

2009 Games of the Small States of Europe, WADA Independent Observer Report

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INTRODUCTION

The Independent Observer Team (IO Team) appointed by the World Anti-Doping Agency (WADA) had a presence in Cyprus at the XIII Games of the Small States of Europe for the period May 28 to June 4, 2009. The Team consisted of the following two members:

- Andy Parkinson, Director, Drug-Free Sport Directorate, UK Sport (Great Britain) - Chair
- Natalie Grenier, Project Coordinator, Standards and Harmonization, WADA (Canada)

The Games of the Small States of Europe is an event that hosts more than 800 athletes from 8 countries and includes 12 sport disciplines. They are typical of many events around the world where high expectation needs to be balanced with increasing demand on Organising Committees with respect to anti-doping management.

The IO Team was charged with conducting an "Audit" style mission which provided for regular feedback to representatives of the Cyprus NADO (CyADA) and the Organising Committee of the Games of the Small States of Europe (GSSE).

It must be made clear that this approach is quite different from the observation only type of mission which formerly applied in Major Events. Consequently the need to provide a comprehensive report of all observations does not apply and this document seeks only to summarise key observations without providing detail of all matters which have already been raised and satisfactorily dealt with as the Games progressed. Meetings were held on a daily basis sometimes comprising of representatives of both CyADA and the GSSE and on occasion only representatives of CyADA.

The Team extends its sincere appreciation to Dr. Michael Petrou (President of CyADA), Dr. Andreas Liveris (GSSE anti-doping representative) and Dr. Costas Christodoulakis (Chair of the Medical Commission of the GSSE). They afforded every co-operation to assist the IO Mission. We extend our warmest thanks to the other volunteers in Cyprus who assisted us during our time in Cyprus.

The approach of the IO Team was to monitor all aspects of the doping control programme (barring, in this case, the laboratory which is subject to the disciplines of WADA accreditation requirements) to a sufficient level to not only be able to draw valid conclusions about the accuracy of the application of the rules but also to provide assistance in delivering the doping control programme for the Games. This included a significant focus on the planning of activities rather than their execution and it is in the planning that the IO Team felt was of most value. The approach was very much an active involvement in assisting and guiding those responsible for anti-doping to make best use of the limited resources and to maximise the deterrence and detection effect of their programme. With a team of just 2 it was never the intention of the IO Team to monitor every sample collection and while we did not observe every instance where unusual circumstances occurred we are satisfied that the conclusions we have drawn are valid generalisations in terms of the system as a whole.

The IO Team met early each morning and discussed the previous day's observations. Matters of significance were identified and brought forward by the IO Chair to a morning meeting which was generally attended by Dr. Petrou and Dr. Liveris. Both Dr. Petrou and Dr. Liveris were receptive and responsive to matters raised by the IO Team and, where appropriate, this was demonstrated by adjustments to the planned work and activities.

There is little in this report which was not brought to the attention of the CyADA and the GSSE during the course of those meetings. On the other hand a number of individual or relatively minor matters that were raised at those meetings, and subsequently addressed satisfactorily, have not been raised here.

RELATIONSHIP BETWEEN CyADA & THE GSSE

Only days prior to the arrival of the IO Team a new law had been passed by the Cypriot Government establishing an independent National Anti-Doping Organisation in Cyprus (CyADA) and removing anti-doping responsibility from a Committee established under the Cyprus Sports Organisation (a body which administrates all sports and their funding on behalf of Government). While there is no doubt that this should be seen as an extremely positive development in Cypriot sport, the impact of establishing CyADA so close to one of the biggest events the country is likely to host raised a number of issues that required to be resolved within a short space of time, notably:

- The Cypriot Government was required to ratify the UNESCO Convention Against Doping in Sport
- CyADA needed to formally accept the World Anti-Doping Code
- Much of the rules and regulations referred to the previous NADO arrangement rather than recognising CyADA

All that said, CyADA and the Cypriot Government should be congratulated on using the Games as an important stepping stone towards further enhancing the anti-doping capability and capacity in Cyprus.

