

INTERNATIONAL STANDARD FOR TESTING AND INVESTIGATIONS (ISTI)

Consultation - Second consultation phase

Showing: All (198 Comments)

PART ONE: INTRODUCTION, CODE PROVISIONS AND DEFINITIONS (3)

Swedish Sports Confederation

Tommy Forsgren, Results Management Manager (Sweden)
NADO - NADO

SUBMITTED

In competition definition:

SSC is supportive of consistency but not fully supportive of the proposed definition.

SSC supports the change to “commencing at 11.59 pm on the day before the event”, however, we do not support that if athletes withdraw from competition after 11.59 pm should remain subject to IC testing. Withdrawal from competition may be a good reason for testing, but the OOC menu is sufficient in such cases. The reason for withdrawal may be that the athlete realizes that he/she may still have metabolites of a substance prohibited IC only in his/her body and therefore chooses not to compete. This would be the appropriate action and should not be punished.

Doping Authority Netherlands

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

SUBMITTED

Doping Authority Netherlands is grateful for having the possibility in WADA’s consultation process to bring forward their comments and suggested amendments to the draft versions of the upcoming ISTI. Doping Authority Netherlands (DAN) is aware of the fact that the ISTI and its predecessor the IST have been amended 5 times in total over a time period of 15 years. Doping Authority Netherlands is expecting the revision of the standard to result in an overall thought out, thorough and in general balanced document.

Part one: Introduction, code provision and definitions

As a general comment relating the final version of the ISTI Doping Authority Netherlands encourages WADA to evaluate and fine tune the risk assessment of the TDSSA at a certain point in time. The TDSSA has been in force for three years with no significant increase in adverse analytical findings within the Netherlands. From the first of January 2019 the TDSSA has become more stringent for disciplines with an MLA for ESAs of 30%.

Conseil supérieur des sports

Matheo TRIKI, Sportif Rugby (Espagne)
WADA - Others

SUBMITTED

The objectives of Article 7 are; one, to provide clarity on the scope of the responsibility for each Signatory as it relates to their primary functions for Education; two, to outline the means by which cooperation can be achieved in order to avoid duplication and maximize efforts and effectiveness of Education Programs; and three, to outline the Accountability framework by which Signatories will be held accountable in relation to the International Standard for Education.

7.2 National Anti-Doping Organizations (NADOs)

Each National Anti-Doping Organization (NADOs) shall be the authority on Education within their respective countries.

Each National Anti-Doping Organization shall devise a program that focuses on target groups who are under their jurisdiction. This includes all Athletes who are subject to Testing and their Athlete Support Personnel as well as all other groups identified as the Education Pool in Article 4.

In addition to the above, National Anti-Doping Organizations may have a role in educating the following:

Roles & responsibilities of Signatories

Objective

Code Article 18.1 states that: "All Signatories shall within their means and scope of responsibility and in cooperation with each other, plan, implement, evaluate and monitor information, Education and prevention programs for doping-free sport"

7.3 International Federations

International Federations shall ensure that Education is provided for all International- Level Athletes as determined by their own criteria in reference to Article 4.3.2 of the International Standard for Testing and Investigations.

Comment to 7.3: Nothing prevents an International Federation from educating Athletes under its jurisdiction who are not International-Level Athletes, if it sees fit, e.g., where they are competing in an International Event. International Federations are required to ensure that Event-Based Education programs conducted on their behalf by other Signatories, National Federations or other third parties are done so to a high standard.

7.4 Major Event Organizations

The Major Event Organizations shall ensure provision of Education activities for the Events that are directly under their jurisdiction as per Article 20.6.7 of the Code.

7.5 National Olympic Committees/National Paralympic Committees

Where a National Anti-Doping Organization does not exist, the National Olympic Committee (or, as applicable, the National Paralympic Committee) will be the authority on Education in their respective countries, as per Article 20.4.6 of the Code and be subject to International Standard for Education Article 7.2.2.

The National Olympic Committee (or, as applicable, the National Paralympic Committee) shall cooperate with the applicable National Anti-Doping Organization, shall ensure that Athletes and Athlete Support Personnel selected to participate in the Olympic/Paralympic Games (or any Event

7.6 Regional Anti-Doping Organizations (RADOs)

Regional Anti-Doping Organizations shall support member countries to conduct Education Programs. It shall promote Education as per Article 21.3.6 of the Code.

Regional Anti-Doping Organizations shall work with governments and National Olympic Committees within their regions to provide support for the coordination and delivery of Education Programs.

7.7 World Anti-Doping Agency (WADA)

WADA shall provide Education materials for use by Signatories or to be used by any other Person directly as per Article 20.7.6 of the Code. WADA shall support its stakeholders to develop and deliver effective Education Programs. WADA shall be responsible for ensuring compliance with the International Standard for Education and the Code through the Code compliance process and in line with the International Standard for Code Compliance by Signatories.

8.0 Cooperation with and recognition of other Signatories

8.1 Signatories shall coordinate their Education efforts to avoid overlapping activities and to

maximize the effectiveness of their Education Programs. In particular:

a) Signatories shall consult with other relevant Signatories in order to coordinate Education activities and to avoid unnecessary duplication.

b)

c) 8.2

Clear agreement on roles and responsibilities for Event-Based Education shall be agreed in advance. This should be done in accordance with the roles and responsibilities outlined in Article 7.

Signatories shall share information on their Education Programs with other relevant Signatories, specifically at a minimum, their education plans.

9.0 Accountability

9.1

Signatories will be held accountable through two main channels:

a) Outputs of the Education Program, namely:

a. A documented education plan

b. An evaluation of the implementation and impact of the education plan,

including the status of all objectives set as part of this plan. b) The Code compliance process

9.2

International Standard for Education. Education activities targeting the Education Pool must be outlined in the education plan. For Athletes and Athlete Support Personnel not included in the Education Pool, a clear rationale must be provided for this with a description of how this will be rectified in the future. It is mandatory for Athletes in the Registered Testing Pool and Athletes currently serving a suspension period to be included in the Education Pool.

9.3 The education plan shall endeavor to focus on the positive aspects of clean sport, focusing on the avoidance of inadvertent doping for those subject to anti-doping rules in the first instance, while also acknowledging that the vast majority of Athletes wish to compete clean, with Education activities supporting them to do this directly, or indirectly through the Education of other target groups.

The education plan shall identify an Education Pool as described in Article 4 of the

1.0 Introduction and scope (1)

NADA

Regine Reiser, Result Management (Deutschland)

NADO - NADO

SUBMITTED

SCAs/"other Organisations"/third party organisations: Are sample collection agencies (like IDTM, PWC, clearidium etc.) going to be code signatories (also an ITA)?

3.0 Definitions and interpretation (3)

Department of Health - National Integrity of Sport Unit

Luke Janeczko, Policy Officer (Australia)

Public Authorities - Government

SUBMITTED

The Code includes a drafting comment that the Standard will include a model definition for a National Level Athlete – this has not been included.

Anti-Doping Norway

SUBMITTED

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

Definitions

ADNO support the definition of In-Competition.

ADNO support the definition of Recreational Athlete

ADNO support the definition of Vulnerable Person

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

· DAN supports the broadening of the definition regarding in-competition in case an athlete redraws.

· Article 10.6.1 is missing in this document. “The definition Substantial Assistance relates to Article 10.6.1”.... Please add the word Code equal to the phrase in Article 11.2.1.

· DAN welcomes the definition of a vulnerable person. This secures, protects and mitigates. Consistency in use of the definition throughout the Code and its standards is needed and we wonder how this term relates to the ‘Protected Person’ as introduced in the draft 2021 Code.

3.1 Defined terms from the 2021 Code that are used in the International Standard for Testing and Investigations (ISTI) (9)

World Rugby

SUBMITTED

David Ho, Anti-Doping Science and Results Manager (Ireland)
Sport - IF – Summer Olympic

World Rugby note the reference to "Vulnerable Person" drafted in the ISTI, but referred in the draft Code as "Protected Person". Can WADA please clarify which terms is to be used?

ISU

SUBMITTED

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

Definition of **Vulnerable Person**: ; (ii) has not reached the age of eighteen years and is not included in any *Registered Testing Pool* and has never competed in any *International Event* in the open category;

ISU Comment: NOT ONLY RTP should be mentioned but also Testing Pool.

.... is not included in any *Registered Testing Pool* OR *TESTING POOL*....

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

Vulnerable Person – This seems to be the same as the new definition of ‘Protected Person’ in the WADA Code. We have the same comment as for the Code.

This term replaces the term of “minor” that was defined as aged under 18 years old. With this new definition, it concerns mainly athletes under 16 years old. Athletes between 16 and 18 y.o would not be concerned by this definition if they have already participated in an international event. It would therefore mean that a player between 16 and 18 y.o with very little experience in international event would not be covered by the definition of protected person and therefore not benefit from a milder sanctioning regime. In football, this does not make much sense. Players of this age (between 16-18) might have participated in an international event before but have almost no international experience and their chances to evolve later as an adult in the international level of football is not high. Furthermore, these players are minors according to civil and criminal law and therefore are treated differently than adults so there is no reason to divert from this in sports law.

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

AthleteAs DFSNZ has previously submitted, the definition of athlete in the Code is circular. DFSNZ strongly suggests a change to the second sentence: An Anti-Doping Organisation has discretion to apply anti-doping rules to a Participant who is neither an International-Level Athlete nor a National-Level Athlete, and thus to bring them within the definition of "Athlete".

Sport Ireland

SUBMITTED

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

These comments will be included in Sport Ireland's Code Submission:

Aggravating Circumstances. Sport Ireland has concerns regarding one aspect of the definition – "*a normal individual would be likely to enjoy the performance-enhancing effects of the anti-doping rule violation(s) beyond the otherwise applicable period of Ineligibility*".

This could be feasible if substances were categorised this way in the Prohibited List, failing which Sport Ireland has significant concerns regarding the practicality of this and is of the view it may be susceptible to legal challenge. There would be wide scale inconsistency unless WADA published guidance on what these substances might be. There is also the question of what if the Athlete is not a 'normal individual' and could establish that he / she would not benefit beyond the otherwise applicable period of Ineligibility.

In-Competition. Sport Ireland has a concern regarding the definition including Athletes who withdraw from a Competition after 11:59 p.m. and the fact that those Athletes would be deemed to be In-Competition for 24 hours after withdrawal. Firstly, Sport Ireland will be unaware of when an Athlete withdraws from a Competition and as such will not know whether to request the In-Competition suites of analyses. Secondly, an Athlete who withdraws from a Competition at, for example, 2pm, would be In-Competition until 2pm the following days, whereas an Athlete who took part in the Competition may only be In-Competition until the doping control process is complete. Both Athletes could take a substance which is banned In-Competition only on the night of the Competition. The Athlete who did not take part would be subject to In-Competition

Testing the next day, whereas the Athlete who competed (and perhaps won) would not.

Recreational Athlete. The introduction of this definition will be a significant administrative issue for NADOs and IFs in particular and may have a number of unintended consequences:

1.

NADOs will have to change their definition of National-Level Athlete. This will cause unintended consequence as regards the TDSSA and retroactive TUE applications. The formers requires a minimum level of analysis in relation to National Level Athletes, depending on the sport / discipline. Expanding the pool of Athletes required to be subject to minimum level testing and thereby substantially increasing testing costs. Similarly, any expansion to the pool of National-Level Athletes could mean a significant increase in the number of TUE applications and the number of positive tests for which an Athlete would currently be entitled to a retroactive TUE.

2.

The question of who should be a Recreational Athlete will vary from sport to sport and one overarching definition will be extremely problematic, as WADA found during the first consultation phase. It will undoubtedly lead to inconsistencies.

3.

The wording in relation to representing a country in an International Event is of concern. Athletes competing in International Events are not necessarily representing their country in doing so. Again, this will vary significant from sport to sport.

4.

It is quite possible that an Athlete rising through the ranks quickly will be a Recreational Athlete and may therefore receive a reduced ban even though he / she may now be competing at a relatively high level.

5.

The question of whether an Athlete represented a country in an International Event within the previous 5 years will have to be monitored by IFs and Major Event Organisations and this information provided to other ADOs upon request.

6.

Is it intended that the burden of establishing he / she is a Recreational Athlete will be on the Athlete? Given the likely complexity of the definition, it will not always be clear.

Vulnerable Person: The definition of Vulnerable Person is included where in the Code this definition is relevant to a Protected Person.

Antidoping Switzerland

Ernst König, CEO (Switzerland)
NADO - NADO

SUBMITTED

Definition of In-Competition

Athlete should NOT remain subject to In-Competition Testing (for 24 hours) after their withdrawal from competition for the following reasons:

- If the athlete does not compete no advantage will be gained by the use of IC-only substances
- If athletes become aware they may still have an IC-only substance in their body and therefore decide to withdraw from an event this is an appropriate action and should be encouraged. They should not be penalized for the presence of an IC substance when they have elected not to compete.

There is no way for an ADO (apart from maybe the IF) to know at what time an athlete actually did withdraw from an event and therefore to adapt its test planning (e.g. for test the day after the assumed competition).

RUSADA

SUBMITTED

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

RUSADA welcomes the introduction of the new unified in-competition period, which allows greater harmonization and clarity across all sports, however, we believe that the definition would benefit from specifying which authority has power to issue written notifications that allows to shorten the in-competition periods for athletes who withdrew from their scheduled events, as this crucial aspect is currently unclear.

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

Vulnerable Person Vulnerable Person is defined in the ISTI yet is not referenced and therefore it is unclear as to why this has been defined. It also appears from the Code draft that this definition relates to “Protected Persons”. If it is intended that the concept of “Minors” in the ISTI is to be replaced by “Protected Persons” then please can that be clarified.

Canadian Centre for Ethics in Sport

SUBMITTED

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

CCES supports the definition of In-Competition.

