

## **CCES Submission to 2027 International Standard for Results Management Review Third Consultation Phase**

In response to the World Anti-Doping Agency's (WADA) request for comments as part of Phase 3 of the 2027 International Standard for Results Management consultation process, the Canadian Centre for Ethics in Sport (CCES) submitted the following comments.

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### **Article 5.1.2.2**

The CCES would request consideration be given to the time taken for additional testing, scientific recommendations, additional target testing, or intelligence and investigation initiatives, and whether 20 days would be sufficient in all cases.

### **Article 5.1.2.3**

The CCES would suggest the removal of this provision. As written, there may be privacy implications by disclosing the other ongoing findings. Should this article not be removed the CCES would request clarification on what would constitute a "good reason" to believe that multiple cases all result from a Contaminated Source.

### **Comment to Article 5.1.2.10**

The CCES would suggest considering whether the comment should be its own Article and moved towards the beginning of Article 5.1.2.1.

### **Comment to Article 5.3.2.3**

The CCES would suggest considering whether the comment should be its own Article and moved towards the beginning of Article 5.3.2.1.

### **Article 5.5.5**

In principle, the CCES has no issues with the new article, but additional details must be provided about who is the Independent Review Expert, the process by which they will be identified, if they hold this role for a specified term and/or any term limits. A lack of transparency regarding this individual could create the perception that they are not, in fact, independent. Prior to inclusion in the Code, the CCES would suggest that a limited scope review of this Article takes place once the details are confirmed.

### **Comment to Article 7.2**

Consider establishing a separate Article for this Comment and move it towards the beginning of Article 7.1

### **Article 7.3**

The CCES would suggest updating "admit" to "accept" aligning it with Article 7.1.d

**Article 9.1.1.b-e**

The majority of the content is found in the comments to these Articles. The CCES would suggest elevating this information into the Articles.

**Comment to Annex B 3.4**

The CCES would suggest including details 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.”