

REPORT OF THE
**INDEPENDENT
OBSERVERS**

2ND EUROPEAN GAMES
MINSK, BELARUS 2019



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1. Introduction

At the invitation of the European Olympic Committees (EOC), the World Anti-Doping Agency (WADA) appointed an Independent Observer (IO) Team to attend the 2019 European Games ('the Games') in Minsk, Belarus in June 2019.

The IO programme was established by WADA to enhance athletes' and public's confidence at major sporting events by monitoring and reporting on all phases of the doping control and results management processes in an objective manner. The IO Team, through its observations, assesses whether procedures are in line with the World Anti-Doping Code ('the Code') and relevant International Standards and provides onsite advice, guidance and assistance to the body in charge of delivering the doping control programme.

The EOC and WADA agreed that the IO Team appointed for the 2019 European Games would observe and provide guidance on the following areas:

- Development and implementation of general anti-doping policies and procedures
- Test Distribution Planning (TDP)
- Implementation of the Out-of-Competition and In-Competition testing programmes
- Selection of competitors for sample collection
- Athlete notification and sample collection procedures
- Therapeutic Use Exemptions (TUEs) procedures
- Transport and chain of custody of samples
- Results management process including all hearings that occur during the IO Team's presence
- Any other relevant areas

The IO Team's formal onsite observations began on 18 June 2019 and ended on 27 June 2019, inclusively. During that time, the IO Team visited all 13 venues and observed doping control for 18 sports/disciplines. Two members of the IO Team attended the EOC Medical and Anti-Doping Commission daily meetings to report on the team's observations and to provide ongoing feedback. In addition to verbal feedback, the IO Team submitted daily written reports of its observations and recommendations to the EOC Medical and Anti-Doping Commission. Those reports addressed several technical and operational opportunities for improvements. Most of these recommendations for improvements were acted upon and implemented promptly throughout the period of the Games. A number of recommendations were also discussed as considerations for future Games.

The IO Team also observed the TUE review process as well as a results management hearing process while onsite during the Games.

The intention of this IO Mission was to operate in a collaborative manner with the EOC Medical and Anti-Doping Commission and the Minsk European Games Organising Committee (MEGOC) Anti-Doping team. The IO Team sought to provide guidance and recommendations in the build up to and during the Games to add value to the Games time anti-doping programmes, as well as identify long-term recommendations for future Games. This IO report focusses on the long-term recommendations as well as the many positives of the programme. Not all recommendations are

specifically for the EOC, with some recommendations for consideration for WADA as well. These have been clearly noted in the document.

2. Acknowledgements

The IO Team wishes to thank the EOC Medical and Anti-Doping Commission and the MEGOC Anti-Doping team for the excellent cooperation that took place prior to, during and post the Games. The IO Team extends its gratitude to the EOC Medical and Anti-Doping Commission Chair, Professor Klaus Steinbach, the EOC Medical and Anti-Doping Commission Games-time members, Mr Mark Stuart, Dr Christian Schneider, Dr Jaroslav Vetvicka, Dr Neboijsha Nastov, Consultant Dr Pam Venning and Ms Selin Ayan Tekin the Anti-Doping Co-ordinator. Furthermore, the IO Team also extends its gratitude to the MEGOC Anti-Doping Team, efficiently led by Ms. Katsiaryna Kurylenkava, seconded by Ms Darya Prastakova, for their willingness to reply to all its questions and for their careful consideration of its observations and recommendations.

The IO Team would also like to thank the EOC Secretariat and in particular Mr Steve Scott, for providing the necessary resources to conduct its mission and assisting whenever necessary during the Games. Finally, the IO Team wishes to thank all the Games volunteers, who largely contributed to the success of these Games and to the achievements of the IO Team's tasks.

3. Executive Summary

The anti-doping programme delivered at the 2nd European Games was comprehensive, robust and risk-based. The EOC and MEGOC are to be commended for their efforts and commitment in delivering such a programme, which has played an important role in protecting the integrity of the event, and protecting the clean athletes competing at the European Games. The EOC and MEGOC, both prior to and during the Games, demonstrated an openness and collaborative approach with the IO Team, and carefully took into consideration the IO Team's recommendations.

The Games-time anti-doping programme displayed several strengths, for example the high standards demonstrated by the doping control workforce and the whereabouts programme implemented. A key strength to the programme was the ambitious and successfully delivered Out-of-Competition programme implemented at these Games. Of the 1160 samples collected, 43% were collected Out-of-Competition, reflecting the greater risk in the Out-of-Competition period.

Like any anti-doping programme, improvements can always be made, and this report seeks to identify specific recommendations for the EOC as well as on occasion for WADA. The key recommendations relate to managing pre-Games risk periods and building anti-doping expertise and capacity, however further recommendations are identified for the enhancement of areas of the programme such as the delivery of the Out-of-Competition testing programme, Doping Control Officer (DCO) and Chaperone training, and intelligence. Whilst there are numerous recommendations, these are primarily enhancements to an already good programme, and not significant changes that are required.

It is important to note that, although it was only the second edition of the European Games, the delivery of the programme should be seen as a success. As the concept of the European Games

evolves, and as anti-doping evolves in the coming years, it is important for the Games-time programmes to develop and evolve as well. In order to facilitate this effectively, the EOC should continue to consider and assess its anti-doping resources and capacity both in between and at Games-time.

4. Composition of the Independent Observer (IO) Team

The IO Team consisted of:

- Hamish COFFEY (Chair) - Deputy Director of Operations (Testing), UK Anti-Doping (UKAD)
- Florence LEFEBVRE-RANGEON (Team Manager) - Senior Manager, Government and National Anti-Doping Organisation (NADO) Relations, WADA
- Olivier BANULS - Deputy Director, Cycling Anti-Doping Foundation (CADF)
- Shafag HUSEYNLI - CEO, Azerbaijan National Anti-Doping Agency (AMADA)

5. Games Overview

a. The 2nd European Games

The European Games are a Pancontinental multi-sport event held every four years for athletes from the European continent. The Games are owned, regulated and organised by the EOC. The first edition took place in Baku, Azerbaijan in 2015. From June 21 to June 30, 2019, Minsk, Belarus hosted the second edition of the European Games.

Competitions were held in 15 sports (21 disciplines), eight of which offered qualifications to the 2020 Olympic Games in Tokyo. For the competitions in Boxing and Judo, these Games were considered the European Championships. The full list of sports/disciplines is as follows: 3x3 Basketball, Acrobatic Gymnastics, Aerobic Gymnastics, Archery, Artistic Gymnastics, Athletics, Badminton, Beach Soccer, Boxing, Canoe Sprint, Cycling - Road, Cycling - Track, Judo, Karate, Rhythmic Gymnastics, Sambo, Shooting - Rifle & Pistol, Shooting - Shotgun, Table Tennis, Trampoline Gymnastics, Wrestling.

Close to 4,000 athletes took part in the Games, representing 50 European National Olympic Committees (NOCs). Competitions were held in 13 different venues, all located within the city of Minsk.

b. Key Players

The EOC is the governing body for the European Games and is responsible for developing and enforcing Code-compliant anti-doping rules. The EOC Medical and Anti-Doping Guidelines applicable to the EOC Sports Properties were reviewed by WADA prior to the beginning of the Games.

Within the EOC, the Medical and Anti-Doping Commission, chaired by Professor Klaus Steinbach, was responsible for implementing the anti-doping programme during the Games.

