

# INTERNATIONAL STANDARD FOR TESTING AND INVESTIGATIONS (ISTI)

## Consultation - First consultation phase

**Showing: All (232 Comments)**

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

#### Anti-Doping Norway

SUBMITTED

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

#### TDSSA

Anti-Doping Norway encourage WADA to carefully review the TDSSA. The TDSSA has been in operation for three years. Anti-Doping Norway's experience so far is that there is no increase in positive samples although a vast amount of resources, human and financial, has been spent.

#### UK Anti-Doping

SUBMITTED

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

#### Canadian Centre for Ethics in Sport

SUBMITTED

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

As a general comment for the final version of this Standard, CCES recommends providing hyperlinks to references within the Code, Annexes and other Articles within the Standard.

As a general comment to this Standard, CCES recommends using "their" in place of "his/her" to comply with gender inclusivity norms.

### 1.0 Introduction and scope (2)

#### RUSADA

SUBMITTED

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

Even though RUSADA recognizes that the International Standards are framework documents, which provides general guidelines for ADO operations, we propose, wherever possible, to harmonize the requirements for doping control procedures and associated paperwork based on the throughout review and open discussion of the existing best practices and experience gained by various stakeholders.

The current situation when an athlete is required to comply with different sets of rules set forth by different Testing and Sample Collection Authorities is confusing to athletes and creates an impression that there are no strict guidelines to follow, as it is often difficult for athletes to understand which parts of the procedure can be modified by ADOs and which should remain identical. We believe that for any case where a decision is left for the Testing Authority / Sample Collection Authority / DCO, the text of the Standard should explicitly state that this provision can be modified and who has the authority to make decision in this matter. In addition, in all cases where further information/recommendations on a matter is available in Technical Documents / Guidelines, a reference to such documents should be provided.

We also believe that a number of articles could be improved by relating to various real-life scenarios and recommendations on the best way to proceed in order to balance strict requirements of anti-doping rules with respects to athletes' rights and interests.

These changes would allow the ISTI to become not only a Guideline for ADOs to use in their daily operations, but also a useful reference tool for athletes seeking to better understand their rights and responsibilities.

### International Paralympic Committee

SUBMITTED

James Sclater, Director (Germany)

Other - Other (ex. Media, University, etc.)

The definition of Sample Collection Equipment be updated to reflect changes in Article 6.3.4.

## 2.0 Code provisions (2)

### ISU

SUBMITTED

Christine Cardis, Anti-Doping Administrator (Switzerland)

Sport - IF – Winter Olympic

### CODE 5.2 Scope of Testing

#### Comment to Article 5.2

Unless the Athlete has identified a 60-minute Testing window during the following-described time period, or otherwise consented to Testing during that period, before Testing an Athlete between the hours of **11:00 p.m. and 6:00 a.m.**, an Anti-Doping Organization should have **serious and specific suspicion** that the Athlete may be engaged in doping.

#### I.3 Whereabouts Filing Requirements

I.3.2 Subject to Article I.3.3, the Whereabouts Filing must also include, for each day during the following quarter, one specific 60-minute time slot between **5 a.m. and 11 p.m.** each day where the Athlete will be available and accessible for Testing at a specific location.

[Comment to I.3.2: The Athlete can choose which 60-minute time slot between **5 a.m. and 11 p.m.** to use for this purpose, provided that during the time slot in question he/she is somewhere accessible by the DCO.

#### ISU Proposal 1:

To define one specific 60-minute time slot between 5 a.m. and 11 p.m. and to correct accordingly "Code Article 5 Testing and Investigations"

#### ISU Proposal 2:

An example of definition to guide us on what is **serious and specific suspicious** should be given

### NADA

SUBMITTED

Regine Reiser, Result Management (Deutschland)

NADO - NADO

2.0 Code Provisions, here: 5.4; 5.a.1:

*"While supporting in principle the need for robust and comprehensive testing NADA Germany calls for WADA to give priority to a review of the application of the TDSSA to ensure that the resource demands of the initiative, in its current form, are proportionate to the impact of the programme including in relation to alternative or modified uses of those resources."*

#### **Additional Comments reg the TDSSA:**

##### **NADOs should be in the position to shift/manage MLAs more flexible.**

*While fixed quotes lead to an inflexible use of resources and potentially bind resources which might be better deployed in other disciplines (e.g. no ESAs in Golf, therefore 5% more in Road Cycling), the MLAs should be seen only as an orientation. A more flexible application of the TDSSA would be appreciated in order to "shift" amounts of MLAs from one to another sport. Therefore it might be helpful to define the MLAs as a range (+/- 50%-100% of the fixed quote), instead of having fixed relative amounts in the TDSSA for each discipline. Another option might be to individualize the TDSSA to each NADO giving a summation of the MLAs of ESAs, GH and GHRFs. Within the final relative amount of the MLAs for all samples collected, NADOs are free to apply ESAs, GH and GHRFs to each discipline by their own assessment. The TDSSA MLAs are functioning then as an orientation.*

**It would be interesting to get an insight in the data, the "risk-assessment" of the TDSSA is based on.**

*As each NADO has to implement a risk-assessment and as we were advised by WADA to consider the TDSSA in our risk-assessment (result of CCQ), it would be good to know, where the TDSSA risk-assessment is based on. In order to be in a position to explain our own risk-assessment (including the TDSSA) it would be good if the TDSSA risk-assessment is not a "black-box" ("to buy a pig in a poke"). The basis of the TDSSA risk-assessment should be provided to the NADOs.*

##### **Clarification on automatic reduction of ESAs when a haematological module of the ABP is implemented.**

*The TDSSA claims that MLA for ESAs may be reduced if the hematological module of the ABP is implemented (TDSSA 6.1). Further, 3.3 of the TDSSA says that implementation of the hematological module will be mandatory from 1 January 2019 for disciplines with an MLA for ESAs of 30% and strongly recommended for disciplines with an ESA MLA of 15%. Thus, any ADO shall have an active hematological module for the corresponding disciplines, and a reduction of ESA analyses could be fixed. For example, the TDSSA could say that a discipline is "hemABP discipline +15% ESA."*

##### **Definition of an "ABP minimum levels" (ABPMLs)**

*"Unfortunately, the TDSSA does not give information about the definition of an "implemented hematological module". Even though there might be huge differences in the progress of ABP programs, a minimum percentage of athletes in testpool with hematological profiles should be defined. Further, a minimal number of samples per profile might be beneficial for harmonization. The fact that ABPs of top level athletes might be under custody of an IF and thus not count for the NADO (and vice versa) might distort statistics in that regard."*

### **3.0 Definitions and interpretation (7)**

ISU

SUBMITTED

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

#### **CODE: Appendix 1: Definitions**

Definition of Minor (new)

*Minor*: A natural *Person* who has not reached the age of (eighteen years) sixteen years; or a natural *Person* who has not reached the age of eighteen years and, at the time of the anti-doping rule violation, is not included in any *Registered Testing Pool* and had never competed in any International Event in the open category.

**ISU Proposal**: Category „minor “shall be determined as per Swiss law which sets the age of eighteen years. Definition of Minor should not stay as it is in the CODE 2015: **A natural *Person* who has not reached the age of eighteen years.**

no

SUBMITTED

ANGELO SBERNA, dr. (italy)  
Sport - Other

### 3.0 Définitions et interprétation

#### 3.2 Termes définis dans le Standard international pour les contrôles et les enquêtes:

(ajouter:)

**Contrôle avec notification avant le départ de la compétition**: prélèvement d'échantillon fait avec une notification avant le début de la compétition, pendant laquelle il est fait un chaperonage tant que possible. Après la fin de la compétition, le sportif est accompagné en permanence jusqu'à la fourniture de l'échantillon.

Commentaire: cette nouvelle spécification permet d'éviter (en particulier entre les sportifs qui ne sont pas d'élite) l'abandon de la compétition avant sa fin, fait afin d'éviter la notification de contrôle (...), voir pag. 185 stakeholder comments code 2021, ANGELO SBERNA, dr. (italy) Sport - Other

#### Czech Anti-doping Committee

SUBMITTED

Tomáš Vávra, Coordinator (Czech Republic)  
NADO - NADO

Add to 3.2 Sample Collection Equipment:

The choice of accredited or approved sample collection equipment used for sample collection shall be determined exclusively by the Anti-Doping Organization responsible for Results Management.

#### Anti-Doping Norway

SUBMITTED

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

Anti-Doping Norway suggest that the identified fields of qualifications should be represented in the Expert Panel as a whole and not just that one expert should possess one or more of the said qualifications. In order to avoid misunderstanding it is suggested that the definition and composition of Expert Panels is detailed only one place.

#### NADA Austria

SUBMITTED

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

#### ISTI 3.2

Professional chaperons: the important responsibility of monitoring must not rest with poorly qualified and inexperienced persons.

**RUSADA**

SUBMITTED

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

We propose to establish a single in-competition period for the purpose of doping control (e.g. 12 hours prior to a start of an event) and also to better define the end of this period. In addition to defining the type of analysis to be conducted, the exact timeframe for in-competition period can potentially impact other decisions, e.g. a need to file for a TUE for substances prohibited in competition for athletes who withdrew from event due to requiring medical treatment / hospitalization while their competition / doping control procedure related to the event is still on-going.

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

**3.2 Defined terms specific to the International Standard for Testing and Investigations**

Expand the definition of "Filing Failure" to capture failures that occur for not meeting the deadline as well as failing to update whereabouts throughout the quarter (be deliberate in this wording for athlete education).

In the definition of "Sample Collection Equipment" underline "tamper-evident" should it remain a defined term.

In the definition of "Sample Collection Equipment" consider expanding equipment for blood sample collection to allow for dry blood spot, etc.

CCES agrees with the addition of a definition for "Tamper Evident."

In the definition of "Unsuccessful Attempt Report" remove "from an athlete in a Registered Testing Pool," as UAR reports are beneficial for non-RTP athletes and can be relied upon to add someone to an RTP.

**PART TWO: STANDARDS FOR TESTING (5)****Ministry of sport of Russia**

SUBMITTED

Veronika Loginova, Head of Antidoping Department (Russia)  
Public Authorities - Government

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.

### **Organizacion Nacional Antidopaje de Uruguay**

SUBMITTED

José Veloso Fernandez, Jefe de control Dopaje (Uruguay)

NADO - NADO

Provide legislation to respect the suitability of OCDs and anti-doping operators of the Sports Movement in anti-doping [or the coordinating personnel of each NADO in the country. WADA ensure even that this is possible. The sports experts must be re-accredited by the NADOs and put to work specifically in those sports from the NADO. especially by the Latin American NADOs

### **NADO Flanders**

SUBMITTED

Hans Cooman, Med. doctor (Belgium)

NADO - NADO

All ADOs were of the opinion that WADA's current whereabouts ISTI requirements and whereabouts management system in ADAMS have mostly been designed for individual athletes and do not suit the need of team sports and their athletes.

- Team sports whereabouts systems can be very different from country to country and from sport to sport, and therefore there is a clear need for harmonization and simplification. The Group was of the opinion that

whereabouts requirements should be more standardised across team sports, and much better aligned between IFs and NADOs for the same sport.

- It was also noted that the current 3 months whereabouts submission frequency is not perfectly suited to team sports and there was a general agreement that the frequency should be more flexible for team whereabouts compared to individual whereabouts. The submission frequency should be harmonised between ADOs to reflect the realities of the sport and the different format of a competition within a sport (e.g. club vs. national team competitions).
- In order to be more efficient and to avoid duplication of work, the Group was in full agreement that there is an absolute and urgent need for the development of a specific team whereabouts module in ADAMS Next Gen, allowing several ADOs to share the whereabouts information of the teams under their jurisdiction.
- There was also a full consensus on the fact that whereabouts collection must be coordinated between ADOs. And that proper collaboration agreements between ADOs are in place to avoid that teams and their athletes are requested to provide several and different sets of whereabouts to their IF and to one or even possibly two NADOs.
- Finally, the Group identified a proposal of a team whereabouts pyramid that is proportionate and flexible enough to fit both NADOs and IFs needs, taking into consideration the international/national competition level and/or the sport profile/popularity in a given country.

#### UK Anti-Doping

SUBMITTED

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

#### Canadian Centre for Ethics in Sport

SUBMITTED

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

### 1. Requirement for Testing:

In order for ADOs to properly plan their program and resources, it would be helpful if WADA could provide what a minimum standard/guideline for testing should be.

Article 4.8.4 is the only article within the ISTI that mentions a specific number of tests per athlete (3 tests per athlete included in an RTP). Yet:

- At the most recent Symposium, there was mention that all ADOs with ABP requirements under the TDSSA will be required to test RTP athletes in *mandatory-ABP* sports 3 times a year, and
- Recently, at the Rio Olympic Games, the Pyeongchang Olympic Games and the Gold Coast Commonwealth Games, ADOs were *strongly encouraged* to follow Pre-Games Taskforce recommendations to test athletes. Some of the recommendations even exceeded 3 tests per athlete *in the 4-month* lead-up period to the Event

When it comes to the recommendations of the Pre-Games Taskforces, it is not clear what our obligations as ADOs are nor the consequences of not following the recommendations (other than being perceived as an uncooperative ADO). In certain cases, our resources are planned for the year and may not be redistributed to the recommendations of the Taskforce. If Pre-Games Taskforces will be the way forward with Major Events, we would suggest that this be built in to the ISTI or (preferably) the recommendations be subsidized by the Testing Authority.

## 2. Quality vs. Quantity

While the rules of the ISTI reinforce efficient and effective anti-doping, CCES is unsure whether WADA compliance monitoring is effective in determining if ADOs are developing effective anti-doping programs (quality) or developing compliant programs (quantity).

For example, CCES notices that more and more fee-for-service testing requests from Organizing Committees include GH blood testing and ESA and/or GHRF analysis but the application of these additional analyses is often random or delegated to the DCOs. This is not how the TDSSA is meant to be applied nor is it a proper use of resources but from a compliance standpoint, the Testing Authority would be compliant.

It is important that Compliance monitoring is able to monitor quality of doping control.

### 4.0 Planning effective Testing (1)

#### Freelance journalist

SUBMITTED

Karayi Mohan, Freelance journalist (India)  
Other - Other (ex. Media, University, etc.)

In major championships in vulnerable sports disciplines like athletics, weightlifting, cycling, swimming, wrestling, rowing, boxing etc, in-competition testing should at least include gold medal winners (top placed athletes) if not all the medallists. 'Risk assessment' and 'target testing' have unfortunately become explanations for doing lesser and lesser number of samples at the national and international levels, thereby leaving the 'clean' athletes frustrated and dissatisfied. If the 'clean' athletes have to be reassured, they have to see at least the gold medal winner is being tested. This situation needs to be rectified.

### 4.1 Objective (3)

#### GAISF

SUBMITTED

Davide Delfini, Membership Application Manager (Switzerland)  
Sport - Other

**Art 4.1.3** We would like to suggest exploring the possibility to specify better the process that ADOs can follow to ask to be exempted from conducting out of competition test. We would propose to have the request included in the Test Distribution Plan submission: " The Anti-Doping Organization shall document its Test Distribution Plan and shall file that Test Distribution Plan with WADA (a) when seeking WADA's approval pursuant to Code Article 6.4.2 to analyse Samples using a less extensive menu than that set out in the Technical Document referenced at Code Article 5.4.1, in accordance with Article 4.7.1 of this International Standard,; ~~and~~ (b) where requested by WADA, as part of the process of demonstrating the Anti-Doping Organization's satisfaction of the requirements of Code Article 5.4.; **and when seeking WADA's approval to get exempted from the obligations to conduct testing out-of-competition. WADA may, at its sole discretion, determine a list of sports/disciplines that are exempted from the obligation to conduct out-of-competition testing.**"

We would also suggest implementing the same modification on art 4.6.1 ii). We would propose the following: "...In-Competition Testing shall be made apriority, and a substantial portion of the available Testing shall be conducted In-Competition. However, some Out-of-Competition Testing may 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. **Anti-Doping Organizations may request the approval of WADA to get exempted from out-of-competition for the concerned sport/discipline. WADA may, at its sole discretion, determine a list of sports/disciplines that are exempted from the obligation to conduct out-of-competition testing.**"



**UK Anti-Doping**

SUBMITTED

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

**4.1.2** - Consider stipulating that any conflicts of interests should be documented.

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

In Article 4.1.3 CCES notes that it is important to recognize that a Test Distribution Plan can change throughout the year based on several factors (intelligence, budget, etc.) and that ADOs need to document all these changes and/or versions of their TDPs. From a monitoring perspective, WADA should not only be ensuring that a TDP is developed and approved but also it is implemented.

