to the comment of the Council of Europe:**

*“4.10.12.6. There needs to be a clearer definition on non-Whereabouts test pools, like “Team Testing Pools”. It is not clear on how to handle team whereabouts in the future as the practical system in many countries seems to vary a lot from the regulations in the IST. Are all teams now required to enter their Whereabouts in ADAMS as well? For example, some teams in some countries currently submit their Whereabouts on a weekly or monthly basis via email. This approach offers a significant advantage, as the information provided is often very detailed – teams typically include screenshots from internal databases that contain a wealth of relevant data.*

*ADAMS needs to be fit for purpose to enable the submission of Team Whereabouts. There is a concerns that without significant improvement, it would have a huge impact on resources for ADOs coping with the administration required and also on the teams and athletes. Furthermore, given that the current processes and methods of submission that exists for Testing Pool whereabouts, is established, and it works, the change is also not considered to be one of the most pressing issues with regards to ADAMS functionality.*

*In most team sports, the whole team is placed under whereabouts requirements, so that any player from the team may be tested out-of-competition. This is necessary so that we can conduct targeting on any suspicious player and also provides a deterrence effect for the whole team. Team players are tested regularly but samples wouldn't be collected from every player. To put a mandatory minimum of one test per season on each player would lead to a significant reduction in the number of athletes who would be include in the testing pool which seems counterproductive.*

*Additionally, it is not clear on how to handle the old "other pools" and if it is still possible to collect whereabouts.”*

#### **Swiss Sport Integrity**

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

#### **General Comments**

In light of the heavily reduced Whereabouts requirements for athletes in the RTP, lit. c) of this article will create for team sport Athletes an even greater burden than for RTP athletes. Indicating, and especially updating, Team Activities will be, in practice, a much bigger effort than to just indicating a 60-minute time slot.

## UK Anti-Doping

SUBMITTED

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

### General Comments

4.10.12.1 (c) - UKAD disagrees with the inclusion of Team Activities for the whereabouts information for Testing Pool athletes. This is not part of the requirements for RTP Athletes and it is unclear as to how ADOs would distinguish between team sports e.g. rugby union vs. professional road cycling teams.

4.10.12.5 (a) - As per UKAD comment on 4.10.12.1 (c), reference to 'Team Activities' would need to be removed from Article 4.10.12.5 (a).

### Suggested changes to the wording of the Article

4.10.12.1 (c) - UKAD proposes to delete Article 4.10.12.1 (c) - ~~For team sport Athletes' Team Activities~~ - and replace it with any revised wording that is entered for the training information provision for RTP Athletes (see comment relating to 4.10.6.3).

### Reasons for suggested changes

4.10.12.1 (c) - UKAD is seeking to ensure consistency between RTP and TP Athletes as well as remove any ambiguity in distinguishing what would be classified as 'Team Activities'.

## Sport Integrity Australia

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)  
NADO - NADO

### General Comments

Article 4.10.12.3: SIA asks for the Drafting team to consider the addition of a further criteria for consideration. This being, those Athletes who meet the criteria for inclusion on an RTP, however the athlete can be effectively located for no advance notice testing by an ADO. This would allow greater flexibility for an ADO and has the capacity to benefit Athletes.

Article 4.10.12.2 (now removed): SIA recognises and thanks WADA for this change.

## NADA

SUBMITTED

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

### General Comments

Comment to Art. 4.10.12.1 d) and Art. 4.20.6.2 d)

There needs to be clarification on practical issues such as how should the process of matching a photo be implemented in practice by doping control officers? How can doping control officers ensure that the correct athlete is present when photos on ID documents are significantly older than the image in ADAMS and individuals have changed? What are the consequences if no photo is uploaded or uploaded photos are more than two years old?

Comment to Art. 4.10.12.6:

We ask for a clearer definition on non Whereabouts testing pools like "Team Testpools". The current system implemented by many organisations works well. If the new wording means that team whereabouts are mandatory in ADAMS we fear that ADAMS is not fit for purpose.

In the German team sports, whole teams are placed under whereabouts requirements by the so called team whereabouts, so that any player from the team may be tested out-of-competition. This is necessary so that we can conduct targeted tests on any suspicious player. It provides a deterrence effect for the whole team. Putting the Team Testpool in the status of the test pool would mean that a mandatory minimum of one test per season on each player would be needed. That will lead to a significant reduction in the number of athletes who would be included in the team testing pool and the other players would not be part of the testing system anymore.

Additionally, it is not clear on how to handle the old "other pools" and if it is still possible to collect whereabouts. But this would be necessary to be able to conduct testing in those lower testing pools.

## Canadian Centre for Ethics in Sport

SUBMITTED

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

### General Comments

#### Article 4.10.12.1.c

Aligned with the CCES's comment to 4.10.6.2.e, the CCES requests for WADA to clarify whether a testing pool athlete would be moved into the RTP if a photo is not uploaded to ADAMS.

## USADA

SUBMITTED

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

### General Comments

N/A

### Suggested changes to the wording of the Article

#### Comment to 4.10.12.1

Recommended Change: Changes in bold. "The minimum number of one (1) planned OOC Test to be conducted on Athletes in a TP per year shall include at a minimum the collection of a **urine or DBS** Sample during this SCS."

#### Comment to 4.10.12.6

Recommended Change: Changes in bold. "Whereabouts for *Athletes* in a *TP* shall be filed in *ADAMS* or **other approved system** by the 1st day of the month at the start of the quarter, but ADOs should request that Athletes file by the 15th day of the month preceding the start of the quarter to enable better *Testing* coordination between ADOs. An International Federation or a *NADO* may request whereabouts updates during the quarter with more regular deadlines e.g., weekly or monthly within their rules or procedures which better suit the needs and demands of Team Activities in the relevant sport(s)."

#### Comment to 4.10.12.7

Recommended Change: Changes in bold. "~~An ADO shall record the start date of when the Athlete is included in its TP in ADAMS.~~"

#### Comment to 4.10.12.8

Recommended Change: Changes in bold. "~~An ADO shall record in ADAMS the end date in which the Athlete is no longer included in its TP and shall document the reason for removal either in ADAMS or in another secure way.~~"

Reasons for suggested changes

#### **Comment to 4.10.12.1**

Reason: In order for DBS to remain a viable matrix, WADA and ADOs must be creative in ways to incorporate DBS into our testing plans. If not, we risk DBS becoming obsolete. DBS offers cost effective and time efficient testing, allowing a wider group of athletes to be tested (e.g. whole teams) and therefore the deterrent effect should not be discounted. Restricting DBS only collections on TP athletes is limiting and does not encourage ADOs to adopt the method in their TDPs. We believe DBS only collections on TP athletes, participating in low-risk sports and disciplines (as defined by the ADO's risk assessment) should be counted as part of the minimum OOC testing requirements, provided that the sample is analyzed at a minimum according to the DBS Harmonized menu (outlined in the TD2025DBS).

#### **Comment to 4.10.12.6**

Reason: USADA has for some time had the deadline of the 15th of each month preceding the start of a calendar quarter. USADA did this to ensure everyone would file by the 1st of the quarter and not receive whereabouts failures. This approach has been successful.

With the proposed change by WADA, however, USADA will now be required to issue a filing failure if whereabouts are not filed by the 15th. In Q1 of this year USADA had 95 RTP athletes file between the 15th and the 1st of the month and for Q2 that number was reduced to 37. Either way, there is a significant number of athletes not making the cutoff of the 15th who would, based on WADA's change, now be subject to filing failures. USADA suggests that the ISRM (or best practices guidelines) have ADOs set a submission date of the 15th but not issue filing failures until the 1st. The whereabouts system is onerous enough without raising the bar even higher for clean athletes' quarterly filings.

#### **Comment to 4.10.12.7**

Reason: This requirement was removed in the redline version 2027 IST v1 – 2027 IST v2 under Article 4.10.2.c, therefore, it needs to be removed throughout.

#### **Comment to 4.10.12.8**

Reason: This requirement was removed in the redline version 2027 IST v1 – 2027 IST v2 under Article 4.10.2.c, therefore, it needs to be removed throughout.

### **International Testing Agency**

SUBMITTED

International Testing Agency, - (Switzerland)

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

#### **General Comments**

Article 4.10.12.1 e).

Same comment regarding email receipt as explained under 4.10.6.2f)

Article 4.10.12.5

This creates a new positive obligation for ADO to create a set of rules for TP non-compliance. Article a) also requires ADO to regulate Team Activities. This will require ADO to put in place a results management process since consequences cannot be imposed without due process. This seems to create burdensome obligations, especially for those ADO who focus mainly on RTP athletes. We would suggest to make this optional and replace "shall" by "may".

Article 4.10.12.8

As explained under Article 4.10.4.2., the reference to "meeting the criteria for inclusion in its TP" suggests that such criteria will be made available to the athlete and we would not believe this is wise. We would suggest to change to "they are no longer required".

### **Article 4.10.13 (2)**

## UK Anti-Doping

SUBMITTED

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

### General Comments

4.10.13.7 - UKAD wishes to seek clarification on how photographs submitted by Athletes will be checked and verified e.g. quality of the photo and its accuracy. If this is the responsibility of the ADO this would be burdensome. UKAD proposes that the system would need to perform the quality and verification checks of the submitted Athlete's photograph, to remove the potential administrative burden placed upon ADOs.

## International Testing Agency

SUBMITTED

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

### General Comments

As previously submitted, we believe it remains important for the Standard to explicitly allow the establishment of other, lower-tier types of pools (as per current art. 4.10.14.1). We strongly recommend that this principle be reinstated either in a provision or at least in a comment to art. 4.10.13.

As the Standard currently stands – based on the definition of Whereabouts Pools and the provisions in Article 4.10 – while an ADO may conduct out-of-competition testing on non-pool athletes, only two types of pools can be established, an RTP or a TP. This effectively excludes the possibility of any other pool types and, consequently, prevents ADOs from collecting any form of even basic whereabouts information from athletes outside these two categories.

This would represent a step back for a number ADOs that currently maintain lower-tier pools – such as eligibility pools or other basic pools – where only minimal whereabouts information is collected.

## Article 4.10.14 (2)

## Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

### General Comments

#### 4.10.14.4

This article implies that athletes must be in a Whereabouts pool to be tested ("adding more Athletes (...) to ensure a greater level of Testing is conducted across a wider range of Athletes"). This implication ignores somewhat article 4.10.13 and in particular the fact, that athletes do not necessarily be in a WA pool to be tested. Especially the heavily reduced requirements for the RTP and the TP will as well reduce the benefit of enrolling athletes in a Whereabouts pool.

## International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

### General Comments

#### Article 4.10.14.3.

It would be useful to define the term "whereabouts custodian", along with the results management authority definition of article 7.1.6 of the Code.

## Article 4.10.16 (3)

## International Paralympic Committee

SUBMITTED

Jude Ellis, Head of Anti-Doping (Germany)

Sport - IPC

### General Comments

#### 4.10.16.2

IPC supports the addition of national federations assistance in providing information linked to whereabouts.

## Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

### General Comments

#### **4.10.16.1 Notwithstanding any other provision of Article 4.10:**

**b) An International Federation may delegate some or all of its whereabouts responsibilities under Article 4.10 ....**

**f) At all times the ADO (whether the International Federation, NADO or other ADO with authority over the Athlete in question) that delegates its responsibilities ....**

- In the definition of "NADO Operational Independence" in the Code says, "(3) a National Anti-Doping Organization shall neither delegate any Doping Control responsibility to a sport organization or government entity nor permit a sport organization nor government entity to conduct any Doping Control responsibility;" By reading this part, IST 4.10.16 b and f should be re-worded not using the word "delegate".

## USADA

SUBMITTED

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

NADO - NADO

### General Comments

N/A

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

#### Article 4.10.17.1.b

Recommended Change: Changes in bold.

“Share information on *Athlete* whereabouts requirements via **ADAMS or other approved system**”

#### Reasons for suggested changes

Article 4.10.17.1.b:

Reason: See previous comments on requirements to only file whereabouts in ADAMS.

## Article 5 (5)

### ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

#### General Comments

ICSD supports the athlete notification requirements in Article 5 and welcomes the emphasis on protecting athlete rights. However, we strongly recommend that WADA explicitly reference the need to provide **communication accessibility** for athletes who are **Deaf or Hard of Hearing**. For Deaf/Hard of Hearing athletes, accessible notification is critical to ensure that they fully understand they are being tested, their rights and responsibilities, and how to properly comply with the Doping Control process

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

or athletes who are Deaf, or Hard of Hearing **communication accessibility** must be provided during the notification process. This may include sign language interpreter, visual or written supports, or plain language explanation to ensure full understanding of the notification and rights.

#### Reasons for suggested changes

Without appropriate communication accessibility, Deaf/Hard of Hearing athletes may not fully understand that they are being selected for testing or their rights during the process. This creates a risk of procedural errors and unfair outcomes. Explicitly referencing **communication accessibility for Deaf/Hard of Hearing athletes** will help ensure that Sample Collection Personnel are properly prepared to support Deaf athletes and uphold fairness during testing

### Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

#### General Comments

5.3.1. There is a concern that announced tests will not be recorded correctly in ADAMS if the definition of “No Advance Notice Testing” is not clear enough and too vague. Is a test rated as an announced test, if we have to ring the door bell because the athlete is not informed face to face in the first stage? If the athlete opens the door 30 seconds later, is this still an announced test? It would be useful if, instead of merely indicating “advance notice”, the DCF in ADAMS specified whether there was any third-party contact prior to the athlete being notified. Furthermore, the DCF could also indicate whether a phone call was made to the athlete.”.



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

General Comments

5.4.2 (c) - UKAD proposes that it is amended to ‘Sample Collection Personnel’ so that Chaperones can be included/used for verifying an Athletes identification since they are the primary SCP that undertakes the Notification process.

UKAD seeks clarification on any warning to the Athlete for failure to provide suitable ID and how this is recorded (noting that the TA could review to determine if it is appropriate to follow up as a potential FTC).

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

UKAD proposes the following changes to 5.4.2 (c):

Confirm the Athlete’s identity as per the criteria established in Article 5.3.7. Confirmation of the Athlete’s identity by any other method, or failure to confirm the identity of the Athlete, shall be documented and reported to the TA. In cases where the Athlete’s identity cannot be confirmed as per the criteria established in Article 5.3.7, the DCO SCP shall continue with the Sample collection and document this on the Doping Control or supplementary report form. The TA shall decide whether it is appropriate to follow up in accordance with Annex A - Review of a Possible Failure to Comply of the International Standard for Results Management.

**Reasons for suggested changes**

5.4.2 (c) - Ensures all SCP can conduct the identification requirement given this is one of the key roles of a Chaperone.

Dario Campara, Lawyer (Austria)  
NADO - NADO

General Comments

Article 5.3: Requirements Prior to Notification of Athletes

5.3.1

**Wording in the IST:**

*“5.3.1: No Advance Notice Testing shall be the method for Sample collection save in exceptional and justifiable circumstances. The Athlete shall be the first Person notified that they have been selected for Sample collection, except where prior contact with a third party is required as specified in Article 5.3.10. In order to ensure that Testing is conducted on a No Advance Notice Testing basis, the TA (and the SCA, if different) shall ensure that Athlete selection decisions are only disclosed in advance of Testing to those who strictly need to know in order for such Testing to be conducted. Any notification to a third party shall be conducted in a secure and confidential manner so that there is no risk that the Athlete will receive any advance notice of their selection for Sample collection. [...]”*

**Comment NADA Austria:**

In article IST 3.6 (“Defined Terms from the International Standard for Testing”), “No Advance Notice Testing” is defined as follows: *“Sample collection that takes place with no advance warning to the Athlete and where the Athlete*

is continuously chaperoned from the moment of notification through Sample provision.”

However, this definition is too vague. In ADAMS, it is mandatory to specify whether a test was with or without advance notice, but what exactly constitutes “advance notice”?

For example, if the DCO rings the athlete's doorbell, and the mother answers, telling him the athlete is in his room and will come down in a minute, is this considered advance notice because the athlete was “warned” by his mother? If the athlete claims he didn’t hear the doorbell and only opens the door after the DCO calls him within his 60-minute timeslot, is this considered advance notice because he could have been “warned” by the doorbell? Is “advance notice” related to a specific time range, or does it depend on the measures taken to locate the athlete?