As the Organising Committee for the Games, MEGOC was tasked with organising and delivering the operational aspects of the doping control programme for the Games, reporting to the EOC Medical and Anti-Doping Commission.

The MEGOC Anti-Doping team was led by Ms Katsiaryna Kurylenkava, former Head of Testing at the Belarus National Anti-Doping Agency (BNADA). She was seconded by Ms Darya Prastakova, current Head of Testing at BNADA. Several other staff members of BNADA were involved within the MEGOC Anti-Doping team, working directly for MEGOC, involved in both the planning and delivery phases of the Games.

BNADA was tasked to provide 10 local DCOs and 10 Blood Collection Officers (BCO). In addition, 30 international DCOs (IDCO) were recruited by MEGOC.

The involvement of the local NADO, BNADA, during the Games was a significant and positive feature of these Games. Firstly, it enabled MEGOC and the EOC to utilise the anti-doping expertise of the local NADO. Secondly, it enabled BNADA to develop expertise in Major Events' anti-doping programmes and in the operational delivery of such intense anti-doping programmes. Assisting with the future development of the local NADO is a key aspect of the legacy of these Games.

The EOC contracted the WADA-accredited laboratory in Seibersdorf, Austria to analyse all samples collected during the Games and to report its findings in accordance with WADA's International Standard for Laboratories (ISL).

Recommendation:

- ***The EOC and future Organising Committees should continue at future Games to seek engagement with the local NADO at future Games to leverage existing anti-doping expertise and provide the local NADO with some opportunity to integrate into the Games (in some capacity) and further develop its expertise. The extent to which the local NADO is involved in the Games is strictly a decision for the EOC and Organising Committee.***

The IO Team would like to note that there were some challenges for all in relation to the timing of the IO Mission. The IO Team's arrival was the day before the opening of the Athlete Village, and with the requirement to obtain information on the programme to enable the IO Team to consider the non-operational elements of the programme, meetings and conversations were held with the relevant key individuals. This however had a significant impact on their time, at a time when they were fully focused on the delivery of the programme, therefore causing added stress during an already stressful time. In hindsight, and following a constructive debrief with the EOC, this could have been resolved through a more structured communication and engagement plan in advance of the Games, with clear expectations on all parties.

Recommendation for WADA:

- ***For future IO missions, WADA should consider developing a more specific plan of engagement for the IO Team and the EOC (or other MEOs). This should include setting expectations for the pre-Games period, identifying information to be shared with stipulated timeframes, clarification of the IO Team role during the pre-Games period and stipulating pre-Games meetings/conference calls. This plan could be an appendix to the existing agreement. This would facilitate a greater collaboration between relevant parties and reduce the impact on the key players (for e.g. the Organising Committee) during the period of the Games.***

6. Developing Anti-Doping Capacity and Expertise

As is the case for many Major Events, the EOC's Medical and Anti-Doping Commission is a largely voluntary Commission, mainly coming together for the period of the Games only. Therefore, several responsibilities and tasks for which the EOC have ownership were delegated to MEGOC, for e.g. Risk Assessment and TDP development. Whilst this is relatively common practice at a Major Event, this can create a reliance on the anti-doping expertise employed by the Organising Committee. In addition to this, the IO Team provided detailed recommendations for a number of these tasks, which whilst the IO were happy to provide, should not always be relied upon.

The IO Team feel that the enhancement of the EOC's 'in-house' anti-doping expertise/capacity in between Games would be beneficial to supporting the Organising Committee and ensuring the delivery of as effective a Games-time anti-doping programme as possible and would bring benefits in terms of anti-doping sustainability to the EOC and its other events (for e.g. European Youth Olympic Festivals).

Recommendation:

- ***In order to ensure that the EOC does not rely too heavily on the anti-doping expertise of the entity which will be charged with the operational implementation of the anti-doping programme during the Games, it is recommended that the EOC enhances and increases its anti-doping capacity internally in-between Games, with a focus in the 6-12 months prior to a Games. The benefits of building this capacity will be reinforced with the complexities over the coming years of the introduction of the revised 2021 Code and related International Standards. How the EOC approach this is not for this IO Team to specify, but options available include:***
 - ***Recruitment of anti-doping staff at the EOC***
 - ***Inclusion of members on the EOC Medical and Anti-Doping Commission with day-to-day operational anti-doping experience***
 - ***Maximising the use of the local NADO and its expertise and capacity***
 - ***Engagement of a service provider (for e.g. International Testing Agency – ITA)***

The IO Team recommends the EOC initiates conversations with WADA to determine its best strategy.

7. Risk Assessment

For both the development of the Games-time Risk Assessment and TDP, the WADA IO Team were given the opportunity to review and engage with the EOC in advance of the Games. In the spirit of the collaborative nature of the WADA IO mission, the IO Team were able to provide feedback and recommendations prior to the Games which were implemented by the EOC and MEGOC.

The Games-time Risk Assessment was well structured, well thought out, using WADA's Risk Assessment templates, and therefore was in line with requirements set out in the International Standard for Testing and Investigations (ISTI).

It should be acknowledged that MEOs have to conduct a Risk Assessment at both a sport-discipline level as well as at a country level. It was positive to observe that the EOC and MEGOC included within the final version of the Risk Assessment the country level risk (sometimes a risk factor not incorporated by MEOs) as well as other important factors such as whether a sport/discipline offered qualifications for the Tokyo 2020 Olympic Games.

8. Test Distribution Plan (TDP) and Delivery

a. TDP Development

As with the Risk Assessment, the WADA IO Team welcomed the opportunity to review and provide feedback on the overall TDP developed by MEGOC in conjunction with the EOC – and once again the IO Team's recommendations were implemented. Any Games-time TDP should be driven by the Risk Assessment, ensuring that the distribution of tests across sports and nations is reflective of the risks identified within the Risk Assessment, as well as taking into consideration athlete pool sizes per sport.

Ultimately, the EOC's Games-time TDP developed was comprehensive (in excess of 1000 tests), based on their Risk Assessment and in line with WADA's Technical Document for Sport Specific Analysis (TDSSA).

The WADA IO Team would like to commend the EOC and MEGOC for planning and delivering not only a comprehensive TDP, but a TDP where a significant proportion of tests were conducted Out-of-Competition. 43% of all tests conducted, were conducted Out-of-Competition (the majority of which did take place in the Athlete Village), therefore ensuring that testing was more effective and targeted during a higher risk period, than focussing on In-Competition testing. This proportion of Out-of-Competition testing appears to be higher than that delivered at many other Major Events. This feat was made more impressive by the Out-of-Competition window for these Games being significantly shorter than that of many other multi-sports Major Events. The EOC's anti-doping jurisdiction (and therefore ability to test) was from the opening of the Athlete Village, which formally opened on the 18th June (3 days prior to competition) with many athletes entering the Athlete Village only a couple of days prior to their event and departing soon after completion of the event.

b. Managing Pre-Games Risk

Delivery of a significant proportion of Out-of-Competition testing during the 'Games period' is commendable. However, in order to best manage the risk of doping at an event, and ultimately best protect clean athletes and the integrity of an event, there has been a shift of focus by some MEOs to managing the risk of doping pre-Games.

A comprehensive Games-time TDP is important, however a core risk period for any multi-sport Major Event are the 6-12 months leading up to the events, when athletes are either attempting to qualify for the event or are in their key stages of preparation for the event.