**4.2 Risk assessment (4)****China Anti-Doping Agency**

SUBMITTED

Zhaoqian LUAN, . (China)  
Sport - Other

How often is it to conduct a risk assessment? It is recommended to conduct a risk assessment once a year.

**RUSADA**

SUBMITTED

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

**4.2 Risk assessment in the part pertaining to assessment of physiological risk and potential of certain substances to improve performance**

We propose to create an expert group which can issue periodically updated guidelines on the matter, which can be used as a reference by all ADOs and reference this document in the ISTI.

**UK Anti-Doping**

SUBMITTED

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

**4.2** - The ISTI could state how often a risk assessment should be conducted/reviewed (for RTPs, this is stipulated later in the ISTI) – for example, an annual assessment or review at a minimum.**4.2** - Risk Assessment – for smaller ADOs, pulling this information together may be challenging. As WADA has done a significant amount of work around the TDSSA, which can be considered as a risk assessment or sorts, perhaps reference could be made here to the TDSSA to assist ADOs in their development of the risk assessment.**4.2.1 (d)** - This comment could be stated as also applicable to (g).**4.2.1** - Consideration to be given to adding an additional factor – competition season / calendar. This is to reflect that in certain years athletes will compete in more lucrative and prestigious events (e.g. Olympics) and therefore certain years will potentially have higher levels of risk than others.**4.2.2** - Reference to Technical Document referenced in Code Article 5.4.1 – can be replaced with TDSSA**4.2.2** - While supporting in principle the need for robust and comprehensive testing UKAD calls for WADA to give priority to a review of the application of the TDSSA to ensure that the resource demands of the initiative, in its current form, are proportionate to the impact of the programme including in relation to alternative or modified uses of those resources

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

With respect to Article 4.2.1.e ("Available research on doping trends (e.g., peer-reviewed articles)") CCES notes there are a number of scientific papers on WADA's resources page which may be helpful but it is challenging for non-scientific administrators to understand and to keep up with scientific trends. It would be helpful if WADA could provide quarterly or yearly summaries, and/or include this as a standing topic during the ADO Symposium.

#### 4.3 Establishing the overall pool of Athletes (2)

##### UK Anti-Doping

SUBMITTED

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

4.3 - Reference may need to be made here to "Recreational Athletes" if the Code Review leads to a definition. 4.3.2 (a) - Consider specifying that this information should be shared or made available to NADOs.

##### Irish Sports Council

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

Comment to 4.3.1: In this comment it states that the main focus of IF's TDP should be International - Level athletes and the main focus of NADO's TDP should be National-Level and above. Sport Ireland recommends that be changed to "shall be" rather than "should be".

#### 4.4 Prioritizing between sports and/or disciplines (1)

##### Canadian Centre for Ethics in Sport

SUBMITTED

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

Article 4.4.2 says "[...] more resources should be devoted to the sport or discipline or nation involving the larger number of Athletes." While the number of athletes is important, CCES believes the level or performance level of athletes within a sport as well and/or the type of the sport (e.g., team sports) should be considered as well. If two sports have the same risk of doping, more resources should not automatically be devoted to the sport with larger number of athletes but rather there should be an assessment of the athletes within each of the sports. Perhaps re-word this sentence as: "[...] more resources should be devoted to the sport or discipline or nation involving the larger number of Athletes if the Athletes have the same level of performance."

#### 4.5 Prioritizing between different Athletes (3)

##### RUSADA

SUBMITTED

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

#### 4.5 Prioritizing between different Athletes in the part pertaining to testing of athletes overnight

To ensure equal treatment of athletes worldwide, we propose to establish which criteria are 'valid grounds for Testing overnight' and/or to make it mandatory/recommended to an ADO to receive WADA approval prior to conducting such test. Additionally, we propose to limit the population of Athletes who can be subjected to such tests (e.g., International and National-level athletes, athletes included in Registered Testing Pools, Athletes who are not Minors, etc).

**UK Anti-Doping**

SUBMITTED

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

**4.5.1** - Clause refers to a 'significant amount of Testing' to be conducted as Target Testing. Given that this was a question on the CCQ, with corrective actions, does this need to be quantified? E.g. a minimum of 50%?  
**4.5.2&3** - Clauses could be merged together. 4.5.3 could be added as a category for ADOs to consider for Target Testing – 'high risk athletes' based on the factors listed in 4.5.3 (a)-(k). If kept separate then 4.5.3 should have 'should' replaced with 'shall' to give it the same importance as 4.5.2. As it is worded, and ADO may simply focus on 4.5.2 for Target Testing. This is an excellent starting point, but 4.5.3 adds significant value to a Target Testing programme. Furthermore, within 4.5.3 – position of athlete could be added as a factor for consideration. In some sports (especially team sports) there are certain positions that require specific physiological demands that increase risk compared to other positions. E.g. in football a midfielder covers far more distance than a goalkeeper.  
**4.5.3 (k)** - Whilst the list of factors (a) to (k) are not in order of importance, it may be appropriate to place (k) at the top of the list as such information is something the anti-doping movement is looking to encourage.  
**4.5.4** - The phrase 'Random' within the context of Testing is misleading and misused publicly. 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 or event, 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 clauses and definitions are defined, implies that non-target testing is 'random' with little thought process – when in actual fact the opposite is true. E.g. an ADO may receive intelligence on a team but no particular 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, expanding the concept of 'Target Testing' and phasing out the phrase 'Random'.  
**4.5.5** - Contrary to what is stipulated in the WAD Code comment to Article 5.2. The Code stipulates that unless the athlete has identified a 60-minute testing window then the testing hours are 6am – 11pm. 4.5.5 says testing should take place between 5 a.m. – 11 p.m. Wording should be rephrased for consistency.  
**4.5.5** - Is further guidance needed for what constitutes a 'serious and specific suspicion'?

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

With respect to the Comment to Article 4.5.1, the CCES agrees with this approach. There needs to be a way to monitor athlete selection. ADOs with fewer resources may revert to testing athletes with better or more accurate whereabouts, or be limited to testing athletes that are competing within their country.

In Article 4.5.2.b) add "athletes with the potential to compete at major games."

In Article 4.5.3.b) add "inconsistent performances" in addition to "sudden major improvements in performance."

**4.6 Prioritizing between different types of Testing (3)****RUSADA**

SUBMITTED

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

**4.6 Prioritizing between different types of Testing in the part pertaining to No Advance Notice testing**

We believe that it be useful to have examples of circumstances which WADA would consider *exceptional and justifiable* to waive the requirement of No Advance Notice.

Also, for the purpose of subsequent reporting, it would be useful to have clearer definition of what exactly constitute Advance Notice.

E.g., in its practice RUSADA has the encountered the following scenarios:

- 1) Impossibility to notify an athlete face-to-face (*intercoms, etc., especially if they are answered by a person other than the athlete*)
- 2) Requiring assistance from team official / coach / doctor to establish WA (*whereby 'notifying' him that one or more of the athletes under his authority is selected for testing without disclosing the names of the athlete*)
- 3) Athlete being absent from his WA, but arriving from a different location later (*possible advance notification by a third party who have seen DCOs*)

In all these scenarios, neither RUSADA nor its DCOs have disclosed the identity of athlete to be tested to anyone in advance, however, there is a suspicion that the athlete has been informed about testing by a third party.

### UK Anti-Doping

SUBMITTED

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

**4.6.1 (a) (i)** - 'Out-of-Competition Testing shall be made a priority.' As with our comment in respect of Article 4.5.1, should this be quantified in some way (i.e. minimum of...) as again this is scrutinised in the CCQ.

**4.6.2** - No advance notice Testing should always be attempted and therefore shouldn't be planned. We think advance notice testing should only take place where unavoidable - e.g. attempting an OOC test where the athlete is not immediately present but a family member is, and that family member contacts the athlete who attends to be tested shortly afterwards. This should be fully recorded. 'Exceptional and justifiable circumstances' enables advance notice testing to be planned in advance. All Testing shall be attempted at no advance notice.  
**4.6.2 (a)** - Could this be rephrased to state that placeholder selection should not be known in advance?

### Canadian Centre for Ethics in Sport

SUBMITTED

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

With respect to Article 4.6.2, consider providing clarifications on "No Advance Notice" on different scenarios including the following examples or provide examples of what may qualify as "exceptional and justifiable circumstances."

- A DCO calling an athlete after waiting 55 minutes during the athlete's 60-minute time slot;
- Calling an athlete from the entrance of a gated residence;
- 24-hour notice of ABP testing on specific country/delegation (with no specification on names);
- A service provider having to apply for a visa to enter a country for testing and require a reference from the country for application purposes;
- Notice at competition instructing athletes to report to doping control (with no time limit).

## 4.7 Sample analysis (5)

### IAAF Athletics Integrity Unit

SUBMITTED



Thomas Capdevielle, Deputy Head (MONACO)  
Sport - IF – Summer Olympic

List under 4.7.3 not limited but we would suggest adding a para as follows:

e) any other information made available to the ADO justifying long-term storage of retesting of one or more samples at the ADO's discretion

### **Antidoping Switzerland**

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

Laboratories shall merely analyse samples as requested by the Testing Authority or the Results Management authority, respectively. Respecting the requirements of the Technical Document referenced at Article 5.4.1 is not the laboratories task / duty.

### **RUSADA**

SUBMITTED

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

## **4.7 Sample analysis in the part pertaining to reanalysis of samples due to development of new detection methods**

To ensure harmonization, we believe that information on such methods should be circulated by WADA to all stakeholders and reference to such documents should be made in ISTI.

### **UK Anti-Doping**

SUBMITTED

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

**4.7.3 -** Consider adding an athlete's performance as a factor for long term storage, and that a sample was collected during a high-risk period.

### **Canadian Centre for Ethics in Sport**

SUBMITTED

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

With respect to Article 4.7.3.c ("New detection methods to be introduced in the near future relevant to the Athlete, sport and/or discipline"), CCES believes it would be helpful for WADA to provide some guidance for ADOs. Perhaps this can be a standing topic at the ADO Symposium.

## **4.8 Collecting whereabouts information (13)**

### **World Rugby**

SUBMITTED

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

With particular regard to Whereabouts, the current ISTI allows World Rugby the scope with which to set our own standards, which we appreciate. However, we do feel that there are some areas where improvements could be made in the consistency of process/application which could require adaptations to the ISTI. We propose that wider consultation is required on team sport whereabouts with regards to consistency of practical submission requirements, consequences for teams/team sport players, functionality of ADAMS, and harmonisation across NADOs/IFs and club/international competitions. The aim should be to develop a more cohesive system across a sport that (i) supports collective submission (though retaining individual responsibility), (ii) provides the ability to test at no-notice outside of the team environment, (iii) discourages/disincentivises individual or team-led

collective doping and/or subverting the doping control process, and (iv) encourages harmonisation between the various ADOs who may be collecting whereabouts such that players and teams are subjected to consistent and reasonable requirements when they compete at the same level of competition, and when players move backwards and forwards from club to national team in any given season. We fully support the initial steps that UEFA have led in this area, and despite not necessarily being in full agreement with the detail of their collective proposal, we support all the basic principles they have highlighted.

### [Comment to 4.8.3]

Currently there is no mention suggested or otherwise of any consequence of any failure to submit team activities or inaccurate information in relation to team sports where submissions may be part of an ADO's pyramid approach to whereabouts, other than to include athletes in an RTP. However, for practical reasons this is rarely if ever implemented in a Team Sport setting.

Given the broad scope of the ISTI with regard to whereabouts we propose an addition to the Comments to 4.8.3 suggesting that an International Federation or National Anti-Doping Organisation may wish to consider as part of any team activity submission system encompassing Team Sports, alternative consequences beyond elevation to an RTP, for example a fine/sanctioning mechanism for participating teams if information from Team Activities is not provided, is insufficient or proves inaccurate.

**cadf**

SUBMITTED

francesca rossi, director (switzerland)  
Sport - IF – Summer Olympic

4.8.4 If athletes are in different RTPs, there should be flexibility with regard to the 3 required yearly OOC tests per ADO. For instance, there should not be a minimum of 6 tests if they are included in 2 distinct RTPs.

**ISU**

SUBMITTED

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

## ISTI 4.8 Collecting whereabouts information

4.8.3 The *Anti-Doping Organization* may determine that it needs more whereabouts information in respect of certain categories of *Athletes* than others. It should consider adopting a '**pyramid approach**', based on the risk assessment and prioritizing exercises set out at Articles 4.2-4.5. According to this approach, *Athletes* are put into different tiers, depending on the priority that is placed on *Testing* those *Athletes*. The *Anti-Doping Organization* should determine, in the case of each tier of *Athletes*, how much whereabouts information it needs in order to conduct the amount of *Testing* allocated to those *Athletes* in the Test Distribution Plan effectively and efficiently.

**Comment to 4.8.3:** *In accordance with Article 4.8.4, this top tier of Athletes must be put into a Registered Testing Pool (...) If an Athlete in the tier below the Registered Testing Pool fails to comply with the whereabouts requirements applicable to his/her tier of Athletes, the International Federation or National Anti-Doping Organization in question should consider moving the Athlete up into the Registered Testing Pool.*

### ISU Proposal:

To clearly define the Athletes in the tier below the "Registered Testing Pool" as athletes belonging to a so-called "Testing Pool".

To include in the ISTI and in the CODE their responsibilities as for the athletes included in a Registered Testing Pool (CODE Article 5.6);

Instead of considering to move the Athlete up into the Registered Testing Pool when they fail to comply to the Whereabouts requirement, being allowed to sanction with Filing Failures (CODE 2.4);

Make clear that these athletes have the same responsibilities regarding retirement from Sport (CODE Article 5.7)

### **China Anti-Doping Agency**

SUBMITTED

Zhaoqian LUAN, . (China)  
Sport - Other

**Article 4.8.3** It is recommended that the time limit and number of times of the athletes in the Testing Pool but included in the RTP for violating whereabouts requirements be explicitly specified to ensure harmonized operation by anti-doping organizations.

### **UEFA**

SUBMITTED

Charles-André Lutz, Anti-Doping coordinator (Switzerland)  
Sport - Other

A group of ADOs representing a selection of European NADOs and major team sports IFs met and came up with the following points regarding the collection and management of team whereabouts:

All ADOs were of the opinion that WADA's current whereabouts ISTI requirements and whereabouts management system in ADAMS have mostly been designed for individual athletes and do not suit the need of team sports and their athletes.

Team sports whereabouts systems can be very different from country to country and from sport to sport, and therefore there is a clear need for harmonization and simplification. The Group was of the opinion that whereabouts requirements should be more standardised across team sports, and much better aligned between IFs and NADOs for the same sport.

It was also noted that the current 3 months whereabouts submission frequency is not perfectly suited to team sports and there was a general agreement that the frequency should be more flexible for team whereabouts compared to individual whereabouts. The submission frequency should be harmonised between ADOs to reflect the realities of the sport and the different format of a competition within a sport (e.g. club vs. national team competitions).

In order to be more efficient and to avoid duplication of work, the Group was in full agreement that there is an absolute and urgent need for the development of a specific team whereabouts module in ADAMS Next Gen, allowing several ADOs to share the whereabouts information of the teams under their jurisdiction.

There was also a full consensus on the fact that whereabouts collection must be coordinated between ADOs. And that proper collaboration agreements between ADOs are in place to avoid that teams and their athletes are requested to provide several and different sets of whereabouts to their IF and to one or even possibly two NADOs.

Finally, the Group identified a proposal of a team whereabouts pyramid that is proportionate and flexible enough to fit both NADOs and IFs needs, taking into consideration the international/national competition level and/or the sport profile/popularity in a given country.

### **Antidoping Switzerland**

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

**4.8.2:** Referring to the joint letter to Olivier Niggli from July 17, 2018, we'd like to once again emphasize the need of proportionate and harmonized team whereabouts standards, rules and procedures that are more suited to team sports. A key point is an absolute and urgent need for the development of a specific team whereabouts module in ADAMS Next Gen, allowing several ADOs to share the whereabouts information of the teams under their jurisdiction

It should be considered that if, according to the comment to article 4.8.6, the athlete complies with the ADO who has the greater whereabouts requirements, this will mostly be the international federation who, quite often in disrespect to article 4.8.1, are requiring an 1h-time slot. However, only in few cases, the International Federation can provide all-in-one and particularly mother-tongue assistance to the athletes. This repeatedly led to misunderstandings and notably resentments on the part of the athletes and their support personnel, respectively.