From a practical perspective, there was a need to formalise the arrangements that had been agreed some months previously regarding CyADA's role at the Games and the supporting role of the GSSE Medical Commission. This was problematic and is evidenced by the fact that even though CyADA provided a draft agreement to the GSSE setting out the respective responsibilities of CyADA and the GSSE prior to the Games this agreement was not signed until 19 June 2009 (10 days after the Closing Ceremony). It should be stated that there was an informal agreement reached by both parties prior to the Games. However, insufficient discussion had taken place for both parties to have a clear understanding of the roles of CyADA and the GSSE with respect to TUEs, sample collection, sample analysis and results management. Problems occurred throughout the IO Team's stay in Cyprus as a result of a lack of clarity regarding these roles.

Recommendation:

Organising Committees who subcontract NADOs to conduct all or elements of doping control should enter into formal agreements in advance of the start of any activity and ensure that there is clarity of role between all parties

Given the number of NADOs that provide anti-doping services it would seem reasonable for WADA to develop and provide template agreements setting out the various roles a NADO may undertake which could be amended to suit most NADO-Organising Committee relationships

THE RULES OF THE GAMES

The detailed Doping Control Procedures for the 13th Small European States Games Cyprus 2009 (Rules) had not been finalised prior to the arrival of the IO Team, largely due to the establishment of CyADA and the lack of a formal agreement between CyADA and the GSSE. Information had been provided in the Games' Technical Manual in advance to representatives of the nations competing but this was of a limited nature and in some instances conflicted with the final rules that were agreed by the GSSE.

Through the assistance of the Standards and Harmonization team at WADA, a draft Rules were developed and CyADA, with the assistance of the IO Team, further amended them to reflect the arrangements for the Games. For example, the draft provided by WADA reflected the fast turn around of samples from the laboratory (usual for Major Events but certainly less common for smaller events such as the GSSE). It was noted that CyADA and the GSSE had agreed with both Laboratories (Athens and Lausanne) that fast turn around was not required months before the Games and as such the rules needed to reflect this in the management of any results. The final Rules included the automatic delegation of results management authority back to the responsible International Federation should an adverse analytical finding be provided by either Laboratory once the Games had finished. In the case of a non-analytical violation this would be managed by the GSSE.

The final Rules for the Games were approved by the GSSE on 31 May 2009, the day before the first day of competition. Hard copies were then provided to the nations competing but unfortunately the final version, including the role of the International Federation, was not circulated but rather an earlier version. This caused a difference of opinion at a GSSE Medical Commission meeting where the Team Doctors were present, which did little to instil confidence in the anti-doping programme.

Recommendation:

The Models Rules for Major Events published by WADA should include alternative articles which reflect the fact that results may be received after the Games have concluded and the Organising Committee essentially disbanded

Organising Committees publish the Rules of the Games well in advance and ensure that information published in Athlete Guides and Technical Manuals are consistent with the Rules

TEST DISTRIBUTION PLANNING

CyADA was responsible for the test planning and for allocating sufficient resources to deliver the Test Plan. This was conducted in a pragmatic way identifying opportunities for both in-competition and out-of-competition testing and urine and blood with a focus on also achieving a balance of testing Cypriot athletes and those international athletes competing at the Games. A total of 174 tests were conducted during the period of the Games.

The planning for the out-of-competition period was hindered by the lack of location information available for athletes and delays in CyADA receiving detailed accommodation and training information. Once identified as a priority the GSSE provided as much information as possible but the out-of-competition programme was severely restricted due to the spread of competing nations across two cities and the limited specific information available for each athlete. Ultimately, ten out-of-competition tests were collected and while this proved a good deterrence and message to competing athletes it would have been preferable to have a greater focus on testing athletes as soon as they arrived in Cyprus. CyADA should also be complimented on putting in place a number of target tests based on information received. This demonstrated a desire to have an effective detection programme as well as one that provided a strong deterrence.