Managing this pre-Games risk is a challenge for MEOs. Whilst the Code enables a MEO to extend its jurisdiction beyond the traditional 'Games-period', the reality is this requires significant resource from the MEO to effectively manage. There are however alternatives that can be considered:

1. Establishing a pre-Games Taskforce – as has been adopted by other MEOs, establishing a pre-Games Taskforce would enable the EOC to promote and coordinate pre-Games testing recommendations on prospective athletes attending their event during this high-risk period. This would also provide continuity between pre-Games and Games-time testing plans. Such a Taskforce could consist of a small number of International Federations and NADOs represented at the Games and coordinated either by the EOC or an independent third party (for e.g. the ITA) or a well-established/experienced NADO).
2. Structured engagement and collaboration with International Federations and NADOs – as part of its TDP development, there was engagement with International Federations and NADOs by the EOC (via MEGOC) in the build up to the Games. To most effectively manage the pre-Games risk however, this could be more structured, more collaborative and over a longer period of the pre-Games period (see section 8c – 'Out-of-Competition' for further details).
3. Pre-Games testing grant – as opposed to delivering all tests during the Games period, the finances for a proportion of these tests (for e.g. 20%) could be offered to relevant International Federations and NADOs as a grant to assist with their pre-Games testing programmes, whilst this would reduce the size of the Games-time TDP, it would contribute towards greater management of the pre-Games risk period. This model was employed at the 1st European Games in Baku 2015.

Recommendation:

- ***For future Games, the EOC should consider its strategy for managing the pre-Games high-risk period. The EOC could liaise with other MEOs and/or WADA, to assess the merits and resources required of all options and implement a solution that ensures that testing resources for the Games are optimised to address the pre-Games risk.***

c. Out-of-Competition Testing

As previously referenced, the EOC and MEGOC set an ambitious target of conducting over 40% of all tests Out-of-Competition, for which they are commended. To enhance and maximise

the effectiveness of an Out-of-Competition testing programme, it is not purely about the amount of testing but the quality of each individual test – ensuing that testing is risk-based and intelligence-led.

In developing the Out-of-Competition testing plans, MEGOC engaged with all relevant International Federations and NADOs to seek recommendations for testing from short listed athletes attending the Games. Given the International Federations and NADOs' familiarity with these athletes and extended jurisdiction, this was a positive initiative. Whilst the IO Team does not have exact figures, MEGOC received a good response with many recommendations. All recommendations were considered within the Out-of-Competition testing plans where possible, or alternatively within the In-Competition testing plans. In addition to this, other relevant factors were taken into consideration when developing Out-of-Competition test plans including test histories, athlete performances and intelligence (see Section 11 - 'Gathering and Sharing of Information and Intelligence').

Whilst the engagement with International Federations and NADOs was a positive initiative and is essential to developing an effective Major Event TDP, this process could be further enhanced for future Games. The engagement with International Federations and NADOs occurred approximately 1 month prior to the event and was limited to seeking testing recommendations (including Athlete Biological Passport (ABP) recommendations). The Games-time TDP could have benefitted from earlier engagement with the Anti-Doping Organisations (ADOs) (for e.g. 6-12 months prior to the Games) and for that engagement to be as structured as possible to enable the exchange of any relevant information and not just testing recommendations, for e.g. intelligence, details of athletes in Registered Testing Pools (RTPs), education levels of athletes etc. Whilst the WADA Standards & Harmonization team were consulted on the EOC's TDP, such structured engagement should also include all relevant departments of WADA (for e.g. including Intelligence & Investigations), to ensure they are aware of the collaborations, and to enable them to also share any relevant information/intelligence to assist in the development of the Games-time TDP.

Recommendation:

- ***For future Games, the initiative of engaging with International Federations and NADOs in advance of the Games should be continued, however should start earlier (e.g. 6-12 months prior to the Games) and be more structured to ensure the exchange of all relevant information that could enhance the EOC's anti-doping programme. Such engagement should also include all relevant departments of WADA and clearly link to the EOC's strategy on managing the pre-Games risk.***

Delivery of an effective Major Event Out-of-Competition testing programme has its challenges, especially in relation to locating athletes whilst ensuring no advance notice is provided to the athletes. At these Games, Out-of-Competition testing primarily took place within the Athlete Village, although a small number of tests were conducted at either a training venue or hotel if the athlete was residing outside the Athlete Village. This again was a positive initiative, and the EOC should endeavour to conduct a significant proportion of testing outside of the Athlete Village and Competition Venues at future Games

At these Games, delivery of the Out-of-Competition testing programme was largely facilitated by using a whereabouts system implemented Games-time (see Section 9 - 'Whereabouts'), which was focussed on NOC rooming lists, combined with the MEGOC's arrivals and departures information. This had varying success and was reliant on the athlete being in their room at the time the test was attempted. On occasion, repeated attempts to locate an athlete could have alerted the NOC and/or athlete of the EOC/MEGOC's desire to test a particular athlete.

As indicated, athlete whereabouts is a common challenge at Major Events, and not a straight-forward challenge to overcome, as was the case in Minsk. This was often compounded by the fact that Chaperones had little/no experience in locating and notifying athletes in the Athlete Village. There are several ways to enhance the effectiveness of locating athletes for Out-of-Competition testing, such as:

- Using as much information at its disposal as possible to locate targeted athletes such as trying to visually identify the presence of athletes/teams in common areas of the Athlete Village (for e.g. the dining hall, entrance to the Athlete Village), or training information
- Conducting specific Out-of-Competition training for DCOs and Chaperones operating in the Athlete Village

The IO Team did observe that such guidance for locating athletes Out-of-Competition was stipulated within the Doping Control Operation Manual (although this manual was distributed close to the start of the Games) and this information was also conveyed verbally to the doping control workforce by the MEGOC Anti-Doping Team at daily morning briefings. However, the IO Team did not observe these practices being implemented regularly or consistently.

A positive initiative and practice that was implemented to support the delivery of the Out-of-Competition programme was the use of the Minsk 2019 app. This app contained an athlete database with photos of all athletes competing at the Games. The MEGOC Anti-Doping team encouraged the use of this effective tool to assist the Chaperones to visually identify the athletes selected for testing.

It was also noted that all DCOs and Chaperones working at the Games were clearly marked with 'Doping Control' on their uniforms (for Chaperones this was on an additional bib worn on top of the standard volunteer uniform). Whilst such visibility is important for In-Competition testing, for Out-of-Competition testing this minimises the ability of DCOs and Chaperones to discreetly locate athletes within the Athlete Village, especially when in common areas such as accommodation blocks. In order to minimise the possibility of advance notice, discretion when locating an athlete should be a key consideration.

Recommendation:

- ***The EOC and MEGOC delivered a comprehensive Out-of-Competition testing programme. The following points should be considered for future Games to further enhance the effectiveness of the delivery of the Out-of-Competition programme:***
 - ***Use as much information and intelligence as possible to locate targeted athletes. This includes but is not limited to; trying to visually identify the presence of athletes/teams in communal areas such as the dining hall and entrances to the***

Athlete Village and training details. Whilst not available at these Games, where relevant for future Games, the EOC and future Organising Committees should consider gaining access to athlete accreditation electronic scanning data (i.e. where athletes are scanned in and out of the Athlete Village and other accredited venues) would be very beneficial to determining the location of target athletes.