### Anti Doping Denmark

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)  
NADO - NADO

#### Team Whereabouts:

ADD supports the Team Whereabouts Meeting Summary (meeting at UEFA 11 April 2018) where the following team whereabouts principles were put forward as a way of harmonising and simplifying the collection and administration of team whereabouts in team sports:

- It is proportionate to collect team whereabouts only if it is used to initiate effective and efficient out-of-competition testing• ADOs should share whereabouts of teams under their jurisdiction and teams/athletes must not be asked to provide whereabouts information to more than one ADO• Teams in the same competition should have the same whereabouts requirements unless there is risk-based assessment to justify it• If a team is required to provide team whereabouts, some of its athletes should be tested at least once per year out-of-competition• Whereabouts submission frequency should be harmonised between ADOs to reflect the realities of the sport and the different format of a competition within a sport (e.g. club vs. national team competitions)• ADOs wanting to collect more than just team whereabouts (e.g. permanent home address or partial individual whereabouts to locate athletes when they are not with the team) should be able to justify it• ADOs should only put team sports athletes in a RTP when a risk assessment has clearly shown that lesser requirements based on team whereabouts are insufficient• Athletes who are tested less than 3 times a year must not be in a RTP• In order to be more efficient and to avoid duplication of work, there is a need for a specific team whereabouts module in ADAMS Next Gen allowing several ADOs to share the whereabouts information of the teams under their jurisdiction

The following points require further discussion:

- Enforcement of team whereabouts requirements and clarification of team and athlete responsibilities• Efficient custody transfer of international team sports athletes between ADOs, considering the fact they frequently move from one country to another• Efficient system and definition of principles to eradicate the many "duplicate athletes" in ADAMS

### NADA

SUBMITTED

Regine Reiser, Result Management (Deutschland)  
NADO - NADO

*4.8.4: "...to collect three or more Samples per year..."*

*this passage is not absolutely clear with regards to the comment to 4.8.4: "...at least three times a year".*

*Suggestion: for 4.8.4: "...to collect three or more Samples per year during at least three sample collection sessions per year."*

*4.8.9 b):*

*During some Major Events (e.g. YOG, Worldgames), Athletes participate who are not in a NADO testpool but are requested to file whereabouts via ADAMS during the Event-period..*



*Explanation: As some NADOs link ADAMS directly to the testpool, those Athletes who need an ADAMS-Account for a short period need to be taken into the NADOs testpool. Therefore, the MEOs/IFs should take over the organization of ADAMS-Accounts for those Athletes, who are not in a NADOs testpool. In those cases, 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.*

#### **RUSADA**

SUBMITTED

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

### **4.8 Collecting whereabouts information in the part pertaining to inclusion of athletes in the Registered Testing Pool**

We propose to change the wording from *'collect three or more Out-of-Competition samples'* to *'to conduct three or more Out-of-Competition tests'* to reflect the fact that three Samples can be collected within one testing session (urine, blood, blood for ABP).

Additionally, for the purpose of subsequent reporting ADO should be able to include not only successfully collected samples, but also either all unsuccessful attempts or only those unsuccessful attempts, which resulted in Missed Tests, towards the count of tests conducted on any given athlete in its Registered Testing Pool.

#### **Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

4.8.4 This article currently states that if an IF or NADO plans to collect three or more samples per year OOC from particular Athletes, it shall put them into a RTP.  
Sport Ireland recommends that this should be changed to three tests per year rather than three samples.

#### **Czech Anti-Doping Committee**

SUBMITTED

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

ISTI 2017:

"Where an International Federation or a *National Anti-Doping*

*Organization* plans to collect **three** or more *Samples* per year *Out-of-*

*Competition* from particular *Athletes*, it shall put them into a *Registered*

*Testing Pool*"...

We propose to change the number 3 (Samples) to 2 (Samples) per year due to very limited budget for OOC tests in small NADOs. Therefore we must strongly reduce the number of athletes in national RTP and OOC testing is reduced to small amount of athletes. Membership in RTP has strong deterrent influence before doping to athletes.

**Canadian Centre for Ethics in Sport**

Elizabeth Carson, Manager, Sport Services (Canada)

NADO - NADO

Article 4.8.2 addresses gathering whereabouts information from other sources, rather than from the individual athlete, for example, when an organized and carried out on a collective basis. CCES agrees with this approach as long as the testing can remain unpredictable. Athletes from team sports should not only be tested during periods where team activities are taking place or in team settings.

The Comment to Article 4.8.3 address tiers of athletes. It may be useful to standardize the "naming" of the different tiers. Many ADOs have taken the pyramid approach but the terms can differ: Testing Pool, Test Pool, etc. It can be confusing, especially if for an athlete both the NADO and the IF have separate types of pools (and different names).

The requirement in Article 4.8.4 to collect "three or more Samples per year Out-of-Competition from particular Athletes" limits how many athletes an ADO can include in its RTP and ultimately its testing. Many ADOs do not have the resources to test *any* athletes 3 times a year and without including athletes in the RTP, they will likely: 1) spend resources on attempts that will result in unavailable athletes (the information that can be submitted through ADAMS from non-RTP athletes can be very general and often requires more follow-up); and 2) test athletes in the sport without focusing on the highest risk athletes. It is acknowledged in the comment to 4.8.1 that whereabouts information can have a useful deterrent effect but the three-sample requirement does not allow ADOs to use whereabouts as a (very economical) deterrent in the fight against doping. Consider re-wording to allow ADOs a little more judgement on the necessity of including athletes in the RTP.

In Article 4.8.5, use the wording "may be liable for an anti-doping rule violation" instead of "shall be liable."

In Article 4.8.7, change last sentence to "in the lead-up to a major games or event" instead of "in the lead-up to an Olympic or Paralympic Games or a World Championship."

In Article 4.8.9, consider adding a "Room Number" field in ADAMS specific for use during MEO.

**International Testing Agency**

SUBMITTED

International Testing Agency, Legal Affairs Manager (Switzerland)

Other - Other (ex. Media, University, etc.)

In relation to Art. 4.8.4, consider clarifying whether the "plan" to collect three attempts constitutes a requirement to include an athlete in a RTP or not. Also, the formula "plans to collect" could be interpreted in various ways. Equally, the last part of Comment to 4.8.4 requires some clarification; i.e. does an ADO have to conduct three attempts on its own or is a combination of 3 attempts by different ADOs sufficient?

**4.9 Co-ordinating with other Anti-Doping Organizations (4)****NADA**

SUBMITTED

Regine Reiser, Result Management (Deutschland)

NADO - NADO

**4.9.2**

*An additional role should be considered: Client Authority.*

*Explanation: where an IF is requesting the NADO to cooperate during IC-Testing, but the NADO is not keeping the TA or RMA and subcontracts an SCA, the requested NADO who cooperates with the IF does not appear in any reporting and is not authorized to gain access to any DCF information or lab results etc.*

*This gap might be filled by establishing a new role: the "client authority".*

*This role is defined as e.g. the financing part of the testing or the part with the legal authority in that country (e.g. responsible for/subject to state's anti-doping-law) and should therefore be mentioned in all official documentation (where necessary: e.g. DCF, CoC/LTL, ADAMS) and additionally, must be supplied with analyses reports and DCFs.*

*Additionally, in cases where an IF is testing in a country with an anti-doping-law and has not involved the countries' NADO, the state's law is bypassed. At least, the IF is obliged to share full DCF information and results in case of an AAF or positive finding with the countries NADO. Here, the status of the NADO could be the "client authority" (passive but informed and thus in a position to react, based on the countries anti-doping-law).*

### **UK Anti-Doping**

SUBMITTED

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

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.

### **Canadian Centre for Ethics in Sport**

SUBMITTED

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

To assist with better coordination between ADOs, consider standardizing deadlines dates for whereabouts submission. CCES suggests the due dates for all whereabouts submissions (whether to a NADO or to an IF) should be the 15th day of the month prior to the start of the new quarter: December 15, March 15, June 15, and September 15. Standardizing the deadline ensures that all athletes are subject to the same deadline, and those who are included in more than one RTP have the same deadline for organization to whom they submit the information. The suggested dates above also allow the ADO to start planning tests well before the start of the quarter (i.e., planning for testing on January 1 and beyond can start as of December 15, whereas it is much more challenging to start planning with December 31 deadline, especially when some athletes don't submit their whereabouts until the final day of the submission period).

### **Turkish Anti Doping Commission**

SUBMITTED

Mehmet YOGURTCUOGLU, Deputy General Coordinator / Legal Advisor  
(Turkey)  
NADO - NADO

Anti-Doping Organizations may contract third parties to act as Sample Collection Authorities on their behalf. However, a national federation shouldn't be allowed to use it against a NADO to by-pass its jurisdiction without prior consultation only based on the consent of an IF. As a principle, Anti-Doping Organizations shall consult with other relevant Anti-Doping Organizations to coordinate Testing activities. They shouldn't contract third parties for national events in the countries where there is a Code compliant NADO with a comprehensive doping control program. Instead, they should advice and encourage a national federation to contact the relevant NADO instead and have open communication with NADOs at all times in this regard. Therefore, we propose the following amendment to ISTI:

4.9.3 In case of a shared jurisdiction by the IF and the NADO over a National Event or a National Level Athlete, if there is a Code compliant NADO in the country with an extensive doping control program, the collection of Samples shall be initiated and directed by the NADO of that country whereas the IF focuses its resources on other Athletes or Events where Testing is inadequate. The Anti-Doping Organization and the ruling body of the Event shall cooperate to conduct such Testing and the Results Management for any such test shall be the responsibility of the Anti-Doping Organization initiating the test.

## 5.0 Notification of Athletes (2)

### NADA Austria

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

SUBMITTED

### ISTI 5.4

More transparency will improve the test distribution plans, because they have to pass public opinion. If there is traceability which athletes were tested how often, at which time and place (only general information to ensure privacy and data protection) and which additional analytics were performed, trust is earned.

### International Testing Agency

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

SUBMITTED

Consider introducing a provision enabling a process of "provisional notification" (for doping control) of an athlete, allowing the athlete to be released untested. For purposes of illustration, at Major Events some tests are carried out exclusively on world record breakers. If a world/Olympic record is broken several times during the heats of a discipline, it may no longer be required to test the athlete who broke the world record in the first instance; hence the need of releasing the athlete.

## 5.1 Objective (1)

### UK Anti-Doping

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

SUBMITTED

Objective should include reference to conducting Testing at no advance notice.

## 5.2 General (3)

### IAAF Athletics Integrity Unit

Thomas Capdevielle, Deputy Head (MONACO)  
Sport - IF – Summer Olympic

SUBMITTED

Check consistency times 11pm / 5 am or 6 am

no

ANGELO SBERNA, dr. (italy)  
Sport - Other

SUBMITTED

## 5.2 Généralités

La notification (...) responsabilités;



(modifier:)

d) pour un *contrôle* inopiné, accompagner et observer le *sportif* depuis la notification jusqu'à l'arrivée au poste de *contrôle du dopage* désigné;

e) pour le *contrôle* avec notification avant le départ de la compétition, un chaperonage efficace depuis le moment de la notification, et après en permanence dès la fin de la compétition jusqu'à l'arrivée au poste de *contrôle* du dopage désigné; et

f) documenter la notification ou la tentative de notification.

#### Canadian Centre for Ethics in Sport

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

SUBMITTED

In Article 5.2.d, consider changing the wording from "...to the arrival at the designated Doping Control Station" to "to the end of Sample Collection." E.g., the athlete must continue to be chaperoned if he leaves the doping control station to attend medal ceremony.

### 5.3 Requirements prior to notification of Athletes (3)

#### RUSADA

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

SUBMITTED

### 5.3 Requirements prior to notification of Athletes [or Annex H] in the part pertaining to the documents carried by Sample Collection Personnel

We propose to clarify the requirements for documentation carried by Sample Collection Personnel, in particular to require DCOs to have not only a Letter of Authorization and general photo ID (passport, driving license, etc.), but also Sample Collection Authority-issued DCO ID, certifying that a DCO has been trained by this Sample Collection Authority and expiry date of such ID. We also propose to require BCOs to have with them documents confirming their medical training.

There should also be clarification on the consequences for the athlete, if DCO/BCO arrives without proper paperwork, in particular if BCO is unable to demonstrate that he or she is qualified for venipuncture.

Additionally, the current Letter of Authorization available through ADAMS states the name of athlete to be tested, which makes it impossible for DCO to show such Letters to security personnel or other staff controlling access to sport venues and other facilities. It would be useful to have 'anonymous' Letter of Authorization available through ADAMS for this purpose, which would list date and location of the test as well as all mission participants (DCOs, chaperones, BCOs).

#### UK Anti-Doping

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

SUBMITTED

**5.3.1** - To be consistent with this comment, consideration should be given to reviewing the 'No Advance Notice Testing' definition. This could be extended to include NFs as well as Athletes. There may be exceptions to this – e.g. the NF is the event organiser and contracted to coordinate testing at an international event, or may request (and pay for) testing at an event where testing was not due to take place.

**5.3.3** - All Sample Collection Personnel should carry complementary identification, not just the DCO

**5.3.4** - This should be photographic ID whenever possible. In the absence of photo ID, the SCA can then establish appropriate criteria  
**5.3.7** - The Athlete shall be the first person notified – the Article

should stipulate that this notification should be by the Sample Collection Personnel/DCO or Chaperone. **5.3.7/5.3.8** - There are realities beyond modifications for Minors, where a 3rd party may well be informed of notification of the athlete prior to the athlete. For e.g. at training venues or In-Competition, the DCO may require assistance in identifying which athlete is the athlete due to be tested – particularly the case where there are large training groups. In such instances a third party can assist. However if this occurs, then it is crucial that that individual is informed not to inform the athletes, and for the DCO/SCP to accompany that individual until the athlete has been notified by the SCP. This ensures that the test remains no advance notice. **5.3.8** - Where a third party has been informed of notification, they should be accompanied to ensure they do not notify the athlete until the athlete has been notified by the SCP.

#### Canadian Centre for Ethics in Sport

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

SUBMITTED

With respect to Article 5.3.3, CCES wishes to raise as a point of discussion whether the article should specify that chaperones do not require specific (photo) IDs, especially since many ADO programs do not have chaperone programs. CCES has experienced a few instances where an athlete has requested to see the chaperone's identification. No official accreditation or ID is currently provided, nor is it required. Aside from Major Events where accreditation is required, it is easy for anyone to walk off the street and "pose as chaperone" if no accreditation or ID is required. Additionally, should this article specify how chaperones are to be trained? This section is vague in Annex H on Sample Collection Personnel Requirements.

### 5.4 Requirements for notification of Athletes (6)

#### IAAF Athletics Integrity Unit

Thomas Capdevielle, Deputy Head (MONACO)  
Sport - IF – Summer Olympic

SUBMITTED

5.4.7 - replace process by report

no

ANGELO SBERNA, dr. (italy)  
Sport - Other

SUBMITTED

### 5.4 Exigences pour la notification du sportif

#### 5.4.1 Lorsque (...)

e) des responsabilités du *sportif*, y compris des exigences suivantes :

(modifier:)

i) demeurer en permanence sous l'observation directe de l'ACD/escorte depuis le moment du contact initial par l'ACD/escorte jusqu'à la fin de la procédure de prélèvement d'*échantillon*, exclus le cas de "*contrôle* avec notification avant le départ de la compétition" pendant lequel il doit faciliter un chaperonage efficace après la notification, et en permanence depuis la fin de la compétition;

#### 5.4.2 Lorsque le contact est effectué, l'ACD/escorte doit :

(modifier:)

a) garder en permanence le *sportif* sous son observation depuis le moment de ce contact jusqu'à la fin de la phase de prélèvement des *échantillons*, exclus le cas de "*contrôle* avec notification avant le

départ de la compétition" pendant lequel le chaperonage après la notification peut être efficace, et depuis la fin de la compétition doit être fait en permanence;

#### Antidoping Switzerland

Ernst König, CEO (Switzerland)  
NADO - NADO

SUBMITTED

**5.4.1: While supporting in principle the need for robust and comprehensive testing, Antidoping Switzerland calls for WADA to give priority to a review of the application of the TDSSA to ensure that the resource demands of the initiative, in its current form, are proportionate to the impact of the programme including in relation to alternative or modified uses of those resources.**

**5.4.2 c): Antidoping Switzerland calls for WADA to accept other (Whereabouts) systems than ADAMS and to enable data exchange by implementing an API.**

#### RUSADA

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

SUBMITTED

### 5.4 Requirements for notification of Athletes

*5.4.7 If the Athlete delays reporting to the Doping Control Station other than in accordance with Article 5.4.4 but arrives prior to the DCO's departure, the DCO shall decide whether to process a possible Failure to Comply. If at all possible the DCO shall proceed with collecting a Sample, and shall document the details of the Athlete's delay in reporting to the Doping Control Station.*

The wording "*but arrives prior to the DCO's departure*" seems to imply that the athlete has been left unchaperoned for the duration, which is against the requirements and it is not up to DCO to decide whenever to process it as a 'Failure to Comply' in this case.

