

Summary of Audit Outcomes

Audit details

Signatory	Dates of Audit	Type of Audit	Scope of Audit
Commission communautaire commune de Bruxelles-Capitale (Brussels NADO)	2-3 April 2025	In-person ☒ Virtual ☐ Desk ☐	Full Audit ☐ Partial Audit ☒ If partial audit, program areas audited: Testing, Intelligence and Investigations, Results Management and Governance

Background of the audit

The partial audit was proposed by WADA's internal Compliance Taskforce and endorsed by the Compliance Review Committee (CRC) based on the monitoring process outlined in the International Standard for Code Compliance by Signatories (ISCCS), specifically Articles 7.2.1 and 7.2.2. WADA officially notified Brussels NADO of the audit on 31 January 2025.

The Lead Auditor communicated with the Brussels NADO via email to provide initial details and a draft audit plan, and on 13 March 2025 held a teleconference to discuss the objectives of the audit, the audit plan, logistical details, and to confirm the availability of all staff of the Brussels NADO and documentation during the period of the audit.

Methodology

To prepare for this audit, the audit team used data held by WADA, including ADAMS, Gracenote, and the legal department's database, as part of its review of the Brussels NADO's anti-doping program in the areas of Governance, Testing, Intelligence and Investigations and Results Management. Furthermore, WADA requested that the Brussels NADO provide a number of documents in advance of the audit.

From the discussions, interviews, observation of procedures and review of documents provided by the Brussels NADO during the audit, it was apparent that the Brussels NADO had prepared for the audit and was open in the discussions. Staff and documents were available to the audit team during the audit.

General findings

Date updated: 10 October 2025				
Program Area	Critical Findings	High Priority Findings	General Findings	Total
Governance	-	-	-	-
Testing	6	5	-	11
Intelligence & Investigations	-	-	-	-
Results Management	5	-	-	5
Total	11	5	-	16

Summary of findings¹

Critical findings

1. Although the Brussels NADO had conducted a testing risk assessment, it did not fully comply with the International Standard for Testing and Investigations (ISTI). The risk assessment also did not include a certain number of sports and sport disciplines in which athletes perform at national and international level in Belgium. Furthermore, the Brussels NADO confirmed during the audit that the testing risk assessment was developed after the Test Distribution Plan (TDP), although it should be done before so that the results of the risk assessment can assist the development of the TDP.
2. The TDP did not prioritise between sports and/or sport disciplines or between different athletes for the purposes of target testing, as required in the ISTI. The criteria for inclusion in the Brussels NADO's Registered Testing Pool (RTP) and Testing Pool (TP) could not be updated as needed due to regulatory factors. Insufficient samples were collected on several TP athletes, contrary to the ISTI. The Brussels NADO also did not plan to test athletes in its TP Out-of-Competition (OOC) at least once per year, as required in the ISTI.
3. During the audit, the Brussels NADO confirmed that its Doping Control Officers (DCO) were instructed to systematically call the athlete if they cannot be located before declaring a failed attempt, which is contrary to the ISTI.

¹ The following is a summary of the key findings of the audit as opposed to an exhaustive list of all findings. In respect of each finding, WADA required a specific corrective action to be undertaken in order to avoid similar issues in the future.

4. There were several cases in which the Brussels NADO did not notify the relevant Anti-Doping Organizations (ADOs) with a right of appeal of its reasoned decision not to bring forward an Adverse Analytical Finding (AAF) as an Anti-Doping Rule Violation (ADRV), as required in the Code and International Standard for Results Management (ISRM).
5. The process followed by the Brussels NADO for apparent filing failures is not in line with the ISRM. More specifically:
 - Where an athlete does not submit its whereabouts filings by the date requested by the Brussels NADO, which is some days before the start of the quarter, the Brussels NADO registers a filing failure against the athlete, even though a filing failure cannot be asserted unless the information is submitted after the start of the quarter in question;
 - The first notification sent to the athlete provides that the filing failure is registered without giving the athlete an opportunity to submit their explanations or setting out the athlete's right to then contest that decision; and
 - When notifying an athlete of a filing failure, the Brussels NADO did not indicate that the athlete must file the required whereabouts filing (or update) by the deadline specified in the notice (which must be within 48 hours after receipt of the notice), as required in the ISRM.
6. When registering a third whereabouts failure for an athlete within 12 months, the Brussels NADO sent a notice of charge without first sending a first notification of an apparent ADRV, as required in the ISRM.

High priority findings

1. The Brussels NADO did not coordinate its testing efforts with other ADOs with overlapping testing authority to maximise the effectiveness of those combined efforts, to avoid unnecessarily repetitive testing of particular athletes and to ensure athletes competing at international events are suitably tested in advance, as required in the ISTI.
2. On occasion, the Brussels NADO did not follow up on Athlete Passport Management Unit (APMU) target testing recommendations, as required in the ISTI.
3. The Brussels NADO did not use temperature loggers to record the temperature of blood samples from sample collection to analysis, as required in the ISTI.
4. The RTP inclusion letter of the Brussels NADO did not require RTP athletes to submit certain required information, such as, their place of work or where they conduct any other regular activity.

Conclusion

The Brussels NADO recorded a high number of findings in the area of testing (11, including six critical). In the area of Results Management several aspects could only be assessed theoretically considering that the Brussels NADO has had limited results management activity to date. Some key findings relate to the complexity of the legal framework as well as the anti-doping landscape in Belgium, which is the only country that does not have a single, centralized NADO. It is recommended that the four NADOs of Belgium attempt to streamline their activities in a more efficient manner.