Recommendation:

Organising Committees identify the need for quality team and athlete location information and to provide in a timely manner to the testing authority

With respect to the in-competition period, this ran fairly smoothly. However, it is evident that due to the responsibility of the GSSE to allocate space for the Doping Control Stations and the responsibility of CyADA to determine the Test Plan, these two functions were not particularly well coordinated. Both CyADA and the GSSE were very responsive to changing the lay out of the Doping Control Stations but in some instances the Doping Control Stations could have been better placed if greater communication had existed in the planning between CyADA and the GSSE. In some instances the Test Plan which was

established overloaded the Doping Control Stations but over all this was adequately managed by CyADA and the Doping Control Staff present. It is worth noting that it is not uncommon for testing authorities to plan resources before establishing the final Test Plan.

In addition, changes in the competition schedule, which were not communicated to CyADA by GSSE in a timely manner, resulted in cancellations of a number of testing mission orders.

Recommendation:

Testing Authorities need to establish the Test Plan and allocate resources in a coordinated way

Organising Committees need to have in place mechanisms ensuring that changes in the competition schedule will be communicated to the Testing Authorities in a timely manner

EDUCATION

The GSSE organised a Sport Medicine Seminar in April 2009 which was attended by a number of doctors from participating countries and covered medical issues and anti-doping control procedures during the Games. The GSSE also circulated limited information about anti-doping requirements including those relating to TUEs in advance of the Games. Hosting the WADA Athlete Outreach programme was a good initiative although had its challenges due to the multiple venues and hotels where athletes were residing.

CyADA was encouraged to provide educational material provided by WADA at the Doping Control stations but due to limited human resources these were not sufficiently circulated and as a result did not quite have the impact that they could have had.

ADMINISTRATION SYSTEMS

The IO Team observed some of the administrative systems put in place by CyADA, notably the management of documentation and sample storage prior to transportation to the respective Laboratories. Aside of the limited human resources available to manage the documentation, all the systems observed respected confidentiality protocols and were well managed at CyADA's offices. The storage facility for samples was one of the best observed by the IO Team and took the form of a reinforced temperature controlled room within the CyADA offices which was extremely secure.

Due to the name change of the NADO so close to the Games, there was some discussion about the forms that were to be used. Eventually, a practical solution was found by using the existing urine collection forms and using the Greek NADO's blood collection form, due to the number of Greek Doping Control Staff working at the Games.

On the first day of competition it was observed that the GSSE Accreditation Card for athletes and athlete support personnel did not have a unique identification number and as such could not be recorded on the sample collection forms as a means of athlete identification. A practical solution to this was achieved whereby Team Doctors were asked to carry with them photocopies of original identification cards (Passports, drivers licence) and these were to be produced at the time of notification. The IO Team was only advised of one situation where this did not work and the athlete was required to wait for approximately 2 hours in doping control while the athlete representative located the athlete identification. With this exception, the IO Team is satisfied that the operating procedures and documents for doping control at the Games met the necessary requirements.

Recommendation:

Organising Committees need to ensure that functional areas take into account the requirements of doping control when developing accreditation cards so that they can be used as a unique means of identifying athletes

THERAPEUTIC USE EXEMPTION PROCESSES

In accordance with the provisions stipulated in the Rules, CyADA was the authority for any TUE presented during the period of the Games. Team Doctors had been requested to arrive with all valid TUE Certificates from their home nation and this was complied with by all nations. In addition, for Cypriot

athletes, CyADA was the Anti-Doping Organisation who had access to all relevant TUEs. For the period of the Games, nations were advised that TUEs would only be considered if they were for emergency cases. While this approach was consistent with the Rules, it should be noted that by being so prescriptive it could be argued that athletes from nations with less than developed NADOs could be disadvantaged and that some flexibility should be allowed to ensure that athletes could, in exceptional circumstances, submit TUE applications for non-emergency situations.