If the purpose of the article is to describe a situation where the Athlete remains under observation, but unduly delays his arrival to Doping Control Station, e.g., by having prolonged post-event discussion with his coach at the finish line, we propose to replace the phrase "*but arrives prior to the DCO's departure*" with "*contrary to the instructions from DCO, but eventually arrives to Doping Control Station*".

#### UK Anti-Doping

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

SUBMITTED

**5.4.1 (i) - Permitting athletes to shower should only be permitted in exceptional circumstances and this clause should reflect this, e.g. if an athlete has competed in water-based activities on inland water.**

#### Canadian Centre for Ethics in Sport

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

SUBMITTED

In Article 5.4.1 change the second "a)" to "e)."

With respect to Article 5.4.1.i, is it possible for the ISTI to specify that athletes are only allowed to shower after doping control is completed? Or would this be a human rights issue? Alternatively, if athletes are permitted to shower, it would be helpful to add a comment which specifies the preferred

way of proceeding when athletes request to use the shower, ice baths or hot tub for cool down or bathing prior to providing their sample.

In Article 5.4.1.h, add "or consume alcohol" so that the reads "Not to hydrate excessively or consume alcohol since this may delay the production of a suitable Sample."

## 6.0 Preparing for the Sample Collection Session (1)

### RUSADA

SUBMITTED

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

### 6.3 Requirements for preparing for the Sample Collection Session in the part pertaining to privacy and sole-use requirements for Doping Control Station

We believe that this article requires an explanatory note for situations where the Athlete lists a public place (office, college, fitness center, etc.) as his WA or wishes to relocated to such place due to prior commitments. In such cases it may be impossible for ensure complete privacy of the Athlete and/or guarantee the exclusive use of the facilities for Doping Control Station only. However, in cases there the Athlete does not object to such breach of his privacy and DCO believes that the circumstances of sample collection session will not compromise the integrity of the samples, they should both document their agreement in Supplementary Report and the sample collection session should proceed.

### 6.3 Requirements for preparing for the Sample Collection Session (7)

#### cadf

SUBMITTED

francesca rossi, director (switzerland)  
Sport - IF – Summer Olympic

6.3.3 - We suggest to add an observer designated by the SCA or TA if needed (e.g. in the framework of an audit ISO).

### Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, RAQ (France)  
NADO - NADO

§6.3.4 a)Le système de numérotation est unique pour un fournisseur. Mais s'il y a plusieurs fournisseurs différents, les numéros risquent fortement de ne plus être unique. C'était le cas actuellement avec Versapak et Berlinger. Il faudrait que cette codification comprenne également le nom (ou quelques initiales) du fabricant. Ou bien, il faudra indiquer sur la documentation des contrôles, le nom du système.

g) Les flacons d'urine doivent pouvoir être congelés à -80°C (et pas seulement à -20°C). Certaines substances sont instables également à -20°C et nécessitent une conservation du flacon B à -80°C. C'est d'ailleurs une recommandation du document technique TD2018-CGLH lorsque la LH est détectée. C'est aussi nécessaire en cas de transport sous carboglace.

m) Quelle certification ISO ? ISO9001 ? ISO14001 ? Il faudrait indiquer ISO9001.

o) Que veut dire "une institution de contrôle reconnue" ? Cela manque de précisions.

p) Pourquoi imposer un flacon B de 100 mL alors qu'il ne faut mettre que 30mL dans ce flacon ? il faudrait 100mL pour le flacon A et au moins 50mL pour le flacon B

### NADA

SUBMITTED

Regine Reiser, Result Management (Deutschland)



## NADO - NADO

## 6.3: Requirements for preparing for the Sample Collection Session

## 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."*

6.3.4 a), Question: What are those barcode requirements of ADAMS? Where are these requirements documented?

Comment to 6.3.4: "...which may include Athletes, Sample Collection Authorities, Sample Collection Personell, and Laboratories..."

Suggestion; add "Testing Authorities"

**UK Anti-Doping**

SUBMITTED

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

**6.3.2** - This clause could usefully be more explicit for testing athletes with impairments (i.e. reference accessibility), and for blood testing (e.g. well lit).

**Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

Comment to 6.3.5: Sport Ireland recommends that the transfer of custody "shall" be documented rather than "should" be documented.

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

In Article 6.3.2 add a reference to confidentiality: "The DCO shall use a Doping Control Station which, at a minimum, ensures the Athlete's privacy and confidentiality..."

In Article 6.3.3 change the word "entitlement" to "right," as the term "right" is more consistent with the language used throughout the Standard.

**Versapak Doping Control Ltd**

SUBMITTED

Fabio de Jesus, Business Manager (United Kingdom)  
Other - Other (ex. Media, University, etc.)

1. The sample collection authority shall ensure / it is recommended that the athlete has at least a choice of two different sample collection equipment in the doping control station meeting the

requirements under 6.3.4.

### 6.3.4 Sample Collection Equipment (8)

#### ISU

SUBMITTED

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

6.3.4 Equipment systems for blood and urine *samples* which, at a minimum:

j) Have a sealing system with one or more indicators, which allow verification that the *Sample* is correctly sealed in the A and B bottles or containers;

#### ISU Comment:

Do the kits have the sealing indicators? What are the indicators?

If the system is not available, this cannot be a standard until kits are equipped.

#### Czech Anti-doping Committee

SUBMITTED

Tomáš Vávra, Coordinator (Czech Republic)  
NADO - NADO

Add sentence:

The choice of accredited or approved sample collection equipment used for sample collection shall be determined exclusively by the Anti-Doping Organization responsible for Results Management.

Similarly to laboratories in 6.1 Code

#### Anti-Doping Norway

SUBMITTED

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

Anti-Doping Norway encourage WADA to have a certification program towards sample equipment suppliers, similar as to the laboratory accreditation mechanism. Any requirement in the ISTI relating to equipment will be placed upon the ADO and thus make an ADO vulnerable against possible failure in equipment.

A requirement of durability for both bottles and sealing system of a minimum of 10 years (allowing for relevant re-analysis) could be defined.

#### UK Anti-Doping

SUBMITTED

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

6.3.4 - What constitutes 'sufficiently robust' and who decides this?

#### Canadian Centre for Ethics in Sport

SUBMITTED

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

In Article 6.3.4.o) expand the subsections that are referenced to include h), j), k), l), m), and n): "... validate at a minimum that the equipment meets the criteria set out in subsections b), f), g), h), j), k), l), m), and n) above."

### **Versapak Doping Control Ltd**

SUBMITTED

Fabio de Jesus, Business Manager (United Kingdom)  
Other - Other (ex. Media, University, etc.)

1. The sealing equipment must have undergone independent testing which when requested by ADOs, Federations and other sporting bodies can be supplied by the manufacturer for review.
2. The collection equipment must include a unique identifier which will allow a laboratory to authenticate a genuine sample collection equipment when required.

### **Arne Ljungqvist Anti-Doping Foundation**

SUBMITTED

Staffan Sahlstrom, Executive Director (Sverige)  
Other - Other (ex. Media, University, etc.)

On behalf of Arne Ljungqvist Anti-Doping Foundation, I hereby submit our comments/proposal to the proposed amendments to Standards for testing.

#### Comment 1

6.3.4.a) Have a unique numbering and barcode system, which meets the number and barcode requirements of *ADAMS*, incorporated into all bottles, containers, tubes or other items used to seal the *Sample*

The possibility to use a QR code instead of a barcode system could be added. QR codes use is growing considerably and allows integration with diverse technological solutions and tools. Even if there is no such a code in the equipment today, it may be beneficial to have it included as an option when available.

#### Comment 2

6.3.4. e) are constructed of a material and sealing system that is sufficiently robust to withstand the conditions and environment in which the equipment will be used or subjected to, including but not limited to transportation, Laboratory analysis and long-term storage.

Can the indication about time for storage be more specific than "long-term"?

To test the basic material of the equipment in depth, the manufacturer must know exactly what criteria the material needs to meet. If material is exposed to long term conditions, there is a fair risk that no adequate testing method can be defined. In such case one possible scenario could be to rely on past experiences and empirical values.

#### Proposal

Would it be possible to use the same regulation already used by the IOC for sample testing of old samples? The IOC does not perform tests on "retention-samples" longer than 10 years.

We could imagine two options:

a) Replacement of "long-term-storage" through "a maximum of 10 years storage"

b) Make a link to directly rely on the IOC practice which says "10 years" to make sure to prevent change of the ISTI is necessary if any change of practice at the IOC is decided sometime in the future. In relying on their practice, it automatically updates the ISTI too.

In our opinion, we would strongly recommend defining the minimal and maximal temperature parameters

Comment 36.3.4. h) Are constructed of a material and sealing system that can withstand multiple freeze/thaw cycles.

In order to correctly perform required product tests, it is relevant to give exact instructions to a testing laboratory. The indication of "few freeze-thaw-cycles" is a very vague one and an exact instruction could not be provided to any testing institute. Would it be possible to be more specific in the number of cycles or is the meaning of WADA to let decide each manufacturer to define its own standard? Moreover, it would be mandatory to have an exact temperature and time indication to perform such "freeze-thaw-cycles". Also, the kind of liquid (urine or water?) to be tested in the container would need to be defined. A pragmatic approach could be to rely on long term experience with at product if possible.

Comment 4.

6.3.4. o) Have undergone testing by a recognized and independent testing institution to validate a minimum that the equipment meets the criteria set out in subsections b), f) and g) above. Any modification to the material or sealing system of the equipment shall require testing to ensure the equipment continues to meet the stated requirements.

If the testing criteria are not properly set, it may be difficult to recruit an independent and competent testing institute. Testing institutes generally require specific criteria that define then the applied testing methods. Also, long-term tests often cannot be simulated or cannot be ultimately confirmed. It may be a question, if long-term experience could be taken and accepted as a reference too. There is a fair risk that each manufacturer now starts to set its own criteria given, if there is no guideline, such as a written down international standard or a basic catalogue how such equipment tests are required to be performed.

Therefore, we would like to make the following remark:

It should be considered to create an international standard:

a) For all independent testing institutes that will be accredited

b) For exact parameters against which new equipment shall be tested.

Our main objectives as foundation about the doping control equipment is:

I Securing and maintaining the currently used high quality equipment

I No dilution of the quality by unclear, new regulations

I The new regulation must not open unnecessary doors for new legal discussions.

I Testing institutes must fulfil certain quality standards, e.g. a mandatory certification of compliance with the ISO 17025 standards. It is important that there is a common and clear understanding of the testing processes and criteria. In addition, it would be recommended to receive a written confirmation of the institute which confirms their capacity and competence in performing tests in a technical professional way.

Proposals to achieve the goals

- Clear test specification and criteria in order to make tests comparable.

- The testing mandate must comply with the new ISTI Regulation D)

Comment 5

6.4.3. to cover all relevant terms.



- The new ISTI Regulations Appendix D) must be as clear and specific as possible to be an obligatory reference for testing institutes who perform quality tests on the control equipment.
- A selection of institutes who are appropriate for such testing shall be validated against a specified catalogue of mandatory criteria.
- Exact instructions regarding the field tests which shall be performed in addition to the laboratory tests. E.g. which testing groups shall be recommended to perform such field test. Review the legal impact of new paragraphs on the existing material
- Review possible legal implications of the new paragraphs.

Thank you for the opportunity to comment on the standard and we are available for any additional comments in this respect.

Staffan Sahlström

### Validity

SUBMITTED

Karin Grute Movin, Managing Director (Sweden)  
Other - Other (ex. Media, University, etc.)

*Validity is a newly started research and development business with a great knowledge and experience in new technology, sports and antidoping. Our focus is to deliver a next generation secure, trustworthy and reliable system for doping control in sport. We aim to maintain the integrity of global doping control programs and improve the security of the collection, transport and processing of the doping control samples, enabling sportsmanship and equality amongst athletes and other professionals all over the world. As Wada is revising the code we would like to leave a few comments. If there is anything unclear or leaving you with question marks please do not hesitate to contact us.*

From a technical perspective, when working with product development we normally start an analytic phase by defining a requirement specification. This is a living document where we fill in needs and requests for the business case. If a requirement is not met, the solution is not valid. If a request is not met, the solution could still be valid but it might lead to a lower ranking when choosing the final concept for production.

A general suggestion to the WADA code is to write requirements more objectively to not limit the possibility for new solutions and ideas.

We will try to explain by using examples from today's documentation and requirements.

#### 6.3.4 i) "The A and B bottles, containers or tubes shall be transparent..."

Instead of writing that the bottle has to be / shall be transparent, our suggestion is to define the purpose to why it should be transparent.

Requirement; The substance in a sealed bottle should be visible.

Request; The substance in a sealed bottle should be visible from all angles without opening the bottle.

#### 6.3.4 a) "Have a unique number and barcode system..."

Requirement; Each sample kit should be identified by a numerical number given from Adams system.

Request; Each sample kit should have bar codes visible on both package, bottle and cap.

Additional specifics that could be clarified;

Does the number need to be shown the entire time or is it enough that it could be read at specific stations in the chain of custody?

Can the number be on the inside of the hat and only visible before the athlete has given the urine?

Both questions above would make it harder for someone to cheat and identify the "right" bottle amongst others further down the chain. (Sotji-case as example.)

## 7.0 Conducting the Sample Collection Session (2)

### RUSADA

SUBMITTED

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

## 7.0 Conducting the Sample Collection Session

We believe that this section should also lists grounds for closing Sample Collection Session (other than athlete providing proper sample and logistical grounds mentioned in annex for samples with insufficient specific gravity) and to describe who has be power to decide to close the session in various circumstances (Testing Authority, Sample Collection Authority, DCO).

### 7.3 Requirements prior to Sample collection in the part pertaining to hydration.

Given the impact of alcohol on values in the steroid profile, we believe it should be clearly stated in the Standard whenever or not low-alcoholic drinks (such as beer) is acceptable form of hydration.

### UK Anti-Doping

SUBMITTED

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

Change references from DCO to Sample Collection Personnel, or where applicable amend to specify DCO or Chaperone e.g. 7.3.2, 7.3.3, etc

## 7.1 Objective (2)

### Agence française de lutte contre le dopage

SUBMITTED

Adeline Molina, RAQ (France)  
NADO - NADO

"respect de la vie privée et de la dignité du sportif" : Quelles sont les limites? Il semble nécessaire d'en fixer pour une harmonisation entre les différents pays.

### RUSADA

SUBMITTED

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

We believe that this section should also lists grounds for closing Sample Collection Session (other than athlete providing proper sample and logistical grounds mentioned in annex for samples with insufficient specific gravity) and to describe who has be power to decide to close the session in various circumstances (Testing Authority, Sample Collection Authority, DCO).

## 7.3 Requirements prior to Sample collection (3)

**RUSADA**

SUBMITTED

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

**7.3 Requirements prior to Sample collection in the part pertaining to hydration.**

Given the impact of alcohol on values in the steroid profile, we believe it should be clearly stated in the Standard whenever or not low-alcoholic drinks (such as beer) is acceptable form of hydration.

**UK Anti-Doping**

SUBMITTED

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

**7.3.3** - 'The DCO shall provide the Athlete with the opportunity to hydrate.' We feel this wording is confusing, as it could be misinterpreted as the DCO providing the athlete with water, which should be avoided. Wording could either be removed or reworded for e.g. 'The Athlete is entitled to hydrate, however the DCO should inform the athlete to avoid excessive rehydration...'

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

Article 7.3.3 mentions avoiding excessive hydration. Consider providing guidelines or a comment on acceptable hydration.

**7.4 Requirements for Sample collection (7)****IAAF Athletics Integrity Unit**

SUBMITTED

Thomas Capdevielle, Deputy Head (MONACO)  
Sport - IF – Summer Olympic

7.4 or 7.5: we should may be acknowledge paperless forms ?7.4.5: add testing location on DCF  
t) athlete's consent to be removed (GDPR)

**China Anti-Doping Agency**

SUBMITTED

Zhaoqian LUAN, . (China)  
Sport - Other

**Article 7.4.5** requires to fill in the Doping Control Form with the names of the Athlete's coach and doctor. It should be noted that some sports teams have head coaches, assistant coaches, and coaches who are specifically responsible for the athlete's training. It is recommended to specify how to fill in the form if the athlete has more than one coach.