3.2 Defined terms specific to the International Standard for Testing and Investigations (8)

ISU

SUBMITTED

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

Risk Assessment: The assessment of risk of doping in a sport or sports discipline conducted by an *Anti-Doping Organization* in accordance with Article 4.2 of the *International Standard for Testing and Investigations*.

ISU: though one may expect that the main risk is related to doping, it is still possible to assume that other risks may exist, e.g. lack of supplies for testing or compromised quality of the supplies, lack of personnel or their training, lack of communication or records deficiencies. Therefore, we would suggest here and throughout the text to replace this term with a more specific of **Doping Risk Assessment**. In addition, other possible risks can be defined.

Definition of Chaperone:

ISU: to be added in the Definition: The Chaperone shall be of the **same gender** as the Athlete

Swedish Sports Confederation

Tommy Forsgren, Results Management Manager (Sweden)
NADO - NADO

SUBMITTED

In competition definition:

SSC is supportive of consistency but not fully supportive of the proposed definition.

SSC supports the change to “commencing at 11.59 pm on the day before the event”, however, we do not support that if athletes withdraw from competition after 11.59 pm should remain subject to IC testing. Withdrawal from competition may be a good reason for testing, but the OOC menu is sufficient in such cases. The reason for withdrawal may be that the athlete realizes that he/she may still have metabolites of a substance prohibited IC only in his/her body and therefore chooses not to compete. This would be the appropriate action and should not be punished.

Sport Ireland

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

SUBMITTED

Suitable Specific Gravity for Analysis: Sport Ireland has concerns regarding the downward adjustment to 1.003 for samples above the volume of 150mls. Sport Ireland seeks clarification whether or not the lower SG will affect the ability of the detection rate of prohibited substances?

Test Distribution Plan: This definition is too detailed. The criteria for a TDP is listed in the relevant article of the ISTI 4.2, 4.3, 4.4, 4.5 and 4.6.

Drug Free Sport New Zealand

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

SUBMITTED

In-Competition DFSNZ's view is that the in-competition period should begin at 12:00hrs on the day prior to the first day of competition. This is a fairer approach for an athlete who is competing early in the morning of the first day compared to an athlete who is not competing until the evening. The detection window of a substance could result in different consequences for these athletes.

Further to this, it is not clear how alternative definitions would apply to a multi-sport major event such as the Olympic Games. Would different definitions apply depending on the athlete's sport? This has the potential to be confusing for athletes (and ADOs).

Suitable Specific Gravity for Analysis DFSNZ welcomes this amendment as providing for a more practical approach for athletes who provide a dilute sample.

Vulnerable Person The ISTI includes a definition of "Vulnerable Person" that is identical to the definition of "Protected Person" in the Code. Definitions should be consistent across all WADA documents. DFSNZ prefers the term "Protected Person".

Doping Authority Netherlands

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

- Doping Control Coordinator: ADAN supports the addition of this definition. Unfortunately third parties (potentially non signatories) being a DCC are not bound directly to the codes international standards. Therefore a non-level playing field on an organizational level is a reality. Stringent criteria should be set for service providers.
- Expert: According to our opinion further explication of the experts being external seems logic here. The wording external does not cover the load. Removal of the sentence could also be an option.
- Expert panel: The Athlete Passport Management Unit of the Anti-Doping Organization nor the Anti-Doping Organization seems to have a say in which additional experts are involved. Bearing in mind who is responsible for e.g. the financial burden one of both should play a role in the appointment.

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

In-Competition:

Our concern is around the last sentence, relating to withdrawal. Currently there is no system in place to notify ADOs of an Athlete's withdrawal from a competition, and so it will be difficult to monitor and enforce the subsequent 24 hour In-Competition Testing period. Also, an ADO may set up an Out of Competition test the day after a Competition (still within the 24 hour period), and be unaware that the Athlete has withdrawn, so that In-Competition analysis is either not conducted or reported by the lab.

If WADA is not proposing to put processes in place to manage this notification issue, we would propose changing the wording of the last part of the definition to "*the Athlete shall remain subject to In-Competition Testing until the end of the Sample collection process related to such Competition*", instead of for 24 hours afterwards.

Suitable Specific Gravity for Analysis:

UKAD does not agree that the proposed amendments should be made to this definition.

We are concerned that the proposal to lower the specific gravity (SG) requirements will create unnecessary analytical challenges such as: i. affect SG adjusted corrections for certain analytes (for example, an over correction of testosterone is highly likely to lead to an increase in false anomalous results in the steroid passport that would require needless follow-up); ii. increase the frequency of steroid measurements that fall below the limit of detection making these data points uninterpreted for the purposes of the steroid passport; and iii. prevent meaningful data being obtained from special analyses such as EPO and IRMS. Ultimately, we believe that the risk of an increase in the rate of false negatives and false anomalous results is unnecessary when considering the low incidence of athletes that currently cannot produce a sample in range (1.005) after a few attempts

Canadian Centre for Ethics in Sport

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

CCES supports definition of Suitable Specific Gravity for Analysis.

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

In relation to the definition of Suitable Specific Gravity for Analysis, it is noted that the novel regime may turn out to be quite complex to implement and could trigger operational intricacies during Sample Collection. Such framework would add a layer of complexity and could expose the protocol to inconsistencies, as well as ambiguous or subjective situations (e.g. when measuring the urine's volume; or in case of partial samples, etc.).

In the interest of simplicity, it is proposed that a unique threshold - if possible lower than 1.005 - is kept; while the minimum volume is increased to the necessary level. For instance, 120ml at 1.003. In such case, the definition of Suitable Volume of Urine for Analysis would need to be adapted accordingly.

3.3 Defined terms specific to the International Standard for Laboratories (ISL) (2)

UEFA

SUBMITTED

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

Athlete Passport Management Unit – add the phrase ‘additional analysis requests’ as this is one of the key services an APMU provides to an ADO.

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

Threshold Substance: DAN encourages WADA to expand the number of threshold substances that are identified in the Technical Document on Decision Limits (TDDL). Increasing laboratory technology constitutes AAFs at concentration levels that are a result of the regular food chain, pharmaceutical impurities or inhalation of atmospheric aerosols.

3.4 Interpretation (1)

NADA

SUBMITTED

Regine Reiser, Result Management (Deutschland)
NADO - NADO

DEFINITION In-Competition:

With regards to the IC-time, the IC-Period should start at the same time for all participating athletes but end individually. The individual end of IC time is to open the opportunity to test athletes asap after an event. If athletes are “IC” for the complete period of an event (e.g. 3 Weeks during Tennis-Tournaments), also if they are competing only on the first day of the event, they will be not available for testing (if the MEO/IF is not cooperating with a NADO). Based on this, Athletes might be unavailable for testing due to the IC-Time although they are not actively taking part at the Event anymore, even not being at the location of the event.

a. It should be made clear, that the IC-time starts for all participants of the event at 11:59p.m. and not on individual starts during an event. The start of the IC-time is equal to all participating athletes.

b. The IC- time ends for those athletes who will not start during a tournament any more , when the Doping-tests of the specific tournament are finished. If Athletes stay in the Competition in order to take part at upcoming tournaments, they will stay subject to IC-Testing until the end of the testing of their last tournament. The end of the IC-Time is individual.

DEFINITION Specific Gravity:

the information on the SG should be displayed in Annex G and furthermore explained as questions arise:

- 1. Is there a guarantee, that samples with the SG of 1.003, Vol.: 150ml or more are usable for the complete scope of analysis?*
- 2. Is the Steroid-Profile unaffected by a lower SG?*
- 3. Practical Question: What is the division of the Urine to A/B-Sample (e.g.: B-Sample only 30ml, A-Sample max. 85ml)?*

PART TWO: STANDARDS FOR TESTING (2)

Ministry of sport of Russia

Veronika Loginova, Head of Antidoping Department (Russia)

Public Authorities - Government

SUBMITTED

It is necessary to add to the ISTI a provision that if the organizer of the sporting event / testing organization cannot provide enough of the doping control personnel and the athlete ready to pass a sample is forced to wait, then the testing should be postponed or canceled. (The Doping Control Officer must be ready at any time at the doping control station to test the athlete).

Recognizing that the International Standard is inherently a framework document providing general regulations for testing and investigations, we nevertheless propose, wherever possible, to unify the requirements for procedures and their documenting based on the review of the current best practices by IFs and NADOs.

It would help to prevent situations in which an athlete who is under the jurisdiction of his national anti-doping agency, an international sports federation and a major event organizer and who is subject to sample collection sessions conducted by various Sample Collection Authorities, is asked to comply with different requirements during the procedure.

For example, it seems prudent to establish a uniform (12-hour before the start of the Event) timeframe for In-Competition period for the purposes of doping control rather than leave this issue to the discretion of individual sports federations.

Also, at the moment the Standard and its accompanying technical documents have no requirements or recommendations for a minimum number of sample collection personnel and/or capacity of doping control station in relation to a number of athletes to be tested. Accordingly, the Standard also have no requirements for Sample Collection Authorities to ensure that such requirements are met in order to prevent unreasonable delays in the procedure.

In addition, we believe that the following articles of the Standard require further information, clarifications and harmonization:

Article 4.5: In the part pertaining to testing athletes at night (formalizing the list of grounds for such testing, limiting the scope of such testing to certain categories of athletes, potential requirement for prior approval of such testing by WADA)

Article 4.6: In the part pertaining to testing with advance notice (formalizing the list of grounds for such testing, potential requirement for prior approval of such testing by WADA)

Article 5.3 and Annex H: In the part pertaining to documents that should be carried by sample collection personnel (mandatory requirement for DCO to have a SCA-issued DCO ID with a validity period (in addition to the letter of authorization and general photo ID), mandatory requirement for BCO to have documents confirming their proper training / certification for blood sample collection, the rights of athletes and procedures to follow in cases when sample collection personnel is unable to present such documents).

Article 7.0: In the part pertaining to the procedure as a whole requires addition of a section with a list of conditions / criteria under which the doping control procedure can be concluded (other than athlete providing proper sample and logistical issues already mentioned in the documents), which would also define who should be able to decide on the issue in particular circumstances (DCO, Sample Collection Authority or Testing Authority). It also seems reasonable to establish the maximum number of samples with insufficient specific gravity to be collected from an athlete in one sample collection sessions.

Annex I.3.2: In the part of pertaining to athletes providing whereabouts in places with restricted access should clearly indicate that in this case the athlete is required to take measures to ensure his availability for testing in the form of notification of security personnel controlling access to his whereabouts about possible arrival of DCOs and requesting their assistance in providing access to without advance notice

Annex I.4.3: In the part pertaining to DCO calling athletes 5 minutes before the end of the 1-hour window should make it clearer whenever such calls are permitted or not and if yes, who has authority to decide on the issue, as well as to describe consequences for athletes in the case of their presence at the location indicated in ADAMS, as compared to being nearby and able to arrive to the location within 5 minutes.

Conseil supérieur des sports

Matheo TRIKI, Sportif Rugby (Espagne)

WADA - Others

SUBMITTED

1.

4.0 Planning effective Testing

2.

4.1 Objective

4.2 Risk Assessment and Test Distribution Plan

4.3 Defining International and National-Level Athletes

4.4 Similarly, a National Anti-Doping Organization is free to determine the criteria it will use to classify Athletes as National-Level Athletes. Again, it should make that determination in good faith, in accordance with its responsibility to protect the integrity of the sport at the national level (the source of national pride in different sports, and the stepping stone to international Competition, including representation of the nation in International Events or Competitions). Consequently, the definition shall at a minimum encompass all those who compete at the highest levels of national Competition in the sport in question (i.e., in national championships or other Events that determine or count towards determining who are the best in the country in the category/discipline in question, and/or who may be selected to represent the country in International Events or Competitions). It shall also include those nationals of its country who generally or often compete at international level and/or in International Events or Competitions (rather than at national level) but who are not classified as International-Level Athletes by their International Federation.

4.5

the priority sports/disciplines/nations have been established (see Article 4.4), an intelligent Test Distribution Plan uses Target Testing to focus Testing resources where they are most needed within the overall pool of Athletes. Target Testing shall therefore be made a priority, i.e., a significant amount of the Testing undertaken as part of an Anti-Doping Organization's Test Distribution Plan shall be Target Testing of Athletes within its overall pool.

1.

Testing which is not Target Testing shall be determined by Random Selection and should be conducted in accordance with the selection options in the Guidelines for Implementing an Effective Testing Program. Random Selection shall be conducted using a documented system for such selection. Random Selection may be either

weighted (where Athletes are ranked using pre-determined criteria in order to increase or decrease the chances of selection) or completely random (where no pre-determined criteria are considered, and Athletes are chosen arbitrarily from a list or pool of Athlete names), Random Selection that is weighted shall be prioritized and be conducted according to defined criteria which may take into account the factors listed in Article 4.5.3 (as applicable) in order to ensure that a greater percentage of 'at risk' Athletes is selected.

4.6 Prioritizing between different types of Testing and Samples

4.6.1 Based on the Risk Assessment and prioritization process described in Articles 4.2 to 4.5, the Anti-Doping Organization must determine to what extent each of the following types of Testing is required in order to detect and deter doping practices within the relevant sport(s), discipline(s) and/or nation(s), intelligently and effectively:

4.7 In-Competition Testing shall be made a priority, and a substantial portion of the available Testing shall be conducted In-Competition. However, some Out-of-Competition Testing shall still take place, proportionate to the risk of Out-of-Competition doping in such sport/discipline. 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 Out-of-Competition periods, there may be no Out-of-Competition Testing. In these circumstances, the Anti-Doping Organization shall apply to WADA to seek an exemption from Out-of-Competition Testing in accordance with the criteria published on WADA's website or in any protocol issued by WADA.

4.8 Collecting whereabouts information⁸

4.8.1 Whereabouts information is not an end in itself, but rather simply a means to an end, namely the efficient and effective conduct of No Advance Notice Testing. Therefore, where an Anti-Doping Organization has determined that it needs to conduct Testing (including Out-of-Competition Testing) on particular Athletes, it must then consider how much information it needs about the whereabouts of those Athletes in order to conduct that Testing effectively and with no advance notice. The Anti-Doping Organization must collect all of the whereabouts information that it needs to conduct the Testing identified in its Test Distribution Plan effectively and efficiently. It must not collect more whereabouts information than it needs for that purpose.