If the DCO calls the athlete during his 60-minute timeslot or outside due to exceptional circumstances, and he tells him he didn’t hear the doorbell but opens the door 30 seconds later, is this advance notice because the athlete was “warned” by the phone call?

Additionally, if prior contact with a third party occurs, is that automatically considered “advance notice”?

It would be more useful if, instead of simply “advance notice”, the DCF in ADAMS specified whether there was third-party contact before the athlete was notified, including the time range and whether the DCO believes the athlete could have been informed by that third party. Moreover, it should be indicated in the ADAMS DCF if a phone call was made to the athlete."

**Additionally, we also want to refer to the comment of the Council of Europe:**

*“5.3.1. There is a concern that announced tests will not be recorded correctly in ADAMS if the definition of “No Advance Notice Testing” is not clear enough and too vague. Is a test rated as an announced test, if we have to ring the door bell because the athlete is not informed face to face in the first stage? If the athlete opens the door 30 seconds later, is this still an announced test? It would be useful if, instead of merely indicating “advance notice”, the DCF in ADAMS specified whether there was any third-party contact prior to the athlete being notified. Furthermore, the DCF could also indicate whether a phone call was made to the athlete.”*

**International Testing Agency**

SUBMITTED

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

**General Comments**

Article 5.4.3

It should be clarified that if the Athlete refuses to sign the notification form or evades before or during the notification process, the failure to inform the athlete of the Consequences of a Failure to Comply (since the Athlete ran away) or to obtain a signed copy of the notification form are not material to the finding of a 2.3 or 2.5 ADRV.

**Article 5.2 (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**

5.2. a) There needs to be clarification on which gender is the gender that is chosen. Is it the "sport gender" or the gender the athlete chose. This makes a difference in the planning control staff. As well practice has shown that there needs to be a clearer guideline for DCO on how to handle gender diverse athletes. For example a former male athlete starts as female athlete but no operation on the sex has taken place. It might be very uncomfortable

for a female DCO to test the athlete. Is there a possibility for the DCO to step out and end the control process in such cases?

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

### General Comments

Comment to 5.2 (a) - UKAD welcomes the initial guidance provided for 'open' or mixed gender sport categories, however, is of the same view that further consultation is required before introducing the concept of choice. UKAD have listed below areas which would need clarification/consultation:

- Clarification would be needed with regards to OOC testing for athletes who compete in 'open' or mixed gender sport categories. For example, does the athlete still get to choose their preferred gender and therefore would the SCA be required to send a male and female SCP to the SCS? UKAD are concerned that this could have practical and resource implications for SCAs.
- If an SCA did not send a male and female gender and sent the 'assumed' gender SCP, but the athlete chooses to have an alternative gender DCP, do they have reasonable grounds to refuse. UKAD are concerned this could allow for potential manipulation by a doping athlete.
- Clarification would be required on if an Athlete can change their decision on preferred gender during a test e.g. in the event of partial or additional samples. UKAD proposes that the gender SCP cannot be changed between partial and additional samples.
- Clarification would be required on if an Athlete can change their decision on preferred gender from test to test e.g. if gender fluid, is the decision based on the Athlete preference on the date the testing is taking place and irrespective of their preferred gender on the previous test.
- Clarification is required on if the concept of choice is allowed for all athletes who compete in 'open' or mixed gender sport categories or only for athletes who declare themselves as 'Other' i.e. only for gender diverse and transgender athletes. UKAD is concerned that this may not be fair to limit the concept of choice to transgender and gender diverse athletes and so this would need to be considered.

Above comment also links directly to Appendix C.1 (f) (ii) and also C.4.5.1

### Suggested changes to the wording of the Article

Comment to 5.2 (a) - UKAD has no proposed wording but is happy to engage with WADA to discuss further. UKAD would propose for consideration:

- Athletes cannot change their preferred gender during a test e.g. between partial or additional samples.
- To manage the practical implications for SCAs and potential for manipulation at a test, particularly, OOC, Athlete's should declare / submit their preferred gender to the ADO in advance/proactively. TAs should work with those applicable sports to ascertain the preferred gender for those Athletes. Whilst SCA's should still consider sending both genders, when testing IC or at multi-athlete tests in mixed and open category sports, if the preferred gender is known, it would be acceptable to send that gender of SCP to subsequent tests.
- It would be acceptable for a test to proceed if the gender of the SCP is of the same gender of the Athlete's previous test/declaration made regarding the preferred gender.

### Reasons for suggested changes

Comment to 5.2 (a) - To ensure the concept of introducing choice considers the practical implications for SCAs and Athletes.

## NADA India

SUBMITTED

NADA India, NADO (India)

NADO - NADO

### General Comments

Agreed

## Sport Integrity Australia

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)

NADO - NADO

### General Comments

Article 5.2: SIA seeks clarification as to what should occur in the instance where an Athlete in an Open or Mixed event refuses to be witnessed [ds](#) by the sex of the SCP offered. SIA suggests that the Drafting Team should consider making it mandatory to have both male and female SCP present for all Open or Mixed events.

### Suggested changes to the wording of the Article

Article 5.2: SIA asks for WADA to include commentary as to Article 5.2, either within the IST or otherwise, and particularly on the expected actions an ADO should take if an Athlete in an Open or Mixed event, who is selected for testing, refuses to be witnessed by the sex of staff available (e.g. advance notice test, FTC etc). Alternatively, SIA asks for WADA to mandate that both male and female SCP are present for all Open or Mixed events.

Given this, SIA also proposes a change to the comment to Article 5.2(a) as follows:

“When an SCA plans to test at an Event that includes ‘open’ or mixed gender sport categories and where the sport gender the Athlete competes in is not specified under the applicable sports rules, the SCA ~~where possible~~ shall appoint at a minimum a male and female SCP to the SCS”

### Reasons for suggested changes

SIA considers that the absence of any commentary or guidance as to Article 5.2 and the expectations of an ADO should an Athlete in an Open or Mixed event, who is selected for testing, refuses to be witnessed [ds](#) by the sex of the staff available. If WADA were to mandate that both male and female SCP are present for all Open or Mixed events, it is possible that such situations could be avoided.

## NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

### General Comments

Comment to Art. 5.2 a), Art. 7.4.5, Annex C1 f and Annex C4.5:

There needs to be clarification especially on the case where no gender is specified. Looking at cost it is not possible to always send a male and a female - just if it is clearly a mixed competition.

As well practice has shown that there needs to be a clearer guideline for DCOs on how to handle gender diverse athletes. For example a former male athlete starts as female athlete but no operation on the sex has taken place. It can be very uncomfortable for a female DCO to test the athlete that is now starting as female but has not changed.

We ask for the possibility to change the gender in such situations if all agree. Otherwise there is the concern that DCOs might end the process at this stage.

## Canadian Centre for Ethics in Sport

SUBMITTED

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

### General Comments

#### Article 5.2.d

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

## Article 5.3.2 (13)

## International Tennis Integrity Agency

SUBMITTED

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

### General Comments

Firstly, the ITIA dispute that in most cases, a phone call placed 5 minutes before the end of the athlete's designated 60 minute time slot provides the athlete with sufficient notice that may impact the integrity of the sample subsequently collected.

Secondly, the phone call provides an extremely effective method of locating athletes and collecting a sample, preventing a 'Unavailable attempt' and all the associated costs of such. This is even more so in circumstances where the athlete's doorbell is not functional or they are out of earshot, but within their nominated location.

In all cases where a phone call is made to locate an athlete in an out-of-competition test, the timings of such calls and the locating and notification of the athlete are all recorded on the Doping Control Form.

Furthermore, the ITIA are concerned that if tests in which phone calls are placed within the last 5-minutes, and the athlete located shortly after are to be categorised as 'advance notice', WADA may enforce minimum numbers for 'no advance notice' tests, which will significantly increase the resources required to remain compliant.

We would repeat the submission we have made regarding Article 4.10.7.1 h below:

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

ADOs wish to collect samples from athletes and therefore if there is another way reaching the player 5 minutes before the end of the hour it should be utilised. Tennis players often believe unknown numbers calling them are spam or unwanted callers so they do not answer. Using all the numbers an athlete files would improve the chances of reaching them to facilitate a test being collected from them.

Additionally, the ITIA question the need to record a Test in ADAMS as advance notice if the sample was collected after the phone call in circumstances where the athlete was located and notified immediately/shortly after the

phone call was placed. It is no different to an athlete waiting until for example 45 minutes to answer their home address door having heard the DCO knock/ring the bell. Are these recorded as advance notice?

It may be how this clause is drafted but as it stands it is unclear as to whether a phone call made 5 minutes before the end of the 60 minute whereabouts time slot, or the phone call is made 5 minutes before the end of any other testing window, or the phone call that is made in exceptional circumstances (ie outside the normal 5 minutes before the end of the 60-minute timeslot) constitutes advance notice or if it is all of these scenarios.

That being said, it cannot surely be the intention to apply this to a 5 minute phone call before the end of the hour? Unless there is clear evidence that a test can be compromised 5 minutes before a test then this surely cannot be advance notice. This will have a significant impact on ADOs delivering no notice testing which in turn places them in jeopardy from a Code compliance perspective.

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

### General Comments

UKAD does not currently permit phone calls by the DCO to RTP Athletes. UKAD understands that this Article and Article 4.10.7 is to support ADOs in the successful collection of Samples from RTP Athletes.

UKAD supports that if phone calls are to be permitted, it should be restricted to exceptional circumstances, however, has concerns about the prescriptive nature of the Article and would propose an amendment to this Article to allow for other exceptional circumstances and that the reasoning for the phone call is documented.

### Suggested changes to the wording of the Article

UKAD proposes the following change to 5.3.2:

The use of a phone to contact an Athlete outside of its permitted use (in the last five (5) minutes of the Athlete's 60-minute time slot for those in a RTP in accordance with Article 4.10.7.1.I) shall only be used in exceptional circumstances ~~as outlined below~~, and where the DCO has been instructed by the TA to do so. In such cases the Sample collection shall be recorded in ADAMS as advance notice along with the exceptional circumstances that existed for the telephone call to be made to the Athlete.

Examples of exceptional circumstances include: .....

### Reasons for suggested changes

To reduce the prescriptiveness of this Article and allow for other reasonable exceptional circumstances.

## NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

### General Comments

5.3.2 a)

### Wording in the IST:

**“Comment to Article 5.3.2 a):** *The use of a telephone to call an Athlete in a Whereabouts Pool due to the provision of inaccurate or incomplete whereabouts contained in an Athlete’s Whereabouts Filing which results in the DCO ~~not~~ being unable to locate the Athlete for a Test is not considered an exceptional circumstance. In such situations, the whereabouts custodian may consider the applicable consequences against the Athlete.”*

**Comment NADA Austria:**

The “not” is incorrect and changes the meaning of the sentence.

**Anti-Doping Sweden**

SUBMITTED

Jenny Schulze, Testing and Science Manager (Sweden)

NADO - NADO

**General Comments**

**5.3.2 Phone calls to athletes outside the current permitted use**

Almost 50 % of ADSE’s RTP (and TP) athletes live in buildings that are not accessible unless you use the intercom, which more and more often goes directly to the athlete’s cell phone. Therefore we do NOT consider this an exceptional circumstance. And the trend is that this will be the case for 100 % of apartment buildings in a few years. We strongly recommend to include an instruction how to deal with these situations in the IST. We have instructed our DCOs to call the athlete directly on their cell phone instead of using the intercom and to keep the athletes on the phone until they have notified them in person. It usually only takes a couple of minutes until they can be notified in person, and we consider this a “no advance notice”.

This goes both for attempts in and outside the 60-minute slot. Any deviation from what is expected in such cases (i.e. that the athlete hangs up on the DCO, that it takes more than a couple of minutes to notify the athlete in person etc) shall be noted in the DCO report, and possibly also as an advanced notice control.

**Reasons for suggested changes**

The "advanced notice" in these cases is only a matter of a few minutes.

It will cause frustration among the DCOs when they know the athlete is inside the building, but they will have to wait outside until 5 minutes remain of the slot time for reasons that is very hard to explain to the DCOs.

In addition, testing outside the slot time will be more or less impossible in these types of buildings if you are not allowed to call the athlete.

**CHINADA**

SUBMITTED

MUQING LIU, Coordinator of Legal Affair Department (CHINA)

NADO - NADO

**General Comments**

**Article 5.3.2**

According to Article 5.3.2 of the IST, the use of a phone to contact an Athlete outside of its permitted use is limited to five exceptional circumstances, which is too narrow. Therefore, we recommend that the following circumstances be added:

1)When a Doping Control Officer (DCO) or Testing Authority (TA) has sufficient reason, based on Anti-Doping Intelligence or other relevant information, to suspect that an Athlete is intentionally evading Sample Collection, the DCO is permitted to use a phone to contact the Athlete outside of the Athlete's 60-minute time slot. Such phone contact would allow the DCO to establish communication with the Athlete and confirm their location. If an Athlete intentionally evades Testing, such as hiding in a concealed location upon the arrival of the DCO and failing to present themselves, it may be impossible for the DCO to locate them. If the DCO is not permitted to make a phone call to locate the Athlete, the Athlete may later provide misleading or false information in their explanations, making it difficult for the Results Management Authority to determine the Athlete's actual location at the time of the attempted test. Furthermore, if the DCO is unable to contact the Athlete by phone, the Athlete could falsely claim that they remained at the declared location during the entire time period, while asserting that the DCO never arrived or failed to make a reasonable attempt to locate them.

2)Where a DCO or TA has sufficient reason, based on Anti-Doping Intelligence or other relevant information, to suspect that an Athlete has provided false Whereabouts information, the DCO is permitted to use a phone to contact the Athlete outside of the Athlete's 60-minute time slot. If the Athlete has deliberately filed false Whereabouts information, the DCO will be unable to contact the Athlete by phone or confirm their location, making it difficult to establish the Athlete's actual location on the day of the attempted test.

### Canadian Centre for Ethics in Sport

SUBMITTED

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

#### General Comments

#### Article 5.3.2

The CCES would request this article considers athletes who are not included in a whereabouts pool and includes the additional flexibility to contact an athlete by phone when the athlete lives in a gated community or building with restricted access.

### NADA

SUBMITTED

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



## General Comments

### Comment to Art. 5.3.1

There needs to be a clearer definition on what exactly an advanced notice includes. Is ringing the doorbell already rated as an advanced notice test? What if the mother of the athlete and not the athlete opens the door but the athlete is at home but just did not open the door? Is this rated as advanced notice test? Or does this article only refer to phone calls, problems with gated communities e.g.?

To make sure the documentation in ADAMS is harmonised worldwide we suggest to define advanced notice testing more in detail and as well explain the reason for ADOs why it is necessary to document those situations as advanced notice test.

We are as well concerned that this will raise the administrative work for DCOs and ADOs.

As well there is the question if advanced notice tests do have any consequences? We are concerned that to avoid advanced notice testing we fear that testing will most of the time take place within the 60 minutes time slot and outside the hour testing will be avoided.

## Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

## General Comments

The diverging provisions in article 4.10.7.1 and this article regarding making phone calls will most likely not be understood by the athletes. Namely, if one day the ADO does phone the athlete and then does not the other day (depending on the timing of the attempt), in our experience this will lead to numerous negative feedback (which we already observe nowadays given the different handling internationally). Such discrepancies in practice should be avoided at any cost as it negatively affects the perception of our work among the athlete population.

Comment to 5.3.2 a): There is a double negation in the comment to this article, namely "the DCO not being unable to locate the Athlete for a Test". Also, the comment that "in such situations, the whereabouts custodian may consider the applicable consequences against the Athlete" is not adequate given that there are no longer any requirements regarding the Whereabouts outside of the 60-minute time slot that could lead to a filing failure due to a Unsuccessful Attempt.