- ***Delivery of specific Out-of-Competition training for DCOs and Chaperones, including, for e.g., how to discretely locate athletes within the Athlete Village***
- ***Ensure discretion by minimising as much as possible the identification of DCOs and Chaperones when locating athletes***
- ***Increase the proportion of Out-of-Competition testing conducted outside of the Athlete Village***

d. In-Competition Testing

The In-Competition testing programme was also comprehensive, with good coverage of testing across all sports and disciplines as well as across the different stages of competition. This ensured that In-Competition testing was not solely focussed on the testing of medallists but included testing at qualification stages.

Logistically, MEGOC are commended for ensuring that the In-Competition testing process was managed efficiently and effectively. As referenced below, all DCOs were taken on comprehensive venue tours prior to competition starting, which clearly assisted with ensuring that the In-Competition testing process and flow was effectively managed.

In-Competition testing was comprehensive with selection policies based on a combination of:

- Final positions
- Random draws
- International Federation / European Federation Anti-Doping Rules
- Target testing

The IO Team recognise that target testing was incorporated into the In-Competition testing plans, which was important for the EOC/MEGOC to implement. This included target testing based on ADO recommendations (as previously referenced), Intelligence and recommendations from the EOC Medical and Anti-Doping Commission (see section 11 - 'Gathering and Sharing of Information and Intelligence'). The IO Team also noted that MEGOC engaged with International and European Federations in advance of the Games – primarily through the International and European Federation Technical Delegates – which resulted in little input prior to the Games from the Technical Delegates. However, there was some lack of clarity as to the rationale for some In-Competition selection policies across sports. For example, it was not clear as to when (or within which sports/disciplines) all medallists were tested as opposed to only some medallists, why testing only took place in certain disciplines and not others etc.

Recommendation:

- ***The EOC should consider improving their In-Competition testing plans by developing strategies, based on the risk of the sport, for athlete selection (e.g. policy on testing medallists, target testing specific disciplines). This would form the basis of an In-Competition testing plan, which could then be flexible and adaptable to enable target testing to take place based on intelligence and International Federation/NADO recommendations, as was incorporated in Minsk.***

The IO Team also note that sport-specific information was not always provided to the Lead DCOs in advance of In-Competition testing. The subtleties of different sports for e.g. competition formats, athletes competing in multiple events, sport specific draw processes, are important factors for the Lead DCO to be aware of and can have an impact on the doping control process. In some cases, this was mitigated by using a Lead DCO with sport-specific experience, however this was not always the case.

There was also a lack of consistency and clarity over the role and engagement of the International/European Federation Technical Delegate, which varied considerably across sports. As previously indicated, MEGOC did engage in advance of the Games with the relevant Technical Delegates, however this lack of consistency could have been further mitigated through providing the Lead DCO with sport-specific information and guidance. It was further observed that on some occasions, the Technical Delegate was made aware of selection policies prior to the completion of the event. In order to maintain no advance notice testing, this should not occur.

Recommendation:

- ***Where possible, future Organising Committees working on behalf of the EOC should ensure that a Lead DCO (and other DCOs) with sport-specific experience is allocated to that sport. This will assist with an effective doping control process. In addition to this, the Organising Committee should consider developing sport-specific operational guidelines that can be shared with Lead DCOs in advance of testing. This will support the Lead DCO in ensuring an effective doping control process is implemented. Such sport-specific information should include (but not limited to):***
 - ***Competition format***
 - ***Sport-specific selection policies/draw procedures***
 - ***Any sport specific intricacies that may impact on anti-doping***
 - ***Engagement of International/European Federation Technical Delegate***

e. Athlete Biological Passport (ABP) Testing

The EOC and MEGOC are commended for assigning a budget to conduct 50 ABP tests on behalf of other ADOs. Through their engagement with International Federations and NADOs, MEGOC obtained recommendations for ABP testing. MEOs providing relevant ADOs with the opportunity to refine athletes' biological passports within the framework of a Major Event is essential and a significant asset to the ADO's monitoring and targeting of athletes. The contribution of the relevant ADOs (i.e. the relevant Passport Custodian) was also important to support the EOC and MEGOC in defining testing priorities and selection of athletes for ABP purposes.

Recommendation:

- ***The EOC and MEGOC proactively facilitated ABP testing at these Games through the engagement with relevant ADOs. The EOC should consider the following points for future Games to further enhance the effectiveness of the ABP programme:***
 - ***Early and structured engagement with ADOs to identify athletes under an ADO's passport custody to be tested for ABP purposes. This communication is essential given the operational challenges presented as an athlete's biological passport can be under the custody of the International Federation or NADO.***
 - ***Effective communication with relevant ADOs to ensure that their Athlete Passport Management Unit (APMU) is primed to review and provide recommendations quickly to enable the EOC to conduct target testing. The risk of missing the opportunity to test an athlete during the event and therefore the detection window should be minimised.***

9. Whereabouts

The EOC are commended for their approach to whereabouts for these Games. The whereabouts process implemented was replicated from Baku 2015, and was proportionate to the needs of the programme. This included:

- Gaining access to athlete whereabouts in the Anti-Doping Administration and Management System (ADAMS) for those athletes in a pre-existing RTP
- Requesting rooming lists from NOCs within 24 hours of arrival into the Athlete Village

As previously indicated, the above information was supported through MEGOC's use of pre-existing information such as arrivals and departures information to help facilitate the Out-of-Competition testing programme.

The whereabouts process was clear and simple with stipulated timeframes for submission. Whilst the majority of NOCs did comply with the requirements within these timeframes, there were a few NOCs that did not. The EOC used every opportunity to re-iterate the need and importance of providing this whereabouts information in a timely fashion, for e.g. the Chef de Mission meeting. These mechanisms proved successful.

Whereabouts continues to be a challenge at many Major Events, and whilst whereabouts management was largely successful at these Games, there were no consequences for NOCs for failing to provide whereabouts information. The absence of a clear process and repercussions for failing to submit whereabouts information creates a sense of unfairness for those NOCs taking the time and making the effort to submit whereabouts information.

Recommendation:

- ***The EOC implemented a clear and proportionate whereabouts process however its anti-doping rules did not contain consequences in case of whereabouts requirements not being fulfilled. The EOC should consider including such consequences in their rules for future Games.***

10. Therapeutic Use Exemptions (TUEs)

The TUE process was managed in accordance with the EOC Medical and Anti-Doping Guidelines and the International Standard for TUEs. The EOC TUE Committee (TUEC) was the sub-committee appointed by the EOC Medical and Anti-doping Commission Chairman to assess each TUE during the period of the Games. It was composed of four physicians, one pharmacist and one coordinator.

Prior to the start of the Games, the TUEC verified that all pre-existing TUEs and supporting medical data were complete. Any further information or supporting documentation deemed necessary to validate the TUE was requested from the submitting athlete or the relevant ADO. The TUEC's role was also to promptly evaluate any new request for TUEs that could be applied for by any athlete at any time during the period of the Games. The decision rendered by the TUEC was reported to WADA (through ADAMS), the athlete, the athlete's NOC and the relevant ADO. Such decision was only valid during the Event Period.

There were three possible means of communication to submit and apply for TUEs: via a paper-based application posted in a dedicated letter box, via emails to a dedicated email address or via ADAMS. The EOC set up a secured sharing platform (ShareFile) to exchange information if needed (i.e. to other members of the TUEC if not present at the daily Medical and Anti-Doping Commission meeting).

