

CCES Submission to 2027 International Standard for Results Management Review Second Consultation Phase

In response to WADA's request for comments as part of Phase 2 of the 2027 International Standard for Results Management consultation process, the CCES submitted the following comments.

Article 5 – First Results Management Phase

Comment to Article 5.1.2.1.b: Consider changing “The Results Management Authority **should** always refer to both Code Articles 2.1 and 2.2 in the notification and charge letter” to “**shall**” to ensure more consistent approaches to notification amongst signatories.

Additionally, the step of contacting WADA and other ADOs to determine whether any prior violations exist would be a duplication of efforts. Ideally all past violations are captured in ADAMS but since all parties are copied on the Notification letters they could identify if a past violation was not listed in ADAMS.

Article 5.1.2.1.c: The CCES welcomes the addition of the reference to a timeline but notes that it would be more helpful to include a specific timeline by which the athlete **should** request the B sample analysis. Keeping in mind the comment regarding the ISL where the RMA “**should**” inform the laboratory within 15 days. The inclusion of “should” in each case still permits flexibility for the ADO in working with the athlete on their decision to request the B sample analysis or not.

The comment to this article references “CP” but the definition of CP (Confirmation Procedure) has been deleted. This should be spelled out.

Article 5.1.2.1.f: The CCES recommends clarifying what is intended as a “short deadline.”

Article 5.1.2.3: Consider adding a specific deadline by which the B sample must be analyzed in recognition of the concern raised regarding sample degradation.

Comment to Article 5.1.2.8: Considers whether the comment should be its own Article and move it towards the beginning of Article 5.

Comment to Article 5.3.2.3: Considers whether the comment should be its own Article and move it towards the beginning of Article 5.

Article 7 – Charge

Comment to Article 7.1.c: The step of contacting WADA and other ADOs to determine whether any prior violations exist would be a duplication of efforts. Ideally all past violations are captured in ADAMS

but since all parties are copied on the Notification letters responsibility could be placed on those organizations to verify if a past violation exists that was not listed in ADAMS.

Comment to Article 7.1.d: Consider changing “should make it clear” to “shall,” to ensure ADO is as transparent as possible

Article 7.1.g: Consider changing the first “and/or” to “and” (“...under Code Article 10.8.2, ~~and/or~~ provide substantial Assistance...”)

Comment to Article 7.2: Consider establishing a separate Article for this Comment and move it towards the beginning of Article 7

Article 7.3: Please clarify if the addition is intended to point to Article 7.1 c as opposed to 7.1.d.

Article 9 – Decisions

Article 9.1.1.b: The majority of the content is found in the comment. Consider elevating this information into the Article itself.

In the comment to Article 9.2.4: is the wording used in this comment “*in electronic, digital, and word-searchable format.*” intended to “define” the term machine-readable from Code Article 14.2.2. If so, this should be outlined in the Code Article.

Article 9.2.3: Consider changing “should” to “shall.”

Article 11 – Violation of the Prohibition Against Participation During Provisional Suspension

Comment to Article 11.1: The wording “prohibited” should be changed to “prohibition” in the sentence “If the violation of the **prohibited** against participation during Provision Suspension.”

Annex B – Results Management for Whereabouts Failures

Article B.3.2.d: Consider changing “should” to “shall” in the sentence “The notice **should** also advise the Athlete that three (3) Whereabouts Failures in any 12-month period is a Code Article 2.4.”

Comment to Article B.3.4: Numbering should be changed from “B.3.3” to “B.3.4”

Comment to Article B3.4: Consider including clarification on the processes for subsequent Whereabouts Failures encountered during the Results Management process of a violation of Code Article 2.4 and how these Failures “may be used as an alternative basis for the Code Article 2.4.”

Annex C – Results Management Requirements and Procedures for the Athlete Biological Passport

Article C.2.2.5.1: Considering including clarification on the distinction between “likely” and “highly likely” within the Athlete Biological Passport Operating Guidelines.