**Antidoping Switzerland**

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

7.4.5 t): The athlete's consent for the processing of Sample collection data should not be mandatory as some countries have the legal basis to do so and do not need the athlete's consent.

7.4.5 u): Acting on the assumption that the sample is owned by the Testing Authority (cf. article 10.1) and hence not by the athlete, there is no need to ask for that consent. Also, it is observed that athletes often feel unconfident about that question and do not dare to decline as they're afraid that this could make them look suspicious.

**UK Anti-Doping**

SUBMITTED

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

**7.4.5 (t)** - Due to GDPR, this could be deleted where consent is no longer the legal basis for the processing of Sample Collection data, or an alternative legal basis could be set out. **7.4.5** - Include age of Athlete as this is required by the laboratory

**Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

7.4.5 Sport Ireland suggests that the method of identification to validate the identity of the athlete shall also be recorded.

For clarification Sport Ireland suggest the following:

7.4.5 h) The discipline recorded on the DCF shall be in line with the TDSSA. 7.4.5 q) A reference could also be made to record the requirements for an ABP sample that are listed in K.2.6.

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

In Article 7.4.5.a) reference is made to notification being done with advance notice. Consider adding a definition for "Advance Notice Testing" which could include mandatory elements which need to be recorded (for example, how the advance notice transpired, how much advance notice was given, etc.)

Article 7.4.7 states "The DCO shall provide the Athlete with a copy of the records of the Sample Collection Session that have been signed by the Athlete." Consider rewording the sentence such that it includes the possibility of a digital copy, rather than a paper copy, being provided to the athlete in instances where the sample collection session is conducted using paperless methods. For example: "The Athlete shall be provided with a copy of the records of the Sample Collection Session that have been signed by the Athlete. The copy may be provided in paper format or digital format (e.g. via email or a clearinghouse.)"

**Versapak Doping Control Ltd**

SUBMITTED

Fabio de Jesus, Business Manager (United Kingdom)  
Other - Other (ex. Media, University, etc.)

1. The equipment manufacturer shall also be recorded with the unique serial

**8.0 Security/Post-test administration****8.3 Requirements for security/post-test administration (1)****Canadian Centre for Ethics in Sport**

SUBMITTED

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

With respect to reporting requirements, it is mentioned throughout that ADOs are required to report information to WADA "via ADAMS or other system approved by WADA." The addition of an API to allow information to flow from such "other system" into ADAMS would be very helpful in eliminating the duplication of data entry which currently occurs for ADOs who are using other systems.



## 9.0 Transport of Samples and documentation

### 9.3 Requirements for transport and storage of Samples and documentation (4)

#### **cadf**

SUBMITTED

francesca rossi, director (switzerland)

Sport - IF – Summer Olympic

**9.3.2** - Allow the SCA to send the sample to a laboratory for transiting purposes; e.g. we have used the Bogota lab before sending through the samples to another lab. It allowed us to prepare all the paper work for the customs and keep the mission secret beforehand.

#### **UK Anti-Doping**

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

**9.3.2 & 9.3.4** - Consider changing wording to 'authorised transport method or authorised personnel' to account for the ability for SCP or other authorised personnel (e.g. ADO staff) to hand deliver samples to the laboratory.**9.3 & Annex K** - Whilst referenced, blood sample transportation requirements need to be more clearly visible within the ISTI. Annex K makes reference, however the overall Annex is in relation to 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

#### **Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)

NADO - NADO

9.3.1 The transport system shall also have a process to track the location of the samples.

#### **Canadian Centre for Ethics in Sport**

SUBMITTED

Elizabeth Carson, Manager, Sport Services (Canada)

NADO - NADO

In Article 9.3.2 add a comment about the need to document any issues related to the transport of samples (delays, etc.)

## 10.0 Ownership of Samples (2)

#### **UK Anti-Doping**

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

UKAD has had an excellent cooperation with the CADF on long term storage of samples whereby the details of samples for GB cyclists owned by the CADF that are being discarded by them are shared with UKAD in case we wish to store the sample long term and obtain ownership of the sample(s). In practice this would be difficult to do across all ADOs, however reference to this type of collaboration could be added either to the ISTI, or potentially more worthwhile in the Effective Testing Guidelines.

#### **Canadian Centre for Ethics in Sport**

SUBMITTED

Elizabeth Carson, Manager, Sport Services (Canada)

NADO - NADO

An article or comment should be included in section 10 which outlines WADA's right to request samples from an ADO for the purposes of further analysis or to verify sample or equipment integrity.

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

**times of india**

SUBMITTED

BIJU CYRIAC, assistant editor (india)

Other - Other (ex. Media, University, etc.)

Recently the National Anti-Doping Agency (NADA) India Appeals Panel gave the verdict that NADA doesn't have the powers to seize banned performance enhancing drugs from the rooms of athletes. The panel's verdict came while letting off an Indian athlete who was slapped with a ban after NADA officials confiscated drugs from his bag. The above incident makes it clear that Anti-Doping officials should get the powers to confiscate banned drugs from athletes and their support staff.

### 11.0 Gathering, assessment and use of intelligence

#### 11.1 Objective (1)

**cadf**

SUBMITTED

francesca rossi, director (switzerland)

Sport - IF – Summer Olympic

11.1.1 - We would suggest replacing "[...] by informing [...] Test Distribution Plan" by "to plan effective testing" as 4.0 Planning effective Testing includes the TDP, RTP, risk assessment, etc. and intelligence is used in all these areas.

#### 11.2 Gathering of anti-doping intelligence (5)

**IAAF Athletics Integrity Unit**

SUBMITTED

Thomas Capdevielle, Deputy Head (MONACO)

Sport - IF – Summer Olympic

3rd line: add: but not limited to...

**cadf**

SUBMITTED

francesca rossi, director (switzerland)

Sport - IF – Summer Olympic

11.2.1 - We would suggest adding "International Federations" to "[...] pharmaceutical companies, National Federations [...]".

11.2.2 - Reference to the ISPPi and the applicable law and regulations should be made, for example by adding at the end of the paragraph "and in accordance with the applicable ISPPi and the applicable law and regulations."

**Department of Health - National Integrity of Sport Unit**

SUBMITTED

Luke Janeczko, Policy Officer (Australia)

Public Authorities - Government

Australia suggests that Article 11.2 of the ISTI should be amended to include confidential web-based reporting which, for ASADA, exceeds the amount of telephone reporting received.

**Anti-Doping Norway**

SUBMITTED

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

The definition of intelligence should be defined and described.

The process for gathering intelligence should be defined allowing for each ADO to understand this process. Examples of how information may be gathered and how it should be secured should be defined.

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

In Article 11.2.1, consider adding reference to media reports, social media, and athlete profiles

In Article 11.2.2 better define a threshold level for the privacy of the information (e.g.: locked vault or sitting on our desks in a locked office) and include a minimum standard for proper disposal of information.

**11.3 Assessment and analysis of anti-doping intelligence (1)****Anti-Doping Norway**

SUBMITTED

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

The comment states that there are different models that can be used to evaluate and analyze the information you collect. Anti-Doping Norway believe it should be one unified model, such as the 5x5 that WADA is using. When using a unified model, it would be easier and more efficient to share information between ADOs (and other relevant factors like law enforcement). Then there will be a mutual understanding of the evaluations made on source and information. This makes it easier to assess the information and source for the receiving party.

**11.4 Intelligence outcomes (3)****cadf**

SUBMITTED

francesca rossi, director (switzerland)  
Sport - IF – Summer Olympic

**11.4.1** - See previous comment on 11.1.1.

**Department of Health - National Integrity of Sport Unit**

SUBMITTED

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

Australia suggests that the opening sentence should be amended to acknowledge that intelligence informs all aspects of anti-doping, not just test distribution planning

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

In Article 11.4.2 add a reference to sharing information with the relevant governing body when information is received regarding to non-Code compliant sports.

Also consider adding a comment around protecting sources and an overarching comment about the obligations ADOs have to share information with ADOs.

**12.0 Investigations****12.1 Objective (2)****cadf**

SUBMITTED

francesca rossi, director (switzerland)  
Sport - IF – Summer Olympic

**12.1.1.a)** - For consistency purpose, we would suggest adding AAFs to the list as the circumstances behind each AAF should be investigated.

**Anti-Doping Norway**

SUBMITTED

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

Anti-Doping Norway believe that it should be emphasized when there is a reasonable cause for suspicion and that this decision is made by the ADOs legal expertise in order to establish the mere balance of probability.

**12.2 Investigating Atypical Findings and Adverse Passport Findings (1)****cadf**

SUBMITTED

francesca rossi, director (switzerland)  
Sport - IF – Summer Olympic

**12.2.1** - See previous comment on 12.1.1.a)

**12.2.2** - The practical purpose of this point is not obvious, please clarify the rationale.

**12.3 Investigating other possible anti-doping rule violations (5)****cadf**

SUBMITTED

francesca rossi, director (switzerland)  
Sport - IF – Summer Olympic



**12.3.2** - The terms intelligence and investigation should be clearly defined in general and more specifically in the context of this provision.

### **Antidoping Switzerland**

SUBMITTED

Ernst König, CEO (Switzerland)  
NADO - NADO

12.3.2: The mere suspicion that an ADRV may have been committed cannot justify to inform any other organization about the investigation. However, ADOs should be encouraged to get in touch with WADA and the International Federation in order to gain potential additional intelligence that could bolster the case.

### **Anti-Doping Norway**

SUBMITTED

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

This chapter states that the athlete or support personnel are required to cooperate during the investigation. Anti-Doping Norway believe that it should be clarified the meaning of "cooperation", such as if this entail that an athlete or other person is required to meet for an interview, or obliged to hand over things that can be regarded as evidence, such as cell phones, PC etc. It should also be defined if this apply to support personnel who's under investigation or witnesses.

### **UK Anti-Doping**

SUBMITTED

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

## **1. Access to communications devices for investigations and the provision of other evidence.**

Power: Seizure of communication devices and provision of passwords and/or encryption keys and provision of other physical evidence

UKAD frequently investigates non-analytical anti-doping rule cases where the evidence comes from border seizures or other third parties. In these cases, there is very likely to be relevant information on the suspect's communication devices.

UKAD has no power to seize, or demand information from, those devices or to seize other physical evidence (such as paper records) and thus does not have the ability to use this information to investigate and prove or disprove the allegations.

We seek consideration of bolstering NADOs' investigative powers, so that NGBs are required to charge or suspend an athlete when they do not provide evidence requested by a NADO, or otherwise participate in an investigation. If suspended until they comply, an athlete could have the opportunity to apply to an independent Panel to have their suspension lifted.

Should the athlete persist in their refusal to supply the material sought, we propose that an adverse inference could also be drawn due to that refusal by any Panel that ultimately deals with any ADRV.

## **2. Drawing adverse inferences from silence or failure to participate in an anti-doping investigation**

Power: Introduction of a caution in formal interviews and the ability to draw adverse inferences in ADRV proceedings where an athlete does not answer questions in interview. To provide a fair basis for this, UKAD suggests that a "caution" (as used by police forces) be introduced before formal interview, such as:

"The purpose of this interview is to ask you some questions relating to a possible anti-doping rule violation, namely ..... , which you may have committed. You do not have to say anything, but it may harm your defence if you do not mention when questioned something which you later rely on in any subsequent tribunal or other civil or criminal hearing. Anything you do say may be given in evidence"

#### Adverse Inference

Drawing on established practice in the criminal courts, this would allow tribunals, in particular circumstances, to draw an adverse inference from a suspect's silence or failure to mention, when questioned under caution prior to charge, a fact which they later rely on in their defence in a hearing.

#### Canadian Centre for Ethics in Sport

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

SUBMITTED

In Article 12.3.2 expand to further clarify when WADA needs to be informed about investigations and provide more clarity around the point at which the ADO is "starting an investigation."

In Article 12.3.5 the second "should" should be "shall": "... the Anti-doping organization shall bring proceedings against them for violation of Code Article 2.5..."

### 12.4 Investigation outcomes (1)

cadf

francesca rossi, director (switzerland)  
Sport - IF – Summer Olympic

SUBMITTED

**12.4.1** - To apply Code Article 13.3, WADA will require information and investigative files from the ADO. Therefore, and considering the ISPP and the applicable law and regulations, we would suggest adding a reference to intelligence sharing between the ADO and WADA.

**12.4.3.c)** - See previous comment on 11.1.1.

## PART FOUR: ANNEXES (1)

RUSADA

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

SUBMITTED

### Annex A - Investigating a Possible Failure to Comply

#### A.3 Responsibility (1)

UK Anti-Doping

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

SUBMITTED

**A.3.2** - Consider stipulating in the ISTI what the consequences of a possible FTC are and therefore what the SCP should be specifying to the athlete/other party. UKAD has had recent cases where this

has come under scrutiny, and therefore we feel it would be beneficial to have the requirements of what information to stipulate within the ISTI – similar to how the ISTI stipulates the notification requirements.

**A.3.2** - Clarification of who is considered an 'other party'.

**A.3.3** - This could be combined with A3.2.

## **Annex B - Modifications for Athletes with Impairments (2)**

### **UK Anti-Doping**

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

UKAD feels this section 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.

### **Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)

NADO - NADO

This section needs to be clarified and further extended as it is open to interpretation.

Clearer guidelines should be given on acceptable modifications to sample collection equipment sample collection procedure. Sport Ireland has received feedback from Athletes with Impairment that there is inconsistency with how the procedure is followed in different countries and Sport Ireland believes this Annex should further developed to ensure that a consistent procedure is followed.

## **B.4 Requirements (1)**

### **Canadian Centre for Ethics in Sport**

SUBMITTED

Elizabeth Carson, Manager, Sport Services (Canada)

NADO - NADO

In Annex B.4.6, consider providing examples of alternatives if it is not possible for the existing urine collection or drainage system to be replaced. For example: "If the athlete does not have a new, unused catheter or drainage bag, the bag should be emptied and rinsed..."

## **Annex C - Modifications for Athletes who are Minors**

### **C.3 Responsibility (2)**

#### **Anti-Doping Norway**

SUBMITTED

Anne Cappelen, Director Systems and Results Management (Norway)

NADO - NADO

Testing minors should require consent from an adult, either being the parent or a guardian of the minor, irrelevant if testing is taking place in- or out-of-competition.

#### **Czech Anti-Doping Committee**

SUBMITTED

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

NADO - NADO

ISTI 2017:

...

"This includes confirming wherever necessary that the organiser of the *Event* obtains the necessary parental consent for **Testing** any participating *Athlete* who is a *Minor*"

We propose to remove mandatory parental consent obtaining by organiser, because of majority no advance notice testing OOC and also In Competition.

#### C.4 Requirements (4)

##### ISU

SUBMITTED

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

#### ISTI Annex C - Modifications for *Athletes* who are *Minors*

C.4.5 The DCO shall determine who (in addition to the *Sample* Collection Personnel) may be present during the collection of a *Sample* from an *Athlete* who is a *Minor*, namely a representative of the *Minor* to observe the *Sample* Collection Session (including observing the DCO when the *Minor* is passing the urine *Sample*, but not directly observing the passing of the urine *Sample* unless requested to do so by the *Minor*) and the DCO's/Chaperone's representative, to observe the DCO/Chaperone when a *Minor* is passing a urine *Sample*, but without the representative directly observing the passing of the *Sample* unless requested by the *Minor* to do so.

**ISU Proposal:** For Minor it is always even more stressful to have 2 persons observing him / her to pass the urine Sample even though the representative is observing DCO who is observing the Minor. For the Minor who is passing the Sample it would be less stressful to have the Sample Collection done as the Athletes who are not Minors, just DCO observing him / her and having representative present in the Administration room without going to toilet with DCO.

##### UK Anti-Doping

SUBMITTED

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

**C.4.3** - Include wording at the end, 'All such modifications should be documented' to make consistent with B.4.3C.4.4 - "Athletes who are Minors should must be notified in the presence of an adult." Also – "Even if the Minor declines a representative, the Sample Collection Authority, DCO, or Chaperone, as applicable, must ensure another third party/adult is present during notification of and collection of the Sample from the Athlete." Otherwise, C.4.4 is not consistent with C.4.6.C.4.4 - If a DCO/Chaperone has another third party present during notification and/or sample collection, this should ideally be another member of the SCP. Clause should be reworded to reflect this.C.4.7 - Clause should stipulate that the preferred location is not only where an adult is most likely to be present, but will also be likely to remain throughout the course of the sample collection session.