4.9

4.9.1 Anti-Doping Organizations shall coordinate their Testing efforts with the efforts of other Anti-Doping Organizations with overlapping Testing Authority, in order to maximise the effectiveness of those combined efforts and to avoid unnecessarily repetitive Testing of particular Athletes. In particular Anti-Doping Organizations shall:

a) consult with other relevant Anti-Doping Organizations in order to coordinate Testing activities (including whereabouts, Athlete pool selection and Test Distribution Plans) and to avoid duplication. Clear agreement on roles and responsibilities for Event Testing shall be agreed in advance in accordance with Code Article 5.3. Where such agreement is not possible, WADA will resolve the matter in accordance with the principles set out at Annex J – Event Testing.

4.9.2 Anti-Doping Organizations may contract other Anti-Doping Organizations or third parties to act as a Doping Control Coordinator or Sample Collection Authorities on their behalf. In the terms of the contract, the commissioning Anti-Doping Organization (which, for these purposes, is the Testing Authority) may specify how any discretion afforded to a Sample Collection Authority under the International Standard for Testing and Investigations is to be exercised by the Sample Collection Authority when collecting Samples on its behalf.

5.0 Notification of Athletes

5.1 Objective

The objective is to ensure that an Athlete who has been selected for Testing is properly notified with no advance notice of Sample collection as outlined in Article 5.4.1, that the rights of the Athlete are maintained, that there are no opportunities to manipulate the Sample to be provided, and that the notification is documented.

5.2 General

Notification of Athletes starts when the Sample Collection Authority initiates the notification of the selected Athlete and ends when the Athlete arrives at the Doping Control Station or when the Athlete's possible Failure to Comply is brought to the Testing Authority's attention. The main activities are:

1.
 - a) Appointment of DCOs, Chaperones and other Sample Collection Personnel sufficient to ensure No Advance Notice Testing;
2.
 - b) Locating the Athlete and confirming their identity;
3.
 - c) Informing the Athlete that they have been selected to provide a Sample and of their rights and responsibilities;
4.
 - d) Continuously chaperoning the Athlete from the time of notification to the arrival at the designated Doping Control Station; and
5.
 - e) Documenting the notification, or notification attempt.

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 5.3.8. In order to ensure that Testing is conducted on a No Advance Notice Testing basis, the Testing Authority (and the Sample Collection Authority, 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 third party notification 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 and shall occur at the end of the Competition in which the Athlete is competing.

5.4 Requirements for notification of Athletes

5.4.1 When initial contact is made, the Sample Collection Authority, DCO or Chaperone, as applicable, shall ensure that the Athlete and/or a third party (if required in accordance with Article 5.3.8) is informed:

1.
 - a) That the Athlete is required to undergo a Sample collection;
 - e) Of the Athlete's responsibilities, including the requirement to:
2.
 - 1.

Remain within direct observation of the DCO/Chaperone at all times from the point initial contact is made by the DCO/Chaperone until the completion of the Sample collection procedure;

2.

Produce identification in accordance with Article 5.3.4;

3.

Comply with Sample collection procedures (and the Athlete should be advised of the possible Consequences of a failure to comply); and

4.

Report immediately for Sample collection, unless there are valid reasons for a delay, as determined in accordance with Article 5.4.4.

3.

f) Of the location of the Doping Control Station;

4.

g) That should the Athlete choose to consume food or fluids prior to providing a Sample, they do so at their own risk;

5.

h) Not to hydrate excessively, since this may delay the production of a suitable Sample; and

6.

i) That any urine Sample provided by the Athlete to the Sample Collection Personnel shall

1.

5.4.3 The Chaperone/DCO shall have the Athlete sign an appropriate form to acknowledge and accept the notification. If the Athlete refuses to sign that they have been notified, or evades the notification, the Chaperone/DCO shall, if possible, inform the Athlete of the Consequences of refusing or failing to comply, and the Chaperone (if not the DCO) shall immediately report all relevant facts to the DCO. When possible the DCO shall continue to collect a Sample. The DCO shall document the facts in a detailed report and report the circumstances to the Testing Authority. The Testing Authority shall follow the steps prescribed in Annex A – Investigating a Possible Failure to Comply.

5.4.4 The DCO/Chaperone may at their discretion consider any reasonable third party request or any request by the Athlete for permission to delay reporting to the Doping Control Station following acknowledgment and acceptance of notification, and/or to leave the Doping Control Station temporarily after arrival, and may grant such permission if the Athlete can be continuously chaperoned and kept under direct observation during the delay. Delayed reporting to/temporary departure from the Doping Control Station may be permitted for the following activities:

9.0

documentation are transported in a manner that protects their integrity, identity and security.

9.3.2 Samples shall always be transported to the laboratory that will be analyzing the Samples using the Sample Collection Authority's authorised transport method, as soon as possible after the completion of the Sample Collection Session. Samples shall be transported in a manner which minimizes the potential for Sample degradation due to factors such as time delays and extreme temperature variations.

4.0 Planning effective Testing (1)

World Rugby

SUBMITTED

David Ho, Anti-Doping Science and Results Manager (Ireland)
Sport - IF – Summer Olympic

World Rugby support the proposed amendments which add clarity to ISTI in particularly the amendments made to the whereabouts provisions in 4.8

4.1 Objective

4.1.2 (1)

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

As Annex H only relates to SCP and Article 4.1.2 relates to any person (e.g. office staff), it may be helpful to specifically reference clause H.4.2 in Article 4.1.2, or move the wording from H.4.2 to 4.1.2, and reference this clause in H.4.2.

4.1.4 (1)

ISU

SUBMITTED

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

4.1.4 The *Anti-Doping Organization* shall monitor, evaluate and update that Risk Assessment and Test Distribution Plan during the year/cycle and as necessary in light of changing circumstances; and implementing the Test Distribution Plan.

ISU: potential drafting to clarify the idea may be needed.

4.2 Risk Assessment and Test Distribution Plan (1)

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

It is unclear why this title has been changed to '*Risk Assessment and Test Distribution Plan*'. Articles 4.3, 4.4 etc. all relate to defining a TDP according to the definition of TDP. Therefore, we recommend changing the title back to '**Risk Assessment**'. As an option section 4 could reference TDP within the overall title.

4.2.1 (4)

ISU

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

SUBMITTED

ISU: vulnerable persons can be added here as another factor to take into consideration.

Doping Authority Netherlands

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

SUBMITTED

4.2.1 e) Interpretation of peer-reviewed articles can be a challenge for non-scientific orientated administrators. It would be helpful if WADA could provide insight in global and regional trends.

RUSADA

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

SUBMITTED

For sake of consistency and to avoid unnecessary duplication of work, RUSADA proposes that WADA should commission and disseminate to ADOs annual reviews concerning the aspects of Risk Assessments stipulated in these items (in particular, physiological risks beyond the score of TDSSA, relevance of prohibited substances to specific sports/disciplines and research on doping trends).

RUSADA would also like to propose that WADA should make their Annual Testing Statistics and ADRV Reports available not only as pdf files for general public, but also in a format that allows data analysis (e.g. .csv files) to ADOs.

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

4.2.1 (i) To be consistent with Article 4.1.4, consider changing '*at what time(s) during the year...*' to '*at what time(s) during the year/cycle...*'. This enables a risk assessment to consider sports whereby cycles are greater than a year and therefore the risk changes throughout that cycle (as well as within the specific year itself).

4.2.1.

By removing the wording '*assessing the relative risks of doping*' in clauses (a) and (b), we feel there is now no link between prioritizing between sports/disciplines and the risk of doping. Consider changing (a) and (b) wording to '*allocating Testing between the different disciplines/sports/nations in line with its risk assessment conducted in accordance with 4.2, and ...*'

Also, please note that the Article has clauses 4.4.1 a), b), a), b), instead of a), b), c) and d).

4.2.4 (2)

DFSNZ notes that the TDSSA is now formally recognised in the Code. We have concerns regarding the inflexibility of the TDSSA and the demand it places on resources that might otherwise be directed more intelligently elsewhere.

DFSNZ proposes that rather than have each NADO apply the TDSSA across every sport it tests (if that is indeed the intent) that the TDSSA should instead be based on risk specific to the individual country - for example, the 10-15 highest risk sports). NADOs would then have discretion (using the MLAs as a guidance) as to whether to apply the TDSSA below a country's highest risk sports . This would enable additional analyses to be applied intelligently, where there is the greatest risk, rather than it becoming a tick box exercise. The TDSSA in its current form restricts the NADO's ability to apply its own thinking and its own intelligence.

Rather than WADA assessing whether an ADO has 'ticked the boxes' for MLAs it could instead audit an ADO's risk assessment and correlating test plan to gauge that it is understanding and applying an intelligent testing plan.

Further to the above, DFSNZ proposes that where less than 10 tests are carried out in a sport, the TDSSA should simply not apply.

For smaller NADOs that conduct a small number of tests in lower risk sports (i.e. <10) as a deterrent, the TDSSA generates disproportionate numbers of additional analyses required compared to NADOs that do higher numbers of testing (under the TDSSA >1 rule).

For small, remote NADOS, the costs of the additional analyses under the revised Code (and TDSSA) will require either more resources to be found or a drop in the number of overall tests conducted.

DFSNZ would like to better understand the risk assessment behind the TDSSA where for example, it requires ESA analysis for samples collected in the sport of weightlifting. There appears to be an element of adding a 5% requirement for good measure (or just in case) to a number of analyses/sports, which collectively add significantly to the cost and complexity of implementing the TDSSA. This will be particularly challenging when the GH analysis becomes mandatory as the cost of collecting and transporting blood samples in a location remote from a laboratory can be prohibitive in lower risk sports.

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

4.2.4 Referring to the general remark above the impact of the TDSSA is high and the TDSSA should therefore be as smart as feasible.

4.3 Defining International and National-Level Athletes (1)**International Paralympic Committee**

SUBMITTED

James Sclater, Director (Germany)
Other - Other (ex. Media, University, etc.)

Comments should made regarding athletes that do not fall within the definition of both ILA and NLA. This is especially important for TUE reasons.

4.3.2 (6)

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

4.3.2 Therefore, once the Risk Assessment and the Test Distribution Plan ~~is~~**are** completed, the next step is to determine

NADA

SUBMITTED

Regine Reiser, Result Management (Deutschland)
NADO - NADO

4.3.2. a:

for a better organization of testing in the RTP, IFs shall share their list of RTP-Athletes with NADOs and vice-versa.

Antidoping Switzerland

SUBMITTED

Ernst König, CEO (Switzerland)
NADO - NADO

Art. 4.3.2 b)

The compulsory inclusion of "all Athletes who compete at the highest level of national Competition" in the definition of a National-Level Athlete is not taking into consideration the national status of a sport and will inevitably lead to recreational athletes being considered as National-Level Athletes. The definition of NLA should remain entirely in the discretion of the NADOs as this is the only way to maintain proportionality in the application of the Anti-Doping-Rules within the national context.

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

4.3.2 b)

It is not clear in this article if the national level athlete criteria must be applied to every sport ("in the sport in question")?

Related to our comments on the TDSSA, DFSNZ has a policy of conducting a small amount (4-8 tests) in selected sports which are not deemed to be high risk in the New Zealand context, but where we wish to maintain a presence (by testing) to have a deterrent effect on athletes in that sport. These sports tend to be low participation where "national level athletes" may well include high school students.

The application of the TDSSA to this testing and the cost and complexity associated with implementing the MLAs (whether conducted in these sports or transferred to other high risk sports as provided for in the TDSSA) may deter DFSNZ carrying out any testing in these sports at all (which may have a downstream effect of enabling doping).

For example, being required to conduct additional analyses in the sport of judo which is considered a relatively low risk (and low participation) sport in New Zealand would likely mean less testing in our higher risk sports such as rowing and cycling.

Where the number of athletes that come within the scope of "national level athlete" has other implications, especially financial, it is to be expected that ADOs will seek to adapt and prioritise in accordance with their resources. However, the inflexible approach of the TDSSA does not permit an ADO to prioritise in this respect.

The national athlete criteria combined with the TDSSA discourages any testing at all in lower risk sports.

RUSADA

SUBMITTED

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

RUSADA is uncertain that Risk Assessment and TDP Development should precede the definition of National and International level athletes, since those definitions has implications beyond TDP (most importantly for TUE requirements) and therefore should be independent of the TDPs, clearly communicated to all athletes well in advance and, preferably, remain the same within at least one whole Olympic cycle.

We propose to move these definitions to the beginning of the Article 4, since they define the scope of NADO / IF testing program, which should be clearly understood before Risk Assessment and TDP are developed.

Canadian Centre for Ethics in Sport

SUBMITTED

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

In Article 4.3.2.b, CCES is concerned by the use of the term “all.” As it reads, the definition of a National-Level Athlete would have to include “all those who compete at the highest levels of national Competition.” In some sports, having “all” athletes who compete at a national level creates quite a large pool of athletes, diluting the pool of resources available to conduct “meaningful and effective” testing, as per the Code. NADOs should have the flexibility to identify the appropriate number of athletes from those sports where there is a large pool competing at national competitions. As such, we recommend removing “all” from the sentence, to ensure NADOs don’t have the onerous obligation to include all of the athletes who compete at a national competition: “the definition shall at a minimum encompass those who compete at the highest levels of national Competition in the sport in question.”

4.4 Prioritizing between sports and/or disciplines**4.4.1 (2)****UEFA**

SUBMITTED

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

4.4.1 – update the coding (should be c and d rather than a second a and b)

Doping Authority Netherlands

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

Inconsistency in article numbers. With regard to article bb) it seems logical to incorporate the level of performance. Resources should not automatically be devoted to sports with a larger number of athletes.