All Team Doctors were advised that TUE forms would be provided by the GSSE and advised to provide completed TUE applications to Dr. Liveris who would in turn provide them to CyADA for consideration by the CyADA TUE Committee. Given the limited number of TUEs presented during the Games this arrangement seemed to work satisfactorily but it was the cause of some concern to both parties and to Team Doctors about how they would physically submit TUEs. In addition, while Team Doctors were advised that TUE forms would also be available at competition venues, the IO Team did not see any evidence of this when enquiring at a number of competition venues.

Recommendation:

TUE forms should be readily available at multiple locations during the period of the Games and a simple process, such as a post box, should be clearly identified to all Team Doctors

On a related matter, it was brought to our attention that for some team sports, notably basketball and volleyball, the rules of the respective International Federations required a team representative to complete a form prior to the start of each game listing the medication every athlete on the team roster had taken in the past 7 days. It was not clear what the purpose of this form was and what value it had in the doping control process. Following a number of enquiries by Team Doctors, and subsequent agreement with the GSSE, CyADA advised all Doping Control Staff that they were not required to request this form for the remainder of the Games.

Recommendation:

There be a clear reason why additional medical information is required by some International Federations and if there is valid reason that the process for completion is not overly bureaucratic and does not create unnecessary confusion prior to athletes competing

SAMPLE COLLECTION

CyADA used Doping Control Staff from both Cyprus and Greece, totally 30, many of whom had been involved at the Athens 2004 Olympic & Paralympic Games. The Doping Control Staff were located in two of the cities and as such the Doping Control Staff were coordinated largely by phone via Dr. Petrou during the period of the Games. There was one meeting of all the Doping Control Staff on their arrival and before the testing period commenced which was detailed and a good means of ensuring consistency in sample collection procedures. The structure established was that there would be a mix of Cypriot and Greek Doping Control Staff in every team and that the Cypriot Doping Control Staff were generally utilised in a chaperone role. The overriding impression is that Doping Control Staff were generally well trained and that doping control was conducted at a sufficient quality. A number of minor issues that arose during the Games in this area were raised with CyADA and the GSSE in the IO Team's morning meeting and the following are worthy of a mention in this report.

Access to the Doping Control Station was monitored using an entry-exit log. However, on the first day of operation this was not used extensively and the flow of people in and out of the Doping Control Stations was not as tightly controlled as the IO Team would have liked. In addition, there were no Doping Control Station Passes provided, which on one particular occasion caused an undesirable situation where members of the GSSE Medical Commission were refused access to the Doping Control Station even though they were entitled to enter the Doping Control Station given their role as officially recognised observers in the Rules. This issue was quickly overcome with Doping Control Station Passes being produced overnight and provided to all relevant individuals, including members of the GSSE Medical Commission.

Recommendation:

Entry-exit logs for Doping Control Station must be well maintained and Passes provided in advance to allow for easy identification of individuals authorised to enter Doping Control Stations

Access to the Sample Processing Room was also not as tight as the IO Team expected it to be. It is the IO Team's belief that once an athlete had entered the Sample Processing Room that the door is then shut and that individuals should not enter or exit unless in exceptional circumstances. This respects the right of the athlete and ensures that it is clear at the end of the session who has been present during that session. On a number of occasions, authorised people entered and exited sample collection sessions and on one occasion members of the GSSE Medical Commission demanded to enter a sample collection session after it had started. This situation was discussed at length the next day at the Team Doctors meeting and a solution achieved that respected the rights and privacy of athletes.

Recommendation:

Organising Committees and Doping Control Staff ensure that the rights and privacy of athletes are respected by ensuring that only in exceptional circumstances should authorised individuals enter or exit the Sample Processing Room after the start of the sample collecting process

A number of venues were not sufficiently large or resourced to cope with the Test Distribution Plan for that venue. At the swimming venue, the Doping Control Station was right behind the starting blocks and due to the volume of athletes required to undergo sample collection this created a very public crowd around the Doping Control Station. It is worth noting that the Doping Control Staff at this venue were of a very high quality and managed the situation well given the circumstances.

