

CCES Submission to 2027 International Standard for Testing 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 Testing consultation process, the Canadian Centre for Ethics in Sport (CCES) submitted the following comments.

General Comments to Part One

The CCES would suggest the definition of "Unsuccessful Attempt Report" (UAR) consider removing "from an athlete in a Registered Testing Pool or Testing Pool" as UAR reports are beneficial for non-Registered Testing Pool (RTP) athletes and can be relied upon to add someone to an RTP. Should WADA agree, the CCES feels the requirement to include the UAR in ADAMS should be limited to only RTP Athletes.

Article 4.6.1.1.c

For clarity, WADA should include details for the process for where and how to apply for an exemption for out-of-competition (OOC) testing. It would also be helpful to have additional clarity confirming if only international federations (IF) can apply for this exception or if national anti-doping organizations (NADO) are able to as well.

Article 4.6.1.3.a

Considering the introduction of dried blood spot (DBS) testing, the CCES would suggest removing the reference to "venipuncture" and updating this section to "collection of whole blood and analysis of."

Article 4.8.3

The CCES would suggest considering changing the prescribed timeline to 20 days prior to the opening of the Village, to outline a single deadline.

Article 4.10.6.2.d

The CCES would request clarification on whether a whereabouts failure can be pursued simply on the basis of an athlete's failure to upload a photo to ADAMS. This requirement could be seen as overly prescriptive and disproportionate, while creating an additional administrative burden. Enforcement would be difficult as would validation of the photo being representative of the athlete (which would likely require cross-referencing with open-source searches). Additionally, not all anti-doping organizations (ADO) provide their Doping Control Officers (DCO) with access to ADAMS, meaning DCOs in the field would be unable to validate the photo compared to the athlete who may be in front of them unless the photo was provided by other means, which may be difficult depending on the systems and methods used by ADOs when issuing missions.

Article 4.10.7.1.c

The CCES would request clarification on whether this article is required given that an athlete is already required to comply with the sample collection process until completion. Consider including clarifying elements for exceptional circumstances. As an example, would a violation of Code Article 2.3 be pursued if a session extends outside the 60-minute time slot, the athlete has a flight to catch, and they can provide evidence of the flight.

Article 4.10.12.1.c

Aligned with the CCES's comment to 4.10.6.2.e, the CCES requests for WADA to clarify whether a testing pool athlete would be moved into the RTP if a photo is not uploaded to ADAMS.

Article 5.2.d

Although there is no change, we are reiterating our comments from the last Code review to consider changing the wording from, "...to the arrival at the designated Doping Control Station" to, "to the end of Sample Collection" to ensure that it is clear the athlete must continue to be chaperoned. For example, they must be chaperoned if they leave the doping control station to attend a medal ceremony.

Article 5.3.2

The CCES would request this article considers athletes who are not included in a whereabouts pool and includes the additional flexibility to contact an athlete by phone when the athlete lives in a gated community or building with restricted access.

Article 5.3.7.1

Regarding, "the DCO shall where applicable check the Athlete's photograph within their ADAMS," the CCES would request clarification on what would be considered "where applicable."

Articles 6.3.4.s and 6.3.4.t

The CCES would suggest removing the volume references in 6.3.4.s and 6.3.4.t and moving them to the Guideline to allow for more flexibility if future changes are warranted.

Article 7.4.5.a

The CCES would reiterate our comment that with the inclusion of the country of test, consideration should be given to include the city as well.

Article 9.3.2.a

The CCES would request clarification on the acceptable "logistical reason" considered in the article, "If for any logistical reasons the immediate transportation of urine and DBS *Samples* is not possible, such transportation shall occur no later than five (5) days from the date of *Sample* collection" (e.g., due to the shipping company's shipping holiday closures or cost considerations).

Comment to Annex A.4.8

The CCES supports this inclusion but, as written, the requirements to check identification this would require a video call. This may be restrictive for some athletes. The CCES suggests considering expanded wording to permit a parent/representative to listen to the session via phone call as well.

Comment to Annex B.4.4

The CCES supports this inclusion but, as written, the requirements to check identification this would require a video call. This may be restrictive for some athletes. The CCES suggests considering expanded wording to permit a parent/representative to listen to the session via phone call as well.

Annex D. 1.1

The CCES suggests replacing the reference to “by venipuncture” with “To collect an Athlete’s whole blood Sample in a manner that ensures...”

Comment to Annex D.4.6

Although there is no change, the CCES would reiterate our comments from the last Code review to include wording to allow athletes to lie down for 10 minutes, rather than only provide the option of “a normal seated position.” There are athletes who know they are prone to 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, they could be included as well. This is also referenced in Annex I.3.1 and Annex J.5.5.

Annex D.4.9

The CCES would suggest updating the wording to remove reference to “venipuncture.”

Proposed Wording: The Blood Collection Officer (BCO) shall assess the most suitable location for collecting the sample that is unlikely to adversely affect the *Athlete* or their performance. [...] The tourniquet, if applied, shall be immediately removed after the collection has commenced.

Annex F.4.3 and Comment

Advising an athlete they are not to hydrate may be unsafe to the athlete. Considering that samples are collected until a suitable sample is provided, the CCES would suggest WADA considers rewording to specify excessive hydration.

Proposed Wording: While waiting to provide a further Sample, the Athlete shall remain under continuous observation and should be advised not to over hydrate, since this may delay the production of a suitable Sample. In appropriate circumstances, excessive hydration after the provision of an unsuitable Sample may be pursued as a violation of Code Article 2.5

[Comment to F.4.3: It is the responsibility of the Athlete to provide a Sample with a Suitable Specific Gravity for Analysis. Sample Collection Personnel shall advise the Athlete and Athlete Support Personnel as appropriate of this requirement at the time of notification in order to discourage excessive hydration prior to the provision of the Athlete’s first Sample.]

Annex G.4.4.2

Consider removing the requirement for a DCO trainer to observe the trainee DCO witnessing the passing of the sample. The CCES notes that a Chaperone, who has significantly less training than a DCO trainee is

able to witness the provision of the sample without the DCO observing. Alternatively, could be considered as “should” instead of a “shall.”

Annex G.4.4.4.e

This article refers to accredited chaperones. The CCES would request clarification be provided to outline what specifically defines an accredited chaperone.

Annex I.5.2

The prior article says the athlete shall be chaperoned until the 2 hours period has elapsed. The CCES would note that as there should not be samples collected within 2 hours, this article may not be necessary.

Annex I.5.5

Aligned with feedback from the INRS, there is a need for consistency between the International Standard for Testing (IST) and the Athlete Biological Passport (ABP) guidelines. It has been noted that in recent cases, the Blood Stability Score (BSS) has been challenged as even though it may be < 85, the sample wasn’t necessarily cool and IST Articles D.4.16 and D.4.18 indicate that the sample must be transported in a “cool and constant environment.”

Annex J.3.3

The CCES would suggest updating the wording to remove, “Due to the absence of venipuncture during DBS collection.”

General Comments to Annex K

Consider whether Annex K would be better suited as “Guidelines for Testing During a Pandemic” rather than an Annex in the IST. Consider also changing the title to include reference to national epidemics.

Proposed Wording: COLLECTION OF URINE SAMPLES IN A VIRTUAL ENVIRONMENT DURING A PANDEMIC OR EPIDEMIC