##### Irish Sports Council

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

C.4.4 Sport Ireland recommends that if a Minor declines a representative the SCA, DCO or chaperone shall ensure that a third party is present to witness the DCO/chaperone actions during the witnessing of the sample provision.

##### Canadian Centre for Ethics in Sport

SUBMITTED

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



In Annex C.4.6 further expand on who can qualify as a representative for the DCO/Chaperone if the athlete declines to have one.

In Annex C.4.8 add a comment about considering technological means for ensuring an athlete can have a representative present.

## Annex D - Collection of Urine Samples

### D.1 Objective (1)

#### Canadian Centre for Ethics in Sport

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

SUBMITTED

In Annex D.1.e) underline "tamper-evident" should it remain a defined term.

### D.4 Requirements (4)

#### ISU

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

SUBMITTED

D.4.6 The DCO/Chaperone **who witnesses the passing** of the Sample shall be of the **same gender** as the Athlete providing the Sample

#### ISU Anti-Doping Procedure

##### B.3.4 Support Personnel

(...) The Chaperones must be of the same gender as the Skater being tested and be able to communicate in English and, if possible, in other languages.

#### ISTI Definition: (page 24)

**Chaperone:** An official who is trained and authorized by the *Sample* Collection Authority to carry out specific duties including one or more of the following (at the election of the *Sample* Collection Authority): notification of the *Athlete* selected for *Sample* collection; accompanying and observing the *Athlete* until arrival at the *Doping Control* Station; accompanying and/or observing *Athletes* who are present in the *Doping Control* Station; and/or witnessing and verifying the provision of the *Sample* where the training qualifies him/her to do so.

#### ISU Proposal:

**Definition of Chaperone (p. 24): to be added in the definition:** The Chaperone shall be of the same gender as the Athlete if carrying out the following specific duties accompanying and observing the *Athlete* until arrival at the *Doping Control* Station and witnessing and verifying the provision of the *Sample* where the training qualifies him/her to do so.

**Reason:** A chaperone who is not from the same gender as the athlete might not be allowed to get into the changing room....

#### NADA

Regine Reiser, Result Management (Deutschland)  
NADO - NADO

SUBMITTED

D.4.9 The DCO/Chaperone shall ensure an unobstructed view of the athlete's body and must continue to observe the Sample after provision until the Sample is securely sealed. In order to ensure a clear and unobstructed view of the passing of the Sample, the CO/Chaperone shall instruct the Athlete to remove or adjust any clothing which restricts the DCO's/Chaperone's clear view of Sample Provision.

This rule and procedure must bear in mind, that the "visual check" is very serious intervention in Athlete's personal rights.

A more balanced and proportionate way of proceedings should be established. There are situations - IC, directly after finishing the Competition, where possible tampering during the Control procedure could be avoided through other, appropriate and adequate measures.

#### UK Anti-Doping

SUBMITTED

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

**D.4.3** - Clause should stipulate that the Athlete selects a collection vessel from a choice of equipment – i.e. consistent with the wording in D.4.2. **D.4.7** - Amend 'should' to 'shall'. **D.4.8** - Should be more specific about the min requirements for the collection of sample – 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** - Delete the words "or adjust". This is ambiguous, and adjustment of clothing doesn't allow for a clear view. We would also propose adding that the clear view should be from the mid chest to above the knees. Last sentence add – "...in the collection vessel unless full in which case the Athlete should continue to empty their bladder into the toilet."

#### Canadian Centre for Ethics in Sport

SUBMITTED

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

With respect to Annex D.4.4, it would be interesting to understand if terminating a sample collection session due to unsatisfactory equipment is something that has occurred often in the field and to make sure that this is taken into consideration when vetting new equipment suppliers.

With respect to Annex D.4.6, which specifies the witness "shall be of the same gender as the Athlete," is there a need to specify/define gender with transitioned/transgender athletes or even Sample Collection Personnel?

In Annex D.4.7 specify "the Athlete washes his/her with water only"

In Annex D.4.17 and D.4.18 identify who can discard an athlete's urine (e.g., DCO and/or Chaperone).

### Annex E - Collection of Blood Samples

#### E.4 Requirements (4)

cadf

SUBMITTED

francesca rossi, director (switzerland)  
Sport - IF – Summer Olympic

**E.4.2** – we suggest the following rewording. ...*(b) both A and B not to be used only in connection with ABP Passport program; or (c) a single sample to be used in connection with ABP and 2 serum tubes to be used for other applicable analysis; or d) other equipment as otherwise specified by the relevant laboratory.*

**ISU**

SUBMITTED

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

**E.4.10** If the amount of blood that can be removed from the *Athlete* at the first attempt is insufficient, the **BCO shall repeat the procedure up to a maximum of three attempts in total**. Should all three attempts fail to produce a sufficient amount of blood, then the BCO shall inform the DCO. The DCO shall terminate the *Sample* Collection Session and record this and the reasons for terminating the collection.

**ISU Proposal:** If the Team physician is present, after two unsuccessful attempts by the BCO, the third attempt can be done by the BCO or the Team Physician under direct observation by the BCO.

**UK Anti-Doping**

SUBMITTED

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

**E.4.6** - Consideration that this process could be conducted by either the DCO or BCO. Also needs reference to the athlete selecting kit from a choice.

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

In Annex E.4.2.(a) specify “one or two tubes” rather than “a single sample tube” for samples to be used in connection with an ABP as this is recommended later in the ISTI.

In Annex E.4.6, as with the comment to D.4.4, it would be interesting to understand if terminating a sample collection session due to unsatisfactory equipment is something that has occurred often in the field and to make sure that this is taken into consideration when vetting new equipment suppliers.

In Annex E.4.13 underline “tamper-evident” should it remain a defined term.

In Annex E.4, point E.4.15 is missing in the sequence.

In Annex E.4.16 a period is missing between the “E” and “4”

Annex E.4.17 ends with specifying “a method authorized by the Testing Authority.” Should this not be the Sample Collection Authority?

**Annex F - Urine Samples - Insufficient Volume (1)****RUSADA**

SUBMITTED

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

**Annex F - Urine Samples - Insufficient Volume**

*F.4.8 The DCO shall then direct the Athlete to break the seal(s) and combine the Samples, ensuring that additional Samples are added in the order they were collected to the original partial Sample until, as a minimum, the requirement for Suitable Volume of Urine for Analysis is met.*

We believe it should be clarified that Samples should be combined in a new vessel.

#### **F.4 Requirements (3)**

##### **UK Anti-Doping**

SUBMITTED

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

**F.4.2** - Consider referencing new ISTI article 6.3.4, which relates to partial sample kit requirements.  
**F.4.5** - As per comment on clause 7.3.3 re: athlete being given 'opportunity to hydrate'.  
**F.4.7** - Clause should stipulate what to do with the sample if they think it has been tampered with – seal into A&B bottles, and collect a further sample.  
**F.4.7** - Clarity is needed on why this would be investigated as a Failure to Comply.

##### **Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

F.4.4 Sport Ireland would recommend that the DCO retain control of the sealed partial Sample rather than the athlete. If it is decided that the Athlete can retain the sample that the stipulation that the Athlete must stay in the DCS while retaining control of the sample.

##### **Canadian Centre for Ethics in Sport**

SUBMITTED

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

In Annex F.4.4 should be changed to indicate that the DCO (and not the Athlete) shall retain control of the sealed partial sample, and that the sample shall remain in the doping control station and/or waiting area.

Remove Annex F.4.11 given that DCOs can refrain from having to pour the entire sample in the bottles in order to ensure the sample is not too dilute.

#### **Annex G - Urine Samples that do not meet the requirement for Suitable Specific Gravity for Analysis (2)**

##### **International Ice Hockey Federation**

SUBMITTED

Adriaan Wijckmans, Junior Legal Counsel (Switzerland)  
Sport - IF – Winter Olympic

Several laboratories repeatedly indicated to the IIHF that the specific gravity requirements mentioned in the International Standard for Testing and Investigations only slow down the sample collection procedure and have no considerable impact on the analyses of the samples. The IIHF therefore requests WADA to take the requirements with respect to the specific gravity out of the International Standard for Testing and Investigation.

##### **China Anti-Doping Agency**

SUBMITTED

Zhaoqian LUAN, . (China)  
Sport - Other



**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.1 Objective (1)

#### Irish Sports Council

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

Sport Ireland recommends that the maximum number of samples to be collected are 2 unless the athlete is acting suspiciously and has continued to hydrate excessively after being advised by the Chaperone/DCO not to do so.

### G.2 Scope (1)

#### RUSADA

SUBMITTED

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

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

### G.2 Scope

*The procedure begins with the DCO informing the Athlete that a further Sample is required and ends with the collection of a Sample that meets the requirements for Suitable Specific Gravity for Analysis, or appropriate follow-up action by the Testing Authority if required.*

We believe that there should be uniform limit on the number of samples to be collected before the procedure is stopped, which may depend on circumstances of a particular test (IC testing, testing of Minor athletes, low-risk sports, etc.).

### G.4 Requirements (4)

#### IAAF Athletics Integrity Unit

SUBMITTED

Thomas Capdevielle, Deputy Head (MONACO)  
Sport - IF – Summer Olympic

In circumstances where more than 4 diluted samples, labs should be informed of which diluted samples belong to the same athlete to avoid unnecessary analyses.

#### RUSADA

SUBMITTED

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

*[Comment to G.4.6: [...] The DCO should wait as long as necessary to collect such a Sample. The Testing Authority may specify procedures to be followed by the DCO in determining whether exceptional circumstances exist that make it impossible to continue with the Sample Collection Session.*

As we have mentioned above in our comments to Article 7.0, we believe that it would be useful to have examples of acceptable *exceptional circumstances* and/or criteria for concluding the procedure explicitly provided in the text of the Standard. We also believe that it is unreasonable to ask DCO to *wait as long as necessary* since in some cases it may require him to say overnight stay in the athlete's apartment or to have a 'work shift' well in excess of 8-12 hours.

### UK Anti-Doping

SUBMITTED

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

**G.4.6** - Amend 'should' to 'shall' to ensure it is mandatory that ADOs continue to collect additional samples  
**G.4.11** - Propose to change to 'first and most concentrated' samples collected to be analysed by the laboratory

### Canadian Centre for Ethics in Sport

SUBMITTED

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

In Annex G.4.6 and its related Comment, consider wording which gives the Testing Authority/ADO the discretion to decide how many samples they wish to collect after the first athlete's sample is dilute. For example, for a high-risk athlete, it may be warranted to collect samples until one meets the criteria for suitable specific gravity for analysis however, we do not think that this approach should be applied in all sports or at all levels consistently. CCES also recommends adding a comment encouraging ADOs to consider follow-up target testing if appropriate.

With respect to Annex G.4.11, consider gathering statistics to understand if analyzing both samples is really beneficial or whether analyzing the most concentrated of the two samples is adequate. Note that the Testing Authority can use the information gathered to further target the athlete.

## Annex H - Sample Collection Personnel Requirements (4)

### World Rugby

SUBMITTED

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

As per our comments on the Code about Independent Service Providers, we feel that Annex H should recognise more explicitly Independent Service Providers or "third party contractors" as they are referred to in the ISTI. We also believe that the mechanism for Sample Collection Personnel to meet and be measured against the standard set in the ISTI, should be part of an independent auditing process, more broadly falling under compliance audits (where applicable). A means of independently audited 'accreditation' would help raise and harmonise standards for athletes, and significantly improve their confidence in the testing process.

### China Anti-Doping Agency

SUBMITTED

Zhaoqian LUAN, . (China)  
Sport - Other

**Annex H** Are there any specific requirements for those personnel involved in sample collection other than the DCOs, such as those who witness urination and those who are solely responsible for blood collection? For those who are only responsible for collecting blood samples, do they need training and authorization, or do they just need the qualifications in phlebotomy?

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.

### **Commonwealth Games Federation Medical Commission**

SUBMITTED

Michele Verroken, Anti-Doping Administrator (UK)  
Sport - Other

As a minimum a regular official safeguarding check should be made on Doping Control Officers and all chaperones who witness urine provision.

### **Canadian Centre for Ethics in Sport**

SUBMITTED

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

In Annex H, consider adding some criteria by which accreditation of sample collection personnel should be withdrawn.

## **H.2 Scope (1)**

### **UK Anti-Doping**

SUBMITTED

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

## **H.4 Requirements - Qualifications and Training (2)**

### **IAAF Athletics Integrity Unit**

SUBMITTED

Thomas Capdevielle, Deputy Head (MONACO)  
Sport - IF – Summer Olympic

H.4.1 add and other requirements after competence and qualification

### **UK Anti-Doping**

SUBMITTED

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

**H.4.2-** Add "... (c) or any other Athlete Support Personnel associated with an Athlete". **H.4.2 - UKAD** feels this clause should be stronger to ensure conflict of interests are appropriately managed. E.g. an individual who has previously been involved in the administration of a sport may still have a conflict, not just an individual currently working in a sport. Potential for minimum timeframes to be stipulated. **H.4.3.3 - UKAD** is one of the few ADOs with fully trained and accredited Chaperones incorporated into its SCP. Notification, chaperoning and witnessing sample provision are crucial and some of the most important aspects of the whole doping control process, and UKAD feels these should be carried out by trained and accredited individuals. Therefore UKAD proposes that this clause is expanded so that the training of Chaperones mirrors the standards set out for training of DCOs and BCOs. 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).

**H.4.3.4 - Clarity on what 'additional systems' means**

**H.5 Requirements - Accreditation, re-accreditation and delegation (1)****UK Anti-Doping**

SUBMITTED

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

**H.5.2 - Clarity on what 'additional systems' means****Annex I – Code Article 2.4 Whereabouts Requirements (5)****International Ice Hockey Federation**

SUBMITTED

Adriaan Wijckmans, Junior Legal Counsel (Switzerland)  
Sport - IF – Winter Olympic

On 11 April 2018, a group of ADOs representing a selection of European NADOs and major team sports IFs met in Nyon, Switzerland with the objective of reaching a consensus on how team whereabouts should be collected and managed. The following key principles were established during this meeting:

- All ADOs were of the opinion that WADA's current whereabouts ISTI requirements and whereabouts management system in ADAMS have mostly been designed for individual athletes and do not suit the need of team sports and their athletes.
- Team sports whereabouts systems can be very different from country to country and from sport to sport, and therefore there is a clear need for harmonization and simplification. The Group was of the opinion that whereabouts requirements should be more standardised across team sports, and much better aligned between IFs and NADOs for the same sport.
- It was also noted that the current 3 months whereabouts submission frequency is not perfectly suited to team sports and there was a general agreement that the frequency should be more flexible for team whereabouts compared to individual whereabouts. The submission frequency should be harmonised between ADOs to reflect the realities of the sport and the different format of a competition within a sport (e.g. club vs. national team competitions).
- In order to be more efficient and to avoid duplication of work, the Group was in full agreement that there is an absolute and urgent need for the development of a specific team whereabouts module in ADAMS Next Gen, allowing several ADOs to share the whereabouts information of the teams under their jurisdiction.
- There was also a full consensus on the fact that whereabouts collection must be coordinated between ADOs. And that proper collaboration agreements between ADOs are in place to avoid that teams and their athletes are requested to provide several and different sets of whereabouts to their IF and to one or even possibly two NADOs.

**China Anti-Doping Agency**

SUBMITTED

Zhaoqian LUAN, . (China)  
Sport - Other

**NADA Austria**

SUBMITTED

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

**Annex I.3.1**

Instead of forcing every testpool athlete to provide whereabouts for a whole quarter it would be sufficient to receive a list of individual competition highlights for the whole season and whereabouts for two weeks



in advance which is long enough to schedule doping controls. Considering the time and effort of the current system, this change makes a relevant difference for the athlete, in degree if not in kind. In addition, this regulation would reduce the unintentional error-rate and allow doping control managers to define the right time and place if they take the individual competition highlights into account.

#### Annex I.4.3.c

The ISTI I.4.3 c provision "as last resort the DCO may (but does not have to) telephone the Athlete) must be extended to all whereabouts information with timeframes (e.g. activities). Since the consequences for missed tests and filing failures are the same, it is not comprehensible for the athletes that they may be called during their time slot (eg. from 7-8 a.m.) and are not allowed to be called while sitting at home riding ergometer (eg. from 3-4 p.m.). Suggested solution of this problem: Every attempted doping control based on whereabouts information with specific timeframes is a missed test. Every lack of information not in connection with a doping control is a filing failure (eg. whereabouts not sent). Every attempted doping control based on whereabouts information without specific timeframes or outside of whereabouts information is the ADOs own risk, therefore no telephone calls and subsequently no missed test / filing Failure

#### Annex I.6.4

Athletes in team sports are not treated equally compared to athletes in individual sports, e.g. whereabouts. Team sports should be treated the same way as individual sports, meaning the same risk assessment criteria. If a team sport falls into a high risk category, the extended national team members (e.g. football about 25-35 players) should be required to fill out individual whereabouts.