## Sport Integrity Australia

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)

NADO - NADO

## General Comments

Comment to Article 5.3.2(a)-(c): SIA recognises the change implemented by way of the insertion of the comment to Article (a)-(c), in that, not all venues need to be visited before making a phone call (where circumstances make it logistically not possible to visit all locations). SIA suspects instances may arise where Athletes use video doorbells to not answer the door at their residence or Athletes answer their video doorbell on their phone whilst in another country (thus becoming aware SIA is attempting a test on them). SIA encourages WADA to consider providing guidance, either in the IST or otherwise, in relation to video doorbell use by Athletes and particularly as to what processes should be followed if the door is answered remotely

by an Athlete who is not at that location. SIA proposes that a mandatory ‘knock first’ approach could be incorporated as part of attempting to notify an Athlete at their residence instead of the use of a doorbell.

## Finnish Center for Integrity in Sports FINCIS

SUBMITTED

Marjorit Elorinne, Quality Manager (Suomi)

NADO - NADO

### General Comments

We would appreciate reconsideration or clarification of the limitations imposed on the use of phone contact.

As an Anti-Doping Organization conducting a number of OOC tests also for those athletes under our jurisdiction who are **not in any whereabouts pool**—we frequently encounter situations where the Doping Control Officer (DCO) arrives at an athlete’s home and a third party (e.g., a family member) is present. In such cases it is very likely that the athlete will become aware of the test attempt anyway.

Under these circumstances—and particularly when dealing with athletes not subject to whereabouts filing (or even RTP/TP athletes outside their 60-minute time slot) we believe it is **more effective and practical to permit phone contact**, to facilitate timely sample collection and preserve the integrity of the testing process.

Prohibiting such contact can result in missed opportunities to conduct the test altogether, despite the athlete's availability shortly thereafter. Therefore, we recommend that the IST include **a more flexible, risk-based approach** to phone contact in OOC testing, particularly when the athlete's awareness of the test attempt is evident and the opportunity to complete testing remains viable.

## USADA

SUBMITTED

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

NADO - NADO

### General Comments

#### Article 5.3.2

For Comment: USADA strongly objects to the changes in these provisions by leaving out restricted access locations. Leaving out restricted access locations serves no anti-doping purpose but disadvantages ADOs in making it more difficult to collect samples and disadvantages athletes by unnecessarily causing more whereabouts failures.

USADA specifically requests in the strongest terms that restricted access to an Athlete's location be added to the list of exceptional circumstances where a phone call is permitted (e.g., dorms, gated communities, hotels). Restricted access communities are very common in the United States for safety and security, and they present situations where there is no undue delay between initial contact and notification. Additionally, ring doorbells or buzzer intercoms are essentially the same as restricted access because they provide the athlete prior notification via the athlete's phone of who is at the door in the same way as a phone call but WADA does not address these scenarios so these remain permissible. And if these remain permissible, then the same rationale applies to restricted access communities.

Restricted communities must be included within the list of exceptions for many reasons:

(1) Athlete safety and security must always be the top priority, and athletes often live in restricted communities for their safety and security (e.g., avoiding stalkers) or by default if living in a university dormitory for example.

(2) USADA is unaware of any instances in which an athlete was able to avoid detection in the brief time it takes a DCO to go from a gate (restricted access) to a door (almost always under five minutes). Intelligence on the matter, as confirmed through the recent case involving Blessing Okabare, is that athletes will simply not answer the door or phone if they believe they will test positive. The science also supports a phone call for restricted communities where there is no undue delay between the call and notification because if an athlete were able to void a sample in the moments before notification and then provide a second sample for analysis, this

second sample will very likely contain all the prohibited substances as in the first voided urine. The miniscule risk of not detecting a prohibited substance based on something an athlete could do in the five minutes or less between the call and notification is resoundingly outweighed by the burden and harm this would place on ADOs by reducing the number of samples able to be collected and on Athletes by requiring them to input locations not at their home each day for their 60-minute timeslot and ultimately lead to completely unnecessary whereabouts failures and ADRVs. The anti-doping system should be focused on obtaining samples effectively and efficiently, not racking up whereabouts failures unnecessarily against athletes.

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

##### Article 5.3.1

Recommended Change: Changes in bold.

“No Advance Notice Testing shall be the method for *Sample* collection **save except** in exceptional and justifiable circumstances”

#### Reasons for suggested changes

##### Article 5.3.1

Reason: More accepted word choice.

#### International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

#### General Comments

With regard to the principle of No Advance Notice, we recommend providing further clarity on what situations should be documented as having involved advance notice during sample collection. While it has been clearly stated that a phone call to the athlete constitutes advance notice and should be recorded as such, it is equally important to clarify whether this also applies to other increasingly common methods of access - such as intercom systems, entry buzzers, or smart doorbells. This would allow for an harmonized enforcement across all ADOs.

In practice, the difference between placing a phone call and using a buzzer or intercom may be negligible. In both cases, the athlete may become aware of an impending OOC test before the DCO physically reaches them, and the timeframes involved can be quite similar in many cases. As the number of athletes living in buildings with such controlled access continues to grow, it may be deemed inconsistent to treat only phone calls as a form of advance notice.

Additionally, if it is concluded that there is little practical difference between a phone call and other digital notification systems (e.g. smart doorbells that send alerts to phones), it may be worth reconsidering the current restriction on phone calls. Specifically, it may be more effective to allow a phone call as a last resort during out-of-slot testing – after multiple unsuccessful attempts to make contact – just as is currently permitted during the athlete's declared time slot.

This is particularly relevant given that athletes are no longer required to submit training or competition schedules as part of their whereabouts information. In this context, continuing to single out the phone call as the one form of advance notice that is prohibited may seem unnecessarily restrictive and ultimately counterproductive.

#### Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

### General Comments

The AIU agrees to the addition of a list of exceptional circumstances to no notice testing that are deemed to be acceptable but notes that the list is exhaustive. The list should therefore also include where an ADO exceptionally conducts a large-scale screening strategy with advance notice for ABP purposes (if need be, with WADA's knowledge and consent).

## Article 5.3.6 (3)

### SA Institute for Drug-Free Sport

SUBMITTED

khalid galant, CEO (South Africa)

NADO - NADO

### General Comments

An SCP card with the SCA should be sufficient

### Suggested changes to the wording of the Article

and complementary government issued identity document (or an official

electronic government issued identity document contained on their personal device) that includes their name and photograph (i.e., driver's license, health card, passport or similar valid identification) and the expiry date" **should be removed from article 5.3.6**

### Reasons for suggested changes

What happens if an SCP does not have the additional cards. Does it invalidate a test? Why is it necessary to have an additional complementary card when a NADO issues a card?

### Anti-Doping Sweden

SUBMITTED

Jenny Schulze, Testing and Science Manager (Sweden)

NADO - NADO

### General Comments

#### 5.3.6 Identification requirements for DCOs

ADSE is supportive of the suggestion that the SCP must identify themselves. However, we do NOT support that it has to be with a government issued identity document, where (at least in Sweden) the personal identification number is included, which leaves the door open for the athlete to retrieve all information about the DCO (address, income, if they have children, which car they are driving, where they work etc).

It should be enough that the athlete can verify that the DCO has a valid accreditation from the SCA.

ADSE suggests an optional solution with a QR code on the SCA accreditation. When the athlete scans the code, they will be directed to the website of the SCA where it is verified that the SCP has a valid accreditation with name, picture and expiry date.

### Reasons for suggested changes

The SCP may find themselves in very uncomfortable and threatening situations where they are even scared that the athlete may record their license plate numbers, where they absolutely do not want to show their personal

identification numbers to the athlete.

## USADA

SUBMITTED

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

NADO - NADO

### General Comments

N/A

### Suggested changes to the wording of the Article

Recommended Change: Changes in bold. “**SCP, excluding volunteer notifying chaperones**, shall carry an accreditation card/badge (may be an electronic document on their personal device) from the **SCA** which contains their name, role and an expiry date and complementary government issued identity document (or an official electronic government issued identity document contained on their personal device) that includes their name and photograph (i.e., driver’s license, health card, passport or similar valid identification) and the expiry date.”

### Reasons for suggested changes

Reason: USADA supports this amendment to enhance transparency and protect athlete safety. However, USADA recommends that a less stringent rule apply to volunteer chaperones who are unknown to the ADO (and often the sport organization) until shortly before (meaning the same day) the event/sample collections. Therefore, it is not practical to issue them credentials that include both their name, role, and expiration date. To reduce the impractical administrative burden on Local Organizing Committees and ADOs to certify and produce credentials for every volunteer chaperone, USADA suggests that presenting a government-issued ID along with ADO credentials indicating their role in the anti

## Article 5.3.7 (6)

## UEFA

SUBMITTED

Rebecca Lee, Anti-Doping Team Leader (Switzerland)

Sport - Other

### General Comments

It is not always necessary to ask for a photo ID of an athlete.

### Suggested changes to the wording of the Article

'5.3.7 **If the Athlete is not readily identifiable**, the TA or otherwise the SCA shall require the Athlete selected to provide a Sample to provide a government issued identity document.....'

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

### General Comments

5.3.7.1 - Resubmitted comment - UKAD proposes that guidance is provided in the event that the third party is unable to provide a government issued photo identity document.

UKAD is also of the view that clear parameters are set as to who may be able to undertake the third-party identification for the athlete e.g. limited to an ASP or as a minimum a person that is known to the Athlete.

Finally, UKAD proposes that it is amended to 'Sample Collection Personnel' so that Chaperones can be included/used for verifying an Athlete's identification since they are the primary SCP that undertakes the Notification process.

'Comment to 5.3.7.1' - Resubmitted comment - UKAD proposes that an additional option is provided for identifying Athletes in an In-Competition setting, particularly when considering team sports.

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

5.3.7.1 - UKAD proposes the following changes:

If the Athlete is not readily identifiable during an IC or OOC Test based on the above requirements, then if the Athlete is in a Whereabouts Pool, the SCP shall where applicable check the Athlete's photograph within ADAMS. Failing this the SCP shall attempt to locate a third party who can confirm the identity of the Athlete. If a third party is available to identify the Athlete, they too will be required to provide a government issued photo identity document to validate their identity. The third party can only be someone who is known to the Athlete e.g. XXXXX OR The third party can only be someone who is considered an ASP. The details of the third party's role and type of government issued photo identity shall be documented by the SCP. If a third party is unable to provide a government issued photo identity document, the SCP should still proceed with the identification of the Athlete using the role and name of the third party and taking a photo of that individual. OR If a third party is unable to provide a government issued photo identity document, the SCP must seek alternative methods to verify the Athletes identity e.g. conduct an online search of the Athlete and take an accompanying photo. The Sample Collection Personnel shall record the details of the online website/address used to identify the Athlete.

'Comment to 5.3.7.1' - UKAD proposes the addition of a comment to 5.3.7.1;

If Testing is conducted In-Competition and an official team sheet or start list is provided with an associated team or race number, and the alternative options listed in 5.3.7.1. are not available, the SCP may use the official team or race number to confirm the Athlete's identity.

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

5.3.7.1 - Ensure clarity on who is an accepted third party and process should they not have government issued photo ID. Ensure all SCP can conduct the identification requirement given this is one of the key roles of a Chaperone.

'Comment to 5.3.7.1' - To capture alternative identification options for In-Competition settings.

#### **NADA India**

SUBMITTED

NADA India, NADO (India)

NADO - NADO

#### **General Comments**

Agreed

## Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

### General Comments

**5.3.7.1 If the Athlete is not readily identifiable during an IC or OOC Test based on the above requirements, then if the Athlete is in a Whereabouts Pool, the DCO shall where applicable check the Athlete's photograph within ADAMS....**

- In the Summary of Major Changes of 4.10.6.2 d) Clarification to stakeholder's feedback says that "The proposed requirement for an Athlete in a Whereabouts Pool to submit a passport style photo as part of their whereabouts filing to support Athlete identification during Testing has been discussed with WADA's Head of Privacy and Data Protection, and rather than the photo appearing on the Athlete's ADAMS profile page, it is proposed that this photo strictly appear within the whereabouts filing section to which limited persons will have access."

If this is the case, this photo can't be used/accessed for IC due to the current ADAMS functionality!? So you might need to consider to change the ADAMS functionality or re-consider the location to post the athlete's photo in ADAMS or might need to remove IC from 5.3.7.1.

## USADA

SUBMITTED

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

NADO - NADO

### General Comments

For Comment: USADA advocates for athletes to be able to use Athlete Connect for providing a photograph, therefore, again stress the importance of the further development of an API to guarantee that these photographs are accessible through ADAMS if required.

## Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

### General Comments

#### Article 5.3.7.1

Regarding, "the DCO shall where applicable check the Athlete's photograph within their ADAMS," the CCES would request clarification on what would be considered "where applicable."

## Article 5.4.1 (2)

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

### General Comments

5.4.1 (d) (i) - UKAD supports that Athletes need to understand their Rights and Responsibilities and what is required during the SCS.

UKAD seeks clarification on what interpretation systems and/or tools should be made available to assist Athletes and are concerned about the practical implementation. Additionally, interpretation systems and/or tools may require connectivity which is not always available at missions. This is because of the range of potential languages that may require capturing, and when NADOs/SCAs are testing at events, they have no control as to what interpretation services are provided. Therefore UKAD thinks it should be the responsibility of the Testing Authority/Event Organiser and not the SCA.

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

5.4.1 (d) (i) - UKAD proposes that guidance is provided on what interpretation systems and/or tools are built into paperless systems. UKAD also proposes that consideration is given to accessibility of interpretation systems and/or tools.

Comment to Article 5.4.1 d) i): Where it is known that Athletes subject to Testing may not speak the language of the SCP conducting the SCS, in the event an interpreter is unavailable, the TA/Event Organiser is responsible, where available and accessible, to have interpretation systems and/or tools in place e.g. translation apps, online translation websites, to assist Athletes understand their rights and responsibilities, and the required procedures during the SCS. When testing Athletes with a vision impairment, such interpretation systems and/or tools will require it to be accessible for those Athletes e.g. voice activation, brail. The SCP should record the details of the interpretation and/or tools used during the SCS.

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

5.4.1 (d) (i) - Concerns with the practical application of this Article and clarification on what would be deemed acceptable. Ensuring it considers accessibility for SCP and for athletes with a vision impairment.

#### **NADA India**

SUBMITTED

NADA India, NADO (India)  
NADO - NADO

#### **General Comments**

Agreed

### **Article 5.4.4 (8)**

#### **Agence française de lutte contre le dopage**

SUBMITTED

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

#### **General Comments**

position of WADA onthe shower is clear

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

put it in the text and not in the comments



<b>NADA India</b> NADA India, NADO (India) NADO - NADO	SUBMITTED
<b>General Comments</b>  Agreed	
<b>Sport Ireland</b> Áine Hollywood, Science Officer (Ireland) NADO - NADO	SUBMITTED
<b>General Comments</b>  Sport Ireland welcomes the clarification with regards to ice baths.	
<b>Sport Integrity Commission Te Kahu Raunui</b> Toby Cunliffe-Steel, Athlete Commission Chairperson (New Zealand) NADO - NADO	SUBMITTED
<b>General Comments</b>  We, the Athlete Commission to New Zealand's NADO, support our NADO's submission on Article 5.4.4 Permitted activities for delayed reporting to or temporary departure from the DCS	
<b>Sport Integrity Commission Te Kahu Raunui</b> Jono McGlashan, GM Athlete Services (New Zealand) NADO - NADO	SUBMITTED
<b>General Comments</b>  We oppose allowing ice baths prior to sample provision. As with showers, ice baths present a practical risk that athletes could urinate, which compromises sample integrity. We recommend that any warm-down practice that includes immersion in water is prohibited prior to sample collection.  <i>We have consulted with the Commission's Athletes Commission who are supportive of this submission.</i>	
<b>Sport Integrity Australia</b> Cameron Boland, Assistant Director Anti-Doping Policy (Australia) NADO - NADO	SUBMITTED
<b>General Comments</b>	

Comment to Article 5.4.4: SIA is supportive of the proposed insertion of the comment to Article 5.4.4, and particularly of the mandatory language employed (i.e. “shall not”). However, given the practical significance and importance of the comment to Article 5.4.4, SIA considers that it could be added to the body of Article 5.4.4 (rather than included as a comment).

## Anti-Doping Norway

SUBMITTED

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

NADO - NADO

### General Comments

Comment to 5.4.4: It seems illogical that ice baths are permitted when showering is not. The whole point is that the first Urine after notification is the one being sealed. How can the SCA control that the Athlete does not urinate in the ice bath?

