

# INTELLIGENCE AND INVESTIGATIONS DEPARTMENT

2021 – 032

## SUMMARY OF OPERATION ECHO

14 October 2021



**WORLD  
ANTI-DOPING  
AGENCY**

## Operation Echo

In February 2011, as part of a study into potential Nandrolone contamination of supplements, British Cycling coaching staff collected samples from elite athletes and screened these samples for 19-Norandrosterone (19-NA) at a non-WADA-accredited laboratory. Before providing the samples, British Cycling told the athletes that United Kingdom Anti-Doping (UKAD) was aware of the study and that the results of their sample analysis would not be shared with UKAD. Operation Echo has established that on 12 January 2011, UKAD was advised of the study via an email from British Cycling. The email reported that athlete samples were to be tested for 19-NA at a non-WADA-accredited laboratory. The email said nothing about whether the analysis results would be shared with UKAD. This email is missing from the UKAD files server and UKAD had no record of the study or ever receiving the analysis results.

## Nandrolone

While exogenous Nandrolone is a Prohibited Substance, humans may naturally produce small amounts of Nandrolone, and, therefore, excrete in urine its major metabolite, 19-NA, at low concentrations. Therefore, to distinguish doping with Nandrolone from what is produced naturally by the body, WADA established requirements for WADA-accredited laboratories to follow to determine whether or not an Adverse Analytical Finding is reported.

---

# 1 KEY EVENTS

---

**12 November 2010** A British cyclist was tested, out-of-competition, by United Kingdom Anti-Doping (UKAD). No Adverse Analytical Finding was reported. However, the sample reported a subthreshold<sup>1</sup> result for "a small concentration" of the Nandrolone metabolite, 19-norandrosterone (**19-NA**). A subthreshold result is the detection of 19-NA at a concentration below the WADA Decision Limit.

---

**7 December 2010** The laboratory reported the subthreshold result to UKAD.

---

**9 December 2010** UKAD requested a meeting with British Cycling and the athlete involved. The meeting occurred shortly thereafter.

---

**5 January 2011** A British Cycling employee (**BC01**) emailed a colleague saying that given the "controversy surrounding the presence of Nandrolone in athletes [sic] urine" from "supplement contamination", BC01 proposed a "small study/audit" (the "**Nandrolone Study**") to investigate this within British Cycling. As part of this study, urine would be collected from athletes and tested for 19-NA at the Kings College London (**KCL**) WADA-accredited laboratory.

---

**6 January 2011** BC01 asked KCL if it would analyze the samples collected as part of the Nandrolone Study.  
KCL denied the request and told BC01 that as a WADA-accredited laboratory, KCL was "not allowed to screen athletes" and therefore "could only accept samples from competing athletes if they follow the official WADA guidelines".

---

**7 January 2011** BC01 forwarded the reply from KCL to a colleague and said, "this will be a problem which I'd [been] warned might happened. I'm asking around re other labs".  
BC01 emailed KCL and said a UKAD employee (**UK01**) was "aware of [and] supports" the analysis of the samples as a "screening/profiling" and "NOT [as an] internal doping control". BC01 said UK01 was copied on the email and that KCL could contact UK01 directly. Contrary to BC01's claim, UK01 was not copied on the email.  
BC01 sent an email to a colleague saying that they had spoken to UK01, and UK01 had recommended the Horseracing Forensic (Sport Science) Laboratory (**HFL**) as an "independent tester".  
BC01 sent colleagues a draft of the email BC01 proposed to send to "the riders" (the "**Consent**"). The proposal said:

"I would like to analyse riders [sic] urine for the presence of 19 norandrosterone, which is the metabolite of nandrolone which is tested for. You may be away [sic] of the great controversy concerning trace amounts in athletes [sic] urine. The problem is that also complicated as individuals can produce this substance in minute amounts themselves or by chemical reaction in their urine sample. Therefore, it

---

<sup>1</sup> Nandrolone was considered a threshold substance until September 2017.

would be most useful to screen your urine for this substance to exclude its presence NOT only by contamination but also these other causes as part of this study. [The study] is voluntary. It is confidential within British Cycling. Analysis will be performed by an independent laboratory, reporting only to myself and [name withheld] and NOT WADA or UK Anti-doping. UK Anti-doping are aware of this study and support it."