#### RUSADA

SUBMITTED

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

#### Annex I – Collection of whereabouts information

*[Comment to I.2.1: in the part pertaining to notification of athletes about their inclusion in the Registered Testing Pool]*

We propose to specify which date should be considered as the date on inclusion in the Registered Testing Pool in cases where the athlete fails to acknowledge the receipt of the notification prior to the date specified in the notification and the procedure to follow in cases where the athlete does not acknowledge the receipt at all or unduly delays the provision of WA information in ADAMS.

*[Comment to I.3.2: [...] An Athlete is entitled to specify a 60-minute time slot during which he/she will be at a hotel, apartment building, gated community or other location where access to the Athlete is obtained via a front desk, or doorman, or security guard.]*

We propose to specify that in such cases the Athlete still remains responsible for ensuring his availability of testing and should do everything in his power to make arrangements with any such employees, e.g. informing them about potential DCO visits and asking them to assist DCOs in locating him without prior notification.

*[Comment to I.4.3 in the part pertaining to DCO calling athletes 5 minutes before the end of the 1-hour window]*

We propose to modify this comment to ask DCOs to call the athlete 5 minutes after the end of the 1-hour window. This way the athlete will be held fully responsible for his failure to file proper whereabouts in ADAMS and/or be available for testing at the specified location, however, ADO will be able to gain useful

intelligence regarding future testing plans for the athlete and potentially save money on follow-up testing after filing failure/missed test (e.g. athlete being available for testing immediately after the call at the specified WA and providing a clean sample vs. the athlete being in completely different locations at the time or being available for testing only after substantial delay or not at all or providing several diluted samples which may indicate attempts to 'wash out' prior to a test).

### UK Anti-Doping

SUBMITTED

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

The provision of the 60 minute time slot has been operational for a number of years and is well established. Many athletes use early morning or late evening as their 60 minute time slot. Combined with limited training information, there is a limitation on successful OOC collections throughout the course of the whole day, with successful attempts often taking place early morning and later in the evening. This means the OOC testing programme may not be operating as effectively as it could do. With short detection windows for some substances and micro dosing, it is unclear how effective and how much of a deterrent the provision of a 60 minute time slot is. There clearly needs to be a balance between effective programmes and proportionality for the athletes, however consideration should be given to reviewing whether the current whereabouts requirements, including the 60 minute time slot, are the most effective. UKAD does not feel they are ineffective, and feel that they are proportionate for the athlete, however we would welcome a review on whether there are more effective requirements for whereabouts. For example could requesting the athletes to provide multiple but shorter time slots on each day be more effective? UKAD feels clauses on the process to be followed once an athlete is being considered for removal should be included in this Annex.

It would appear that an increasing number of ADOs are implanting whereabouts requirements for pools of athletes below the RTP – as recommended in the Effective Testing Guidelines. Given that this could become more popular, consideration could be given to whether whereabouts requirements and repercussions for these testing pools could have greater levels of standardisation.

### 1.1 Introduction (5)

#### IAAF Athletics Integrity Unit

SUBMITTED

Thomas Capdevielle, Deputy Head (MONACO)  
Sport - IF – Summer Olympic

Long comment under I.1.1 no longer necessary beyond first sentence. I.1.4 remove para on transition rules

#### GAISF

SUBMITTED

Davide Delfini, Membership Application Manager (Switzerland)  
Sport - Other

~~Art I.1.4 is not relevant anymore and should be deleted: "I.1.4 To give Athletes the full benefit of the changes to the 2015 Code (reducing the relevant period under Code Article 2.4 from 18 months to 12 months), any Whereabouts Failure that occurred prior to 1 January 2015 will "expire" (for purposes of Code Article 2.4) 12 months after the date of its occurrence."~~

### UK Anti-Doping

SUBMITTED

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

I.1.3 - This only includes the one type of filing failure regarding quarterly submissions - it should also include a filing failure for inaccurate submissions I.1.4 - Can be removed

### Irish Sports Council

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

I.1.4 This clause can now be removed.

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

In Annex I consider including information regarding the IF's requirement to notify the NADO about athletes who have strikes.

In Annex I.1.2 add "may" to the sentence "Three Whereabouts Failures by an Athlete within any 12-month period may amount to an anti-doping rule violation..."

In the Comment to Annex I.1.3 CCES recommends that in point a), the Filing Failure wording be expanded to include "or any day during that quarter" so it would read: "a Filing Failure will be deemed to have occurred on the first day of the quarter or any day during that quarter for which the Athlete fails to make a (sufficient) filing..."

**I.2 Entering and leaving a Registered Testing Pool (5)**

**IAAF Athletics Integrity Unit**

SUBMITTED

Thomas Capdevielle, Deputy Head (MONACO)  
Sport - IF – Summer Olympic

Introducing mandatory training courses for international-level athletes (on whereabouts requirements, failures..)

**GAISF**

SUBMITTED

Davide Delfini, Membership Application 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 must 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 should provide his/her Whereabouts Filings to, and each notice sent to the Athlete should specify that he/she should provide his/her 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 must 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."

**UK Anti-Doping**

SUBMITTED

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



**I.2.1** - Greater emphasis and clearer requirements should be stipulated on how athletes are informed, educated and furthermore supported in the provision of their whereabouts requirements by ADOs. Whilst appreciating there are resource implications for ADOs, there are occasions where IFs delegate initial inductions/education and ongoing support to the NF. This often leads to the NF liaising with the NADO for further assistance and guidance, whereas this should be the responsibility of the ADO who has selected that athlete(s) to be part of their RTP.

**Irish Sports Council**

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

SUBMITTED

I.2.1 and Comment to I.2.1: Sport Ireland recommends that the reference to should be changed to shall.

**Canadian Centre for Ethics in Sport**

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

SUBMITTED

In the Comment to Annex I.2.1 change "should" to "must" to specify that "Athletes included in an RTP must be informed and educated so that they understand the whereabouts requirements..."

As with the comment to Article 4.9, to assist with better coordination between ADOs, consider standardizing deadlines dates for whereabouts submission. CCES suggests the due dates for all whereabouts submissions (whether to a NADO or to an IF) should be the 15th day of the month prior to the start of the new quarter: December 15, March 15, June 15, and September 15. Standardizing the deadline ensures that all athletes are subject to the same deadline, and those who are included in more than one RTP have the same deadline for organization to whom they submit the information. The suggested dates above also allow the ADO to start planning tests well before the start of the quarter (i.e., planning for testing on January 1st and beyond can start as of December 15, whereas it is much more challenging to start planning with December 31 deadline, especially when some athletes don't submit their whereabouts until the final day of the submission period).

**I.3 Whereabouts Filing Requirements (6)**

**IAAF Athletics Integrity Unit**

Thomas Capdevielle, Deputy Head (MONACO)  
Sport - IF – Summer Olympic

SUBMITTED

remove I.3.1 c) (GDPR) I.3.1 (d) add other overnight travel address I.3.1 (f) add time of the competition Suggestion add new sub-para (g) any other information that the ADO deems to be necessary for the efficient and effective conduct of No-Advance Notice Testing + accompanying comment to the effect that an ADO may require an athlete to provide detailed information about their travel to and from competition I.3.4. ADO should be able to request further information from any athlete suspected of making whereabouts filings that are suspicious in nature or demonstrate a pattern of last minute or retrospective changes to Whereabouts I.3.5: address late whereabouts changes: ...asap by no later than...save in exceptional circumstances to be justified by the athlete

**GAISF**

Davide Delfini, Membership Application Manager (Switzerland)  
Sport - Other

SUBMITTED

**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..."

### UK Anti-Doping

SUBMITTED

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

**I.3.1** - Consideration should be given to reference in this clause that a failure to provide minimum requirements without justified rationale could result in a filing failure. c) delete 'consent' and change to 'understanding of the legal basis to the sharing of...'. **I.3.1** - Due to the provision of a mailing address, clarity on whether the expectation is for all notices to be by mail. If so, consideration should be given to amend this so that notices can be sent electronically as this is more efficient and effective. **I.3.2** - Add to sentence regarding staying in hotel, gated community, etc., that details on how to access such accommodation should be provided and this should not be just a phone number e.g. room number, access code, etc. Clarity on what is expected of athletes in relation to being 'accessible and available' as recent cases have demonstrated this is ambiguous. Whilst every scenario cannot be accounted for, there needs to be greater guidance and clear expectations on both athletes and DCOs.

### Canadian Centre for Ethics in Sport

SUBMITTED

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

In Annex I.3 ADAMS and ISTI need to align to ensure that the basic information required is captured in ADAMS.

### International Testing Agency

SUBMITTED

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

In relation to the processing of Filing Failures for Unsuccessful Attempts ("UA") outside of the 1-hour slot, the matter has proven to be conflictual across (certain) anti-doping stakeholders due to divergent interpretations of the applicable rules in the ISTI.

In fact, when it comes to the practical application of the provisions regulating the matter, different approaches seem to be adopted by ADOs; for purposes of illustration:

1. regardless of circumstances explained in the DCO's report, the ADO issues a notification of apparent Filing Failure for all UAs outside of the 1-hour slot (provided that no departure from the ISTI is observed) and then takes a decision on whether to record the Failure based on the justifications provided by the athlete;
2. based on the circumstances explained in the DCO's report, the ADO decides, at its discretion, whether or not to issue a notification of apparent Filing Failure to the athlete;
3. in all instances, the ADO does not issue a notification of apparent Filing Failure for UAs occurred outside of the 1-hour slot – and hence does not require the athlete to submit any justification.

The matter requires clarification. In our opinion, there should not be a discretionary margin - either such instances are consistently processed as apparent failures (and then - if appropriate - not recorded) or they are not processed at all. The current regime is uncertain and does not allow an harmonized application of the rules. Such situation may lead to undue disparities for identical factual circumstances.

ISTI comment to Art. I.3.4 provides that: (...) *The Anti-Doping Organization may be able to determine the insufficiency of the information from the Whereabouts Filing itself, or alternatively it may only discover the insufficiency of the information when it attempts to test the Athlete and is unable to locate him/her. In either case, the matter should be pursued as an apparent Filing Failure (...).*

We would recommend enshrining such principle in the article itself and making it expressly mandatory to proceed with (at least) an apparent failure and then take a decision based on the explanations provided by the athlete.

Diversely, another proposal would be to require the athletes to submit two 1-hour slots (am and pm), in addition to the other mandatory information (regular activities, competitions and overnight accommodation). Thereafter, any attempt outside of the 1-hour slots will be processed as an apparent filing failure only in serious circumstances.

#### International Paralympic Committee

SUBMITTED

James Sclater, Director (Germany)

Other - Other (ex. Media, University, etc.)

I.3.3- Remove the exclusion of MEOs. Add: During a major event, where there is a an alternate submission system provided by the Test Authority, athletes may be provided with a waiver from submitting a 60 minute window. For the alternate submission system to be permitted, there must be consequences to non-compliance.

I.3.5- It must be made clear that athletes that do not file changes and regular activities in a timely matter must be charged with a filing failure. It should not be acceptable for an athlete to enter the minimum information possible and make changes strictly at the last minute.

#### I.4 Availability for Testing (6)

##### IAAF Athletics Integrity Unit

SUBMITTED

Thomas Capdevielle, Deputy Head (MONACO)

Sport - IF – Summer Olympic

Ability to request written explanation for any window of testing that is expanding beyond 24h and systematic use of expanded time slots

##### GAISF

SUBMITTED

Davide Delfini, Membership Application Manager (Switzerland)

Sport - Other

##### UK Anti-Doping

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

**I.4.3 (c)** -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)** -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 OOC testing, has excellent collection rates, and we feel 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.

**Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

I.4.1 Sport Ireland would recommend inserting that the Athletes are also accessible during this 60 min timeslot.

Comment I.4.3 (c): Sport Ireland strongly recommends the removal of the possibility of a DCO ringing the athlete as a last resort in an effort to locate the athlete. It is the athlete's responsibility to be present and available for testing during their 60 min timeslot.

**Anti Doping Denmark**

SUBMITTED

Jesper Frigast LARSEN, Legal Manager (Denmark)  
NADO - NADO

We are of the opinion that calling the athlete on the phone should not be specified to a certain point of time within the 60 minute time slot e.g. after 55 minutes.

When the DCO has made all reasonable efforts to locate the athlete it is reasonable to suggest that the DCO should have the possibility of calling the athlete anytime within the 60-minute time slot.

From a detection and resource perspective, we definitely value collecting the sample higher than potentially filing a missed test.

With regards to detection, taking diuretics during the period from notification to sample collection would be detected in the analysis, while the administration of e.g. plasma volume expanders to dilute the blood would have limited effects within a very short period of time. We therefore see little potential of masking potential previous doping abuse, when an athlete is notified and unsupervised during a short period of time from notification to sample collection.

Therefore we propose to reformulate the note in the ISTI from:

**I.4.3****Original text**

Where an Athlete has not been located despite the DCO's reasonable efforts, and there are only five minutes left within the 60-minute time slot, then as a last resort the DCO may (but does not have to) telephone the Athlete (assuming he/she has provided his/her telephone number in his/her Whereabouts Filing) to see if he/she is at the specified location. If the Athlete answers the DCO's call and is available at (or in the immediate vicinity of) the location for immediate testing (i.e., within the 60 minute time slot), then the DCO should wait for the Athlete and should collect the Sample from him/her as normal. However, the DCO should also make a careful note of all the circumstances, so that it can be decided if any further investigation should be conducted. In particular, the DCO should make a note of any facts suggesting that there could have been tampering or manipulation of the Athlete's urine or blood in the time that elapsed between the phone call and the Sample collection. If the Athlete answers the DCO's call and is not at the specified location or in the immediate vicinity, and so cannot make himself/herself available for testing within the 60-minute time slot, the DCO should file an Unsuccessful Attempt Report.

to

Where an Athlete has not been located despite the DCO's reasonable efforts, ~~and there are only five minutes left within the 60-minute time slot,~~ then as a last resort the DCO may (but does not have to) telephone the Athlete (assuming he/she has provided his/her telephone number in his/her Whereabouts Filing) to see if he/she is at the specified location. If the Athlete answers the DCO's call and is available at (or in the immediate vicinity of) the location for immediate testing (i.e., within the 60 minute time slot), then the DCO should wait for the Athlete and should collect the Sample from him/her

as normal. However, the DCO should also make a careful note of all the circumstances, so that it can be decided if any further investigation should be conducted. In particular, the DCO should make a note of any facts suggesting that there could have been tampering or manipulation of the Athlete's urine or blood in the time that elapsed between the phone call and the Sample collection. If the Athlete answers the DCO's call and is not at the specified location or in the immediate vicinity, and so cannot make himself/herself available for testing within the 60-minute time slot, the DCO should file an Unsuccessful Attempt Report.

#### **Canadian Centre for Ethics in Sport**

SUBMITTED

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

In the Comment to Annex I.4.2 there is a formatting error with underlining before the word "before."

In Annex I.4.3.c) make the phone call mandatory and not discretionary, in accordance with the precedent set by ITF.

### **I.5 Results Management (5)**

#### **ICF**

SUBMITTED

Michel Alarcon, Anti-Doping Manager (Switzerland)  
Sport - IF – Summer Olympic

ISTI Annex I.5.2.c.

If the Results Management Authority concludes that any of the relevant requirements have not been met (so that no Whereabouts Failure should be declared), it shall so advise WADA, the International Federation or National Anti-Doping Organization (as applicable), and the Anti-Doping Organization that uncovered the Whereabouts Failure, giving reasons for its decision. Each of them shall have a right of appeal against that decision in accordance with Code Article 13.

In case a NADO, or other Management Authority decides to not pursue with a whereabouts failure, the only way for the sport governing body to contest this decision is to make an appeal in CAS. This is a real obstacle in controlling the fairness of such decisions, as no organisation will want to bear the cost of an appeal for a whereabouts failure (1 out of 3) which does not lead yet to an ADRV.

An example of this situation: if the result management authority decide not to sanction an athlete for a missed test, only based on an explanation by letter, with no proof, then it is not in line with the ISTI criterias. However, no organisation will appeal this decision as the cost would be too important.