4.5 Prioritizing between different Athletes**4.5.1 (4)**

4.5.1 Once the International and National Level *Athletes* has **have** been defined (see Article 4.3)...

UEFA

SUBMITTED

4.5.1 – update the wording (should be ‘Once the International and National Level Athletes have been defined’ rather than ‘has been defined’)

NADA

SUBMITTED

4.5.1:

In this context (and the following 4.5.2 and 4.5.3) "Target Testing" might be understood only with regards to OOC-Testing, especially due to the distinction between "different Athletes".

At this point an extension/additional definition reg. IC-Testing might make sense:

*"...be Target Testing of Athletes **within its overall pool.**"*

*Suggestion: "...**within its overall pool and during IC testing.**"*

Explanation: during IC-testing, not only testpool-athletes might be tested (non-testpool athletes might be target tested as well due to whistleblowing etc.).

Suggestion (prepending 4.5.4):

"While OOC-Target testing should be personalized to athletes at all times, IC-Target testing should integrate additional options within its definition.

IC-Target testing implies:

Specific and personalized (Athlete Name) selection of Athletes (Same as OOC defined Target Testing)

Furthermore IC-Target Testing is expanded to pre-determined criteria:

Selection by Ranking 1-4

Selection by determinated Rankings (i.e.: Ranking 1-3 plus Ranking 12-14 etc.)

Selection by Athlete level (only RTP-Athletes, only natl. Team Players)

Selection by specified group of athletes (e.g.: all national Team players, etc.)

(Selection of the event itself (depending on potentially starting high-level Athletes; level of Championship: local, national, worldwide))

(Selection by bib Number)"

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

Change 'has' to 'have' in the first line

4.5.2 (1)**RUSADA**

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

SUBMITTED

With the exception of team sports in which nationals of foreign countries may represent national clubs / teams within the scope of the given NADO testing program, RUSADA finds it difficult to justify re-allocating NADO resources to searching for the athletes who would fit the definition of this item and who are most likely already providing whereabouts information to the NADO of their own country or relevant IF. We believe that this item should be moved to the section describing cooperation between various ADOs (Article 4.9).

4.5.3 (1)**UK Anti-Doping**

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

4.5.3 (c)

Failure to Comply is a defined term relating specifically to ADRVs 2.3 (Refusal, Failure to Comply) and 2.5 (Tampering). This Article appears to be referring to 2.4 (Whereabouts Failures) and is therefore at odds with the definition of Failure to Comply.

4.5.4 (1)**UK Anti-Doping**

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

As raised in UKAD's first submission we feel the phrase 'Random' within the context of Testing is misleading. Whilst selection can be done by random draw, there should always be some element of targeting to the testing session. For example, targeting a specific match, competition, targeting a specific sport/discipline, targeting a specific club. Furthermore, Target testing as a concept only looks at the individual Athlete level. This is limiting, and where this doesn't happen, the way these Articles/ definitions are defined, implies that non-target testing is 'random' – when in actual fact the opposite is true. E.g. an ADO may receive intelligence on a team but not an individual. The ADO could target the club and do a random selection of players from the whole squad. Using current definitions this would be considered a 'random' test, yet this is not the case. Therefore, consideration should be given to rewording definitions and expanding the concept of 'Target Testing'.

Whilst we agree that weighted random testing shall be prioritised, given its nature, it is still fairly targeted – therefore there should be a change from simply 'Target' and 'Random'. As an example, if an ADO does 49% Target testing and 51% weighted random, as currently drafted it is not prioritising effectively. If the

ADO does 51% Target testing and 49% random, it technically is being more effective. However, the reality is the former could be considered more effective than the latter.

4.6 Prioritizing between different types of Testing and Samples

4.6.1 (4)

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

DFSNZ has concerns on what the "criteria" and "protocol" will include to seek an exemption from OOC testing and how much further administrative resource this might require. We often conduct a small number (4-8) of in-competition tests only in sports which are not considered to be high risk in New Zealand. This is in order to maintain an anti-doping "presence" within that sport as a deterrent.

If the criteria or protocols are too complex or demanding, this may discourage ADOs from conducting any testing at all in lower risk sports.

This is connected with our feedback on Article 4.3.2 where the national level athlete criteria combined with the TDSSA further discourages any testing at all in these sports.

This addition creates more "red tape" and further subjugates NADOs being able to think for themselves and act accordingly in the best interests of sport in their country.

Anti-Doping Norway

SUBMITTED

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

4.6.1 ii)

ADNO believe it to be inefficient and futile to make it obligatory for an ADO to apply to WADA to seek exemption from Out-Of-Competition testing from criteria established by WADA (in small number of sports with no material risk of doping). WADA will be able to review the testing both in ADAMS and in the annual reports and be more served with a dialogue with the ADO in question and the possibility of initiating a Code Compliance process if the Parties do not agree. An ADO should be able to provide a solid explanation to the testing program upon request from WADA allowing WADA to support the ADOs testing program.

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

4.6.1 (a) (i)

As Out-Of-Competition testing is the priority for an effective testing programme, UKAD does not agree that testing across all sports/disciplines should have some material In-Competition testing. In some cases, this is not an effective use of finite resources, in other cases, the opportunities to conduct In-Competition testing under UKAD's jurisdiction is incredibly limited (for example in some winter sports where the number of UK Athletes competing is very low – e.g. biathlon/cross country skiing – and only international level events are competed at). Being forced to implement a small level of In-Competition testing to meet an Article in the ISTI, removes an ADO's flexibility to effectively use its finite resources.

4.6.1 (a) (ii)

UKAD understands the need to ensure that appropriate levels of Out-Of-Competition testing are conducted across all sport/disciplines. Whilst we do not explicitly disagree with the need to seek an exemption, this will be onerous on many ADOs. Given finite resources, there are examples of sports

where the significant risk of doping is In-Competition, and therefore it is a more effective use of resources for the ADO to solely focus on In-Competition testing and conduct no Out-Of-Competition testing. There are sports/disciplines whereby the TDSSA MLAs are 0% across all categories. This largely implies a very limited risk, if any risk at all out-of-competition for this sport/discipline. Perhaps for these cases, no exemption should be required from WADA?

Canadian Centre for Ethics in Sport

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

SUBMITTED

In Section 4.6.1.a.ii, CCES recommends removing the requirement to apply to WADA to seek an exemption from out-of-competition testing in situations where risk of doping is minimal during out-of-competition periods. In sports where testing resources are limited and the risk of doping is in-competition, we believe ADOs should have the flexibility to choose how those resources are being applied.

4.7 Sample analysis and retention strategy (2)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

Recommendation to stipulate in 4.7 the need to conduct Sample analysis in accordance with the TDSSA. In isolation, it is not clear in this section that this is required.

Kamber-Consulting

Matthias Kamber, Independent Expert (Switzerland)
Other - Other (ex. Media, University, etc.)

SUBMITTED

The experience with the TDSSA is that ADOs:- reduced the number of athletes in a testing pool- apply testing according to an excel sheet with TDSSA requirements instead of intelligence and smart testing- the number of more tests (e.g. for hGH) did result in more AAFs
- the number of available tests are reduced due to more costs fulfilling TDSSA- I have rarely seen an ADO doing more tests as minimally requested by TDSSA

The TDSSA model is too rigid, too administrative and too bureaucratic. ADOs should be able to assign tests according to their experience, the sporting culture in their country and gathered intelligence. This may lead to a different distribution to test assignments and requested analysis. If this is the case, then an ADO has to explain why without being threatened of being non-compliant.

4.7.2 (1)

RUSADA

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

SUBMITTED

RUSADA believes that TDSSA MLAs should take into account not only physiological aspects of the sport as outlined by WADA in the relevant Technical Document, but also the level of athletes in a given sport in the country with a possibility of reduction if the country does not have any 'elite' athletes in a given sport.

In addition, we believe the possible reduction in ESA MLA based on implementation of ABP module should be revised, since new TDSSA make it mandatory to have ABP module for all athletes in the RTP. The procedure for obtaining such reduction should be clearly outlined and the conditions need to be specified to ensure transparency of the process.

4.7.3 (1)

RUSADA

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

SUBMITTED

RUSADA proposes that WADA should inform ADOs about advances in detection methods which may impact sample retention and/or re-analysis strategies.

4.8 Collecting whereabouts information (3)

World Rugby

David Ho, Anti-Doping Science and Results Manager (Ireland)
Sport - IF – Summer Olympic

SUBMITTED

World Rugby welcome this redraft which gives greater clarity in terms of whereabouts requirements, and provides a clear framework to consider when dealing with a team sport whereabouts programme.

Anti-Doping Norway

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

SUBMITTED

4.8

ADNO support that an athlete can only be in one RTP with the consequences that the Custodian in ADAMS related to whereabouts is left to the ADO with the RTP athlete allowing other ADOs to test at will ensuring that any whereabouts failure is only handled by one ADO.

It is not clear which ADO should have the primacy relating to adding an athlete to the RTP. ADNO suggest that the ADO first addressing the athlete for the RTP also will be the Custodian. A requirement of notifying the athletes International Federation/NADO when an athlete is identified for the RTP should be a requirement. The same notification requirement is also relevant if the ADO with the Custodian remove the athlete from its RTP (allowing the other ADO to include the athlete on its RTP).

Doping Authority Netherlands

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

SUBMITTED

The pyramidal structure of the whereabouts criteria and the inclusion in different testing pools provides a more proportioned approach towards the athletes involved. The tiered possibilities create also a solution towards team sports. Challenging will be the management and especially the quarterly adjustments for NADO's. Generally they have to cope with a large number of mutations in several sports and disciplines. We propose to effectively evaluate the testing pools on a 6 months basis.

4.8.2 (2)

Sport Ireland

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

SUBMITTED

Sport Ireland **strongly opposes** that each ADO shall use ADAMS for all aspects of Doping Control. Sport

Ireland has its own management IT system and whereabouts system and can provide relevant ADOs will access to athletes whereabouts and provide any testing plans upon request. Sport Ireland would like to re-iterate that the use of ADAMS is only practical if the data transfer issues are resolved. WADA must deliver on its commitment from previous years to provide an API, without this, the commitment to the mandatory use of ADAMS for all aspects of doping control is premature.

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

DFSNZ suggests there is a typo and this Article should be reworded to:

"....may collect whereabouts information and shall use **this information ADAMS** to conduct effective Doping Control"

DFSNZ does not use ADAMS to plan, coordinate or conduct conduct doping control (i.e. test missions) as ADAMS does not currently meet all its needs in that regard.

4.8.6 Testing Pool(s) (1)

Czech Anti-Doping Committee

SUBMITTED

Jan Chlumský, Head of Executive for Doping Control (Czech Republic)
NADO - NADO

I suggest possibility to include members of lower pools with 60 minutes time slot into consequences according to code art. 2.4 and art. 10.3.2.

Without possibility of sanction WA information requirements are weak.

4.8.6.2 (1)

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

UKAD feels that this Article should also reference Filing Failures for provision of inaccurate whereabouts information. Therefore, consider changing the wording to, '*...provide the required whereabouts information by the filing deadline **and/or provides inaccurate whereabouts information (a Filing Failure), and/or to be available for Testing...***'

Additionally, in some instances an ADO may conduct testing based on information from alternative sources than the Athlete's whereabouts if this is believed to be inaccurate. To clarify this, consideration to be given to changing the wording to, 'using the Athlete's Whereabouts Filing, **unless the ADO has other information to suggest the Athlete is not at the location listed in the Whereabouts Filing**'

4.8.6.3 (1)

Sport Ireland

SUBMITTED

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

Sport Ireland **strongly opposes** that each ADO shall use ADAMS for whereabouts. Sport Ireland has whereabouts system and can provide relevant ADOs will access to athletes whereabouts upon request. Sport Ireland would like to re-iterate that the use of ADAMS is only practical if the data transfer issues are resolved. WADA must deliver on its commitment from previous years to provide an API, without this, the commitment to the mandatory use of ADAMS for whereabouts is premature.

4.8.7 General Pool (5)

ISU

SUBMITTED

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

4.8.7.3 To ensure accurate whereabouts are filed and maintained by Athletes in a *Testing* pool, an International Federation or a National Anti-Doping Organization **shall within their rules and procedures include appropriate consequences** to individual Athletes or teams who are part of a Testing pool if; (...)

[*Comment 4.8.6.3: Any consequences may be in addition to the elevation of an Athlete into the Registered Testing Pool as described in Article 4.8.2.*]

ISU: Example of additional **appropriate consequences** could be given in a comment

UEFA

SUBMITTED

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

4.8.7.1 – This clause states that for all athletes in a ‘Testing Pool’, an overnight address, competition/event schedule and regular activities shall be collected. We would propose that this should be a ‘should’ clause rather than a ‘shall’ clause. Alternatively, the requirement could be to submit a ‘home address’. If you collect an overnight address, we’re almost putting them on 365 whereabouts because it would need to be updated regularly.

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

4.8.7.4 DFSNZ disagrees with the requirement that RTP athlete whereabouts are filed in ADAMS. DFSNZ has a whereabouts system that meets our needs and complies with the requirements under the Code, such as providing access to other ADOs with jurisdiction. We consider this requirement to be premature ahead of the updated version of ADAMS which is yet to be completed.

RUSADA

SUBMITTED

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

RUSADA believes that the wording of this item is ambiguous and can be interpreted very broadly. We propose to limit the scope of additional consequences to athletes in non-registered testing pool to treating violations specified in this article as ‘Filing Failures’ to be reviewed and processed in accordance with relevant Result Management procedures and update the corresponding definitions in the Code.

We believe the fact that athletes in lower tier testing pools are not required to specify a 60-minute slot and therefore could not commit whereabouts failure under ‘Missed Test’ should not excuse them from providing accurate and up-to-date information on their whereabouts for the purpose of un-announced testing and absolve them of responsibility in case of failure to do so.