## International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

### General Comments

The introduction of the comment to art. 5.4.4 is welcomed, but in relation to ice baths we suggest to clarify that it *may* be considered a warm down activity *depending on the specific sport/discipline at stake*. In certain sports, it would not qualify as such.

## Article 6 (2)

### ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

### General Comments

ICSD supports the preparation requirements in Article 6 to ensure that testing is conducted fairly and respectfully. However, we strongly recommend that WADA explicitly state that Doping Control Officers (DCOs) must prepare to provide **communication accessibility** for athletes who are **Deaf or Hard of Hearing**. Many accessibility problems occur when DCOs arrive without the necessary arrangements (such as interpreters), placing the athlete at a disadvantage

### Suggested changes to the wording of the Article

For athletes who are **Deaf or Hard of Hearing**, Doping Control Officers must ensure that appropriate **communication accessibility** is arranged in advance of the Sample Collection session. This may include sign language interpretation, visual tools, or plain language materials to ensure the athlete can fully understand and participate in the process.

### Reasons for suggested changes

If communication accessibility is not prepared in advance, Deaf or Hard of Hearing athletes may experience confusion, delays, or procedural errors during sample collection. It is essential that **preparation for testing includes**

**planning for communication needs**, just as it includes planning for other logistical and procedural elements. This ensures fairness and consistency across all testing

<b>Anti Doping Denmark</b>	SUBMITTED
Jakob Mørkeberg, Scientific Consultant (Denmark) NADO - NADO	
<b>General Comments</b>  N/A	
<b>Suggested changes to the wording of the Article</b>  6.3.4 s and t – remove volumes	

**Article 6.3.4 (7)**

<b>Anti Doping Denmark</b>	SUBMITTED
Silje Rubæk, Legal Manager (Danmark) NADO - NADO	
<b>General Comments</b>  N/A	
<b>Suggested changes to the wording of the Article</b>  Point s og t: remove volumes	

<b>NADA</b>	SUBMITTED
NADA Germany, National Anti Doping Organisation (Deutschland) NADO - NADO	
<b>General Comments</b>  Comment to Art. 6.3.4:  "For Capillary Blood Sample Collection": here, Dried Blood Spot would be correct, as v) and w) refer only to DBS samples; liquid capillary blood samples do not require absorbant support	

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

**Sport Integrity Australia**

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)

NADO - NADO

**General Comments**

SIA recognises our previous request for clarity on expiry of 10 years, SIA is satisfied it was meant to withstand the 10 years statutory limitations for kits that could withstand 10 years of storage, not that their expiry should last 10 years. (i.e kits should be suitable to withstand 10 years of storage).

SIA is unsure that we as user of the equipment will be provided with this guarantee from suppliers given they manage expiry dates as a means of ensuring quality and assurances. Given WADA work with equipment providers, SIA suggests that the assurances from suppliers that the equipment will last this time frame can be provided to WADA directly. This would see ADOs using equipment that is approved directly by WADA.

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

SIA is unsure that as a user of the equipment, we will be provided with this guarantee from suppliers given they manage expiry dates as a means of ensuring quality and assurances. Given WADA work with equipment providers, SIA suggests that if the assurances of longevity from suppliers could be provided to WADA directly this would equate to implicit approval of use of equipment from WADA for use by ADOs.

**Canadian Centre for Ethics in Sport**

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

**General Comments****Articles 6.3.4.s and 6.3.4.t**

The CCES would suggest removing the volume references in 6.3.4.s and 6.3.4.t and moving them to the Guideline to allow for more flexibility if future changes are warranted.

**USADA**

SUBMITTED

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

NADO - NADO

**General Comments**

N/A

**Suggested changes to the wording of the Article****Article 6.3.4.s For Whole Blood *Sample* Collection and Article 6.3.4.t For Whole Blood *Sample* Collection**

Recommended Change: Remove “shall have the capacity to contain a minimum of 3 mL / 5mL”

## Article 6.3.4.s For Whole Blood *Sample* Collection and Article 6.3.4.t For Whole Blood *Sample* Collection

Reason: Remove the volume requirements to allow all microcapillary tubes which contain 0.5mL. Recommendations for specific tube volumes for venous and capillary blood are better suited to Technical Documents and Guidelines which are reviewed and updated more frequently than International Standards.

### Berlinger Special AG

SUBMITTED

Vreni Müller, Head of Sales & Marketing (Switzerland)

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

#### General Comments

6.3.4 e) Thank you for refining the wording and clearly defining the period of the statute of limitations. The requirement is now fully comprehensible.

6.3.4 e) iv. We sincerely appreciate the removal of this critical paragraph from V1. This adjustment is highly beneficial and will further support the consistent application of established practices.

6.3.4 w) The "visual inspection" provides clarity and satisfactorily addresses our last comment regarding the inspection.

\*\*\*\*\*

6.3.4 m) "Have undergone testing by a testing institution that is independent of the manufacturer and is ISO 17025 accredited..."

-> In the preceding paragraphs, the criteria that a system must meet are specified; however, the methods by which these criteria are tested are not harmonized. Consequently, an external ISO 17025-accredited institute may assess compliance with the requirements very differently from another. This variation can be due to differences in the institutes' level of expertise/knowledge in anti-doping or based on the varying experience and technical know-how of the system manufacturer, who inevitably influences what and how tests are conducted when delegating the testing to an institute.

We have frequently received inquiries from ADOs, federations, or SCAs requesting certification that our equipment is accredited by WADA. To date, such accreditation does not exist but would be highly desirable to ensure that the testing methods applied to assess a system consistently meet the same high standards.

Therefore, we propose that WADA either fully assumes accreditation responsibility for sample collection manufacturers (similar to laboratory accreditation) or, at a minimum, oversees and certifies the testing performed by external institutes. This would provide users of the equipment with assurance that testing is conducted according to uniform methods under WADA supervision and approval, rather than being approved solely at the discretion of the manufacturer in cooperation with the independent institute.

\*\*\*

6.3.4 v) "...Sample absorbent support (i.e., untreated cellulose card and/or synthetic polymer..." vs. Annex J J.4 c) "The absorbent Sample support shall be made of either cellulose or synthetic polymer. For cellulose cards it is only permitted to use untreated/non impregnated cellulose;"

-> In paragraph 6.3.4 v), only the untreated cellulose card is accepted with regard to cellulose-based sample absorbent support materials, whereas Annex J reopens the scope by generally allowing cellulose and subsequently defining specific criteria for the cellulose card.

=> A harmonization of the requirements for the sample absorbent support material would be highly desirable.

Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

### General Comments

ICSD supports the requirements in Article 7.4.5 to ensure that the DCO/Chaperone explains the Sample Collection procedure and the athlete's rights and responsibilities in a language the athlete can understand. However, we strongly recommend that WADA explicitly state that for athletes who are **Deaf or Hard of Hearing, communication accessibility** must be provided — as standard spoken language or written language alone may not be sufficient for full understanding

### Suggested changes to the wording of the Article

The DCO/Chaperone shall explain to the Athlete the Sample Collection procedure and the Athlete's rights and responsibilities in a language the Athlete can understand. For athletes who are **Deaf or Hard of Hearing**, appropriate **communication accessibility** shall be provided. This may include sign language interpreter, visual or written supports, or plain language explanation, as required to ensure the athlete fully understands the procedure and their rights.

### Reasons for suggested changes

Many Deaf or Hard of Hearing athletes require more than written forms to fully understand the Sample Collection process and their rights. Without explicit guidance, DCOs may not provide appropriate communication accessibility, leading to misunderstandings or procedural unfairness. Clarifying this requirement in Article 7.4.5 will promote consistent and fair testing for all athletes

## Finnish Center for Integrity in Sports FINCIS

SUBMITTED

Marjorit Elorinne, Quality Manager (Suomi)

NADO - NADO

### General Comments

We would suggest clarification in the IST (Art 7.3.4./6.3.2/definition of DCS) to address the application of **Doping Control Station standards when sample collection is conducted at an athlete's home** (either due to the athlete's acceptance of the location or as indicated in their whereabouts e.g., for RTP athletes during their 60-minute time slot).

In practice, we occasionally face **challenges with athlete behavior during home-based testing**, as sometimes athletes (mostly non RTP/TP athletes) argue that, as the testing occurs in their personal residence, they retain full personal freedoms (such as the consumption of alcohol or the taking of photos during the process) regardless of the DCS context.

To mitigate such misunderstandings and ensure a consistent and respectful testing environment, it would be helpful for the IST to **explicitly state that when a doping control mission is conducted at an athlete's home, the designated sample collection area is to be considered a DCS**, and therefore **subject to the same behavioral standards and restrictions as any other official DCS**.

This clarification should explicitly affirm that:

- The **prohibition on alcohol consumption** (as per Article 7.3.4) applies within the sample collection area, even if located within a private residence.
- **Taking photographs or videos** that may compromise the integrity or confidentiality of the testing process is also restricted within the DCS.

Such an addition would strengthen the authority of the Doping Control Officer (DCO) in the field and support ADOs in ensuring a controlled and compliant testing environment, regardless of location.

## Article 7.4.5 (5)

### 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

Comment to 7.4.5 (f) - UKAD proposes alternative terminology is used to 'unspecified' when the sport gender of the athlete is not specified as male or female under the applicable rules of the sport. UKAD believes the term 'unspecified' is a provocative term to use in the context of someone's gender identity.

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

UKAD proposes the following changes to the Comment to Article 7.4.5 (f):

[Comment to Article 7.4.5 f): If the sport gender of the athlete is not specified as male or female under the applicable rules of the sport, the DCO shall record the sport gender as ~~unspecified~~ other on the Doping Control documentation.]

*Or to an alternative term to offer a more inclusive term for capturing other gender identities.*

#### Reasons for suggested changes

To ensure more inclusive terms are used.

### Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

#### General Comments

#### Article 7.4.5.a

The CCES would reiterate our comment that with the inclusion of the country of test, consideration should be given to include the city as well.

## NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

### General Comments

Comment to Art. 5.2 a), Art. 7.4.5, Annex C1 f and Annex C4.5:

There needs to be clarification especially on the case where no gender is specified. Looking at cost it is not possible to always send a male and a female - just if it is clearly a mixed competition.

As well practice has shown that there needs to be a clearer guideline for DCOs on how to handle gender diverse athletes. For example a former male athlete starts as female athlete but no operation on the sex has taken place. It can be very uncomfortable for a female DCO to test the athlete that is now starting as female but has not changed.

We ask for the possibility to change the gender in such situations if all agree. Otherwise there is the concern that DCOs might end the process at this stage.

## Anti-Doping Norway

SUBMITTED

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

NADO - NADO

### General Comments

N/A

### Suggested changes to the wording of the Article

For samples for the blood passport, if the athlete has done any heat training in the last 15 days prior to the sample collection? If so, specify frequency and dosage.

### Reasons for suggested changes

More and more research have documented that heat training can have an effect on the blood values and therefore be a confounder that is important to get documented in relation to APMUs evaluation of the blood passport.

When collecting a Blood passport sample, the athletes should therefore be asked if they have done any heat training within the previous 15 days prior to sample collection, and if so be requested to specify the frequency and dosage.

## Article 9 (1)

### NADA India

SUBMITTED

NADA India, NADO (India)

NADO - NADO

### General Comments

Agreed



## Article 9.1 (1)

### Sport Ireland

SUBMITTED

Áine Hollywood, Science Officer (Ireland)

NADO - NADO

#### General Comments

9.4.1

Sport Ireland would like to bring forward the consideration to change entry of documentation within 5 days to 5 **working** days - considering delivery time of hard-copy paper documentation to ADO office, weekend and any national holidays these influence the timeframe for upload.

## Article 9.3 (7)

### SA Institute for Drug-Free Sport

SUBMITTED

khalid galant, CEO (Souoth Africa)

NADO - NADO

#### General Comments

Sending samples within 5 days to the lab is unreasonable considering that ADOs where there are no WADA accredited labs within a reasonable distance that would ensure that no additional costs are spent, would normally send samples in batches for efficiency and to save costs.

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

It should say as soon as practicable.

#### Reasons for suggested changes

Five (5) days is not reasonable if you consider the distribution of WADA accredited labs: 0 in Africa, 17 in Europe, 3 in North America, 1 in South America, 1 in Central America, 1 in Oceania and 5 in Asia, hence this would disadvantage ADOs in S America, Oceania and Africa. The clause is biased toward European ADOs.

### CHINADA

SUBMITTED

MUQING LIU, Coordinator of Legal Affair Department (CHINA)

NADO - NADO

#### General Comments

Article 9.3.2 a)

According to Article 9.3.2 a) of the IST, the transportation of urine and DBS Samples shall occur no later than five (5) days from the date of Sample collection. To avoid confusion, we recommend that WADA further clarify and define such transportation.

## Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

### General Comments

There is a typo as it assumingly should say "Any instructions on additional or (and not 'of') Further Analysis (...)"

## RUSADA

SUBMITTED

Viktoriya Barinova, Deputy director (Russia)

NADO - NADO

### General Comments

9.3.2.a) We suggest a clarification if time frames are counted up to the date of delivery to the laboratory or up to the date of dispatch of samples/transfer to the courier service.

## Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

### General Comments

#### Article 9.3.2.a

The CCES would request clarification on the acceptable “logistical reason” considered in the article, “If for any logistical reasons the immediate transportation of urine and DBS *Samples* is not possible, such transportation shall occur no later than five (5) days from the date of *Sample* collection” (e.g., due to the shipping company’s shipping holiday closures or cost considerations).

## USADA

SUBMITTED

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

NADO - NADO

### General Comments

#### Article 9.3.2.b

For Comment: Further information needs to be provided on what happens if the sample transport exceeds the listed timeframes and if the sample is invalidated. To provide further clarification USADA suggests removing “shall” from the Guidelines, which is quite confusing given Guidelines are not supposed to be mandatory.

#### Comment to Article 9.3.2.b

For Comment: USADA recommends relying on the BSS as it should be used instead of an independent determination. i.e., if the BSS is under 85 the sample should be considered valid even if the temperature is not

considered “cool”. For reference, in the Michael Brinegar case, the CAS panel expressed frustration determining whether a sample is valid due to the confusing wording in the IST and Guidelines.

Suggested changes to the wording of the Article

Article 9.3.2.b

Recommended Change: Changes in bold. “For the transportation of whole blood *Samples*, the following timeframes apply between **collection and ~~collection~~ reception at the lab.** and analysis:”

Reasons for suggested changes

Article 9.3.2.b

Reason: While these timeframes should be aimed for, there are often unavoidable delays in shipment which delay the arrival of the sample at the lab. However, after inspection the sample is often deemed fit for analysis. The restrictive timeframes open up the possibility for legal challenge if a sample is analyzed after the specified time but returns a positive result. Further, there are many situations where additional analysis can be conducted that would fall outside these timeframes. For example, if ERA is requested on an ABP sample after an APMU review, or GH is requested on a serum sample initially collected for endocrine analysis. Once the sample is received by the lab, it is stored appropriately and the time periods for analysis should not apply.

SEARADO

SUBMITTED

Gobinathan Nair, Director-General (Singapore)

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

General Comments

To increase the maximum number of days for shipment

Suggested changes to the wording of the Article

To increase the maximum days from 5 days to 1 week or 10 days (samples stored under cool conditions), so that the NADO is able to accumulate samples (especially OOCT samples where it is collected on separate days apart, dependent on athlete WI and SCP availability).

(I would also assume that the maximum days stated in the IST is referring to the maximum 5<sup>th</sup> day to be shipped out of sample collection country and not the receipt by Lab as we have to take into account the shipping journey taken especially for NADOs that require to ship the samples to the Lab outside their country.

Reasons for suggested changes

Save courier cost due to limited budget, especially for smaller NADOs

Article 9.4 (1)

International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

#### Article 9.4.1

The changes are fully supported.