Recommendation:

- ***Given the sensitivity of the data managed by the EOC's TUEC, it is recommended for future events to implement a system that guarantees the highest possible standards of security and confidentiality of the information. The use of ADAMS only is the preferred option although there might be some logistical constraints to do so. The principle to consider is the protection of data from internal and external risks. For example, the use of emails to share medical files should be proscribed, personal computers should not be used to treat such data unless it fulfils the security requirements defined by the EOC, etc. From a practical perspective, the EOC could consider issuing its TUEC members with dedicated computers that meet such requirements to facilitate their work.***

A decision by the EOC not to recognise or not to grant a TUE may have been appealed by the athlete exclusively to the EOC's independent TUE Appeal Committee (TUEAC). The TUEAC was composed of four NOC Chief Medical Officers from four different NOCs who were also members of the EOC Medical & Anti-Doping Commission. Should a NOC Chief Medical Officer be of the same nationality as the applicant, the NOC Chief Medical Officer was not entitled to intervene in the review, therefore managing any potential conflict of interest. It should be noted that the TUEAC could also be asked to review a file in case of disagreement of the TUEC in the framework of the review of TUE applications.

11. Gathering and Sharing of Information and Intelligence

From the IO Team's observations, it is clear that the EOC and MEGOC embraced and implemented the use of intelligence. This was observed in practice whereby intelligence

received/gathered was discussed, and appropriate actions implemented, for e.g. target testing. Processes implemented included:

- Target testing instigated by the EOC Medical and Anti-Doping Commission following reviews of relevant information sources such as: Doping Control Forms (and specifically the medications declared, to identify any suspicious athlete behaviour), Needle Policy and related declarations and imported medications
- Instruction to DCOs within the Doping Control Manual to report any suspicious athlete behaviour
- Clear communication channels to the EOC Medical and Anti-Doping Commission to enable NOCs to report suspicions of doping

The use of intelligence was enhanced through the excellent processes and training that MEGOC had implemented in advance of the Games for relevant Games-time Functional Areas, for e.g. Security and Cleaning Services. Again, this was observed first hand by the IO Team whereby intelligence was received from Security Services at the Athlete Village, who had found potential paraphernalia in the luggage of two athletes. The interaction between Functional Areas, the communication to the Doping Control Team at MEGOC, the decision making and implementation of appropriate actions (in this case, target testing and analysis of substances found) was excellent, fast and efficient, and the EOC and MEGOC are commended for this. Whilst no further action was warranted in these cases given the medical evaluation of the case, it demonstrated that the relevant processes were in place to facilitate the use of intelligence.

As with many processes, intelligence policies and procedures can always be enhanced, and the IO Team encourage the EOC to build on the procedures already implemented to further enhance their intelligence capabilities at future Games. Specifically, the EOC should consider extending the proactive intelligence gathering in the build-up to the Games, as part of its pre-Games engagement with International Federations and NADOs. Furthermore, it is not clear to what extent the EOC engaged with BNADA in relation to its own Intelligence and Investigations capacities. Whilst NADOs have differing capacities when it comes to Intelligence and Investigations, MEOs should always be encouraged to engage as early as possible in the planning phase with the local NADO to leverage the use of existing intelligence gathering mechanisms.

Recommendations:

- ***The EOC should consider, as part of pre-Games engagement with International Federations/NADOs, to proactively gather intelligence through International Federations/NADOs, and ensure that during the Games, any intelligence received is shared, by secure means, with all relevant parties accordingly (i.e. the NADO, International Federation and WADA).***
- ***The EOC should consider engaging as early as possible in the planning phase with the local NADO to leverage the use of existing intelligence gathering mechanisms, for e.g. relationships with law enforcement and customs, whistle-blower hotlines.***

12. Sample Collection Personnel and Process

a. Doping Control Officers (DCOs) and Blood Collection Officers (BCOs)

The IO Team would firstly like to draw attention to the impressive work conducted by the MEGOC Anti-Doping Team in implementing and managing a Games-time doping control workforce and commend them for their hard work. Whilst the organisation of doping control during a Major Event is always a huge and challenging task, the concerted efforts of the Anti-Doping Team and their dedication and commitment as champions of clean sport played an important role on the success of the entire event.

Furthermore, a testing programme is only ever as good as the Doping Control workforce used. It is they who interact with the athletes and conduct the doping control processes – and the IO Team would like to commend the Games-time Doping Control workforce for their professionalism, dedication and overall excellent standards that were delivered across all sports and venues.

Throughout the Games, sample collection was conducted in a very effective manner by combining teams of local DCOs, IDCOs and local phlebotomists (BCOs). In total 10 local DCOs, 10 local BCOs and 30 IDCOs were used throughout the Games.

The use of local DCOs and BCOs was an important part of the legacy of these Games. The local DCOs and BCOs proved themselves to be very proficient, professional and operated at very high standards. The opportunity to work at a Major Event of such a scale, and to work with and interact with DCOs from other nations, will only help to further develop the standards and skills of local DCOs. This will prove to be an asset for BNADA moving forward.

The use of IDCOs (as at many Major Events), continues to be an excellent initiative. The highly professional IDCOs brought with them their international expertise, knowledge, skills and abilities, and MEGOC successfully integrated them with local staff as was evidenced by the excellent teamwork observed throughout the Games. The use of experienced IDCOs further ensured that challenges faced were managed effectively, and they played a significant role in the ongoing support and development of the volunteer Chaperones.

The IDCOS recruitment process was comprehensive and started 18 months prior to the Games, through communication from MEGOC to NADOs and International Federations. In total 85 applications were received and 30 IDCOS were chosen based on interviews, previous work experience at Major Events, interpersonal skills, proficiency in English and several other selection criteria.

A good command of the Russian language was considered an asset for IDCOS, and many were Russian speakers. This was invaluable, as it enabled the IDCOS, as well as the local DCOs, to communicate effectively with the Chaperones, venue staff, and many athletes. The use of Russian speaking IDCOS was an excellent initiative.

Whilst no formal training was delivered for Games-time IDCOS (all IDCOS were required to be accredited, and therefore trained, by a reputable body – i.e. ADO or Sample Collection

Agency), a number of initiatives were implemented by MEGOC to provide information and assist with their Games-time familiarisation. These included:

- A pre-Games venue tour organised for all DCOs. This covered all key operational aspects including the location of all key functional areas and premises, notification points, where the athletes have access to within the venue etc. This was observed by the IO Team and was comprehensive and an excellent initiative.
- Provision of a Games-time Doping Control manual covering all Games-time technical procedures
- Use of Test Events – many local DCOs attended Test Events at the Games-time venues in advance of the Games. The use of Test Events was another excellent initiative and assisted with the familiarisation for local DCOs of the venues.

Whilst the IO Team reiterates its praise for the Games-time Doping Control workforce, the IO Team did observe in the early stages of delivery, that several IDCOs were not sufficiently familiar with certain parts of the doping control process that were different from what they were used to. These were primarily:

- The partial sample procedure
- The use of different equipment, such as data loggers and refractometers
- The use of different Doping Control Forms
- Blood testing – not all IDCOs had significant experience at managing blood testing

This unfamiliarity did not cause any significant issues, and after the first few days of delivery of the programme, the IDCOs' familiarity naturally improved. However, in the IO Team's opinion, this could have been mitigated through additional training of IDCOs on these elements of the doping control process in advance of their first shift at the Games.