In addition, we believe that mandatory elevation of such athletes to Registered Testing Pool creates an impression that being included in the registered pool is a punishment, which is rather unfortunate and may contrary to ADO interests.

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

4.8.7.5

Whilst the requirements for Athlete inclusion into the RTP are detailed in Annex I, it would be more consistent to include this Article's wording within this section (4.8.6) as well, given it has been inputted for Testing Pool Athletes.

4.8.7.1 (2)

ISU

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

SUBMITTED

4.8.7.1 Athletes in a *Testing* pool are not subject to *Code* Article 2.4 Whereabouts Requirements.

ISU: Athlete in Testing Pool should be subject to Filing Failure and *Code* Article 2.4 Whereabouts Requirements

International Testing Agency

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

SUBMITTED

In order to better reflect the "pyramidal" approach set out in Art. 4.8.4 and to effectively differentiate the whereabouts requirements for the different pools, we recommend that the provision of regular activities for TP athletes is left at the discretion of the ADO and not made mandatory.

4.8.8 Selecting Athletes for the different whereabouts pools and coordination between International Federations and National Anti-Doping Organizations (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

We are slightly unclear as to why the General Pool needs to be specified. If this includes Athletes where there are no whereabouts requirements, then would this not just apply to all other National-Level and International-Level Athletes? If the stipulation of a General Pool is to remain, then we suggest that this be for Athletes for whom there are at least some whereabouts requirements. Alternatively, wording to the following affect could be included, '**Further whereabouts pool(s) with diminishing whereabouts requirements may be defined by an ADO**'

4.8.9 Major Event Organizations (4)

ISU

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

SUBMITTED

4.8.9.3 (..)

All Anti-Doping Organizations with Testing Authority over the Athlete may access that information in order to locate them for Testing. In accordance with Article.

ISU: the last sentence may need to be revised with the reference article # added in the end

NADA

Regine Reiser, Result Management (Deutschland)
NADO - NADO

SUBMITTED

4.8.10.1:

The MEOs should request the IFs to provide the athletes with ADAMS-Accounts and additionally inform the NADOs. If a NADO keeps the custody over already existing ADAMS Accounts, reading permissions to the MEO are granted by the NADO.

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

4.8.9.3

There appears to be inconsistency around the arrangements for Athletes in multiple pools. This Article implies that an Athlete cannot be in the RTP for more than one ADO, whereas Annex I.2.2 refers to arrangements where an Athlete is in more than one ADO's RTP. Therefore, consider removing '...be in one Registered Testing Pool...'

4.8.9.5 (a)

Whilst UKAD agrees that in the build up to a major event RTP/Testing Pools should reflect this, the current wording could be interpreted that RTP/Testing Pools should change to ensure that all those participating are subject to a sufficient level of Out-Of-Competition testing. We feel that this should also be based on the risk of sport/discipline as well as the risk of the individual Athlete. Therefore, UKAD agrees that the RTP/Testing Pool should have a focus on those participating but consider adding wording along the lines of '*and in accordance with any risk assessment*' to ensure this is clear.

Canadian Centre for Ethics in Sport

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

SUBMITTED

In Section 4.8.9.2, remove "through ADAMS" from the sentence. CCES believes ADOs should have the flexibility to share the information by email or other means if ADAMS is not their primary test planning tool.

4.9 Co-ordinating with other Anti-Doping Organizations (3)

Department of Health - National Integrity of Sport Unit

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

SUBMITTED

Article 4.9(e) and J.8 should be amended to note that intelligence should be shared when it is possible to do so. There are circumstances where government legislation may prohibit the sharing of information collected.

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

As raised in UKAD's first submission, we feel that the ISTI could, possibly in this Article, address the matter of MEOs and IFs stipulating entry criteria into events they are hosting. This is a growing trend, and whilst intentions are good, these requirements are often passed down to NFs. NFs inevitably pass these on to the local NADO as the TA in that country. Therefore, indirectly an IF/MEO is influencing the testing plans of a NADO, which should not be the case. Where an IF/MEO stipulates entry requirements, that ADO should be responsible for attempting to deliver these programmes. This could easily be in collaboration with NADOs.

International Paralympic Committee

James Sclater, Director (Germany)
Other - Other (ex. Media, University, etc.)

SUBMITTED

There should be a comment whereby event organisers, NADOs and other collection agencies must get permission from an ADO prior to listing them as the Testing Authority. There are many instances where non-sanctioned events list an IF as the TA, without the IF being aware.

4.9.1 (2)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

4.8.9.3 – This clause states that all ADOs with Testing Authority over an athlete should have access to Whereabouts information in order to locate them for testing. This is currently not possible in ADAMS as the NADO of the Athlete Nationality doesn't get access to Whereabouts info.

Also missing the relevant article number at the end of the paragraph.

4.9.1 b) – Currently, DCFs need to be entered into ADAMS within 14 days – why is this changing to 15 days?

4.9.1 d) – It is not possible to share information on ABP programmes with the Athlete Nationality NADO via ADAMS.

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

4.9.1 (e)

Whilst supportive of this Article in principle, as sharing intelligence with other ADOs is key, there may be circumstances where an ADO cannot (or should not) share intelligence with another ADO. Therefore, consider adding '*where appropriate*' to this Article

4.9.2 (1)

ISU

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

SUBMITTED

In the terms of the contract, the commissioning *Anti-Doping Organization* (which, for these purposes, is the *Testing Authority*) ~~may~~ should specify how any discretion afforded to a *Sample Collection Authority*

ISU: the verb “may” sounds rather indefinite this contents; “should” sounds much better and firmer

5.0 Notification of Athletes

5.2 General (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

In certain scenarios, an ADO may not be made aware of a potential Failure to Comply for a number of hours/days (depending on timing of test and communication between the SCP and ADO). Therefore, based on this Article, notification could last for this duration. We wish to raise this in case it could cause any issues.

5.3 Requirements prior to notification of Athletes (1)

CHINADA

Yao Cheng, Result Management (China)
NADO - NADO

SUBMITTED

In practice, some sample collection agencies only authorizes one DCO to perform the out-of-competition testing. The DCO will recruit unauthorized personnel to take blood samples and witness urination, which may bring about many problems. For example, standard operation cannot be guaranteed due to a lack of experience, or the athlete’s cheating during urination may not be detected or cannot be solved in a timely manner, or athlete may complain of these personnel’s lack of authorization, or disputes may occur if the athlete’s privacy is violated.

Therefore, it is recommended to clearly address that all the sample collection personnel involved in the out-of-competition tests, including DCOs, chaperons, support personnel responsible for taking blood samples or witnessing urination should have the certificates issued by the authorized sample collection agencies or authorization letters with names.

5.3.1 (3)

World Rugby

David Ho, Anti-Doping Science and Results Manager (Ireland)
Sport - IF – Summer Olympic

SUBMITTED

We believe that the reference to 5.3.8 should be 5.3.7.

Anti-Doping Norway

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

SUBMITTED

5.3.1

ADNO support the requirement of No Advance Notification in all circumstances. The last part sentence in

this section identify this to only be relevant for In-Competition. We suggest that the last part of the sentence be stricken so that it reads: "Any third-party Notification 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." If the last part of the sentence shall remain, we suggest that this is added in a sub-article of its own.

Sport Ireland

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

SUBMITTED

5.3.1 refers to Article 5.3.8 but there is no Article 5.3.8.

5.3.3 (2)

RUSADA

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

SUBMITTED

RUSADA would like propose to make it mandatory for DCOs to have with them a photo ID card issued by Sample Collection Authority clearly identifying them as DCOs and to make it mandatory for BCOs to have with them documents confirming their eligibility to conduct venipuncture.

We would also propose that ADAMS should generate an additional document that would specify the name of the Testing Authority, place and date of the testing mission and Lead DCO assigned to the testing mission, but no further information on testing so that this document can be presented to third parties (e.g. security personnel in case of areas/venues with restricted access) as a demonstration that DCO is at the area/venue on the official testing mission without a risk of prior notification of athletes.

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

UKAD's view is that all SCP should be required to carry complementary ID, not just DCOs and BCOs.

5.3.6 (1)

International Testing Agency

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

SUBMITTED

Consider adding the following reference at the end of the provision: "(...) including unsuccessful attempts and Failures to Comply."

5.3.7 (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

As raised in UKAD's first submission, where a third party has been informed of notification in accordance with 5.3.7, they should be accompanied to ensure they do not notify the Athlete until the Athlete has been notified by the SCP. Possible wording to be added to Article, '**Where a third party is required to be notified prior to notification, the third party should be accompanied until the Athlete notification has taken place to ensure no advance notice of the test is given.**'

5.4 Requirements for notification of Athletes

5.4.1 (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

Reference to 5.3.8 should be to 5.3.7.

5.4.7 (2)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

5.4.7 – update the wording (DCO should report the possible Failure to Comply to the **Testing Authority**)

RUSADA

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

SUBMITTED

RUSADA believes that the article should clearly stipulate whenever it applies only to cases in which an athlete unduly delays reporting to Doping Control Station while remaining under observation of a DCO/Chaperone throughout the entire period or if also applicable in cases where an athlete leaves the observation of DCO/Chaperone and arrives to Doping Control Station unaccompanied at later time.

6.0 Preparing for the Sample Collection Session

6.3 Requirements for preparing for the Sample Collection Session

6.3.2 (2)

NADA

Regine Reiser, Result Management (Deutschland)
NADO - NADO

SUBMITTED

6.3.2:

As the organizing committees (OCs) of events are responsible for providing Doping Control Stations (DCS), the DCOs cannot ensure the minimum standards as they are depending on the local OC. The DCO is until today not in a position to decide to decline testing due to deficits of the control station, the athletes might receive a failure to comply by refusing testing when the DCS is not sufficient. Suggestion: "...from these criteria. In those cases where the minimum requirement (privacy) is not provided, the DCO might decide to decline the testing and present this decision to the athlete. The athlete

could follow this suggestion but is also free to deliver a sample. In this case, the suggestion of the DCO needs to be documented on the DCF additionally by the documented decision by the athlete to deliver a sample."

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

As raised in UKAD's first submission, this clause could make provision for testing Athletes with impairments and for blood testing. Possible wording to be added to Article, '**Where conducting Sample collection on Athletes with impairments, the Doping Control Station should, at a minimum, also be appropriately accessible. Where conducting blood Sample collection, the Doping Control Station should, at a minimum, be clean and well-lit.**'

6.3.3 (1)

RUSADA

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

SUBMITTED

(item 6.3.3 e)

RUSADA believes that since the World Anti-Doping Codes permits delegation of certain parts of doping control process, including sample collection, to third parties, but ultimately holds Testing Authority responsible for all aspects of the process, the Standard should clearly stipulate that if the sample collection is outsourced, a representative of Testing Authority is allowed to observe the performance of sample collection personnel during such missions (which would represent external rather than internal auditing of Sample Collection Authority).

(item 6.3.4 e)

RUSADA believes that WADA should advice ADOs on equipment meeting the criteria specified in ISTI and available on the market and to coordinate or assists ADO in coordinating necessary tests to ensure that the equipment is fit-for-purpose.

6.3.4 (5)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

6.3.4 o) – update the wording (volume of urine in each **A and B** bottle or container)

NADA

Regine Reiser, Result Management (Deutschland)
NADO - NADO

SUBMITTED

6.3.4 a):

As no “numbering-system” is introduced in the review, here is a suggestion to have unique numbering system, including the identification of suppliers, the sample and a check-sum:

eleven digits long value where the first two will be used as the “supplier identifier”, followed by 8 digits for the sample code and 1 final digit for a so called “check sum”:

e.g. 01 01234567 9 where [01] is the supplier ID, [01234567] is the sample code and [9] is the check sum. Especially the check sum digit will avoid any mistakes while reading/scanning the barcodes automatically. WADA might be in the position to dedicate the supplier ID to the different suppliers.

Anti-Doping Norway

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

SUBMITTED

6.3.4

ADNO support the requirement relating to equipment. For the purpose of clarity, we suggest that these requirements are presented in an annex.

Doping Authority Netherlands

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

SUBMITTED

6.3.4 The *Sample* Collection Authority shall only use *Sample* Collection Equipment systems for urine and blood *Samples* which, at a minimum

a. with regard to the sentence part “barcode or similar data code which meets the requirements of ADAMS on” the word at least should be added. This provides more flexibility and keeps fulfilling WADA’s needs related to ADAMS.

International Testing Agency

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

SUBMITTED

In relation to Art. 6.3.4(f) (i), in the absence of reliable scientific studies on (1) the stability of the chemical and physical properties of urine for a prolonged number of years; and (2) the adequacy of a any Sample Collection Equipment to preserve such properties; it is recommended that the whole reference to the integrity of the Sample is removed.

7.0 Conducting the Sample Collection Session (2)

Organizacion Nacional Antidopaje de Uruguay

José Veloso Fernandez, Jefe de control Dopaje (Uruguay)
NADO - NADO

SUBMITTED

It is VERY IMPORTANT Enhancing the requirements around the training and monitoring of sample collection personnel that conduct the collection of samples including expanded conflict of interest criteria. MUST BE CLERA STABLISH AND CONSIDER WHEN ASSIGN AN OFICIAL.

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

As raised in UKAD's first submission, we remain of the view that some references in this section should be amended from 'DCO' to 'SCP' or to 'DCO/Chaperone' for example in Articles 7.3.2, 7.3.3, 7.4.1. This will account for the flexibility of roles and responsibilities across these roles, which ultimately makes the Sample collection more efficient and Athlete centred.

7.3 Requirements prior to Sample collection

7.3.3 (1)

RUSADA

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

SUBMITTED

Given the impact of alcohol on steroid profile values and general health and safety concerns, RUSADA believes that consumption of alcoholic drinks (including low-alcoholic ones, e.g. beer) during the doping control procedure shall be strictly prohibited.

7.3.5 (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

7.3.5 (d)

There are occasions where only blood Samples are being collected, and therefore this clause would not be relevant. Therefore, consider including wording at the beginning of this clause - '**Where a urine Sample is being collected...**'.