- 
- 8 January 2011** BC01 emailed several colleagues and identified athletes (the "**Athletes**") that BC01 wanted to be involved in the Nandrolone Study.
- 
- 10 January 2011** HFL emailed a quote for analytical services to BC01. HFL stipulated, however, that before HFL could help, formal approval was needed from either "*UK Sport or UKAD*".
- 
- 11 January 2011** BC01 emailed HFL and accepted the quote. BC01 told HFL that UKAD was aware and supported the Nandrolone Study, and that they would ask UKAD if it was prepared to formalize its approval or, alternatively, HFL could "*take [BC01's] word for it*".
- HFL replied that it was "*essential*" that HFL receive "*something formal*" from UKAD, like an email, to ensure the Nandrolone Study was not running contrary to UKAD's aims. HFL added that in the meantime it would organize the delivery of the sample bottles.
- 
- 12 January 2011** BC01 sent an email to UK01, with HFL in copy, titled "*Nandrolone contamination of supplements study*". The email said:
- "Dear [UK01], as discussed I am performing a supplement purity study on nandrolone, auditing our supplies and testing certificates. As part of this study, I wish to profile the urinary 19 norandrosterone production in riders using these supplements. I wish HFL Laboratories to process urine specimens for this purpose. I envisage testing riders on a weekly basis for 4 weeks. [HFL] has asked for a copy of an "approval" email from UKAD re awareness of this study, as they do work for you and don't want any issues. Please may I request this?"
- UK01 replied that they were "*happy to speak to [HFL] about this*".
- BC01 forwarded their email with UK01 to HFL stating "*please phone [UK01] at UKAD*".
- BC01 sent the Consent to the Athletes.
- 
- 13 January 2011** HFL replied to BC01 email that it would call UK01. HFL then asked for the direct telephone number of UK01.
- BC01 emailed the direct UKAD telephone of UK01 number to HFL.
- HFL emailed BC01 and said they had "*spoken to [UK01]*", there were "*no problems*" and "*we were good to go*".
- BC01 forwarded the above email exchanges to a colleague saying, "*audit proceeding*" - this being a presumed reference to the Nandrolone Study.
- 
- 14 January 2011** BC01 told a colleague that the Athletes had agreed to supply the samples and that a coach [name withheld] would collect the samples.
- 
- 17 February 2011** HFL emailed BC01 and confirmed that HFL had received the samples.

The samples were only analyzed for 19-NA.

---

**1 March 2011**

HFL emailed the analysis results of the samples to BC01. All were considered negative.

BC01 emailed the results ("*great news*") to a colleague. BC01 added that they would like to inform UK01 "*by phone first*" and enquired if BC02 wanted to do it.

UKAD has no record of the Nandrolone Study or ever receiving the analysis results. UK01 does not recall being informed of the analysis results and neither BC01 nor BC02 believe they shared the results with UK01.

---

**4 March 2011**

BC01 emailed the results of the analysis to various members of British Cycling saying that the "*urine testing of [the Athletes]*" produced "*NO excessive natural nandrolone*". In other words, the samples were negative.

British Cycling asked BC01 to email the negative analysis result to the Athletes.

---

---

## 2 INVESTIGATION SUMMARY

---

On 29 March 2021, the World Anti-Doping Agency (**WADA**) began Operation Echo. This investigation was triggered by media reporting that in 2011 United Kingdom Anti-Doping (**UKAD**) had allegedly allowed British Cycling to test athletes in private, using the Horseracing Forensic (Sport Sciences) Laboratory (**HFL**),<sup>2</sup> a non-WADA-accredited laboratory, for the purposes of screening for the Prohibited Substance, Nandrolone. Moreover, athletes provided their samples following an email from British Cycling stating that the analysis results would not be shared with UKAD or WADA. (**Allegation One**)

Following its commencement, Operation Echo identified two further allegations against UKAD. The first concerned the purported release of Athlete Biological Passport data to British Cycling in 2016. (**Allegation Two**)

The second concerned an allegation that UKAD had allowed two athletes, "X" and "Y", who were advancing the defence of "*Contaminated Products*" in answer to an Adverse Analytical Finding, to privately test the concerned supplements at HFL; and that UKAD accepted the results of the HFL analysis at the later Anti-Doping Hearing without conducting independent verification. (**Allegation Three**)

Operation Echo was greatly assisted by the diligent cooperation and transparency of British Cycling and UKAD.