The IO Team did also observe that given the significant number of Chaperones, DCOs and IDCOs recruited for doping control, testing sessions were often very well resourced for the number of tests being conducted. Whilst this has the benefit of ensuring an effective process can be implemented, the effect was it often meant many DCOs and Chaperones worked very long and consecutive days with no break. It is difficult, but important, to find a balance between ensuring well-resourced testing sessions and not over-working the doping control workforce.

Recommendations:

- ***The EOC and future Organising Committees should continue to ensure for future Games that the Games-time Doping Control workforce is experienced, a combination of local and IDCOs, and where possible utilises local language skills. This will add significant value to the delivery of a Games-time programme.***
- ***Taking into consideration that IDCOs come from different NADOs that might have different procedures, equipment and/or documentation, it is recommended that pre-Games training is organised for all local DCOs and IDCOs in advance of their first Games-time shift covering these elements.***
- ***Consideration should be given to the workloads and shift patterns for DCOs and BCOs to ensure that there is a balance between suitable resourcing and ensuring DCOs/BCOs are not working long and consecutive days.***

b. Chaperones

Sport volunteers are a critical part of the overall success of doping control at any major event. During these Games, significant contribution was provided by the 275 dedicated volunteer Chaperones. The Chaperones were professional, diligent and courteous at all times.

The recruitment process started a year before the Games, and 275 Chaperones were selected out of 1000 applicants based on selection criteria including; age, proficiency in English, sports preference, communication skills.

The training implemented for the volunteer Chaperones included:

- Test Events - approximately 50% of recruited Chaperones were invited to and received some training at Test Events in the months leading up to the Games
- The remaining Chaperones received training immediately prior to their first day of testing
- In-venue tour conducted prior to the Games to enable Chaperones to familiarise themselves with the venue

Whilst the use of Test Events to provide training for the Chaperones was a very good initiative, this was only implemented for approximately 50% of all Chaperones. The training delivered to the remaining 50% of Chaperones prior to their first shift did not appear to be a clearly structured training programme and was more ad-hoc training delivered by the Lead DCO. As volunteers, and therefore with an understandable lack of experience and expertise, the absence of comprehensive training in advance of their first day of testing for all Chaperones, did present challenges. It should be noted that the Chaperones were dedicated, generally learnt very quickly and became competent, however the following areas of the process were often challenging in the first days of testing:

- Explanation of athlete rights and responsibilities
- Notification of Minors
- Ensuring suitable location for notification

Despite these challenges, and the lack of experience and expertise, it should be stressed that significant improvements were observed as the Chaperones grew in confidence and experience during the Games. By the end of the IO Team's time at the Games, very good chaperoning skills with clear understanding of the core elements of the role were observed. These improvements can also be attributable to the reactions and actions of the MEGOC Anti-Doping team to support the Chaperones, and the interaction and support provided by many of the local DCOs and IDCs on site.

Recommendations:

- ***The EOC and future Organising Committees should ensure that structured formal training is provided to all volunteer Chaperones in advance of the Games starting. This should be supported with venue tours and the use of Test Events (as used by MEGOC) and refresher training on site prior to their first shift. Training should reflect the core responsibilities of the Chaperone role and focus on any procedural areas raised in this or previous WADA IO reports.***

13. Chain of Custody, Transport and Storage of Samples

a. Post Sample Collection Process

The post sample collection process was secure, efficient and managed in accordance with the ISTI. All samples and doping control documentation collected at the Doping Control Stations were securely stored prior to their dispatch to the Doping Control Command Centre, from where the samples were later dispatched to the WADA-accredited Laboratory.

The chain of custody was appropriately managed and recorded by the Lead DCO until sample delivery at the Doping Control Command Centre. At this stage, samples were stored securely, and the chain of custody was managed and recorded by Doping Control Command Centre staff members before being shipped with the relevant documentation to the WADA-accredited Laboratory by the courier.

b. Sample Transportation

Instead of outsourcing sample transportation to an external courier, MEGOC employed its own couriers to ship the samples to the WADA-accredited laboratory. All samples were shipped, in accordance with the ISTI, once a day (late at night/early hours of the morning) ensuring that all samples collected that day (except in particular circumstances) were delivered to the WADA-accredited laboratory for 9am the following day. This process was efficient and very effective.

c. Turnaround Time for Analyses

At the direction of the EOC, a 24-hour turnaround time was implemented for the reporting of Games-time results. Such fast turnaround time brings a significant added value to the testing programme, especially for those samples collected Out-of-Competition (prior to the athlete competing) or for those samples collected In-Competition on athletes who are due to compete again in another event. It provides the EOC with the guarantee that any result can be potentially reported prior to the athlete competing (again) during the period of the Games. This therefore enables the EOC to prevent any athlete from competing who is facing a potential Anti-Doping Rule Violation (ADRV), therefore protecting the integrity of the event and clean athletes.

d. Sample Retention

As in Baku 2015 for the 1st European Games, the EOC have developed a sample retention strategy for all samples collected at Minsk 2019. In developing the strategy, the EOC took the initiative to gather advice from both WADA and the IO Team. The core principles of the EOC's sample retention strategy are:

- Following the conclusion of the Games, the EOC will communicate with all International Federations, European Federations, NADOs of competing athletes, the International Olympic Committee (IOC) and the ITA to determine if there are any samples from athletes under their jurisdiction they wish to move into their own long-term storage.

- If there are, the EOC will work with the relevant ADO and WADA-accredited laboratory holding the samples to ensure the secure transfer of the sample.

The EOC developed their sample retention strategy with the view of enabling those ADOs with greater and regular exposure to the athletes to retain these samples.

As with most elements across all anti-doping programmes, enhancements could be made for future Games, resources permitting. Considering their objectives of a sample retention strategy (for e.g. the protection of the results and athletes of their Games and the deterrence effect of knowing that such a policy is in place), the EOC could enhance this strategy through long-term storage of samples (in accordance with the statute of limitations), focussing on high-risk samples (for e.g. athletes identified through intelligence, APMU recommendations and medallists of high-risk sports) and conducting further analysis when new analytical methods are available and at a later time within the statute of limitations.

Recommendation:

- ***The EOC should consider enhancing its sample retention strategy for future Games considering the following elements:***
 - ***Storing the samples for up to the period of statute of limitations***
 - ***Developing a strategy to store samples based on risk***
 - ***Conducting further analysis once new analytical methods are available and within the period of statute of limitations***

14. Use of the Anti-doping Administration and Management System (ADAMS)

The EOC and MEGOC successfully used ADAMS to manage the Games-time anti-doping programme. It should be noted that the request for Games-time ADAMS accounts, relevant access and athlete short lists were only submitted to the ADAMS team at WADA one month prior to the Games. Given that accurate and comprehensive data into ADAMS is essential to an effective anti-doping programme, and considering the short turnaround, this created a potential challenge and risk in relation to access to Games-time athletes, creating duplicate athletes in ADAMS etc.

Whilst this was a delay in the request submitted by the EOC and MEGOC (ideally this should have been submitted to the ADAMS team at WADA three months prior to the event), this was due to the EOC and MEGOC being unaware of these preferred timeframes. There appears to be no clear communication/ resource from WADA that stipulates these timeframes and requirements. Therefore, the IO Team makes the following recommendation to WADA on this matter.