7.4 Requirements for Sample collection

7.4.2 (1)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

7.4.2 – update the wording (recorded in detail by the DCO **and reported to the Testing Authority**)

7.4.3 (1)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

7.4.3 – update the wording (document in detail the circumstances around the refusal **and report to the Testing Authority**. The Testing Authority.....)

7.4.5 (2)

UEFA

SUBMITTED

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

7.4.5 g) There needs to be an 'Other' option for the means by which the athlete's identity is verified. UEFA utilises the player pictures submitted and validated at the start of the season, in collaboration with the use of the player shirt number. In case of any doubt, the DCO would ask for a valid photo ID.

Anti-Doping Norway

SUBMITTED

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

7.4.5 k)

ADNO see no need for adding a reference to the equipment manufacturer on the doping control form. If it is an issue to use certain manufacturer, this may be asked in the WADA annual report or similar.

7.4.7 (1)

UEFA

SUBMITTED

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

7.4.7 This clause states that the athlete shall be provided with a copy of the DCF. UEFA offers the athlete an electronic copy and in over 50% of the cases, the athlete doesn't want one. The player has to sign to their refusal. Could we amend the wording to 'shall be **offered** a copy'?

8.0 Security/Post-test administration

8.3 Requirements for security/post-test administration

8.3.2 (2)

UEFA

SUBMITTED

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

8.3.2 – update the wording (the current sentence doesn't make sense) It is also a repetition of article 8.3.4.

8.3.2 – update the wording (Whilst the Chain of Custody is an important part of the Doping Control Process, the Laboratory shall..... Remove the whole phrase from Whilst to Process – it is not necessary in the context of the sentence)

NADA

SUBMITTED

Regine Reiser, Result Management (Deutschland)
NADO - NADO

8.3.2:

Labs should only report to TAs if the security and the integrity of the sample upon arrival has not been maintained.

Questions: If Labs are requested to confirm the integrity of samples upon arrival: are there any procedures and/or practical advises for the labs to prove, that the integrity of a sample is maintained (e.g.: scanner-systems for reading a "Bottle-id" as introduced in 6.3.4: f) i & l).?

8.3.3 (3)

Sport Ireland

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

SUBMITTED

j) should be removed from this list of details sent to the lab.

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

Reference to 7.4.5 (j) is no longer accurate, as the sub-lettering in 7.4.5 has been altered.

Canadian Centre for Ethics in Sport

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

SUBMITTED

In Section 8.3.3, CCES suggests removing item "j" from list, as the laboratory doesn't need the names of the athlete's doctor and coach.

8.3.4 (1)

Sport Ireland

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

SUBMITTED

Article 8.3.4 repeats Article 8.3.2

9.0 Transport of Samples and documentation

9.3 Requirements for transport and storage of Samples and documentation (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

As raised in UKAD's first submission, we think that blood Sample transportation requirements should be more clearly referenced within the ISTI. While Annex K does make reference it is generally concerned with ABP Samples, and therefore not a natural place to look for standard blood Sample transport requirements. This could be done either in Section 9 or Annex K

9.3.2 (1)

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

DFSNZ strongly disagrees with the change to transport samples to the lab as soon as 'possible' (rather than as soon as 'practicable').

We are located in a remote region, where the cost of transporting individual samples (by air freight to Australia) 'as soon as possible' would be cost prohibitive. Our method of transport is 'as soon as practicable' is fit for purpose.

We suggest this would present even more of a challenge to our Pacific Island neighbours who have less resources.

9.3.4 (1)

International Testing Agency

SUBMITTED

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

It is recommended that the provision be adapted to allow for electronic / paperless means of transmission of the Sample Collection Session documentation.

10.0 Ownership of Samples (1)

NADA

SUBMITTED

Regine Reiser, Result Management (Deutschland)
NADO - NADO

*Additional point 10.4. (as outlined in the ISL, the TA needs to be consulted to approve any further analyses):
The TA needs to be consulted by passport custodians prior to any additional analyses on samples, owned by the TA..*

PART THREE: STANDARDS FOR INTELLIGENCE GATHERING AND INVESTIGATIONS (1)

Conseil supérieur des sports

SUBMITTED

Matheo TRIKI, Sportif Rugby (Espagne)
WADA - Others

Gathering of anti-doping intelligence

- Anti-Doping Organizations shall do everything in their power to ensure that they are able to capture or receive anti-doping intelligence from all available sources, including but not limited to Athletes and Athlete Support Personnel (including Substantial Assistance provided pursuant to Code Article 10.7.1) and members of the public (e.g., by means of a confidential telephone hotline), Sample Collection Personnel (whether via mission reports, incident reports, or otherwise), Laboratories, pharmaceutical companies, International Federations, National Federations, law enforcement, other regulatory and disciplinary bodies, and the media (in all its forms).

- Anti-Doping Organizations shall have policies and procedures in place to ensure that anti-doping intelligence captured or received is handled securely and confidentially, that sources of intelligence are protected, that the risk of leaks or inadvertent disclosure is properly addressed, and that intelligence shared with them by law enforcement, other relevant authorities and/or other third parties, is processed, used and disclosed only for legitimate anti-doping purposes.

11.3 Assessment and analysis of anti-doping intelligence

- Anti-Doping Organizations shall ensure that they are able to assess all anti-doping intelligence upon receipt for relevance, reliability and accuracy, taking into account the nature of the source and the circumstances in which the intelligence has been captured or received.
- All anti-doping intelligence captured or received by an Anti-Doping Organization should be collated and analysed to establish patterns, trends and relationships that may assist the Anti-Doping Organization in developing an effective anti-doping strategy and/or in determining (where the intelligence relates to a particular case) whether there is reasonable cause to suspect that an anti-doping rule violation may have been committed, such that further investigation is warranted in accordance with Article 12.0 of the International Standard for Testing and Investigations.

11.4 Intelligence outcomes

- Anti-doping intelligence shall be used to assist for the following purposes (without limitation) developing, reviewing and revising the Test Distribution Plan and/or in determining when to conduct Target Testing, in each case in accordance with Article 4.0 of the International Standard for Testing and Investigations, and/or to create targeted intelligence files to be referred for investigation in accordance with Article 12.0 of the International Standard for Testing and Investigations.
- Anti-Doping Organizations should also develop and implement policies and procedures for the sharing of intelligence (where appropriate, and subject to applicable law) with other Anti-Doping Organizations (e.g., if the intelligence relates to Athletes or other Persons under their jurisdiction) and/or law enforcement and/or other relevant regulatory or disciplinary authorities (e.g., if the intelligence suggests the possible commission of a crime or regulatory offence or breach of other rules of conduct).
- Anti-Doping Organizations should develop and implement policies and procedures to facilitate and encourage whistleblowers as outlined within WADA's Whistleblower policy contained on WADA's website.

12.0 Objective

The objective of this Article 12.0 of the International Standard for Testing and Investigations is to establish standards for the efficient and effective conduct of investigations that Anti-Doping Organizations must conduct under the Code, including but not limited to:

- Investigating Atypical Findings and Adverse Passport Findings
- Anti-Doping Organizations shall ensure that they are able to investigate confidentially and effectively Atypical Findings and Adverse Passport Findings arising out of Testing conducted on their behalf and/or for which they are the Results Management Authority, in accordance with the requirements of the International Standard for Results Management, and of the International Standard for Laboratories.
- The Anti-Doping Organization shall provide to WADA upon request (or shall procure that the Testing Authority, if different, provides to WADA upon request) further information regarding the circumstances of Adverse Analytical Findings, Atypical Findings, and other potential anti-doping rule violations, such as (without limitation)

12.3 Investigating other possible anti-doping rule violations

- Anti-Doping Organizations shall ensure that they are able to investigate confidentially and effectively any other analytical or non-analytical information or intelligence that indicates there is reasonable cause to suspect that an anti-doping rule violation may have been committed, in accordance with the International Standard for Results Management.
- When, following a preliminary review, there is reasonable cause to suspect that an anti-doping rule violation may have been committed, the Anti-Doping Organization shall notify WADA that it is starting an investigation into the matter in accordance with the International Standard for Results Management, as applicable. Thereafter the Anti-Doping Organization shall keep WADA updated on the status and findings of the investigation upon request.
- The Anti-Doping Organization shall gather and record all relevant information and documentation as soon as

possible, in order to develop that information and documentation into admissible and reliable evidence in relation to the possible anti-doping rule violation, and/or to identify further lines of enquiry that may lead to the discovery of such evidence. The Anti-Doping Organization shall ensure that investigations are conducted fairly, objectively and impartially at all times. The conduct of investigations, the evaluation of information and evidence identified in the course of that investigation, and the outcome of the investigation, shall be fully documented.

- The Anti-Doping Organization should make use of all investigative resources reasonably available to it to conduct its investigation. This may include obtaining information and assistance from law enforcement and other relevant authorities, including other regulators. However, the Anti-Doping Organization should also make full use of all investigative resources at its own disposal, including the Athlete Biological Passport program, investigative powers conferred under applicable rules (e.g., the power to demand the production of relevant documents and information, and the power to interview both potential witnesses and the Athlete or other Person who is the subject of the investigation), and the power to suspend a period of Ineligibility imposed on an Athlete or other Person in return for the provision of Substantial Assistance in accordance with Code Article 10.7.1.

- Athletes and Athlete Support Personnel are required under Code Article 21 to cooperate with investigations conducted by Anti-Doping Organizations. If they fail to do so, disciplinary action should be taken against them under applicable rules. If their conduct amounts to subversion of the investigation process (e.g., by providing false, misleading or incomplete information, and/or by destroying potential evidence), the Anti-Doping Organization should bring proceedings against them for violation of Code Article 2.5 (Tampering or Attempted Tampering).

12.4 Investigation outcomes

- The Anti-Doping Organization shall come to a decision efficiently and without undue delay as to whether proceedings should be brought against the Athlete or other Person asserting commission of an anti-doping rule violation. As set out in Code Article 13.3, if an Anti-Doping Organization fails to make such decision within a reasonable deadline set by WADA, WADA may elect to appeal directly to CAS as if the Anti-Doping Organization had rendered a decision finding that no anti-doping rule violation has been committed. As noted in the comment to Code Article 13.3, however, before taking such action WADA will consult with the Anti-Doping Organization and give it an opportunity to explain why it has not yet rendered a decision.

- Where the Anti-Doping Organization concludes based on the results of its investigation that proceedings should be brought against the Athlete or other Person asserting commission of an anti-doping rule violation, it shall give notice of that decision in the manner set out in the International Standard for Results Management and shall bring the proceedings against the Athlete or other Person in question in accordance with Code Article 8.

- Where the Anti-Doping Organization concludes, based on the results of its investigation, that proceedings should not be brought against the Athlete or other Person asserting commission of an anti-doping rule violation

11.0 Gathering, assessment and use of intelligence

11.2 Gathering of anti-doping intelligence (1)

US Olympic Committee

Sara Pflipsen, Senior Legal Counsel (United States)
Sport - National Olympic Committee

SUBMITTED

Section 11.2. Gathering of anti-doping intelligence

When an ADO initiates an investigation into a matter that requires direct contact to Athletes and/or Other Persons, although the USOC supports the position that those individuals should cooperate fully, those Athletes and/or Other Persons should also be afforded with minimum rights and protections during the process. For example, the ADO should provide those individuals with information such as, but not limited to, why they are being contacted, the scope of the matter, potential consequences, and their right to advisor.

11.2.1 (1)

UEFA

SUBMITTED

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

11.2.1 – the phrase states that ADOs shall do everything in their power to receive Anti-Doping intelligence from all available sources. It then lists International Federations as an available source. However, IFs are also defined as an ADOs so they should not be included as a source (or you should also include NADOs as a possible source).

11.4 Intelligence outcomes (1)**Doping Authority Netherlands**

SUBMITTED

Olivier de Hon, Chief Operating Officer (Netherlands)
NADO - NADO

DAN is pleased that article 11.4.3, the procedures to facilitate and encourage whistleblowers, is emphasized in the ISTI.

11.4.3 (2)**US Olympic Committee**

SUBMITTED

Sara Pflipsen, Senior Legal Counsel (United States)
Sport - National Olympic Committee

Section 11.4.3. Whistleblowers

The USOC supports this provision requiring ADOs to develop and implement policies and procedures to facilitate and encourage whistleblowers.

Drug Free Sport New Zealand

SUBMITTED

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

DFSNZ supports this change and has already implemented policies and procedures to facilitate and encourage whistleblowers.

12.0 Investigations**12.1 Objective (1)****RUSADA**

SUBMITTED

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

RUSADA believe that follow up on ATFs, ATPFs and APFs is an integral part of Results Management process and should be described in the International Standard on Results Management rather than in the section on Investigations. The need for and scope of investigations and/or any other follow-up actions in such cases should be at the discretion of ADO's Results Management.

Also, no there are no references to the role of the APMU in the current text of the article.

12.3.5 (1)

US Olympic Committee

Sara Pflipsen, Senior Legal Counsel (United States)
Sport - National Olympic Committee

SUBMITTED

Section 12.3.5 Cooperation by Athletes and Athlete Support Personnel

As mentioned in the comments to Article 21 of the Code, it would be helpful to have clarification and parameters around “cooperation” and what it means to “cooperate.”

PART FOUR: ANNEXES (3)

NADA

Regine Reiser, Result Management (Deutschland)
NADO - NADO

SUBMITTED

J.4

The 35 day period is acceptable for long term planning but might lead to closed areas, where NADOs might be excluded for testing within their country. This is contradictory to WADA Code 5.2.1. Therefore, in cases of "imminent danger" NADOs must get an opportunity to conduct tests (short term). The 35 day period prevents a) no advance notice testing and b) short notice testing based on i.e. short notice intelligence.