### **Allegation One**

This allegation is corroborated by the following facts established during Operation Echo.

In February 2011, as part of its study into potential supplement contamination (the "**Nandrolone Study**"), British Cycling collected samples from elite athletes (the "**Athletes**") for the purposes of screening for Nandrolone. The samples were not collected following the requirements of the International Standard for Testing;<sup>3</sup> they were not analyzed at a WADA-accredited laboratory; and prior to providing the samples, the Athletes were told by email

that UKAD approved of the study and the results of their sample analysis would not be shared with UKAD or WADA.

Analysis reported all samples negative for 19-NA.

Authenticated emails obtained by Operation Echo from British Cycling show that by 12 January 2011, at least one former UKAD employee was aware of the Nandrolone Study and British Cycling's intention to collect samples from athletes and then analyze those samples at a non-accredited laboratory. However, UKAD has no record of these events, including the results of any sample analysis or the critical emails exchanged between British Cycling and the UKAD employee on 12 January 2011.

UKAD should have documented and recorded these events at the time. The impact of this failure is magnified by the inability of those involved to now recall these events and materially contribute to this investigation.

Those then in charge at UKAD – including the UKAD employee who received the 12 January 2011 email - uniformly claim they would never have entertained an arrangement with British Cycling where UKAD would not have received the results of the sample analysis. That said, one UKAD employee interviewed by Operation Echo opined that UKAD should never have agreed to the Nandrolone Study.

Allowing British Cycling to privately analyze samples of their most elite athletes for a Prohibited Substance, at a non-WADA accredited laboratory, even if the results were to be shared with UKAD, would be inconsistent with UKAD's obligation under the World Anti-Doping Code (the "**Code**") to vigorously pursue all potential doping violations. That said, during this period, UKAD conducted numerous out-of-competition tests on the Athletes – all of which were negative for Prohibited Substances.

The Nandrolone Study raises questions as to British Cycling's compliance with the then applicable (2009) UK National Anti-Doping

---

<sup>2</sup> HFL is now called the LGC Laboratory.

<sup>3</sup> As it was then known. In 2015 this standard became the International Standard for Testing and Investigations.

Policy, and UKAD's ability to administer that policy.<sup>4</sup> However, this issue falls outside the scope of this investigation and is a matter within the sole jurisdiction of UKAD.

In 2021, UKAD was subject of a WADA audit as part of WADA's Code compliance monitoring program. That audit was complimentary of UKAD and its current ability to monitor National Federations, including British Cycling. UKAD has pointed to this audit as evidence that these events could not be repeated in the UKAD of today.

### *Operation Blackout*

Operation Blackout was a UKAD investigation of two anonymous letters, received by UKAD in December 2018, which alleged UKAD, and British Cycling had concealed doping. The letters claimed UKAD had allowed British Cycling to privately test the urine of elite athletes for Nandrolone during a specific training camp (the "**Screening Allegation**"). The anonymous letters also claimed: (i) that "a coach was attempting to dope" athletes; (ii) that there was a "clear trail of emails" about these events between British Cycling and UKAD; and (iii) that laptops of a former British Cycling employee (the "**BC Laptops**") held material evidence.

Of the allegations pursued from the anonymous letters, Operation Blackout did not pursue or resolve the Screening Allegation. Consequently, despite having the opportunity and permission of British Cycling, Operation Blackout did not search the BC Laptops for the "clear trail of emails" between British Cycling and UKAD.

Had Operation Blackout conducted this search, it would have discovered the same emails found by Operation Echo in 2021, which indicate UKAD (or at least an employee of UKAD) was aware of the Nandrolone Study and that samples were to be collected and analyzed for a Prohibited Substance by a non-accredited laboratory (viz HFL).

In explanation of its decision not to resolve the Screening Allegation or search the BC Laptops

for the "clear trail of emails" between British Cycling and UKAD, Operation Blackout stated the anonymous letters "did [not] provide any further details that raised any obvious concerns about that testing" and that, during Operation Blackout, "no further information came to light to raise that concern". To this end, Operation Echo is concerned by the failure of Operation Blackout to search the BC Laptops for relevant emails.