Recommendation for WADA:

- ***WADA to ensure that the timeframes and format for requesting a Games-time ADAMS account, relevant access and the sharing of athlete Games-time long and short lists, is clearly communicated. The IO Team propose that this is done in WADA's Guidelines for Major Events as well as incorporated into the MEO's agreement with WADA as part of the information/documentation that is shared/provided in advance of the Games.***

15. Results Management

A disciplinary committee was established by the EOC Executive Committee, in accordance with article 7 of the EOC Medical and Anti-Doping Guidelines applicable to the EOC Sports Properties. Five Adverse Analytical Findings (AAF) were reported by the contracted WADA-accredited laboratory. Three were supported by a valid and applicable TUE.

Of the two other AAFs, one was reported after the period of the Games and the results management process was therefore not observed by the IO Team.

The IO Team was however able to observe the results management process for the remaining AAF. Following all relevant notifications (the athlete, athlete's NADO, Chef de Mission, athlete's International Federation and WADA) a hearing was convened with the athlete, the Chef de Mission and the team doctor. Two members of the IO Team attended the hearing as observers. It was observed by the IO Team that one member of the disciplinary committee was also member of the EOC Medical and Anti-Doping Commission and had therefore been involved in the processing of the case.

The decision was then notified by the EOC in accordance with Article 14.2.1 of the Code to other ADO with a right to appeal. At the time of finalising this report, the deadline to appeal the decision had not yet expired and the decision was not yet publicly disclosed by the EOC.

Recommendations:

- ***Considering the requirement set out in Article 8.1 of the Code for a fair and impartial hearing panel, the IO Team recommends that the EOC ensures that members of the disciplinary committee have no prior involvement with the case, i.e. not involved in the processing of the case. The IO Team wishes to note as well that the draft 2021 Code and the draft International Standard for Results Management reinforce such requirement, referring to a "fair, impartial and operationally independent hearing panel".***
- ***In accordance with Code article 14.3, the IO Team recommends that the EOC ensures that all decisions are publicly reported by the EOC. The public notice shall include the sport, the anti-doping rule violated, the name of the athlete or other Person who committed the violation, the Prohibited Substance or Prohibited Method involved, and the Consequences imposed.***

16. Anti-Doping Awareness and Education

The delivery of effective anti-doping education is another challenge for MEOs. The IO Team welcomes the fact that the EOC invited WADA to operate an Athlete Outreach station, which was operational from 22 – 30 June. The station was well located (in the main dining hall in the Athlete Village) and appeared to be successful in engaging athletes. The Outreach station was operated initially by WADA (22-25 June) and then by BNADA staff (26-30 June). This involvement of BNADA contributed positively to enhancing the anti-doping legacy of the Games and the ongoing development of the local NADO.

In advance of the Games, the EOC provided anti-doping information to the NOCs (Chefs de Mission and team doctors) through the communication of the Doping Control Guide, which was available both in electronic and paper versions.

However, outside of the Outreach Programme, there was little anti-doping information visibly or easily accessible to athletes (for e.g. no educational resources in Doping Control Stations, no information on the EOC or Minsk 2019 website).

The importance of providing sufficient information to athletes is heightened at the European Games as many athletes are young with limited previous exposure to anti-doping (for e.g. for several athletes being tested, it was their first anti-doping test). Whilst many athletes may well have received education from their respective NADO and/or International Federation, MEOs should establish whether athletes and athletes support personnel have indeed received Education prior to the Event and provide access to a variety of Education/information tools during the period of the Games. Such requirement will be heightened by the forthcoming International Standard for Education. Establishing the extent of whether athletes and athletes support personnel have received Education in advance of a Major event could be incorporated into any pre-Games structured engagement and collaboration with NADOs and International Federations (as recommended in Section 8b – Managing Pre-Games Risk).

Recommendations:

- ***Whilst the implementation of an Outreach Programme at the Games was an excellent endeavour, it should be complemented by other initiatives to ensure that athletes have been sufficiently informed about anti-doping procedures and the EOC anti-doping rules prior to and during the Games. Such initiatives can be:***
 - ***Use of WADA Anti-Doping eLearning (ADeL) platform, in particular the Athlete Learning Program about Health and Anti-Doping (ALPHA) course***
 - ***Dedicated section on the EOC and Games website and on the mobile application***
 - ***Availability of educational resources in Doping Control Stations***
 - ***Coordination with relevant NADOs and International Federations in order to establish the extent of athlete and athletes support personnel pre-Games education***

Annex A - Summary of Recommendations

The following is a summary of all the IO recommendations for the EOC from this report by section:

5. Games Overview

- The EOC and future Organising Committees should continue at future Games to seek engagement with the local NADO at future Games to leverage existing anti-doping expertise and provide the local NADO with some opportunity to integrate into the Games (in some capacity) and further develop its expertise. The extent to which the local NADO is involved in the Games is strictly a decision for the EOC and Organising Committee.

6. Developing Anti-Doping Capacity and Expertise

- In order to ensure that the EOC does not rely too heavily on the anti-doping expertise of the entity which will be charged with the operational implementation of the anti-doping programme during the Games, it is recommended that the EOC enhances and increases its anti-doping capacity internally in-between Games, with a focus in the 6-12 months prior to a Games. The benefits of building this capacity will be reinforced with the complexities over the coming years of the introduction of the revised 2021 Code and related International Standards. How the EOC approach this is not for this IO Team to specify, but options available include:
 - Recruitment of anti-doping staff at the EOC
 - Inclusion of members on the EOC Medical and Anti-Doping Commission with day-to-day operational anti-doping experience
 - Maximising the use of the local NADO and its expertise and capacity
 - Engagement of a service provider (for e.g. International Testing Agency – ITA)

The IO Team recommends the EOC initiates conversations with WADA to determine its best strategy.

8. Test Distribution Plan (TDP) and Delivery

- For future Games, the EOC should consider its strategy for managing the pre-Games high-risk period. The EOC could liaise with other MEOs and/or WADA, to assess the merits and resources required of all options and implement a solution that ensures that testing resources for the Games are optimised to address the pre-Games risk.
- For future Games, the initiative of engaging with International Federations and NADOs in advance of the Games should be continued, however should start earlier (e.g. 6-12 months prior to the Games) and be more structured to ensure the exchange of all relevant information that could enhance the EOC's anti-doping programme. Such engagement should also include all relevant departments of WADA and clearly link to the EOC's strategy on managing the pre-Games risk.

- The EOC and MEGOC delivered a comprehensive Out-of-Competition testing programme. The following points should be considered for future Games to further enhance the effectiveness of the delivery of the Out-of-Competition programme:
 - Use as much information and intelligence as possible to locate targeted athletes. This includes but is not limited to; trying to visually identify the presence of athletes/teams in communal areas such as the dining hall and entrances to the Athlete Village and training details. Whilst not available at these Games, where relevant for future Games, the EOC and future Organising Committees should consider gaining access to athlete accreditation electronic scanning data (i.e. where athletes are scanned in and out of the Athlete Village and other accredited venues) would be very beneficial to determining the location of target athletes.
 - Delivery of specific Out-of-Competition training for DCOs and Chaperones, including, for e.g., how to discretely locate athletes within the Athlete Village
 - Ensure discretion by minimising as much as possible the identification of DCOs and Chaperones when locating athletes
 - Increase the proportion of Out-of-Competition testing conducted outside of the Athlete Village
- The EOC should consider improving their In-Competition testing plans by developing strategies, based on the risk of the sport, for athlete selection (e.g. policy on testing medallists, target testing specific disciplines). This would form the basis of an In-Competition testing plan, which could then be flexible and adaptable to enable target testing to take place based on intelligence and International Federation/NADO recommendations, as was incorporated in Minsk.
- Where possible, future Organising Committees working on behalf of the EOC should ensure that a Lead DCO (and other DCOs) with sport-specific experience is allocated to that sport. This will assist with an effective doping control process. In addition to this, the Organising Committee should consider developing sport-specific operational guidelines that can be shared with Lead DCOs in advance of testing. This will support the Lead DCO in ensuring an effective doping control process is implemented. Such sport-specific information should include (but not limited to):
 - Competition format
 - Sport-specific selection policies/draw procedures
 - Any sport specific intricacies that may impact on anti-doping
 - Engagement of International/European Federation Technical Delegate
- The EOC and MEGOC proactively facilitated ABP testing at these Games through the engagement with relevant ADOs. The EOC should consider the following points for future Games to further enhance the effectiveness of the ABP programme:
 - Early and structured engagement with ADOs to identify athletes under an ADO's passport custody to be tested for ABP purposes. This communication is essential given the operational challenges presented as an athlete's biological passport can be under the custody of the International Federation or NADO.