Suggestion: "...35 days prior to the beginning of the Event(...). In cases of strong reasons (intelligence or no planned testing by the ruling body during an Event), the ADO that is not responsible for initiating and directing testing should inform the ruling body of the event reg planned short term testing. If the ruling body refuses or does not answer, the ADO is requested to contact WADA. WADA is obliged to answer within shortest time possible and permit or prohibit at least 2 hours (local time) before the requested testing

Swedish Sports Confederation

Tommy Forsgren, Results Mangement Manager (Sweden)
NADO - NADO

SUBMITTED

- Article 5.2 d- If the RMA concludes that all relevant requirement have been met, it shall notify the athlete within 14 days of the apparent whereabouts failure.

Please clarify "all relevant requirements"

- Art- Article 5.2 d- Consider changing the sentence " at the end of the month" to last day of the month.

Conseil supérieur des sports

Matheo TRIKI, Sportif Rugby (Espagne)
WADA - Others

SUBMITTED

A.1 Objective

To ensure that any matters occurring before, during or after a Sample Collection Session that may lead to a determination of a Failure to Comply are properly assessed, documented and acted upon.

A.2 Scope

Investigating a possible Failure to Comply begins when the Testing Authority becomes aware of a possible Failure to Comply and ends when the Testing Authority or Results Management Authority takes appropriate follow-up action based on the outcome of its investigation.

Responsibility

The Testing Authority or Results Management Authority (as applicable) is responsible for ensuring that:

1.
 - a) when the possible Failure to Comply comes to its attention, it notifies WADA, and instigates an investigation of the possible Failure to Comply based on all relevant information and documentation;
2.
 - b) the Athlete or any other party is informed of the possible Failure to Comply in writing and has the opportunity to respond;
3.
 - c) the investigation is conducted without unnecessary delay and the evaluation process is documented in accordance with the International Standard for Results Management; and
4.
 - d) the final determination (i.e., whether or not to assert the commission of an anti-doping rule violation), with reasons, is made available without delay to WADA and other Anti-Doping Organizations in accordance with Code Articles 7.6 and 14.1.4.

Any additional necessary information about the potential Failure to Comply shall be obtained from all relevant sources (including the Athlete or other party) as soon as possible and recorded.

The Testing Authority or Results Management Authority (as applicable) shall establish a system for ensuring that the outcomes of its investigation into the potential Failure to Comply are considered for results management action and, if applicable, for further planning and Target Testing.

B.2 Scope

Determining whether modifications are necessary starts with identification of situations where Sample collection involves Athletes with impairments and ends with modifications to Sample collection procedures and equipment where necessary and where possible.

Responsibility

The Testing Authority or Sample Collection Authority (as applicable) has responsibility for ensuring, when possible, that the DCO has any information and Sample Collection Equipment necessary to conduct a Sample Collection Session with an Athlete with an impairment including details of such impairment that may affect the procedure to be followed in conducting a Sample Collection Session.

C.4 Requirements

1.

1.

D.4.18 The Athlete shall be given the option of witnessing the discarding of any residual urine that will not be sent for analysis.

1.

1.

2.

I.6.2 A National Federation must use its best efforts to assist its International Federation and/or National Anti-Doping Organization (as applicable) in collecting Whereabouts Filings from Athletes who are subject to that National Federation's authority, including (without limitation) making special provision in its rules for that purpose.

3.

I.6.3 An Athlete may choose to delegate the task of making their Whereabouts Filings (and/or any updates thereto) to a third party, such as a coach, a manager or a National Federation, provided that the third party agrees to such delegation. The Anti-Doping Organization collecting the Athlete's Whereabouts Filings may require written notice of any agreed delegation to be filed with it, signed by both the Athlete in question and the third party delegate.

Annex A - Investigating a Possible Failure to Comply

A.3 Responsibility

A.3.2 (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

SUBMITTED

3.2 a) & A.3.3 a)

There could be scenarios whereby it is impossible for SCP to inform the Athlete of the possible outcome of a failure to comply (for example an Athlete is at their house address, opens the door, but then refuses to acknowledge the SCP. In such an instance, the SCP may not be aware at the time of notification that the Athlete is going to fail to comply). Consideration to include wording to recognise such scenarios, for example, by including words such as *'Where practicably possible informing the Athlete and / or any other party (as applicable) of the possible sanctions applicable to a possible Failure to Comply;'* The second "possible" could also be deleted from these clauses.

A.3.3 (1)

Leave the provision as it is.

Amendments to A3.3 are not appropriate as a Doping Control Officer is not in a position to provide definitive advice to athletes on the sanction they may receive for their actions. There are too many differing factors which affect this process that the officer may not be aware of, for example, the athlete's history of doping.

Annex B - Modifications for Athletes with Impairments (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

SUBMITTED

As raised in UKAD's first submission, we think this section still requires further detail. Whilst Athletes can have a range of impairments that may require a range of modifications (or no modifications), this Annex is still fairly vague and open to interpretation, which does not best protect Athletes. E.g. UKAD feels stipulating the need for a representative for an Athlete with intellectual or visual impairment should be considered – consistent with modifications for Minors. The IPC may have greater guidance on this which could be incorporated.

Annex C - Modifications for Athletes who are Minors

C.4 Requirements

C.4.6 (1)

Drug Free Sport New Zealand

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)

NADO - NADO

SUBMITTED

DFSNZ supports this change and further more encourages DCO to document if any athlete declines to have a representative present.

Annex D - Collection of Urine Samples

D.4 Requirements

D.4.3 (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

SUBMITTED

D.4.3

As D.4.2 has been amended to reflect the choice of Sample collection equipment (which includes Sample collection vessels based on the new definition), consideration to be given to removing D.4.3.

D.4.7 (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

SUBMITTED

As raised in UKAD's first submission, amend 'should' to '*shall*'.

D.4.8 (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

As raised in UKAD's first submission, we think this clause should be more specific about the minimum requirements for the collection of Samples. We suggest the Article should stipulate "**private toilet facilities with cubicles large enough to accommodate the Witness and the Athlete**" rather than "an area of privacy".

D.4.9 (2)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

As raised in UKAD's first submission, we think that the word 'adjust' should be amended and be explicit in terms of the removal of clothing required to give an unobstructed view. Consider amending wording to '**...adjust to ensure the SCP has a clear view from the mid chest to above the knees...**'

Consider amending the wording in the last sentence to '**...in the collection vessel unless full in which case the Athlete should continue to empty their bladder into the toilet.**'

International Testing Agency

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

SUBMITTED

Consider specifying that the DCO shall instruct the athlete to empty his/her bladder after having filled the collection vessel to its capacity. Such detail is often overlooked by DCOs and may cause several consecutive diluted samples.

D.4.14 (1)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

D.4.14 – update wording (The athlete shall pour a minimum of 30ml of urine into the B bottle or container, and then pour the remainder.....)

Annex E - Collection of Blood Samples

E.4 Requirements

E.4.2 (1)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

E.4.2 – update wording (the current sentence doesn't make sense)

E.4.4 (1)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

E.4.4 – update wording (The DCO/BCO – rather than DCO/Chaperone)

E.4.6 (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

As raised in UKAD's first submission, we think that this process could be conducted by either the DCO or BCO. This Article should also reference that the Athlete selects Sample collection equipment from a choice.

E.4.10 (1)

ISU

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

SUBMITTED

ISU: If the Team physician is present, after two unsuccessful attempts by the BCO, if agreed/requested by the Athlete, the third attempt can be done by the BCO or the Team Physician under direct observation by the BCO,

Annex F - Urine Samples - Insufficient Volume

F.4 Requirements

F.4.7 (1)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

F.4.7 – the phrase states that if there is an issue with the integrity of the seal of the partial sample, the DCO should record the details and it should be investigated as a possible Failure to Comply. However, at this stage, it's not a Failure to Comply (unless they refuse to give a second sample) – if it's anything, it would be Tampering.

F.4.11 (1)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

F.4.11 – update the wording to match article D.4.17

Annex G - Urine Samples that do not meet the requirement for Suitable Specific Gravity for Analysis (1)

Annex G requires that additional samples should be collected until the requirement for Suitable Specific Gravity for Analysis is met. However, the DCOs cannot accurately determine how much equipment to bring before they leave for testing. They can only rely on their past experience to estimate the number of tests. And many anti-doping organizations still stop the sample collection session after collecting the second additional urine sample. Besides, if multiple samples are collected but the laboratory only requests to analyze the first and last samples, it does not make much sense to collect so many samples. Therefore, it is recommended to clearly address that the maximum times of collecting additional samples. We suggest collecting one, except under exceptional circumstances.

G.4 Requirements

G.4.4 (2)

Anti-Doping Norway

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

SUBMITTED

G. 4.4

ADNO believe it to be too strict if an athlete shall be advised not to hydrate at all if the suitable specific gravity is not met in the athlete's sample, requiring additional samples. We suggest that the athlete should be advised to hydrate very moderately and preferably not at all – or similar wording.

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

Whilst understanding the need to minimise the amount an Athlete hydrates, UKAD does not think it is fair to ask an Athlete not to hydrate. Therefore, consider re-adding the word 'excessively'

G.4.6 (3)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

G.4.6 – This clause states that the DCO shall continue to collect samples from an athlete until the specific gravity is met. We propose that this remains as a 'should' clause rather than a 'shall' clause. We conducted a large study on this issue and, despite the athlete following the DCO instructions not to drink more, in nearly all cases, the second and third samples collected have lower specific gravity than the first sample. There has never been an issue for us with the specific gravity being too low for analysis even if we stop after two samples have been collected.

NADO Flanders

Jurgen Secember, Legal Adviser (België)
NADO - NADO

SUBMITTED

It should be made explicit that failure to collect additional samples does not in any way invalidate the doping control process. The obligation for DCOs to collect additional samples is to make sure prohibited substances can be detected if they are present in the athlete's body. For non threshold substances, the lab can still have a positive analytical result from a diluted sample, confirming the presence of a prohibited

substance.

A sample that does not meet the requirements can still be tested. The athlete can not have grounds to challenge the validity of the results if the sample is not otherwise compromised and the ISL is followed.

This needs to be clarified to prevent doped athletes to use this a possible shortcoming of the ISTI to escape consequences. The additional samples do not constitute of a right for the athlete, but serve the purposes of the TA.

Canadian Centre for Ethics in Sport

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

SUBMITTED

In Annex G.4.6, CCES recommends using the term “should” instead of “shall”: “The DCO should continue to collect additional Samples...”

G.4.11 (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

UKAD suggests that the lab should analyse the first and most concentrated Sample as this will give the better data. It is not guaranteed that the last Sample collected will be the most concentrated.

Annex H - Sample Collection Personnel Requirements

H.4 Requirements - Qualifications and Training

H.4.2 (4)

UEFA

Rebecca Lee, Anti-Doping Coordinator (Switzerland)
Sport - Other

SUBMITTED

H.4.2.1 – This conflict of interest clause goes too far. Articles a), b), e) and f) are acceptable. Article d) is unnecessary because it's covered under the other articles. Article c) is impossible to implement. For example if a DCO's son or daughter plays football at school then 'they have family members actively involved in the daily activities of the sport' and we couldn't use them as a DCO.

Furthermore if the DCO has signed a mandate contract with the ADO containing clauses of conflict of interest, it is sufficient.

Department of Health - National Integrity of Sport Unit

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

SUBMITTED

Article H.4.2.1(c) should account for the level of competition involved. For example, a Doping Control Officer with a child who referees under-10 football should not be excluded from elite football competitions on that basis.

Drug Free Sport New Zealand

Jude Ellis, Programme Director - Testing & Investigations (New Zealand)
NADO - NADO

SUBMITTED

H.4.2 c) It is not entirely clear what constitutes "daily activities of the sport". For example, some sample collection personnel will have children competing regularly in a sport at the local level - we assume this does not prohibit them from being appointed to a test mission?
DFSNZ's view this should be limited to where sample collection personnel have an official role within the sport in question. For example, where someone serves as secretary on a local club committee.
Further to this, DFSNZ notes that while the draft changes mention family members of Sample Collection Personnel who are involved in the sport, it is silent on SCP who participate in the sport themselves. Certainly all potential conflicts of interest should be documented. However, DFSNZ's view is that there should be some discretion into how conflicts of interest are managed where, for example, a DCO who participates at a very low social level of football should not be preventing from testing in football (subject to any other identified conflicts).

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

As raised in UKAD's first submission, we suggest that this cause should also account for conflicts of interest with Athlete support personnel as well as Athletes. Consider including the following wording, '...(c) or any other Athlete Support Personnel associated with an Athlete'

H.4.3

H.4.3.3 (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

As raised in UKAD's first submission, we suggest that this Article should be expanded so that the training of Chaperones mirrors the standards set out for the training of DCOs and BCOs – given the importance of the role of Chaperone and the notification and chaperoning processes. In addition to this Chaperones should be fully accredited individuals, re-accredited at a minimum of every 2 years, in line with standards set out for DCOs and BCOs (H.5.3).

Annex I – Code Article 2.4 Whereabouts Requirements (1)

Swedish Sports Confederation

Tommy Forsgren, Results Management Manager (Sweden)
NADO - NADO

SUBMITTED

- Article 5.2 d- If the RMA concludes that all relevant requirements have been met, it shall notify the athlete within 14 days of the apparent whereabouts failure.

Please clarify "all relevant requirements"

- Art- Article 5.2 d- Consider changing the sentence " at the end of the month" to last day of the month.

I.1 Introduction

I.1.4 (1)

Jurgen Secember, Legal Adviser (België)
NADO - NADO

The wording of the second part is not clear, where it concerns consequences for not filing the quarterly submission on the date requested by the ADO.

It should be made clearer that not respecting the submission date 15 days prior to the start of the quarter is in fact a filing failure, but for the purposes of consequences (combination of 3 filing failures or missed tests), the first day of the quarter is the date of the filing failure.