The one non-conformity the IO Team was made aware of occurred at this venue and was a direct result of a lack of resource and a busy Doping Control Station. On arrival at the competition venue the IO Team was advised that due to a lack of Chaperones and the fact that athletes had been notified for sample collection following a race but before the relays were to take place in which many of the notified athletes were competing, a Chaperone allowed an athlete to urinate in a public toilet rather than insist on providing a sample at the Doping Control Station which was in very close proximity. The disappointing aspect of this is that the IO Team were extremely impressed with the speed and quality in which the Lead DCO at the swimming venue was processing samples and it was felt that should the Chaperone have alerted the Lead DCO to the fact that a swimmer needed to urinate, a partial sample process could have been undertaken thereby preserving the first sample of the athlete and enabling the athlete to compete.

RESULTS MANAGEMENT

The IO Team did not have the opportunity to observe any management of results. However, documentation provided following the Games demonstrates that results were managed in an appropriate and manner, although reports from the Athens Laboratory exceeded the ten working days specified in the Agreement that CyADA had with the laboratory.

GENERAL CONCLUSIONS

As noted in the introduction, these Games were typical of many events around the world. There is no doubt that as anti-doping has become more specialised and arguably more complex, it is essential that if there are domestic resources that can be used (ie. National Anti-Doping Organisations) Organising Committees must make best use of them. This ensures that the experts are responsible for the delivery of the anti-doping programme and equally allows Organising Committees to focus on other aspects of the Games. In order to do this there is a need for early clarity of roles and a clear understanding of the responsibilities of each party. If there was one significant failing at these Games it was that this did not happen early enough.

That said, the Games were delivered by both CyADA and the GSSE with a passion for sport and their country and I have no doubt can be seen as a huge success for Cypriot sport. The legacy of the Games in the shape of CyADA should not be underestimated and it is now incumbent on all the sporting authorities in Cyprus to support the activities of CyADA so that they in turn will support the ongoing development of clean sport and athletes in Cyprus. The IO Team wishes them well and has high hopes of what Cyprus can achieve in the area of anti-doping.

SUMMARY OF RECOMMENDATIONS

1. Organising Committees who subcontract NADOs to conduct all or elements of doping control should enter into formal agreements in advance of the start of any activity and ensure that there is clarity of role between all parties
2. Given the number of NADOs that provide anti-doping services it would seem reasonable for WADA to develop and provide template agreements setting out the various roles a NADO may undertake which could be amended to suit most NADO-Organising Committee relationships
3. The Models Rules for Major Events published by WADA should include alternative articles which reflect the fact that results may be received after the Games have concluded and the Organising Committee essentially disbanded
4. Organising Committees publish the Rules of the Games well in advance and ensure that information published in Athlete Guides and Technical Manuals are consistent with the Rules
5. Organising Committees identify the need for quality team and athlete location information and to provide in a timely manner to the testing authority
6. Testing Authorities need to establish the Test Plan and allocate resources in a coordinated way
7. Organising Committees need to have in place mechanisms ensuring that changes in the competition schedule will be communicated to the Testing Authorities in a timely manner
8. Organising Committees need to ensure that functional areas take into account the requirements of doping control when developing accreditation cards so that they can be used as a unique means of identifying athletes
9. TUE forms should be readily available at multiple locations during the period of the Games and a simple process, such as a post box, should be clearly identified to all Team Doctors
10. There be a clear reason why additional medical information is required by some International Federations and if there is valid reason that the process for completion is not overly bureaucratic and does not create unnecessary confusion prior to athletes competing
11. Organising Committees and Doping Control Staff ensure that the rights and privacy of athletes are respected by ensuring that only in exceptional circumstances should authorised individuals enter or exit the Sample Processing Room after the start of the sample collecting process
12. Entry-exit logs for Doping Control Station must be well maintained and Passes provided in advance to allow for easy identification of individuals authorised to enter Doping Control Stations