- Effective communication with relevant ADOs to ensure that their Athlete Passport Management Unit (APMU) is primed to review and provide recommendations quickly to enable the EOC to conduct target testing. The risk of missing the opportunity to test an athlete during the event and therefore the detection window should be minimised.

9. Whereabouts

- The EOC implemented a clear and proportionate whereabouts process however its anti-doping rules did not contain consequences in case of whereabouts requirements not being fulfilled. The EOC should consider including such consequences in their rules for future Games.

10. Therapeutic Use Exemptions (TUEs)

- Given the sensitivity of the data managed by the EOC's TUEC, it is recommended for future events to implement a system that guarantees the highest possible standards of security and confidentiality of the information. The use of ADAMS only is the preferred option although there might be some logistical constraints to do so. The principle to consider is the protection of data from internal and external risks. For example, the use of emails to share medical files should be proscribed, personal computers should not be used to treat such data unless it fulfils the security requirements defined by the EOC, etc. From a practical perspective, the EOC could consider issuing its TUEC members with dedicated computers that meet such requirements to facilitate their work.

11. Gathering and Sharing Information and Intelligence

- The EOC should consider, as part of pre-Games engagement with International Federations/NADOs, to proactively gather intelligence through International Federations/NADOs, and ensure that during the Games, any intelligence received is shared, by secure means, with all relevant parties accordingly (i.e. the NADO, International Federation and WADA).
- The EOC should consider engaging as early as possible in the planning phase with the local NADO to leverage the use of existing intelligence gathering mechanisms, for e.g. relationships with law enforcement and customs, whistle-blower hotlines.

12. Sample Collection Personnel and Process

- As EOC and future Organising Committees should continue to ensure for future Games that the Games-time Doping Control workforce is experienced, a combination of local and IDCs, and where possible utilises local language skills. This will add significant value to the delivery of a Games-time programme.
- Taking into consideration that IDCs come from different NADOs that might have different procedures, equipment and/or documentation, it is recommended that pre-Games training is organised for all local DCOs and IDCs in advance of their first Games-time shift covering these elements.

- Consideration should be given to the workloads and shift patterns for DCOs and BCOs to ensure that there is a balance between suitable resourcing and ensuring DCOs/BCOs are not working long and consecutive days.
- The EOC and future Organising Committees should ensure that structured formal training is provided to all volunteer Chaperones in advance of the Games starting. This should be supported with venue tours and the use of Test Events (as used by MEGOC) and refresher training on site prior to their first shift. Training should reflect the core responsibilities of the Chaperone role and focus on any procedural areas raised in this or previous WADA IO reports.

13. Chain of Custody, Transport and Storage of Samples

- The EOC should consider enhancing its sample retention strategy for future Games considering the following elements:
 - Storing the samples for up to the period of statute of limitations
 - Developing a strategy to store samples based on risk
 - Conducting further analysis once new analytical methods are available and within the period of statute of limitations

15. Results Management

- Considering the requirement set out in Article 8.1 of the Code for a fair and impartial hearing panel, the IO Team recommends that the EOC ensures that members of the disciplinary committee have no prior involvement with the case, i.e. not involved in the processing of the case. The IO Team wishes to note as well that the draft 2021 Code and the draft International Standard for Results Management reinforce such requirement, referring to a “fair, impartial and operationally independent hearing panel”.
- In accordance with Code article 14.3, the IO Team recommends that the EOC ensures that all decisions are publicly reported by the EOC. The public notice shall include the sport, the anti-doping rule violated, the name of the athlete or other Person who committed the violation, the Prohibited Substance or Prohibited Method involved, and the Consequences imposed.

16. Anti-Doping Awareness and Education

- Whilst the implementation of an Outreach Programme at the Games was an excellent endeavour, it should be complemented by other initiatives to ensure that athletes have been sufficiently informed about anti-doping procedures and the EOC anti-doping rules prior to and during the Games. Such initiatives can be:
 - Use of WADA Anti-Doping eLearning (ADeL) platform, in particular the [Athlete Learning Program about Health and Anti-Doping \(ALPHA\)](#) course
 - Dedicated section on the EOC and Games website and on the mobile application
 - Availability of educational resources in Doping Control Stations
 - Coordination with relevant NADOs and International Federations in order to establish the extent of athlete and athletes support personnel pre-Games education

The following is a summary of all the IO recommendations for WADA from this report by section:

4. Games Overview

- For future IO missions, WADA should consider developing a more specific plan of engagement for the IO Team and the EOC (or other MEOs). This should include setting expectations for the pre-Games period, identifying information to be shared with stipulated timeframes, clarification of the IO Team role during the pre-Games period and stipulating pre-Games meetings/conference calls. This plan could be an appendix to the existing agreement. This would facilitate a greater collaboration between relevant parties and reduce the impact on the key players (for e.g. the Organising Committee) during the period of the Games.

14. Use of the Anti-Doping Administration and Management System (ADAMS)

- WADA to ensure that the timeframes and format for requesting a Games-time ADAMS account, relevant access and the sharing of athlete Games-time long and short lists, is clearly communicated. The IO Team propose that this is done in WADA's Guidelines for Major Events as well as incorporated into the MEO's agreement with WADA as part of the information/documentation that is shared/provided in advance of the Games.

Annex B – Games-Time Statistics

Testing Overview

Total samples	1160
In-Competition samples	667
Out-of-Competition samples	493
Urine samples	1015
Blood samples	124
ABP blood samples	21
Athletes tested	933
ESA analysis	195
GH analysis	124
GHRF analysis	118
Adverse Analytical Findings (AAF)	5
Atypical Findings (ATF)	0

Testing by Sport

Sport	In-Competition samples	Out-of-Competition samples	Total samples
Archery	20	8	28
Athletics	93	94	187
Badminton	27	16	43
Basketball 3x3	23	10	33
Beach Football	17	4	21
Boxing	56	52	108
Canoe Sprint	55	58	113
Cycling – Road	35	24	59
Cycling – Track	52	54	106
Gymnastics – Acrobatic	7	3	10
Gymnastics – Aerobic	10	3	13
Gymnastics - Artistic	16	9	25
Gymnastics – Rhythmic	7	1	8
Gymnastics - Trampoline	9	2	11
Judo	61	46	107
Karate	18	29	47
Sambo	30	7	37
Shooting	56	20	76
Table Tennis	24	10	34
Wrestling	51	43	94
TOTAL	667	493	1160