### Article 10 (2)

#### **NADA India**

SUBMITTED

NADA India, NADO (India)

NADO - NADO

#### **General Comments**

Agreed

#### **Swiss Laboratory for Doping Analyses**

SUBMITTED

Tiia Kuuranne, Director (Switzerland)

Other - WADA-accredited Laboratories

#### **General Comments**

10.2.2 The TA may transfer ownership of the Samples to the RMA or to another ADO upon request. The ADO requesting the transfer of ownership of a Sample shall be responsible for any costs associated with that Sample from the time of the request.

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

Addition: The transfer of ownership shall be communicated also with the Laboratory having the custody of the sample.

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

If the information is not shared with the laboratory, the requests for long-term storage, further analyses or data provision.

### Article 11 (2)

#### **NADA India**

SUBMITTED

NADA India, NADO (India)

NADO - NADO

#### **General Comments**

Agreed

#### **International Testing Agency**

SUBMITTED

International Testing Agency, - (Switzerland)

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

General Comments

As previously submitted, it is strongly recommended that upon request MEOs be granted at least read-access to the passport during Major Events. Relying on the prompt actions of the (IF/NADO) Passport Custodian may not be feasible due to various factors, such as limited knowledge of athletes participating in the event, time zone differences, staff or resource constraints, and challenges in implementing data protection-compliant methods for information transmission. Moreover, providing MEOs with direct access to the Passport, but allow the MEO to gain a clearer understanding of the passport status. This will enhance their ability to prioritize correctly target testing based on the available resources, particularly when dealing with large volumes of APMU recommendations.

Moreover, providing the MEO with direct access to the passport not only enhances efficiency by eliminating the need for multiple communication channels but also ensures access to the primary source of information. This will enhance their ability to prioritize correctly target testing based on the available resources, particularly when dealing with large volumes of APMU recommendations. In addition, the APMU must also be required to provide rapid communication during Major Events to support reactive testing strategies. Alternatively, a direct line of communication should be allowed between the MEO and the APMU, due to the critical risk of time delays if the communication is only allowed via the passport custodian and MEO.

Article 11.2 (2)

International Cricket Council

SUBMITTED

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

General Comments

Many athletes have multiple ADAMS IDs, often created by WADA in preparation for major events. This results in IFs having to manage and resolve the issue by requesting profile merges in ADAMS.

Sport Ireland

SUBMITTED

Áine Hollywood, Science Officer (Ireland)  
NADO - NADO

General Comments

11.2.3

Sport Ireland agree with this unequivocally. However, WADA/ADAMS need to outline a more sophisticated or effective system to merge duplicate profiles. Sport Ireland provided a list of noted duplicate profiles to ADAMS in September 2024 and have been waiting now 10 months for these to be merged.

Article 11.3 (3)

International Paralympic Committee

SUBMITTED

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

General Comments

#### Article 11.3.1

It's not clear in this Article whether the sharing of passport information must still be requested or is it automatic?

IPC recommends that read access of passport information be automatically shared in ADAMS with all ADOs that have jurisdiction over the athlete.

#### UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

##### General Comments

11.3.4 - UKAD supports this Article but has encountered cases where the application of this Article has not been applied i.e. the request in writing for the transfer has not been made. There is no current functionality within ADAMS that supports ADOs to monitor this. UKAD notes that previously this was mitigated by checking the 'message & notification' feature in ADAMS which provided a record of all passports transferred. Unfortunately, this feature has recently been removed from ADAMS. Therefore, in the event of an ADO failing to communicate a passport custody transfer, there is no way of knowing that this has taken place and ADOs are not always notified to review the passport or any outstanding actions.

UKAD proposes that a feature is built into ADAMS to support the application of this Article. This may be through the reinstatement of the 'messages & notification' feature or through a notification to the ADO to review and accept the passport custody transfer.

##### Reasons for suggested changes

11.3.4 - To support the practical application of this Article and ensure the smooth transition of any outstanding actions from one IF/ADO to another

#### International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

##### General Comments

Currently, there is a lack of clarity regarding passport custodianship when an athlete is included in both the International and National RTPs. To address this, we strongly recommend adding a clause to art. 13.1 stating that, in such cases, the IF should assume passport custodianship by default – unless a formal agreement to transfer custodianship is documented in ADAMS.

This change would also entail a corresponding update to the definition of *Passport Custodian* in art. 3.3.

#### Article 11.4 (4)

#### Japan Anti-Doping Agency

SUBMITTED

Chika HIRAI, Director of International Relations (Japan)

NADO - NADO

##### General Comments

### 11.4.2/11.4.3

11.4.2 mentions TA maintains the responsibility for additional analysis, 11.4.3 mentions Passport custodian maintains the responsibility for the target tests, but there is no article mentioning who maintains (covers the cost) of LTS. TA or Passport Custodian?

#### NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

#### General Comments

### Article 11.4: Management of APMU Recommendations and Follow-up

#### 11.4.2

Article 11.9 stipulates, "Where the TA is not the Passport Custodian, the TA that initiated and directed the Sample collection maintains the responsibility for additional Analytical Testing of the Sample unless agreed otherwise."

However, it can be the case that the Testing Authority does not have access to the passport, as it is not the Passport Custodian, and the Passport is not shared with the Testing Authority. To improve efficiency, it would be beneficial for the Testing Authority to receive a notification in ADAMS indicating when further analysis is required and the TA is not the Passport Custodian..

#### International Testing Agency

SUBMITTED

International Testing Agency, - (Switzerland)

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

#### General Comments

#### Article 11.4.2

As previously submitted, consider adding an explicit reference to the fact that the TA maintains the responsibility also for the cost of the analyses. This would be in line with the wording used for instance in relation to LTS.

#### Swiss Laboratory for Doping Analyses

SUBMITTED

Tiia Kuuranne, Director (Switzerland)

Other - WADA-accredited Laboratories

#### General Comments

11.4.1 .... "Where the ADO does not implement such recommendations, the ADO shall document their reasoning in ADAMS."

#### Reasons for suggested changes

Question: Is this reasoning aimed at WADA only or is it visible to the APMU too (e.g. APMU Chat)?

ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

General Comments

ICSD strongly supports the intent of Annex A to ensure that appropriate modifications are provided during Testing. However, we respectfully request that WADA explicitly state in this Annex that **communication accessibility** is a required modification for athletes who are **Deaf or Hard of Hearing**. Many Doping Control Officers currently interpret Annex A as applying only to physical impairments, and as a result, Deaf or Hard of Hearing athletes often do not receive the communication support needed to fully understand and participate in Testing

Suggested changes to the wording of the Article

Modifications include, but are not limited to, adjustments for physical, sensory, or communication needs. For athletes who are **Deaf or Hard of Hearing**, appropriate **communication accessibility** must be provided. This may include sign language interpreter, visual supports, or plain language materials to ensure that the athlete fully understands and can comply with the Testing process

Reasons for suggested changes

**Deaf or Hard of Hearing athletes** frequently encounter barriers during Testing because DCOs are not trained to recognize communication accessibility as a required modification. This results in confusion, procedural errors, or unfair outcomes. By explicitly including **Deaf or Hard of Hearing athletes** and **communication accessibility** in Annex A, WADA will promote consistent and fair Testing practices and help ensure that all athletes are treated equitably

International Paralympic Committee

SUBMITTED

Jude Ellis, Head of Anti-Doping (Germany)

Sport - IPC

General Comments

A.1  
IPC recommends including the need to respect the human dignity of athletes with impairments when collecting a sample in Article A.1. We note that dignity is mentioned in Article 7.1, which refers to the sample collection session overall. However, this is particularly relevant to the modifications that might be made when testing athletes with an impairment, so should be specifically included here.  
  
In some situations, particularly where the doping control facilities are not fully accessible the DCO’s desire to collect the sample combined with the athlete’s desire to comply with the request can result in the human dignity of the athlete being disrespected during the sample collection. This is particularly a concern for athletes with a significant impairment.

A.4.8

IPC supports this inclusion of a representative being able to connect virtually to the sample collection session using their mobile device.

Suggested changes to the wording of the Article



*To ensure, where possible, that the particular needs of Athletes with impairments are considered in relation to the provision of a Sample, whilst maintaining the integrity of the Sample and respecting the privacy and human dignity of the Athlete.*

**Reasons for suggested changes**

In some situations, particularly where the doping control facilities are not fully accessible the DCO's desire to collect the sample combined with the athlete's desire to comply with the request can result in the human dignity of the athlete being disrespected during the sample collection. This is particularly a concern for athletes with a significant impairment.

**Japan Anti-Doping Agency**

SUBMITTED

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

**General Comments**

**Comment to A.4.8**

We support this proposal. At the same time, if the athlete does not have a mobile phone with them at the notification, it might be better to clarify that athlete can ask SCP to follow them to get mobile phone, like obtaining ID / finding athlete rep.

**UK Anti-Doping**

SUBMITTED

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

**General Comments**

A.4.7 - Resubmitted comment - This Article places the responsibility on Athletes with an impairment to provide the additional equipment for the provision of a urine sample.

UKAD agrees that this should be for medical equipment e.g. catheter, when in relation to the provision of a urine sample. However, UKAD proposes that it is made clear that this does not extend to sample collection equipment e.g. sample collection vessels, and that any collection vessels/equipment is the responsibility of the TA/SCA to provide. This is to ensure greater clarification on what equipment would be accepted and to protect the integrity of the sample.

A.4.8 - UKAD seeks further clarification on this amendment to the IST in relation to the type of call and ensure it is clear that this does not extend to witnessing of urine sample provision.

UKAD also seeks clarification should the representative not have government issued ID and proposes the testing continues since it is the athlete's representative.

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

A.4.7 - UKAD proposes the following changes:

"Should an Athlete require any additional medical equipment to be able to provide a Sample, such as catheters and drainage systems, it is the sole responsibility of the Athlete to have the necessary equipment available for this purpose and understand how to use it. The provision of additional equipment only applies to the urine sample

provision and does not include sample collection equipment e.g. collection vessels. Sample collection equipment must be provided by the SCA."

*Note; that any amendment here will need to be considered within WADA's Sample Collection Guidelines.*

A.4.8 - UKAD proposes the following changes to the 'Comment to A.4.8':

....If a representative is not able to be physically present at the location where the Athlete has been requested to provide a Sample but is available to observe the sample collection process virtually, the Athlete may connect virtually to their representative using their mobile device. This is preferably via a video call but can be via a voice call OR This must be a video call and cannot be a voice call. The representative and the Athlete are not permitted to record the Sample collection and sealing process. The representative may not directly observe the passing of the urine Sample, unless requested to do so by the Athlete. The DCO shall document on the Doping Control form the full name of the representative, the type of government issued photo identification presented to the DCO to validate their identity, their role and relationship to the Athlete. If the representative is unable to provide government issued photo identification, the representative can remain and this should be recorded on the DCF. Any issues with the virtual observation shall not invalidate the Test.]

**Reasons for suggested changes**

A.4.7 - Ensures that ADOs minimise the risk of potential tampering by a doping Athlete and/or challenge in the event of an AAF. Ensures the SCAs retains control of the sourcing and provision of sample collection vessels.

A.4.8 - Provides clarification on the application of this Article.

**Sport Integrity Australia**

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)  
NADO - NADO

**General Comments**

SIA strongly suggests for this provision to be amended to require an Athlete with vision or intellectual impairments to have a representative present unless the Athlete determines not to have a representative during the SCS.

Currently, SIA does not proceed with the testing of an Athlete with a vision or intellectual impairment if the Athlete does not have a representative present. We strongly suggest this approach be mandated globally to ensure that all Athletes with vision or intellectual impairments are afforded the same protections.

If WADA is not amenable to this, SIA suggests, as an alternative, that an Athlete with a visual or intellectual impairment can choose to have phone (verbal) contact with a representative. However, SIA notes that further guidelines or commentary would need to be developed to describe how this process would be conducted and to ensure that the privacy of the SCP and the Athlete, as well as the property of the Athlete (i.e. the phone), are protected.

SIA acknowledges, and appreciates the need for, the strict rules that exist at present regarding recording and phone use during SCS. The proposed approach to permit the virtual observation of the SCS appears to constitute a significant change in approach from these existing rules, which has the capacity to cause confusion.

SIA is not supportive of the proposed approach to permit the virtual observation of the SCS due to:

Potential privacy concerns on the part of those persons involved in the SCS, including SCP and Athletes;

Potential practical difficulties in conducting virtual observation, such as, who is responsible for facilitating the virtual observation and how they will do this;

The risk that the identity of the virtual observer may not be able to be effectively verified;

The risk of recording and/or wider circulation of the SCS; and

The risk of damage to Athlete's property (i.e. phone).

In any case, SIA suggests that SCP should retain a discretion to not permit the virtual observation of the SCS where appropriate.

### Canadian Centre for Ethics in Sport

SUBMITTED

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

#### General Comments

#### Comment to Annex A.4.8

The CCES supports this inclusion but, as written, the requirements to check identification this would require a video call. This may be restrictive for some athletes. The CCES suggests considering expanded wording to permit a parent/representative to listen to the session via phone call as well.

### Sport Integrity Commission Te Kahu Raunui

SUBMITTED

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

#### General Comments

We strongly oppose the removal of consent requirements for athletes who are minors or intellectually impaired. While participation in sport implies acceptance of Anti-Doping rules, seeking explicit consent from a parent or guardian provides an important safeguard for these groups. In a New Zealand context, this process works effectively, and we recommend it is retained.

*We have consulted extensively with the Commission's Athlete Commission on this matter, who have differing views that will be presented in their own submission.*

### 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, agree that athletes with impairments must receive care and consideration relevant to their individual needs — especially those with intellectual impairments and minors — and support increased clarity around procedures.

There were differing views within our AC on the removal of obtaining consent from intellectually impaired athletes. Some believe all athletes should be subject to anti-doping rules through participation, irrespective of any impairment, yet any refusal — and its consequences — must also be clearly communicated to a caregiver or support person of

an intellectually impaired athletes. Others believe that an additional consent step at the point of testing remains necessary.

We recommend WADA consider further guidance on understanding and informed engagement for impaired athletes.

Annex B (11)

ICSD

SUBMITTED

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

General Comments

ICSD supports the personnel qualifications and training requirements in Annex B. However, we strongly recommend that WADA explicitly include **training on accessibility** for athletes who are **Deaf or Hard of Hearing** as a required part of Doping Control Officer (DCO), Blood Collection Officer (BCO), and Chaperone training. Many issues experienced by Deaf or Hard of Hearing athletes during Testing are due to a lack of awareness or preparation by Sample Collection Personnel

Suggested changes to the wording of the Article

In Annex B, under **Personnel Requirements** or **Training Requirements**, add:  
  
Training for Doping Control Officers (DCOs), Blood Collection Officers (BCOs), and Chaperones shall include guidance on providing appropriate **communication accessibility** for athletes who are **Deaf or Hard of Hearing**. This may include the use of sign language interpreters, visual supports, or plain language explanations to ensure that athletes fully understand and can participate in the Testing process

Reasons for suggested changes

Without proper training, Sample Collection Personnel may not know how to communicate effectively with **Deaf or Hard of Hearing athletes**, leading to confusion, stress, and procedural errors. Including **accessibility training** as part of personnel requirements will help ensure that Testing is conducted fairly and consistently, and that the rights of Deaf or Hard of Hearing athletes are respected throughout the process

Council of Europe (CoE)

SUBMITTED

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

General Comments

Annex B: There are legal questions around the observation process of urine samples and blood drawing in the group of minors athletes. There is the recommendation to question Annex B from a human rights perspective.

Japan Anti-Doping Agency

SUBMITTED

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

General Comments

### Comment to B.4.4

We support this proposal. At the same time, if the athlete does not have a mobile phone with them at the notification, it might be better to clarify that athlete can ask SCP to follow them to get mobile phone, like obtaining ID / finding athlete rep.

### UK Anti-Doping

SUBMITTED

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

### General Comments

B.4.4 - please refer to the comment on A.4.8, as the feedback is the same.