### **Allegation Two**

This allegation is not supported by the information reviewed during Operation Echo.

While British Cycling had requested Athlete Biological Passport data from UKAD, these requests were denied by UKAD. Moreover, no information reviewed during this investigation suggests that such data was shared, secretly or otherwise, by UKAD.

### **Allegation Three**

This allegation is not supported by the information reviewed during Operation Echo.

Athlete "X" and "Y" blamed their Adverse Analytical Findings for anabolic steroids on supplements that had been obtained from a specific company. After they were notified of their positive tests, both athletes privately arranged to have their supplements analyzed by HFL. UKAD was not involved in this supplement analysis.

The HFL analysis found the supplements contained similar Prohibited Substances to those detected in the samples of "X" and "Y".

Athlete "X" and "Y" went to a joint hearing and UKAD did not challenge the scientific analysis provided by HFL nor the material facts of the athletes' cases. UKAD's case focused on whether the athletes were at fault or negligent and the extent thereof.

Under the Code, facts and matters can be established by any "reliable means". In this case, the athletes were required to establish how the anabolic steroid entered their system. They did so by having their supplements

---

<sup>4</sup> Per Article 2.12.1 of the 2009 Policy, "It shall be UK Anti-Doping's responsibility to monitor compliance by NGBs with the requirements of [the 2009] Policy".

analyzed by HFL, a laboratory which specialized in supplement testing.

Staff involved in the prosecution of this case told Operation Echo that HFL was a credible laboratory, and the results of their analysis were considered “reliable evidence” and therefore not challenged by UKAD before the Anti-Doping Hearing Panel (the “ADHP”).

The ADHP ruled Athlete “X” and “Y” were at “fault or negligent”, but not significantly so. Consequently, both received a reduced sanction.

From the information review by Operation Echo, Athlete “X” and “Y” did nothing wrong by getting the analysis done by HFL and it was within UKAD’s discretion under the Code to accept that analysis.

#### UKAD’s View

On 20 September 2021, Operation Echo met with UKAD Interim Chief Executive, Emily Robinson (**CEO Robinson**), and discussed the investigation. This meeting was per standard practice of the Intelligence and Investigations Department.

Material findings and issues of concern, as found by Operation Echo, were raised with CEO Robinson. The CEO assured Operation Echo that such findings would be seriously considered and addressed by UKAD. Moreover, the CEO reported that the UKAD of today is very different to that of 2011, and she was “highly convinced” events as identified by Operation Echo could not reoccur. In support of this view, CEO Robinson submitted a detailed summary of the “many layers of scrutiny [and] oversight” that now reside over UKAD employees and their actions.

CEO Robinson also reported that the UKAD Chair had commissioned an independent internal audit firm to review internal decision-making procedures. This audit is ongoing.

#### Operation Blackout

Operation Echo has provided UKAD with copies of the emails that UKAD had failed to recover from the BC Laptops. CEO Robinson assured Operation Echo that UKAD will conduct all necessary investigations arising



from these emails, including a review of Operation Blackout.

#### Recommendations

Operation Echo recommends the following:

- (i) A copy of the full investigation report for Operation Echo (the “**Investigation Report**”) be provided to WADA’s President and Director General.
- (ii) A copy of the Investigation Report and the oversight summary provided by CEO Robinson be provided to the WADA Compliance, Rules and Standards Department for its consideration.
- (iii) A copy of relevant extracts of the Investigation Report be provided to the United Kingdom Department of Digital, Media, Culture and Sport – the public authority empowered to review the operations of UKAD – for its consideration.
- (iv) A copy of relevant extracts of the Investigation Report be provided to the Union Cycliste Internationale – the governing body under which British Cycling operates – for its consideration.

Operation Echo makes no corrective recommendations as those involved in the events of 2011 are no longer employed by UKAD, and a recent (2021) compliance audit by WADA did not identify any issues of concern.

	
<b>Aaron Walker</b> Deputy Director	<b>Klara Bolen</b> Intelligence Analyst

Approved 14 October 2021



**Gunter Younger**  
Director

Intelligence and Investigation Department  
World Anti-Doping Agency