

Summary of Audit Outcomes

Audit details

Signatory	Dates of Audit	Type of Audit	Scope of Audit
NADO-DG Eupen (German Community 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 German Community NADO of the audit on 31 January 2025.

The Lead Auditor communicated with the German Community NADO via email to provide initial details and a draft audit plan, and on 10 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 German Community 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 German Community NADO's anti-doping program in the areas of Governance, Testing, Intelligence and Investigations and Results Management. Furthermore, WADA requested that the German Community 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 German Community NADO during the audit, it was apparent that the German Community 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	1	-	1	2
Testing	7	3	-	10
Intelligence & Investigations	-	1	-	1
Results Management	-	-	-	-
Total	8	4	1	13

Summary of findings¹

Critical findings

1. The German Community NADO does not allocate sufficient financial and human resources to implement an anti-doping program that is compliant with the Code and International Standards.
2. The German Community NADO had not entered all Doping Control Forms (DCFs) into ADAMS within the 21-day requirement from sample collection, as required in the International Standard for Testing and Investigations (ISTI). In addition, some data entry errors were identified, leading to certain samples not being matched in ADAMS.
3. Although the German Community NADO had conducted a testing risk assessment, it did not fully comply with the 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 German Community NADO did not monitor, evaluate and update its testing risk assessment during the year/cycle in light of changing circumstances and implementing the Test Distribution Plan (TDP).
4. The TDP was not aligned with the risk assessment and did not prioritise between sports and/or sport disciplines, nor did it determine what types of testing are required in an order of priority to detect and deter doping practices within sports/sport disciplines.

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.

5. The German Community NADO did not meet the Minimum Levels of Analysis (MLA) mentioned in the Technical Document for Sport Specific Analysis (TDSSA), as required in the ISTI.
6. Based on the information available to the audit team, the German Community NADO did not conduct three Athlete Biological Passport blood tests per year on athletes in the Registered Testing Pool (RTP) competing in sports and/or disciplines where the MLA for Erythropoietin Receptor Agonists (ERAs) is 30% or greater.
7. The criteria for inclusion in the German Community NADO's RTP and Testing Pool (TP) could not be updated as needed due to regulatory factors. In addition, the German Community NADO did not collect three or more Out-of-Competition (OOC) tests per year from athletes in its RTP, nor did it plan to test athletes in its TP OOC at least once per year, as required in the ISTI.

High priority findings

1. The German Community NADO did not use temperature loggers to record the temperature of blood samples from sample collection to analysis, as required in the ISTI.
2. The RTP inclusion letter of the German Community NADO did not include all mandatory requirements of the ISTI, such as, mentioning that the athlete may also be tested by other anti-doping organizations which have testing authority over them.
3. The reaccreditation program for sample collection personnel of the German Community NADO was not compliant with the requirements of the ISTI.
4. The policies and procedures of the German Community NADO in relation to intelligence gathering did not properly address the risk of leaks or inadvertent disclosure, as required in the ISTI.
5. The German Community NADO did not publish an annual general statistical report as required by the Code.

Conclusion

The German Community NADO recorded a high number of findings in the area of testing (10, including seven critical). In the area of Results Management, several aspects could only be assessed theoretically considering that the German Community 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.