### Suggested changes to the wording of the Article

B.4.4 - UKAD proposes the following changes to the 'Comment to B.4.4':

....If a representative is not able to be physically present at the location where the Athlete has been requested to provide a Sample but is available to observe the sample collection process virtually, the Athlete may connect virtually to their representative using their mobile device. This is preferably via a video call but can be via a voice call OR This must be a video call and cannot be a voice call. The representative and the Athlete are not permitted to record the Sample collection and sealing process. The representative may not directly observe the passing of the urine Sample, unless requested to do so by the Athlete. The DCO shall document on the Doping Control form the full name of the representative, the type of government issued photo identification presented to the DCO to validate their identity, their role and relationship to the Athlete. If the representative is unable to provide government issued photo identification, the representative can remain and this should be recorded on the DCF. Any issues with the virtual observation shall not invalidate the Test.]

### Agence française de lutte contre le dopage

SUBMITTED

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

### General Comments

remove the virtual assistance of the rapresentative of the athlete, unless this person cannot sign (virtually) the Doping Control form

### NADA

SUBMITTED

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

### General Comments

Comment to Annex B:

We suggest to look again at the observation process on minors from a humans rights perspective. From our point of view, visual checks on minors are not in line with human rights regulations.

Dario Campara, Lawyer (Austria)  
NADO - NADO

General Comments

Annex B – Modifications for athletes who are minors

There are legal concerns regarding the necessity of directly observing urine sample collection from minors under the age of 14. Should this observation remain mandatory even in the absence of any suspicion of sample manipulation?

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)  
NADO - NADO

General Comments

WADA’s proposed changes within the second draft of the IST regarding the requirement for parental consent for testing of Minors has generated discussions within SIA as to alternatives to direct witnessing, and particularly in relation to Minors and the possibility of using other means to ensure that a sample has not been compromised.

SIA appreciates the risk of removing the requirement for direct witnessing in terms of potential urine manipulation, substitution, contamination and tampering, however, in SIA’s view, it may be possible to mitigate such risk in the case of a Minor by means that are as effective as direct witnessing and, if it is viable to do so, a Minor could be observed without the requirement to directly witness the sample leave the Minor’s body, with the possibility for the RMA/TA/APMU to have the ability to enforce direct witnessing if they hold concerns around sample authenticity or have intelligence. For instance, Sample Collection Personnel could be in the bathroom with the Minor, ensuring that correct handwashing procedure is followed and confirming that the Minor doesn’t have anything additional in their hands/doesn’t remove anything from their pockets etc. The Sample Collection Personnel could then observe the Minor providing a sample from a location that allows them an unobstructed view of the Minor, but not directly witness the sample leave the Minor’s body. There may also be solutions through technology that could be explored.

SIA recognises that there may be other options for in field testing of the validity of urine samples, such as, recording sample temperature and pH or chemical testing, which could be completed while Specific Gravity is currently measured. Moreover, if a DCO were to hold any concerns about the validity of the sample, or the sample does not meet the requirements of a valid sample (i.e. temperature/pH etc), the DCO could request an additional sample be provided in line with the requirements listed in Annex F.

SIA appreciates that wholesale changes to Annex B/Annex C may not be possible and/or supported at this late stage in the Code Update Process, however, SIA is providing this feedback with a view to prompting further discussion and would like to have an involvement in any related discussions moving forward – particularly as they relate to minors.

SIA acknowledges that there are existing mechanisms in the IST for the DCO to request another sample if there are any doubts around the authenticity of the sample (e.g. Article 7.4.3). We suggest another sentence be added to this paragraph that if another sample is requested by the DCO due to concerns around the authenticity of the sample that this SHALL be recorded on the Doping Control Form.

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

General Comments

Comment to Annex B.4.4

The CCES supports this inclusion but, as written, the requirements to check identification this would require a video call. This may be restrictive for some athletes. The CCES suggests considering expanded wording to permit a parent/representative to listen to the session via phone call as well.

USADA

SUBMITTED

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

General Comments

N/A

Suggested changes to the wording of the Article

Annex B – B.4.5

Recommended Change: Change in bold. “The representative of the *Athlete* who is a *Minor*, if present, shall only observe the **witnessing DCO/Chaperone** during the passing of the urine *Sample*, unless requested by the *Athlete* who is a *Minor* to observe the passing of the urine *Sample* directly. The second member of the SCP shall only observe the **witnessing DCO/Chaperone** and shall not directly observe the passing of the *Sample*.”

Reasons for suggested changes

Annex B - B.4.5

Reason: Added language for further clarification.

International Testing Agency

SUBMITTED

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

General Comments

B.4.3

The current framework regarding the notification of minors particularly in OOC missions is unclear and inconsistently applied. Specifically, when a DCO and a second SCP arrive at an OOC location and no adult or athlete representative is present at the time of initial contact, the procedure is ambiguous.

It is unclear whether the SCP should:

1. Abandon the notification and wait outside, without having visual contact with the athlete, until an adult may possible arrive; or
2. Proceed to support the athlete by entering the premises, maintaining sight of the athlete, and assisting in locating a representative.

We believe the second approach should be followed to safeguard both the athlete and the integrity of the testing process (bearing in mind the presence of an additional SCP). This (or a different approach) should be clearly stated in the Annex.

As currently written in B.4.3, minors *should be notified in the presence of an adult*, but this requirement in OOC contexts is entirely out of the control of the SCP. We therefore recommend that a comment be added to B.4.3,

outlining the appropriate procedure for DCOs when no adult is present at the time of initial contact.

Annex C (8)

International Cricket Council

SUBMITTED

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

General Comments

Cricket is played in countries with strong cultural sensitivities, making it crucial that the biological gender of the DC staff witnessing sample provision aligns with that of the athlete.

ICSD

SUBMITTED

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

General Comments

ICSD supports the requirements in Annex C regarding the management of athlete Whereabouts information for effective Out-of-Competition Testing. However, we respectfully request that WADA acknowledge the structural challenges faced by **disability-specific, event-based ADOs** such as ICSD. Many **Deaf or Hard of Hearing athletes** are not included in national Registered Testing Pools (RTPs), and ICSD does not maintain its own RTP or have full access to national RTP data in ADAMS. This creates risks of inconsistent Whereabouts compliance and unequal athlete inclusion in the global testing framework

Suggested changes to the wording of the Article

In Annex C (or Commentary), add guidance such as:

For **disability-specific or event-based ADOs** that do not maintain their own RTP, or where athletes such as those who are **Deaf or Hard of Hearing** are not systematically included in national RTPs, coordination with NADOs is essential to ensure appropriate Whereabouts coverage. WADA encourages enhanced collaboration between NADOs and such ADOs to close existing structural gaps and promote equal athlete inclusion in Out-of-Competition Testing

Reasons for suggested changes

Many **Deaf or Hard of Hearing athletes** are unintentionally excluded from RTP processes due to lack of national coordination or system limitations. This places both athletes and ICSD at risk of non-compliance or inconsistent testing coverage. Acknowledging this structural issue and promoting stronger collaboration will help ensure that Deaf or Hard of Hearing athletes are properly included in the global anti-doping framework, and that ADOs such as ICSD can meet their obligations realistically and fairly

International Paralympic Committee

SUBMITTED

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

General Comments



For athletes who use catheters their disability may be such that they are unable to use no-touch catheters and they may also struggle to insert the catheter using gloves. Unsanitary conditions in the DCS or dirty hands put these athletes at risk of infection.

While instances of this would be uncommon, IPC proposes that these athletes be permitted to wash their hands using soap (before rinsing with water) and take whatever other steps deemed necessary to mitigate the risk of infection, without compromising the integrity of the sample.

UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

General Comments

C.1 (f) (ii) and C.4.5.1 - suggestions also linked to feedback on the 'Comment to 5.2 (a)'.

UKAD has had numerous athlete queries in relation to why the sample collection procedures use the term ‘gender’ as opposed to the term ‘sex’, with a number of those athletes stipulating that their expectation is that the SCP witnessing sample provision should be of the same ‘sex’ as the athlete. There is likely to be greater focus and scrutiny on this matter within the UK, given the UK Supreme Court’s decision (April 2025) that the legal definition of woman is based on biological sex. UKAD has further work to do to consider the implications of this recent judgement, however consideration could be given to incorporating both ‘sex’ and ‘gender’ into the sample collection procedures within the IST. This may provide assurances for those athletes whose expectation is to be witnessed by a SCP of the same sex, whilst ensuring the procedures are inclusive for transgender and gender diverse athletes.

Suggested changes to the wording of the Article

UKAD at this stage has no proposed wording amendments to cater for this proposed change given the need to further consider the implications of the UK Supreme Court’s recent ruling, however would be happy to engage with WADA in the coming weeks/months to discuss the matter further.

Examples of changes that are being considered by UKAD, pending further review regarding the recent ruling and relevant legislation include:

- C.1 (f) - The ~~gender of the~~ DCO/Chaperone witnessing the passing of a Sample is either;
- i) the same **sex** as the sport gender of the Athlete
  - ii) **in the case of transgender/gender diverse athletes**, the same gender as the sport gender of the Athlete; or
  - iii) male or female gender as declared by the Athlete, if the sport gender of the Athlete is not specified in the applicable sports rules.

C.4.5 - The DCO/Chaperone who witnesses the passing of the Sample:

C.4.5.1 - shall be of the same **sex** as the Athlete providing the Sample.

C.4.5.2 - In the case of transgender/gender diverse athlete, this will be based on the same sport gender the Athlete competes in.

C.4.5.3 - Where the sport gender of the Athlete competes is not specified under the applicable sport rules i.e. in ‘open’ or mixed gender categories, the Athlete shall declare the preferred gender of the SCP who will witness the passing of their Sample (i.e. male or female). The Athlete’s preference shall be considered final and recorded by the DCO/TA.

Reasons for suggested changes

To ensure consideration is applied for Athlete's who have concerns regarding the SCP sex and not limited to gender.

**NADA Austria**

SUBMITTED

Dario Campara, Lawyer (Austria)  
NADO - NADO

**General Comments**

**Annex C – Collection of Urine Samples**

NADA Austria occasionally encounters situations where athletes need to defecate during the doping control process (e.g., due to diarrhea) before providing a urine sample. This raises several questions:

- In such situations, is an exception made to the observation of the athlete, or does the observer continue to monitor the athlete?
- Should a sample be collected at that time, or should the collection be deferred until the athlete next needs to urinate?
- How should the scenario be handled if an athlete claims to have diarrhea? What is WADA's stance on this matter? If athletes are not to be observed in these cases, there is a concern that this reasoning could be used as a pretext to avoid providing their first urine sample after notification.

**NADA**

SUBMITTED

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

**General Comments**

Comment to Art. 5.2 a), Art. 7.4.5, Annex C1 f and Annex C4.5:

There needs to be clarification especially on the case where no gender is specified. Looking at cost it is not possible to always send a male and a female - just if it is clearly a mixed competition.

As well practice has shown that there needs to be a clearer guideline for DCOs on how to handle gender diverse athletes. For example a former male athlete starts as female athlete but no operation on the sex has taken place. It can be very uncomfortable for a female DCO to test the athlete that is now starting as female but has not changed.

We ask for the possibility to change the gender in such situations if all agree. Otherwise there is the concern that DCOs might end the process at this stage.

**Sport Integrity Australia**

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)  
NADO - NADO

**General Comments**

SIA acknowledges that requesting a fundamental change to urine collection at this stage of the Code update process is likely to be difficult and require significant further global consultation. However, considering SIA’s response to Annex B above, SIA suggests that this could be an opportunity for the global anti-doping community to begin discussions around the need for direct witnessing of Athlete urine sample collection from ALL athletes, with a view to making changes in future WADA Code updates allowing for indirect witnessing of urine sample collection on the proviso that any indirect witnessing is conducted in a setting where any possibility of tampering can be detected by means that are as effective as direct witnessing of the passing of the urine sample. There is an opportunity for the anti-doping community to explore ways to be innovative and at the same time decrease the burden on athletes of the anti-doping process ensuring an athlete centred approach, while at the same time protect the fundamental integrity of the sample collection process.

USADA

SUBMITTED

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

NADO - NADO

General Comments

N/A

Suggested changes to the wording of the Article

**Annex C – C.4.5.1**  
Recommended Change: Change in bold. “Where the sport gender of the *Athlete* is not specified under the applicable sport rules i.e. in ‘open’ or mixed gender categories, the *Athlete* shall declare upon arrival at the DCS their sport gender. ~~If the *Athlete* is not aware of their sport gender, they will~~ **An Athlete competing in an open or mixed gender category and who does not identify as a male or female** will be asked to declare the preferred gender of the SCP who will witness the passing of their *Sample* (i.e. male or female). The *Athlete’s* preference shall be considered final and recorded by the DCO **for the purposes of that sample collection**.

Reasons for suggested changes

**Annex C - C.4.5.1**

Reason: USADA recommends the removal of “If an *Athlete* is not aware of their sport gender”. USADA encourages clear language outlining that if an Athlete competed in an open or mixed gender category and does not identify as a male or female then they will be asked to declare their preferred gender (i.e., male or female) of the witnessing SCP.

Annex D (8)

ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

General Comments

DBS may be introduced in the future by NADOs or other Testing Authorities at ICSD events, we recommend that WADA explicitly state that **communication accessibility** must be provided for athletes who are **Deaf or Hard of Hearing** during the DBS Sample Collection process. This is important to ensure athletes fully understand this newer method of Testing.

Suggested changes to the wording of the Article

When conducting DBS Sample Collection, Doping Control Officers shall ensure that athletes who are **Deaf or Hard of Hearing** receive appropriate **communication accessibility**, such as sign language interpretation, visual

supports, or plain language explanation, to fully understand the procedure.

Reasons for suggested changes

Deaf or Hard of Hearing athletes may not be familiar with DBS collection procedures. Without clear **communication accessibility**, athletes may not fully understand what is required or may experience unnecessary stress or procedural confusion. Including this expectation in Annex D will promote fair and consistent Testing practices for all athletes if DBS is used

International Paralympic Committee

SUBMITTED

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

General Comments

D.4.6 & Comment to D.3.1(c)

Despite the reference to athletes with impairments, IPC has observed DCOs asking athletes who are wheelchair users to vacate their wheelchair to sit on a chair that allows their feet to rest on the floor. This is not necessary. It is sufficient that an athlete who uses a wheelchair remains in their chair in an upright, stationary seated position.

IPC recommends including a specific reference to wheelchair users in this article.

Further to this we suggest wording of the question on the WADA template ABP supplementary form to be amended to “Has the Athlete been seated with their feet on the floor, or stationary in their wheelchair, for ten minutes prior to blood collection?”

Article D.4.3

If not already intended, IPC recommends that the entry of temperature data logger information be made a mandatory field in ADAMS.

Suggested changes to the wording of the Article

...shall instruct the Athlete to remain in an upright, stationary seated position with feet on the floor or stationary in their wheelchair for at least ten (10) minutes prior to providing a whole blood Sample....

Reasons for suggested changes

Despite the reference to athletes with impairments, IPC has observed DCOs asking athletes who are wheelchair users to vacate their wheelchair to sit on a chair that allows their feed to rest on the floor. This is not necessary. It is sufficient that an athlete who uses wheelchair remains in their chair in an upright, stationary seated position.

Anti Doping Denmark

SUBMITTED

Jakob Mørkeberg, Scientific Consultant (Denmark)  
NADO - NADO

General Comments

N/A

Suggested changes to the wording of the Article

D.1.1 whole blood by venipuncture (remove)

D.4.9 change “by venipuncture” to “for blood collection”. Last sentence change to “after the collection has commenced”.

**D.4.18** The storage and transport device(s) shall be capable of maintaining the integrity of whole blood *Samples* notwithstanding changes in external temperature. The temperature shall be measured by a temperature data logger during storage and transportation. Whole blood Samples shall not be allowed to freeze at any time. Samples with temperature loggers showing temperatures below zero for a short time are acceptable.

#### Reasons for suggested changes

D.4.18 If the temp. logger report shows high and/or deviating temperatures (although the BSS<85) the athlete could argue that the transport device did not possess the required qualities (being capable of maintaining the integrity of whole blood Samples at a cool and constant temperature over time). From experiences in court we have been challenged several times with the word 'cool' in the ISTI in cases where the BSS<85 but the temperature was high but transported during a short period of time.

I know that we would like ABP samples to be transported cool and without deviations in temperature but as long as the BSS<85 the temperature 'sholdn't matter' (since the BSS equation allows for 'high' temperatures as long as the CAT is short enough).