#### **China Anti-Doping Agency**

SUBMITTED

Zhaoqian LUAN, . (China)  
Sport - Other

**Annex I.5.2** If an athlete is alleged for whereabouts failure, but he/she submits whereabouts information as required before the anti-doping organization is about to issue a notice. It is recommended to clarify whether this should be handled as a filing failure.

#### **UK Anti-Doping**

SUBMITTED

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

**I.5 -** Consideration to be given to whether it would be more effective to state that an athlete should only be in one Testing Pool. With Results Management sitting with only one ADO, and any relevant ADO



having access to whereabouts information, having an athlete on more than one RTP, and informing the athlete of this can lead to confusion for the athlete.

**I.5.2 (f)** - Consideration to be given to stipulating that an administrative review should be conducted by persons external to the organisation to create an open, transparent and fair process. UKAD operates administrative reviews using personnel from NFs (clearly managing any NF-athlete conflict of interests). Ultimately if this was implemented, ADOs could potentially utilise other ADOs (potentially through a global administrative review group). This would ensure transparency but also consistency globally.

#### Irish Sports Council

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

I.5.2.e.ii: Sport Ireland recommends the removal of the administrative review procedure. This review makes the process longer. Athlete has had a right of reply to the initial notification an alleged Missed Test of Filing Failure where they can state in their response that they were unaware of their inclusion on the RTP or the consequences of Whereabouts Failures.

#### International Testing Agency

SUBMITTED

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

In relation to Art. I.5.2(c), 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.

In relation to Art. I.5.2.(d), consider clarifying 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 a notice of apparent failure is to be sent in the last days of a given month. We would recommend "no less than 24 hours (...) and no later than 14 days."

### I.6 Whereabouts Responsibilities (1)

#### UK Anti-Doping

SUBMITTED

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

**I.6.1 (b) & (c)** - UKAD believes that these clauses should be removed. 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. Furthermore, if too many responsibilities are passed to an NF by an IF (for e.g. educating athletes on their requirements) this inevitably puts pressure on the local NADO to assist.

## Annex J – Event Testing (5)

#### ISU

SUBMITTED

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

**J.1** As anticipated by Code Article 5.3.2., this Annex sets out the procedure to be followed by **WADA** in considering requests made by **Anti-Doping Organizations** for permission to conduct **Testing** at an **Event** where they have been unable to reach agreement on such **Testing** with the ruling body of the **Event**.

### CODE 5.3 (ISTI)

5.3.2 If an **Anti-Doping Organization** which would otherwise have **Testing** authority but is not responsible for initiating and directing **Testing** at an **Event** desires to conduct **Testing of Athletes at the Event Venues** during the **Event Period**, the **Anti-Doping Organization** shall first confer with the ruling body of the **Event** to obtain permission to conduct and coordinate such **Testing**. If the **Anti-Doping Organization** is not satisfied with the response from the ruling body of the **Event**, the **Anti-Doping Organization** may, in accordance with procedures published by WADA described in the **International Standard for Testing and Investigations**, ask WADA for permission to conduct **Testing** and to determine how to coordinate such **Testing**. WADA shall not grant approval for such **Testing** before consulting with and informing the ruling body for the **Event**. WADA's decision shall be final and not subject to appeal. Unless otherwise provided in the authorization to conduct **Testing**, such tests shall be considered **Out-of-Competition** tests. Results management for any such test shall be the responsibility of the **Anti-Doping Organization** initiating the test unless provided otherwise in the rules of the ruling body of the **Event**.<sup>2829</sup>

### ISU Proposal:

WADA must outline specific consequences for an organization not asking the permission to test and conduct the testing without approval.

Then if an Anti-Doping Organization which would otherwise have Testing authority but is not responsible for initiating and directing Testing at an Event initiates Testing without obtaining the permission of the ruling body of the Event, the ruling body of the Event shall inform WADA and WADA must take all the necessary steps (sanctions if pertinent) against the ADO.

### NADA Austria

SUBMITTED

Alexander Sammer, Head of Legal (Austria)  
NADO - NADO

The current regulation and procedure as described in the ISTI is very complicated and too long to act intelligent (sometimes it's necessary to act within days or hours, maybe based on information a NADO currently receives). NADOs should be allowed to conduct testing at every event in their area of responsibility.

### NADA

SUBMITTED

Regine Reiser, Result Management (Deutschland)  
NADO - NADO

### Annex J – Event Testing

#### 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 2hours (local time) before the requested testing.*

**UK Anti-Doping**

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

SUBMITTED

**J** - Consideration that the IC period is a set definition for all sports, and not as stipulated by the IF. This will ensure consistency but provide clarity for all ADOs.

**J.4** - The 35 day notice period is understood, however clarity would be beneficial on what happens if there are such cases within this timeframe. E.g. if there is a need for reactive short notice IC testing based on intelligence, yet there is a dispute regarding jurisdiction – it is unknown as to what the process would be. Given the increase in intelligence-led reactive testing, it may be pertinent to consider this scenario.

**J.8** - Clarity on whether once WADA has made its decision, that precedent is set for that event if it occurs annually (and therefore the dispute is likely to occur again).

**Canadian Centre for Ethics in Sport**

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

SUBMITTED

With respect to Annex J.4, an ADO should not be declined permission to test at an event if the request comes later than within 35 days of the Event. An ADO may request Testing at the Event based on last-minute information/intelligence or registration confirmation. As such, this should be re-worded to clarify that if the request is requested within the 35 days of the Event, "appealing" to WADA will not be an option.

**Annex K - Collection, Storage and Transport of Blood ABP Samples (2)****cadf**

francesca rossi, director (switzerland)  
Sport - IF – Summer Olympic

SUBMITTED

**K2.2** - We would suggest mentioning that ABP samples should be centrifuged in order to enable the laboratory to perform analytical testing for ESA, HBT. We suggest also to recommend to collect A&B serum samples if other analysis than ABP have to be performed on blood samples.

**K2.5** – According to this comment, *the Athlete shall not stand up at any time during the 10 minutes prior to Sample collection. To have the Athlete seated during 10 minutes in a waiting room and then to call the Athlete into a blood collection room is not acceptable.*

Unless supported by scientific evidence, we would suggest adding some flexibility in the wording since this may undermine the validation of a sample in a haematological profile should an athlete who has been seating for 10' needs to walk a few steps only to be withdrawn.

**UK Anti-Doping**

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

SUBMITTED

Some principles apply to blood standard e.g storage and transportation. Consideration to be given to provide clarity on this e.g. rephrasing title to '... of Blood Samples' (remove ABP) and within section stipulate where applies to ABP only.

**K.2 Requirements (3)****cadf**

francesca rossi, director (switzerland)

SUBMITTED

## Sport - IF – Summer Olympic

**K2.2** - We would suggest mentioning that ABP samples should be centrifuged in order to enable the laboratory to perform analytical testing for ESA, HBT. We suggest also to recommend to collect A&B serum samples if other analysis than ABP have to be performed on blood samples.

**K2.5** – According to this comment, *the Athlete shall not stand up at any time during the 10 minutes prior to Sample collection. To have the Athlete seated during 10 minutes in a waiting room and then to call the Athlete into a blood collection room is not acceptable.*

Unless supported by scientific evidence, we would suggest adding some flexibility in the wording since this may undermine the validation of a sample in a haematological profile should an athlete who has been seating for 10' needs to walk a few steps only to be withdrawn.

**UK Anti-Doping**

SUBMITTED

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

**K.2.1** - Consideration that collection of the sample after two hours post training/competition be mandatory, or stipulate that samples should only be collected within the 2 hours due to exceptional circumstances (and this should be clarified as to what these circumstances are). If this was to be made mandatory, then clarity of process if athlete refused – e.g. sample collected by Failure to Comply investigated.**K.2.2** -Whilst there are benefits to collecting urine samples with blood ABP samples, as ESAs can be analysed in blood, the collection of a B sample would also enable ESA analysis.**K.2.2** - Consideration for the table identified in the blood sample collection guidelines to be brought into this section of the ISTI.**K.2.3** - Reference to DCO should include SCA as DCOs will follow procedures as instructed by the SCA. This is the case for clause K.4 as well.  
Wording at the end of the clause should state, 'The storage device shall be one of the following:'  
a) Refrigerator..." etc**K.2.6** - Consideration to reordering (a) to (f) in line with how questions are listed in ADAMS

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

With respect to Annex K.2.2, additional guidance with respect to collection of blood samples within two hours of training or competition would be helpful. Does collecting ABP samples within two hours of exercise invalidate a sample or should the ADO always wait until it's been two hours since the athlete has exercised?

In Annex K.2.5, add wording to allow athletes to lie down for 10 minutes, rather than only provide the option of "a normal seated position." There are athletes that know that they faint with blood collection and request to be lying down for the venipuncture procedure. To avoid moving following the 10-minute waiting period, the Annex could include that the athlete be "in a normal seated position with feet on the floor, or lying down, for at least 10 minutes..." If there are additional considerations for the waiting period for an athlete who requests to lie down during venipuncture, those could be included as well.

**K.3 The Sample Collection Procedure (1)****UK Anti-Doping**

SUBMITTED

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

**K.3 (a)** - This is the same for all blood sample collection, and therefore we question whether it is needed in this clause, which relates to additional elements specific to ABP sample collection.



**K.4 Transportation Requirements (1)****Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

K.4.2 Sport Ireland would recommend that it is the responsibility of the ADO to report with delay (within 15 business days) to report into ADAMS the DCF, ABP Supplementary Form and Chain of Custody rather than the DCO, BCO or other sample collection personnel.

**Annex L – Results Management Requirements and Procedures for the Athlete Biological Passport (3)****IAAF Athletics Integrity Unit**

SUBMITTED

Thomas Capdevielle, Deputy Head (MONACO)  
Sport - IF – Summer Olympic

5th para (p 122) the APMU ~~can~~ to be replaced by must

**China Anti-Doping Agency**

SUBMITTED

Zhaoqian LUAN, . (China)  
Sport - Other

**Annex L** states that the APMU should represent the anti-doping organization or is located within it, which is in conflict with the TD APMU2019 that is being under development. It is recommended to make some clarifications.

**Irish Sports Council**

SUBMITTED

Siobhan Leonard, Anti-Doping Manager (Ireland)  
NADO - NADO

This Annex should be reviewed in connection the APMU Technical Document and any information that is this TD should be removed from this Standard.

**L.1 Administrative Management (2)****Agence française de lutte contre le dopage**

SUBMITTED

Adeline Molina, RAQ (France)  
NADO - NADO

c) Si l'examen initial conclut « dopage probable », le Passeport est passé en revue par trois experts, dont celui qui a mené l'examen initial.

Peut-être simplifier en « Si l'examen initial conclut « dopage probable », le Passeport est passé en revue par 2 autres experts en plus de celui qui a mené l'examen initial, constituant le trio d'Expert chargé du passeport.

Cette notion est toujours un peu confuse entre le L.2.3 et le L3: 1 avis d'expert à 3 avis d'experts ou 1 avis d'expert à 2 avis supplémentaires.

**Canadian Centre for Ethics in Sport**

SUBMITTED

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

It would be helpful if all ADOs with an interest in an athlete's ABP have access to and are notified of all the athlete's information, including the experts' opinions and recommendations in ADAMS. Currently,

only the Passport Custodian gets notified of any changes from the APMU/Experts and in the event that the Passport Custodian does not have the resources or time to follow up, there may be a lost opportunity.

Additionally, the current setting in ADAMS is that passport custodianship is defaulted to the ADO who collects an athlete's first sample. Should we prevent ADOs that do not do Hematological ABP testing from being passport custodian? Or alternatively the passport custodianship could be separated by module (passport custodian for hematological passport would go to TA for 1st passport blood sample and passport custodian for steroidal passport would go to TA for 1st urine sample).

Finally, it would be helpful to include (or make mandatory) in ADAMS the reasons why a sample is reported as invalid.

## L.2 Initial Review Phase (6)

**cadf**

SUBMITTED

francesca rossi, director (switzerland)  
Sport - IF – Summer Olympic

**L.2.1** We would suggest clarifying this paragraph as it is unclear how it actually works. *A specificity of 99% is used to identify both haematological and steroidal ATPFs. In the case of sequence deviations (sequence ATPFs), the applied specificity is 99.9% (1:1000 chance or less that this is due to normal physiological variation).*

**Department of Health - National Integrity of Sport Unit**

SUBMITTED

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

Australia suggests that consideration should be given to adopting wording in the ISTI which is consistent with wording in other related technical documents, such as the Technical Document for Endogenous Anabolic Androgenic Steroids.

**Anti-Doping Norway**

SUBMITTED

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

When there is an abnormal high ret%, follow-up testing is also important to document the possible ON-phase. Therefore, the APMU should also advise if target testing (follow-up testing) is necessary.

**Agence française de lutte contre le dopage**

SUBMITTED

Adeline Molina, RAQ (France)  
NADO - NADO

**L.2.2**

- Attention aux 7 jours ouvrables demandés pour envoyer une demande d'avis à un expert, qu'un expert rende son avis... nuancer «en respectant autant que possible un délai de 7 jours ouvrés»

**ASADA**

SUBMITTED

Naomi Speers, Science and Results Manager (Australia)

NADO - NADO

■

L.2.2.3 – “the sample will undergo a confirmation procedure” – TD EAAS at 3.1 provides exemptions from this, the possibility for these examples should be reflected in ITSI.

■

L.2.3 – “Passport suspicious – APMU Action – Alert the ADO to do target testing” – the current wording requires the ADO to undertake additional testing when other actions such as additional analysis maybe more appropriate. Recommend re-word to be “ Provide recommendations for future actions such as target testing, additional analysis or requesting further information”

**UK Anti-Doping**

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

**L.2.2** - More clarity is required as what is classed as basic information (i.e. training information, competition event) which may jeopardise the confidentiality of the athletes at this stage of the process.  
**L.2.2.1** - How, exactly, and with what expertise, is it established by the panel that the proposed finding is not a physical condition?  
**L.2.3** - APMU action for 'Likely Medical Condition' – it would be beneficial for further guidance on how this information is shared with the Athlete

**L.3 Review by Three Experts (2)****Anti-Doping Norway**

SUBMITTED

Anne Cappelen, Director Systems and Results Management (Norway)

NADO - NADO

Anti-Doping Norway suggest that the identified fields of qualifications should be represented in the Expert Panel as a whole and not just that one expert should possess one or more of the said qualifications. In order to avoid misunderstanding it is suggested that the definition and composition of Expert Panels is detailed only one place.

**UK Anti-Doping**

SUBMITTED

Pola Murphy, Compliance Coordinator (United Kingdom)

NADO - NADO

More clarity is required specifying what “further details” the expert is allowed to request.

**L.4 Compilation of the ABP Documentation Package and Expert Evaluation (2)****cadf**

SUBMITTED

francesca rossi, director (switzerland)

Sport - IF – Summer Olympic

**L.4** – We would suggest to define the framework for “APMU should coordinate with the passport custodian [...] Experts (e.g. suspicious analytical findings, relevant information and relevant pathophysiological information)”.

SUBMITTED

**Agence française de lutte contre le dopage**

Adeline Molina, RAQ (France)

NADO - NADO

Pour le L4:

Plutôt que "Conférence téléphonique" nous proposons «Communication entre l'UGPA et le trio d'Experts, constitution du dossier de documentation relative au PBA et rapport évaluation conjointe des experts .

L'UGPA échange avec les Experts (téléphone, mail, skype,...) pour initier les étapes suivantes...

- L'UGPBA doit envoyer le dossier de documentation relative au PBA (dont le détail a été éliminé= tout ce qui est barré). Il faut ajouter «constitué selon TD APMU (paragraphe 8.4)» ou laisser tout ce qui a été barré pour qu'on sache ce qui est attendu dans le dossier.

**L.5 Issuing an Adverse Passport Finding (APF) (2)****Department of Health - National Integrity of Sport Unit**

SUBMITTED

Luke Janeczko, Policy Officer (Australia)

Public Authorities - Government

Australia suggests that an option should be included for a medical practitioner to assess whether it is likely pathology presents a risk to health rather than mandating notification.

**Agence française de lutte contre le dopage**

SUBMITTED

Adeline Molina, RAQ (France)

NADO - NADO

L'UGPA déclare un résultat de passeport anormal dans ADAMS, incluant une déclaration écrite du résultat de passeport anormal, le dossier de documentation relative au PBA et le rapport conjoint des experts:

Ce n'est pas possible d'inclure tout cela dans ADAMS, plutôt proposer : L'UGPA déclare un résultat de passeport anormal dans ADAMS et envoie à l'OAD et l'AMA la déclaration écrite du résultat de passeport anormal, le dossier de documentation relative au PBA et le rapport conjoint des experts.