I.1.5 (1)

Sport Ireland

SUBMITTED

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

Sport Ireland strongly recommends the removal of the last line of this article "~~However, no consequences for a failure to submit prior to the first day of the quarter shall apply other than as set out in Article I.1.3.~~"

I.2 Entering and leaving a Registered Testing Pool

I.2.2 (1)

GAISF

SUBMITTED

Davide Delfini, Membership Manager (Switzerland)
Sport - Other

(Art I.2.2) We would like to suggest exploring the possibility to clarify the requirement for ADOs to determine which Organization will be the Results Management Authority for violation of art 2.4. We would propose the following: "...Prior to doing so, however, they shall agree between themselves *which of them will be the Results Management Authority in case of violation of art 2.4 and also* which of them the Athlete shall provide their Whereabouts Filings to, and each notice sent to the Athlete shall specify that they shall provide their Whereabouts Filings to that Anti-Doping Organization

only (and it will then share that information with the other, and with any other Anti-Doping Organizations having Testing jurisdiction over the Athlete). An Athlete shall not be asked to provide Whereabouts Filings to more than one Anti-Doping Organization..."

(Comment to I.2.2) WADA should have the authority to intervene in case of the ADOs cannot agree on the Results Management Authority for art 2.4 violations as it is case for the filing. We would propose the following: "If the respective Anti-Doping Organizations cannot agree between themselves which of them will *be the Results Management Authority or which of them will* take responsibility for collecting the Athlete's whereabouts information, and for making it available to the other Anti-Doping Organizations with authority to test the Athlete, then they should each explain in writing to WADA how they believe the matter should be resolved, and WADA will decide based on the best interests of the Athlete. WADA's decision will be final and may not be appealed."

I.2.3 (2)

Sport Ireland

Siobhan Leonard, Director of Anti-Doping & Ethics (Ireland)
NADO - NADO

SUBMITTED

Sport Ireland **strongly opposes** that each ADO shall use ADAMS. Sport Ireland would like to re-iterate that the use of ADAMS is only practical if the data transfer issues are resolved. WADA must deliver on its commitment from previous years to provide an API, without this, the commitment to the mandatory use of ADAMS for all aspects of doping control is premature.

DFSNZ objects to the removal of "or another system approved by WADA" from this article.

Where an ADO uses a system that meets all the requirements for whereabouts under the Code and is tailored to suit an ADOs (and their athletes) specific needs, that ADO should be able to use an another system.

The current version of ADAMS does not met the needs of our athletes as well as our alternative system. Further to this, given the new updated ADAMS/Whereabouts system is still in development, DFSNZ considers this change is premature.

DFSNZ supports the provisions that give ADOs the ability to establish other testing pools (below the RTP) to suit their respective needs.

I.3 Whereabouts Filing Requirements

I.3.2 (1)

NADO Flanders

SUBMITTED

Jurgen Secember, Legal Adviser (België)
NADO - NADO

A personal email address can ensure fast notification to the athlete, but in Belgian civil law, it is not sufficient to send an email unless it is a registered email. A notification of receipt is not accepted as a proof of receipt by a person. Legislation will still require a generally accepted and legitimate means of notification, subject to national law, in order to be able to apply consequences.

I.3.3 (1)

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

I.3.3 Comment / I.3.4

As raised in UKAD's first submission, we suggest that additional wording is required here regarding staying in hotels, gated community, etc. For example the Athlete should have to provide details on how to access such accommodation beyond just a phone number (e.g. room number, access code, etc). Clarity should be provided on what is expected of Athletes in relation to being 'accessible and available' as recent cases have demonstrated this is ambiguous. For example when staying in a hotel, should an Athlete have a responsibility to inform hotel reception about potential attendance of SCP (as many may well do). Whilst every scenario cannot be accounted for, there needs to be greater guidance and clear expectations on both Athletes and DCOs.

I.3.4 (2)

NADO Flanders

SUBMITTED

Jurgen Secember, Legal Adviser (België)
NADO - NADO

More guidance should be given on how to assess the completeness of regular routines and updates in the course of a quarter.

Often an athlete files a very general routine, but diverts on several occasions from the filed regular activities. It is not always easy to assess if the regular routines, that are often relied upon by DCOs to locate an athlete, have changed several days prior to the attempted test, changed last minute or changed for the remainder of the quarter. It appears that I.3.5. only asks to update overnight accommodations and time slot,

and not the routine training schedule.

NADOF thinks that the obligation for athletes should be described in a more detailed way, to make clear whether an athlete is required to file some if not all even occasional changes in his regular routine, or only structural changes for the remainder of the quarter. NADOF is in favour of a firm obligation to update the whereabouts when changes occur, including cases where a regular training is cancelled on a single occasion and the athlete had sufficient time to change the entry for that day. At least it should be clarified under which conditions a diversion from the submitted routine activities can result in a filing failure.

International Testing Agency

SUBMITTED

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

Whilst the amendment to the final paragraph of Comment to I.3.4 ("*... In either case, the matter shall be pursued as an apparent Filing Failure*") is welcome, it is recommended that the matter be further clarified; namely, by explicating whether such wording shall be construed as implying that (1) every Unsuccessful Attempt (in casu: outside of the 1-hour slot) shall be systematically processed as an **apparent** Filing Failure; and consequently (2) the extent to which an insufficiency (or inaccuracy) of the whereabouts information exists (or not), is to be exclusively determined after issuing the apparent failure (in accordance with I.5.2(d) to (g), or may be also established at an "earlier" stage without issuing the apparent filing failure (in accordance with I.5.2(b) and (c)).

I.3.6 (1)

GAISF

SUBMITTED

Davide Delfini, Membership Manager (Switzerland)
Sport - Other

I.3.6 b We would like to suggest exploring the possibility to harmonize the deadline to submit the quarterly whereabouts information, so that all the Athletes will have the same deadline regardless of the ADOs which include them in the Registered Testing Pool. For example, the harmonized deadline could be fixed as the 25th of the month preceding the start of the quarter.

I.3.6 c We would like to suggest exploring the possibility to change the rule to determine the deadline specified in the notice in case of second or third filing failure in the same quarter. We propose to harmonize it for all the ADOs and also to count it from the day of transmission of the notice. We would propose the

following: "...(in the case of a second or third Filing Failure in the same quarter) that he/she was given notice, in accordance with Article I.5.2(d), of the previous Filing Failure, and (if that Filing Failure revealed deficiencies in the Whereabouts Filing that would lead to further Filing Failures if not rectified) was advised in the notice that in order to avoid a further Filing Failure he/she must file the required Whereabouts Filing (or update) by the deadline specified in the notice (which must be ~~no less than 24 hours~~ *14 days after the transmission receipt* of the notice and ~~no later than the end of the month in which the notice is received~~) and yet failed to rectify that Filing Failure by the deadline specified in the notice; and..."

I.4 Availability for Testing (1)

International Testing Agency

SUBMITTED

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

In the last sentence of the provision, the reference to Art. I.1.3 is unclear.

I.4.1 (1)

UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

I.4.1 (d)

Consider changing 'his' to '*their*'

I.4.2 (1)

I.4.2 Comment

Missed Test and Filing Failures are interchangeable in this context. Therefore, consider replacing references to 'Missed Test' to '*Missed Test or Filing Failure*'

I.4.3 (1)**I.4.3 (c)**

As raised in UKAD's first submission, the phrase 'DCO did what was reasonable' is ambiguous and open to interpretation – this has been demonstrated by cases over the past 2 years. This concept needs clarification, strengthening and potentially some minimum standards.

I.4.3 (c) Comment

As raised in UKAD's first submission, UKAD feels that no telephone calls should be made during the 60-minute time slot. If there is clarity provided on 'reasonable attempts' and the expectations on both Athletes and DCOs are clearer, then notice should not be required. UKAD does not make phone calls during Out-Of-Competition testing. We have excellent collection rates, and are of the view that our processes are fair to Athletes. No advance notice is integral to effective anti-doping programmes and therefore consideration should be given to removing phone calls.

I.5 Results Management**I.5.2 (2)****I.5.2 (e) (i) and (g)**

UKAD suggests that an Athlete should also be notified of any decision to cancel a Missed Test or Filing Failure. Therefore, consider including 'Athlete' within the list of those informed.

In relation to Art. I.5.2(d):(1) consider clarifying (even via an ad hoc comment) that the 14-days term to notify an athlete of an apparent failure shall not be considered a peremptory term (i.e. a failure to respect such term shall not prevent an ADO from recording a Failure) as made clear in CAS 2011/A/2671.
(2) consider amending the following paragraph: "(...) (*which must be no less than 24 hours after receipt of the notice and no later than the end of the month in which the notice is received*)" to avoid problematic situations in case an apparent failure is to be sent in the last days of a given month. The following wording is proposed "no less than 24 hours (...) and no later than 14 days."

I.6.1 (1)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

I.6.1 (b) and (c)As raised in UKAD’s first submission, we suggest that these clauses should be reviewed as NFs should not be in a position to determine whether their own Athletes have committed a Whereabouts Failure as this is a conflict of interest.

Annex J – Event Testing

J.8 (2)

ISU

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

SUBMITTED

In the event the Anti-Doping Organization cannot contact (ISU: not clear, contact whom or “can be contacted?”; needs revision) or the ruling body of the Event fails to engage with them (ISU: with whom?), the Anti-Doping Organization shall provide such intelligence to WADA.

Department of Health - National Integrity of Sport Unit

Luke Janeczko, Policy Officer (Australia)
Public Authorities - Government

SUBMITTED

Article 4.9(e) and J.8 should be amended to note that intelligence should be shared when it is possible to do so. There are circumstances where government legislation may prohibit the sharing of information collected.

Annex K - Collection, Storage and Transport of Blood ABP Samples

K.2 Requirements

K.2.8 (1)

ISU

Christine Cardis, Anti-Doping Administrator (Switzerland)
Sport - IF – Winter Olympic

SUBMITTED

The DCO/BCO shall ask the *Athlete* to remain in a normal seated position with feet on the floor for at least 10 minutes prior to providing a blood *Sample*.

ISU: A reference to an alternative policy having an athlete lie down for 10 minutes rather than just sitting, could be mentioned here. This request is based on prior experience, about fainting with the blood draw process

K.2.9 (2)

UK Anti-Doping

Pola Murphy, Compliance Coordinator (United Kingdom)
NADO - NADO

SUBMITTED

K.2.9 (a)

In relation to the 10-minute seated rest with feet on the floor, consider adding wording '*where relevant*' to account for Athletes with lower limb impairments.

Canadian Centre for Ethics in Sport

Elizabeth Carson, Manager, Sport Services (Canada)
NADO - NADO

SUBMITTED

In Annex K.2.9.a), consider alternate wording for "with their feet on the floor" to take into consideration athletes who may have impairments (i.e. amputation of lower limbs). Such athletes may still have been in a seated position for the required 10 minutes which would satisfy this requirement.

K.4 Transportation Requirements**K.4.5 (1)****International Testing Agency**

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

SUBMITTED

Consider the following specification: "*The DCO/BCO shall as soon as possible transport **or send** (...)*".

Annex L – Results Management Requirements and Procedures for the Athlete Biological Passport (2)**Council of Europe**

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

SUBMITTED

Athlete Biological Passport Annex L – L.3 Review by three experts

- the requirements related to an athlete Biological Passport Case is very rigid and limits the work of an ADO or an IF in less obvious cases. As a consequence, the Experts opinion should be advisory and not mandatory, as this may limit the Results Management Authority to forward a possible ADRV.

RUSADA

Tatyana Galeta, Head of the Results Management Department (Russia)
NADO - NADO

SUBMITTED

This Annex should be removed and reference to TDAPMU should be included in the relevant part of the ISTI and the Code.

In addition, RUSADA would like to propose that information uploaded to the Biological Passport part of the program (including Expert reports and ATPFs) shall be shared with all ADOs with authority to the test the athlete rather than with the Passport Custodian only, including notifications of new data.

Also, all ADOs already sign confidentiality agreements to use ADAMS and are bound by the Code, therefore the

L.1 Administrative Management

L.1.2 (1)

Anti-Doping Norway

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

SUBMITTED

L.1.2

The requirement states that: “*Management and communication of the biological data, APMU reporting and Expert reviews shall be recorded in ADAMS and be shared by the Passport Custodian with other Anti-Doping Organizations (ADO(s) with Testing jurisdiction over the Athlete to coordinate further Passport Testing as appropriate*”. In order to facilitate this, we suggest that it is possible to configure ADAMS such that an ADO with testing jurisdiction can receive a notification every time a new sample is matched in ADAMS and when an APMU report is submitted, even though the ADO is not the Passport Custodian. Currently, an ADO with Testing jurisdiction that is not the Passport Custodian only receives notifications when the ADO itself is the Testing Authority.

L.2 Initial Review Phase

L.2.2 The Initial Expert Review (1)

Anti-Doping Norway

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

SUBMITTED

L.2.2

ADNO suggest that the term “*basic information*” is elaborated. Currently, the only example is competition schedule. It is unclear if information such as pregnancy, possible medical conditions, declaration of medicines/supplements (e.g. iron) is included.

L.2.2.4

L.2.2.4.1 (1)

Anti-Doping Norway

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

SUBMITTED

L.2.2.4.1

ADNO suggest that information detailed in the bullet point “*e) Intelligence in relation to the Athlete concerned*” should be possible to share with the Expert also when there is an ATPF.

In order to avoid misunderstanding ADNO suggest the sentence to read “*Relevant intelligence in relation to the athlete concerned*”.

Anti-Doping Norway

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

SUBMITTED

L.3.6

ADNO suggest that it should be possible to confer with the Expert panel also when the third Expert is not asking for “*more information*”. ADNO believes that when two experts indicate "likely doping" the Passport could be discussed.

L.4 Conference Call, Compilation of the ABP Documentation Package and Joint Expert Report

L.4.1 (1)

Anti-Doping Norway

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

SUBMITTED

L.4.1

ADNO suggest that it should not be mandatory to have the conference call if it is deemed unnecessary by the Expert panel and the APMU, as this causes unnecessary costs.