#### Sport Integrity Australia

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)

NADO - NADO

#### General Comments

SIA notes that there is no mention of a supplementary blood form, however, information around prior exercise, physical activity and sitting time is to be recorded by the DCO on the DCF.

Given that information about prior exercise or similar physical activity in the 60 minutes prior to sample collection is to be recorded by the DCO, rather than introducing new sections to be recorded by the DCO on the DCF (where space is already extremely limited), SIA suggests the continuation of using the supplementary blood questionnaire to record this information in a situation where whole blood is collected.

#### Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

#### General Comments

D.1.1 whole blood by venipuncture (remove)

D.4.9 change “by venipuncture” to “for blood collection”. Last sentence change to “after the collection has commenced”.

D.4.18 The storage and transport device(s) shall be capable of maintaining the integrity of whole blood *Samples* notwithstanding changes in external temperature. The temperature shall be measured by a temperature data logger during storage and transportation. Whole blood Samples shall not be allowed to freeze at any time. Samples with temperature loggers showing temperatures below zero for a short time are acceptable.

Reason: If the temp. logger report shows high and/or deviating temperatures (although the BSS<85) the athlete could argue that the transport device did not possess the required qualities (being capable of maintaining the integrity of whole blood

Samples at a cool and constant temperature over time). From experiences in court we have been challenged several times with the word 'cool' in the ISTI in cases where the BSS<85 but the temperature was high but transported during a short period of time.

I know that we would like ABP samples to be transported cool and without deviations in temperature but as long as the BSS<85 the temperature 'sholdn't matter' (since the BSS equation allows for 'high' temperatures as long as the CAT is short enough).

USADA

SUBMITTED

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

NADO - NADO

General Comments

**Annex D – D.4.9**  
Recommended Change: Changes in bold. “The BCO shall assess the most suitable location **for collecting the sample for venipuncture** that is unlikely to adversely affect the *Athlete* or their performance. This should be the non-dominant arm, unless the BCO assesses the other arm to be more suitable. The BCO shall clean the skin with a sterile disinfectant wipe or take the blood *Sample* from a superficial vein into the tube. The tourniquet, if applied, shall be immediately removed after **collection the venipuncture** has been made.”

Suggested changes to the wording of the Article

**Annex D – D.1.1**  
Recommended Change: Remove “by venipuncture”

**Annex D – D.4.18**  
Recommended Change: Changes in bold. “The storage and transport device (s) **shall should** be capable of maintaining the integrity of the whole blood *Samples notwithstanding changes in external temperature. The temperature shall be measured by a temperature data logger during storage and transportation. Whole blood Samples should not be allowed to freeze at any time. at a cool and constant temperature over time, measured by a temperature data logger during storage and transportation notwithstanding changes in external temperature.*”

Reasons for suggested changes

**Annex D - D.1.1**  
Reason: This is not necessary and is too restrictive for future microcapillary use.

**Annex D - D.4.18**

Reason: While ABP samples should ideally be transported cool and without deviations in temperature, as long as the BSS<85 the temperature 'shouldn't matter' (since the BSS equation allows for 'high' temperatures as long as the CAT is short enough).

Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

General Comments

**Annex D. 1.1**

The CCES suggests replacing the reference to “by venipuncture” with “To collect an Athlete’s whole blood Sample in a manner that ensures...”

Comment to Annex D.4.6

Although there is no change, the CCES would reiterate our comments from the last Code review to include wording to allow athletes to lie down for 10 minutes, rather than only provide the option of “a normal seated position.” There are athletes who know they are prone to faint with blood collection and request to be lying down for the venipuncture procedure. To avoid moving following the 10-minute waiting period, the Annex could include that the athlete be “in a normal seated position with feet on the floor, or lying down, for at least 10 minutes...” If there are additional considerations for the waiting period for an athlete who requests to lie down during venipuncture, they could be included as well. This is also referenced in Annex I.3.1 and Annex J.5.5.

Annex D.4.9

The CCES would suggest updating the wording to remove reference to “venipuncture.”

*Proposed Wording:* The Blood Collection Officer (BCO) shall assess the most suitable location for collecting the sample that is unlikely to adversely affect the *Athlete* or their performance. [...] The tourniquet, if applied, shall be immediately removed after the collection has commenced.

Norwegian doping control laboratory

SUBMITTED

Lasse Bækken, APMU (Norge)  
Other - WADA-accredited Laboratories

General Comments

D.4.18

As the BSS accepts higher than cool temperatures (and larger fluctuations) if the collection to analysis time is short enough, we suggest rewriting “The storage and transport device(s) shall be capable of maintaining the integrity of whole blood Samples at a cool and constant temperature over time, measured by a temperature data logger during storage and transportation notwithstanding changes in external temperature” to “The storage and transport device(s) shall be capable of maintaining the integrity of whole blood Samples, measured by a temperature data logger during storage and transportation notwithstanding changes in external temperature”.

As hematological ABP samples may keep their integrity despite the temperature being sub-zero during transport, we suggest rewriting from “shall not be allowed to” to: “Whole blood Samples shall not freeze at any time”.

Annex F (3)

ICSD

SUBMITTED

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

General Comments

ICSD strongly supports the principles of Annex F regarding the ethical and professional standards that Sample Collection Personnel must uphold. We respectfully recommend that WADA explicitly include **communication accessibility** as part of the DCO’s and other personnel’s duty to ensure clear communication and athlete understanding — specifically for athletes who are **Deaf or Hard of Hearing**. This is critical to ensuring fairness and respect for all athletes during Testing

Suggested changes to the wording of the Article

In Annex F, under principles related to **communication** and **athlete understanding**, add:

Sample Collection Personnel shall ensure that athletes who are **Deaf or Hard of Hearing** are provided with appropriate **communication accessibility**, such as sign language interpretation, visual supports, or plain language explanation, to ensure the athlete fully understands the Testing procedures.

Reasons for suggested changes

**Deaf or Hard of Hearing athletes** often face significant communication barriers during Testing, particularly when DCOs are unfamiliar with accessibility needs. Without explicit expectations in the Code of Conduct, important principles such as respect, fairness, and athlete understanding cannot be fully upheld for these athletes. Including this language will help ensure that Sample Collection Personnel are aware of their responsibility to provide **communication accessibility** and uphold the rights of Deaf or Hard of Hearing athletes

Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

General Comments

N/A

Suggested changes to the wording of the Article

The title now contains a spelling error ('Requirment' instead of 'Requirement')

Canadian Centre for Ethics in Sport

SUBMITTED

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

General Comments

Annex F.4.3 and Comment

Advising an athlete they are not to hydrate may be unsafe to the athlete. Considering that samples are collected until a suitable sample is provided, the CCES would suggest WADA considers rewording to specify excessive hydration.

*Prosed Wording:* While waiting to provide a further Sample, the Athlete shall remain under continuous observation and should be advised not to over hydrate, since this may delay the production of a suitable Sample. In appropriate circumstances, excessive hydration after the provision of an unsuitable Sample may be pursued as a violation of Code Article 2.5

*[Comment to F.4.3: It is the responsibility of the Athlete to provide a Sample with a Suitable Specific Gravity for Analysis. Sample Collection Personnel shall advise the Athlete and Athlete Support Personnel as appropriate of this requirement at the time of notification in order to discourage excessive hydration prior to the provision of the Athlete’s first Sample.*

Annex G (6)



Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

#### General Comments

Annex G lacks explicit requirements for SCP to be trained in providing accessible communication for Deaf and Hard of Hearing athletes. ICSD recommends that Annex G include provisions to ensure SCP are equipped with appropriate communication skills and tools to interact equitably with Deaf athletes during the Sample Collection Session

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

#### Proposed additional sentence (insert in Annex G, under general SCP training requirements):

Sample Collection Personnel shall be trained in ensuring effective communication with athletes with communication disabilities, including Deaf and Hard of Hearing athletes, and shall use appropriate communication aids (e.g., written instructions, visual aids, or sign language interpretation) where required to ensure athletes fully understand the procedures and their rights

#### Reasons for suggested changes

Deaf athletes face unique communication barriers which may impact their ability to understand and comply with Sample Collection procedures. Without explicit requirements for SCP training in communication accessibility, there is a risk of procedural errors, athlete stress, and potential violations of athlete rights under human rights principles. Adding this requirement aligns with WADA's stated commitment to human rights and accessibility and promotes equity for Deaf and Hard of Hearing athletes

#### World Rugby

Ross Blake, Anti-Doping Education Manager (Ireland)

Sport - IF – Summer Olympic

#### General Comments

**General:** We wish to reiterate our comments from the first draft around the need for appropriate and specific DCO/chaperone numbers to be mandated at test events. Being able to impose consequences for doping offences identified via sample collection is fundamental to the success of the entire worldwide programme, and this relies entirely on successful adherence to the IST. However in practice, the standard of chaperoning, and particularly shortcuts in allocation of chaperone/DCO numbers by some ADOs for test missions puts this at significant risk. The changes to the IST will help with the chaperoning standards, but the continued failure to impose minimum standards for doping control staff numbers is a risk for all ADOs who contract testing from other ADOs or SCAs. Standards are not consistent, and often problems are not identified until the hearing stage when it is too late, which does both athletes and the RMA a disservice.

**4.4.2 (c)** We consider that this article remains problematically weak with the insertion of '*at least one*' with regards to on-site observation by a DCO trainer. The '*at least*' adds little, as those ADOs with less rigorous training programmes remain subject to the same requirements as per the previous IST and can continue to just perform a single observation, which we consider to be inadequate based on our extensive experience of using a range of service providers worldwide. DCO training remains one of the biggest challenges within the worldwide movement and would benefit from much more stringent sanctions being imposed by WADA. Whilst we acknowledge that this may be a resourcing challenge for some ADOs, a trained and competent DCO should be a non-negotiable part of our responsibility to athletes.

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

### General Comments

G.4.4.4 (d) - Resubmitted Comment: UKAD supports that volunteer Chaperones are provided with temporary partial accreditation, however, that the responsibility for provision is extended to the organisation who determined/decided that volunteer Chaperones are to be used. There are different scenarios and this decision is not always instigated by the SCA.

### Suggested changes to the wording of the Article

G.4.4.4 (d) - UKAD proposes the following changes:

"Volunteer Chaperones shall be provided with a temporary partial accreditation by the TA, SCA or by the Event Organiser (the organisation who decided that volunteer Chaperones are to be used) and be valid for the Event only. The temporary partial accreditation shall contain at a minimum their name and role and shall also have available government issued photo identification to validate their identity."

### Reasons for suggested changes

G.4.4.4 (d) - To accommodate the different organisations involved and situations where volunteer chaperones are used.

## Swiss Sport Integrity

SUBMITTED

Ernst König, CEO (Switzerland)

NADO - NADO

### General Comments

The addition to Annex G.4.4.4 lit.d) regarding the temporary accreditation for volunteer Chaperones will create a massive and disproportional administrative burden, especially for NADOs. Please note that this requirement does make sense for big events where lots of tests are conducted. However, NADOs are often mandated to only collect a very small number of tests at small Events. With this new requirement, the names of the Chaperones must be coordinated, accreditations be customized, printed and sent out to the Lead DCO before-hand. This process will heavily increase the costs for such small missions and will most likely deter Event Organizers (with traditionally very small budget) from asking for Doping Controls. This cannot be in the spirit of the matter. Left aside the fact that short-term changes to the staffing can impossibly be addressed.

## Sport Integrity Australia

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)

NADO - NADO

### General Comments

SIA notes that G4.4.2 (training program for DCOs) mandates that the "...DCO trainer shall observe the trainee DCO witnessing the passing of the urine Sample but not observe the actual passing of the Sample...", however, there is no equivalent provision at G4.4.3 (training program for Chaperones).

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

SIA requests that G4.4.3 have included within it the same provision as at G4.4.2(c).

**Canadian Centre for Ethics in Sport**

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

**General Comments**

**Annex G.4.4.2**

Consider removing the requirement for a DCO trainer to observe the trainee DCO witnessing the passing of the sample. The CCES notes that a Chaperone, who has significantly less training than a DCO trainee is able to witness the provision of the sample without the DCO observing. Alternatively, could be considered as “should” instead of a “shall.”

**Annex G.4.4.4.e**

This article refers to accredited chaperones. The CCES would request clarification be provided to outline what specifically defines an accredited chaperone.

**Annex H (1)**

**International Paralympic Committee**

SUBMITTED

Jude Ellis, Head of Anti-Doping (Germany)

Sport - IPC

**General Comments**

**Comment to Article H.4.1**

IPC highly values intelligence it receives at any time leading into and during a Games or other major event – and will act on reliable intelligence wherever possible.

We recommend the comment to Article H.4.1 be reworded and included as an article (rather than comment to an article) to make this clearer (and to encourage other ADOs to engage).

Suggested rewording:

*Where Anti-Doping Intelligence is received that warrants Target Testing on specific Athletes to be conducted during the Event Period, a request may be sent to the ruling body at any time prior to or during the Event period.*

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

New Article:

*Where Anti-Doping Intelligence is received that warrants Target Testing on specific Athletes to be conducted during the Event Period, a request may be sent to the ruling body at any time prior to or during the Event period.*

**Annex I (4)**

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)  
NADO - NADO

General Comments

SIA notes that Annex I refers to procedures set out in Annex D.4. SIA has previously sought a change to Annex D that, if accepted, would be covered in Annex I’s reference to Annex D.4.

Marjorit Elorinne, Quality Manager (Suomi)  
NADO - NADO

General Comments

When updating the Athlete Biological Passport Operating Guidelines/ABP-SRF regarding the mandatory questions it would be useful to have some additions like Heat-training specifically indicated as well as some more guidance on /examples of situations/ actions which could be useful information to be documented at the time of sample collection (cold exposure methods, resent or ongoing viral infections or illnesses, cupping, massage etc??) More comprehensive instructions or examples would assist BCOs/DCOs documenting the information needed and minimize the need for ADOs to contact the athlete afterward in order to obtain or clarify further information, although this possibility is welcomed.

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

General Comments

Annex I.5.2

The prior article says the athlete shall be chaperoned until the 2 hours period has elapsed. The CCES would note that as there should not be samples collected within 2 hours, this article may not be necessary.

Annex I.5.5

Aligned with feedback from the INRS, there is a need for consistency between the International Standard for Testing (IST) and the Athlete Biological Passport (ABP) guidelines. It has been noted that in recent cases, the Blood Stability Score (BSS) has been challenged as even though it may be < 85, the sample wasn’t necessarily cool and IST Articles D.4.16 and D.4.18 indicate that the sample must be transported in a “cool and constant environment.”

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

General Comments

Annex I – I.5.5

For Comment: This article needs to be consistent with Annex D.4.18. The BSS can be under 85 but if the sample is not transported under cool and constant temperature, which one is given the priority if challenged? USADA recommends that reference of the BSS be added to Annex D.4.18.

### Annex I – I.5.6

For Comment: The language and graph need to be extended below 4 degrees.

## Annex J (12)

### Council of Europe (CoE)

SUBMITTED

Council of Europe, Sport Convention Division (France)

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

#### General Comments

Annex J: There are suggestions to outline the use of 50 µl spots and its use for two different analyses in the Technical Document instead of the IST. As well as there is a concern that single DBS testing for example during events in a concentrated mission will be avoided due to the reasons that have to be given for using single DBS. There is a suggestions to erase giving a reason for single DBS testing or enable giving reason for missions/ group of single DBS tests.

### Anti Doping Denmark

SUBMITTED

Jakob Mørkeberg, Scientific Consultant (Denmark)

NADO - NADO

#### General Comments

N/A

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

J.3.3 Remove start of sentence “Due to absence of venipuncture during DBS collection...”

### Anti Doping Danmark

SUBMITTED

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

#### General Comments

N/A

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

J.3.3 Remove start of sentence “Due to absence of venipuncture during DBS collection...”

Ernst König, CEO (Switzerland)  
NADO - NADO

General Comments

N/A

Suggested changes to the wording of the Article

The second phrase of Annex J.3 does not add up (probably remove the "while")

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 Annex J Collection, Storage and Transport of DBS Samples

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

General Comments

J.3.2 DBS Samples if collected in isolation on RTP or TP Athletes shall not be counted as part of the minimum number of OOC Test requirements. TAs that decide to collect DBS Samples in isolation shall be able to demonstrate to WADA their rationale for doing so.

ADSE suggests omitting the last sentence.

Suggested changes to the wording of the Article

J.3.2 DBS Samples if collected in isolation on RTP or TP Athletes shall not be counted as part of the minimum number of OOC Test requirements. ~~TAs that decide to collect DBS Samples in isolation shall be able to demonstrate to WADA their rationale for doing so.~~

Reasons for suggested changes

If not counted as part of the minimum sentence number of OOC Test requirements, there is no harm in collecting further samples and the rational for doing so should not have to be demonstrated to WADA. We can see several situations where RTP and TP athletes are part of a larger group that are tested for DBS only.

## NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

### General Comments

Comment to Annex J:

As the Annex does not refer to liquid capillary blood samples, we suggest to add this option.

Comment to Annex J 3.2:

We fear that the demonstration of the rational for doing so is an additional burden for ADOs to execute DBS where it would generally be a benefit to execute DBS such as in situtaion where athletes are hydrated (weight phases, long distance disciplines e.g.) or in between competitions, concentrated testing in fields of athletes e.g. Furthermore, it is not clear how such demonstration should look like and ask for a practical approach in this matter.

We suggest to erase giving a reason for single DBS testing or enable giving reason for missions/ group of single DBS tests. In addition, ADAMS needs to be adjusted accordingly.

## Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

### General Comments

### Annex J.3.3

The CCES would suggest updating the wording to remove, “Due to the absence of venipuncture during DBS collection.”

## USADA

SUBMITTED

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

NADO - NADO

### General Comments

### Annex J – J.3.2

For Comment: See previous comment from Comment to 4.10.12.1, in which USADA fully supports DBS only collections to be counted as part of the minimum OOC testing requirements for *TP Athletes*, provided that the sample is analyzed according to the DBS Harmonized menu (outlined in the TD2025DBS), at a minimum.

### Suggested changes to the wording of the Article

### Annex J – J.3

Recommended Change: Changes in bold. “When planning to collect DBS *Samples* ADOs shall consider the available type of analyses. DBS *Sample* collections are complementary to existing *Sample* collections and **while** DBS *Sample* collections **may shall** replace the need for urine *Sample* collections as part of an effective *Testing* program.”

### Annex J – J.3.3

Recommended Change: Changes in bold. ~~“Due to the absence of venipuncture during DBS collection,~~ DBS *Samples* may be collected by a DCO without the need for a BCO if standard precautions in healthcare settings are followed and the DCO is suitably trained. Procedures for DBS collection shall be consistent with local standards and regulatory requirements.

#### **Annex J – J.4.f**

Recommended Change: Changes in bold. “The “A” and “B” absorbent *Sample* support shall allow the collection of distinct “A” and “B” spots (or equivalent) ~~with a minimum total of~~ with a minimum total of 3 spots for the “A” *Sample* and 1 spot for the “B” *Sample* and”

#### **Annex J – J.5.8**

Recommended Change: Changes in bold. “The DCO/BCO shall assess the most suitable location for puncture/incision **which will typically be** at the fingertip and/or from the upper arm that is unlikely to adversely affect the *Athlete* or their sporting performance (e.g., non-dominant hand/arm). This should be a puncture/incision site that is free of any calluses, cuts, scars and tattoos. The DCO/BCO should select an alternative suitable puncture/incision site for *Athletes* with physical impairments if applicable.”

Reasons for suggested changes

#### **Annex J - J.3**

Reason: The sentence, specifically “and while” is not grammatically correct. Additionally, there are times when DBS alone is entirely justifiable. See previous comment from Comment to 4.10.12.1.

#### **Annex J - J.3.3**

Reason: Start of sentence is unnecessary.

#### **Annex J – J.4.f**

Reason: Repetitive language

#### **Annex J – J.5.8**

Reason: Other sites can be used for athletes who need modifications, especially certain paralympic athletes.

### **Sport Integrity Commission Te Kahu Raunui**

SUBMITTED

Jono McGlashan, GM Athlete Services (New Zealand)

NADO - NADO

#### **General Comments**

We request further clarification on whether multiple DBS collection devices can be used across A and B samples, and if so, how they should be securely packaged. The current language leaves room for interpretation and may lead to inconsistent implementation across ADOs.

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

### **Sport Integrity Australia**

SUBMITTED

Cameron Boland, Assistant Director Anti-Doping Policy (Australia)

NADO - NADO

#### **General Comments**

SIA considers that ADOs need further guidance on collection sites for DBS collection, when not using the fingerprint method, and where options are limited or not available or suitable.

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

SIA asks for WADA to include a recommendation for sample collection site for DBS where both arms are not suitable (e.g. in cases of double amputee or other such scenarios).



## Berlinger Special AG

SUBMITTED

Vreni Müller, Head of Sales & Marketing (Switzerland)

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

### General Comments

J.4 a) "...The use of external supports for the transfer of capillary blood (positive displacement pipettes and pipette tips, end-to-end separate calibrated capillaries, etc.) is not permitted.

-> We would be interested to understand why, for example, calibrated pipettes are not permitted as external support for transferring capillary blood onto the sample absorbent support. From a development perspective, such a requirement limits the range of potential system solutions.

### Suggested changes to the wording of the Article

Annex J J.4 f) "...distinct “A” and “B” spots (or equivalent) with a minimum total of with a minimum total of 3 spots..."

-> Please remove "with a minimum total of" once.

## Other Comments / Suggestions (12)

### International Cricket Council

SUBMITTED

Vanessa Hobkirk, Anti-Doping Manager (United Arab Emirates)

Sport - IF – IOC-Recognized

### General Comments

The ADAMS reporting function should be extended to include as a selection criteria ‘Group’ (from the group function in ADAMS) such as testing pools/whereabouts pool such that information relevant to this group of individuals can be accessed in one report. This will provide a quick and efficient way to access the test records of all individuals in the pool. This would help ensure that the TDP is effectively monitored and updated.

The ABP notification function in ADAMS should be enhanced to allow users to easily differentiate between notifications requiring an ADO’s attention and those that are automated.

### ICSD

SUBMITTED

Mark Kusiak, ICSD Anti-Doping (Canada)

Sport - IF – IOC-Recognized

### General Comments

ICSD welcomes the updated IST and appreciates the improvements in quality and clarity. However, we note that while there are good references to accessibility in some areas (Annex A, Article 5.4.1), there is not consistent guidance across all Articles and Annexes to ensure full communication accessibility for Deaf and Hard of Hearing athletes. We strongly recommend that WADA consider adding either a general Article, cross-reference, or Technical Document to ensure that **communication accessibility is consistently required for all testing processes** (urine, blood, ABP, DBS, Event Testing, etc.).

This would support compliance with WADA’s Human Rights commitments and ensure equal treatment of all athletes, regardless of disability

Dave Lolo, CEO (Vanuatu)

NADO - NADO

#### General Comments

No comments/ suggestions.

#### NADA Austria

SUBMITTED

Dario Campara, Lawyer (Austria)

NADO - NADO

#### General Comments

Article 4.3 Defining International-Level and National-Level Athletes4.3.1 & Comment to 4.3.1

#### Wording in the IST:

*“4.3.1.: Code Article 5.2 gives different ADOs authority to conduct Testing on potentially very large pools of Athletes. However, in recognition of the finite resources of ADOs, the Code definition of Athlete allows NADOs to limit the number of Athletes who will be subject to their national anti-doping programs (in particular, Testing) to those who compete at the highest national levels (i.e., National-Level Athletes, as defined by the NADO). It also allows International Federations to focus their anti-doping programs (in particular Testing) on those who compete regularly at the international level (i.e., International-Level Athletes, as defined by the International Federation).”*

*“Comment to 4.3.1: Nothing prevents an International Federation from testing an Athlete under its authority who is not an International-Level Athlete, if it sees fit, e.g., where they are competing in an International Event. Furthermore, as set out in the Code definition of Athlete, a NADO may decide to extend its anti-doping program (including Testing) to Athletes under its authority who are not National-Level Athletes. However, the main focus of an International Federation's TDP should be International-Level Athletes, and the main focus of a NADO's TDP should be National-Level Athletes and above.”*

#### Comment NADA Austria:

If a NADO limits its testing program solely to athletes competing at the highest national levels, there is a significant risk that certain international-level athletes may not be adequately tested. This includes athletes who regularly compete internationally but rarely participate in national-level events and are also not included in the IFs Whereabouts Pools – often because they are not among the absolute elite in their sport.

As a result, these athletes may fall outside the scope of both national and international testing programs, creating a blind spot in the overall testing system.

4.3.2 a)

#### Wording in the IST:

*“Comment to 4.3.2 a): The Code requires each International Federation to publish in clear and concise form the criteria it uses to classify Athletes as International-Level Athletes, so that it is clear to everyone where the line is drawn. For example, if the criteria include competing in certain International Events, then the International Federation shall publish a list of those International Events.”*

#### Comment NADA Austria:

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.

This information is currently difficult or, in some cases, impossible to find on IF websites. 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.

#### Annex E.4 RequirementsE.4.6

#### Wording in the IST:

*“E.4.6: When the Athlete is able to provide an additional Sample, the procedures for collection of the Sample shall be repeated as prescribed in Annex C - Collection of Urine Samples, until a sufficient volume of urine will be provided by combining the initial and additional Sample(s).”*

#### Comment NADA Austria:

**Example 1:** If the athlete provides 60 mL of urine initially, which appears to have a very high specific gravity (i.e., it is very dense), and then 80 mL of urine, which appears to have a very low specific gravity (i.e., it is very diluted), should all of the 80 mL be used and combined with the first sample? Alternatively, should only 30 mL be used from the second sample? What is the best approach: to prioritize a higher total volume or to focus on obtaining a denser sample?

**Example 2:** If the athlete provides 70 mL of urine with a very high specific gravity (dense) initially, and then 100 mL of urine with a very low specific gravity (diluted), should all 100 mL be used and combined with the first sample? Should only 20 mL be used from the second sample? Or should only 80 mL be used from the second sample? Again, what is better – to achieve a higher total volume or to use a denser urine sample?

These questions pertain to balancing the need for sufficient volume with maintaining the integrity of the sample's quality. Which approach is preferred for achieving the most reliable results?

## UK Anti-Doping

SUBMITTED

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

### General Comments

General comment across the Code and International Standards - UKAD is proposing that a review of the terminology used across the Code and International Standards is conducted when referring to gender. Currently it states 'male' and 'female', however, that refers to sex as opposed to gender. UKAD proposes that when referring to gender, terms stating 'male' and 'female' are changed to 'men' and 'women'. This ensures the correct terminology is used when referencing gender.

Appendix E - E.4.4 - Resubmitted Comment: UKAD proposes that this Article is extended to include Chaperones (excluding volunteer Chaperones) to improve efficiencies in the process however notes this should only be applied to an athlete's first partial sample and any combination of samples and subsequent recording should be completed by the DCO.

### Suggested changes to the wording of the Article

Appendix E - E.4.4 - UKAD proposes the following:

"The Chaperone or DCO shall record the first partial Sample number and the volume of the insufficient Sample on the Doping Control form and confirm its accuracy with the Athlete. Any subsequent partial sample number, volume and confirmation should be completed by the DCO. The DCO SCP shall retain control of the sealed partial Sample."

## NADA

SUBMITTED

NADA Germany, National Anti Doping Organisation (Deutschland)

NADO - NADO

### General Comments

Comment to Annex K:

We suggest to broaden the matrix for digital testing and include DBS testing additionally to urine as it is far easier to execute digital

## 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 the removal of Annex L.

## Canadian Centre for Ethics in Sport

SUBMITTED

Bradlee Nemeth, Manager, Sport Engagement (Canada)

NADO - NADO

### General Comments

General Comments to Part One

The CCES would suggest the definition of “Unsuccessful Attempt Report” (UAR) consider removing “from an athlete in a Registered Testing Pool or Testing Pool” as UAR reports are beneficial for non- Registered Testing Pool (RTP) athletes and can be relied upon to add someone to an RTP. Should WADA agree, the CCES feels the requirement to include the UAR in ADAMS should be limited to only RTP Athletes.

General Comments to Annex K

Consider whether Annex K would be better suited as “Guidelines for Testing During a Pandemic” rather than an Annex in the IST. Consider also changing the title to include reference to national epidemics.

Proposed Wording: COLLECTION OF URINE *SAMPLES* IN A VIRTUAL ENVIRONMENT DURING A PANDEMIC OR EPIDEMIC

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

#### General Comments

N/A

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

#### Annex K

Recommended Change: Changes in bold. “COLLECTION OF URINE **AND DBS** SAMPLES IN A VIRTUAL ENVIRONMENT DURING A PANDEMIC”

#### Reasons for suggested changes

#### Annex K

Reason: Dried blood spot (DBS) sampling offers significant benefits for virtual testing, especially as demonstrated during the COVID-19 pandemic. DBS allows individuals to self-collect small blood samples at home using a simple finger-prick, eliminating the need for in-person visits and professional phlebotomy. This is particularly useful when social distancing and lockdowns make traditional blood collection impractical or unsafe. DBS samples are easy to mail, require no refrigeration, and remain stable during transport, making them ideal for remote or decentralized testing programs.

#### International Testing Agency

SUBMITTED

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

#### General Comments

##### General

Based on the proposed changes to the IST and additional administrative burdens, please see below a list of some of the priorities that WADA could consider with regards to updating ADAMS to ensure ADOs can cope well with the increased IST requirements:

**Testing Time Classification:** Enable documentation within ADAMS DCFs to indicate whether a test is conducted In Hours, Out of Hours (OOH), or marked as N/A. Develop dashboards – similar to those used for TDSSA – to allow monitoring of In Hours vs. OOH testing, particularly for RTP athletes. The same goes for marking advance notice and the specific circumstances around it.

**Testing Pool History:** Enhance the athlete profile section related to testing pool information. The system should allow visibility into the full history of an athlete's testing pool status, including: type of test pool, date of inclusion, reason for inclusion, exclusion date (if applicable), and exclusion reason (if applicable). Currently, only the athlete's current status is viewable, which limits transparency.

**Phone Number Entry:** Improve the section where athletes record their phone numbers by introducing mandatory fields such as country code and phone number validation based on that code. The purpose of each number should also be specified (e.g., primary, mobile, home, coach's number, or third-party delegate).

**Athlete Profile Photos:** Introduce functionality to allow automatic verification that an athlete's uploaded profile photo meets the required compliance standards.

**Team Sports and Whereabouts:** For athletes competing in team sports, enable linkage between the athlete's ADAMS profile and their club. This would allow the NADO in the country where the club is based to access the athlete's whereabouts information. The current workaround – s modifying an athlete's sport nationality – is not ideal. When Team Managers submit Team Activities, those should automatically populate in the relevant athletes' Whereabouts information.

## Bird & Bird LLP

SUBMITTED

Huw Roberts, Of Counsel (United Kingdom)

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

### General Comments

#### Section K

The AIU suggests deleting the words 'during a pandemic' in the title as the section deals with other situations in which samples might be collected in a virtual environment e.g., a national epidemic.

## National Anti-Doping Laboratory, Beijing Sport University

SUBMITTED

Lisi (Leo) Zhang, Lab Manager (China)

Other - WADA-accredited Laboratories

### General Comments

A general Resource Requirement is recommended to be added for the SCA, in a similar fashion of ISL provision 5.2, which should at least includes:

-Personnel: Specific qualification of personnel responsible for testing planning. For example, "a natural or life sciences with appropriate experience and/or training in clinical science, sports medicine and pharmacokinetics."

- Management System: a software-based data and information management system with secure and restricted access to stored electronic data by authorized personnel only, which supports and maintains proper traceability and data format requirement fully compatible to ADAMS.

### Reasons for suggested changes

In day-to-day routine operation, laboratories are often frustrated by frequently mistakes in DCFs, not only clerical errors, but also misunderstanding of test method mismatching sample matrix, APMU recommendations and unreasonable turnaround time requests. This is often caused by the lack of basic scientific background of key personnel of Sample Collection Authorities and a properly function designing of their systems outside of ADAMS's scope.