



WADA Independent Observer Report

1st European Games, 12-28 June 2015, Baku, Azerbaijan

1. Background

The Independent Observer (IO) program in Baku adopted a cooperative approach which saw WADA and its experts partner with the European Olympic Committees (EOC) to optimize anti-doping efforts at the 1st European Games. Rather than merely audit policies and procedures to see that the administrative aspects of the doping control program were carried out appropriately, the IO program in Baku sought to identify opportunities for ongoing improvement and address them collaboratively rather than only report matters retrospectively. This collaborative approach included communication between the EOC, WADA, the games organizing committee (BEGOC) as well as BEGOC's contracted service provider PWC all well in advance of the games themselves.

While taking note of general compliance with rules and procedures, the IO team was primarily engaged in looking at the implementation of doping control policy to see that plans were carried out effectively, and that they optimized available human and financial resources in support of clean athletes participating in the event. Prior to the Games, the IO team reviewed the EOC's Anti-Doping Rules, test distribution plans and provided feedback on specific program challenges such as how to implement whereabouts provisions with BEGOC and PWC in particular. The IO team arrived in Baku on June 7th and observed the EOC's anti-doping operations through June 17th.

The IO team was led by Frederic Donzé, WADA's Director, European Regional Office and International Federation Relations, and Stuart Kemp, WADA's Deputy Director of Standards & Harmonization, and supported by Gabriela Andreiasu, Deputy Director, Romanian Anti-Doping Agency, and Tony Cunningham, WADA Education Manager. The team sincerely thanks the EOC and Dr. Klaus Steinbach, EOC's Chief Medical Officer and Chair of the Medical Commission in particular for his support, collaboration and commitment. The team also wishes to thank and acknowledge the other members of the EOC Medical Commission, BEGOC staff including Head of Medical and Anti-Doping Pam Venning as well as Rob Sutcliffe of PWC and all BEGOC volunteers.

2. Program Overview

The overall anti-doping program of the 1st European Games comprised 1024 samples from 866 unique tests including 105 blood tests. Testing was spread across 820 athletes from 46 of the 50 participating countries resulting in two adverse analytical findings. Under the auspices of the EOC and their World Anti-Doping Code compliant rules, doping control services were the responsibility of the local games organizing committee (BEGOC) who in turn delegated collection services and specific anti-doping expertise requirements to German independent corporate service provider PWC with their professional staff who have

considerable experience in World Anti-Doping Code and International Standards requirements and a record of program delivery for a range of Code signatories.

BEGOC wisely had one staff from PWC embedded within the organizing committee (from October 2014 onward) in order to ensure that doping control policies, procedures and workforce requirements were considered within the context of the overall games plan. Analytical services were jointly provided by two WADA accredited laboratories; namely Seibersdorf and Moscow.

The doping control workforce as a whole was comprised of 36 Doping Control Officers (27 of which were PWC employees) and 70 volunteer chaperones. Among these 70, 30 chaperones were recruited internationally to provide the workforce with additional language skills and doping control experience. BEGOC provided airfare and accommodation for these volunteers who added significant value to the anti-doping workforce given the limited experience of local chaperones. All local chaperones were provided advance training in March 2015 by PWC and BEGOC.

3. Program Strengths

a. Whereabouts

In conjunction with BEGOC and PWC, the EOC implemented a pragmatic approach to the collection and use of whereabouts information in support of its 'out of competition' testing activity (i.e. testing conducted in the Athlete's Village prior to competition). So as not to burden all athletes with whereabouts submission in a manner disproportionate to the needs of EOC testing plans, the EOC predominantly relied on whereabouts that participating Registered Testing Pool (RTP) athletes were already providing to their National Anti-Doping Organizations (NADOs) and International Federations (IFs). The EOC and its partners were provided with access to ADAMS for this purpose and took additional steps to ensure that all those selected for testing 'out of competition' were locatable. By working closely with other BEGOC functional areas such as transport and accommodations, the program was able to acquire all that it needed to locate athletes without demanding information directly from them.

The success of this program was partially attributable to the fact that nearly all participating athletes resided in the Athlete's Village and did so for only a short time (i.e. a day or two prior to and after their scheduled events). In this way, Doping Control personnel were able to identify the specific days and times target athletes would be arriving in the village for the first time, and attempts to test them could be planned in advance accordingly and carried out immediately upon their arrival to the Baku Athlete's village. Such an approach was underpinned by a clear policy for participating National Olympic Committees (NOCs); namely that they were required to provide a full rooming list of their athletes that they needed to take responsibility for. With the requirement being that simple, NOCs generally fulfilled their responsibilities without significant difficulty and 'buy-in' to the policy from the NOCs was positive which was likely a reflection of the simplicity of the requirement as well as the efficiency with which testing was conducted and the minimal interference to athletes normal routines.

Two final observations are also worth mentioning regarding the success of the whereabouts program and subsequent out of competition testing. Firstly, the professionalism and experience of those locating athletes in the Athlete's Village should not be underestimated. Doping Control Officers, rather than inexperienced volunteer chaperones were used to

locate and notify athletes. These DCOs were well versed in such testing and were able to use their skills in a resourceful way to make enquiries discretely and appropriately in order to locate athletes without providing advance notice, or disclosing their intended athletes when unsuccessful. Their persistence and capability in this regard was of significant value. Finally, BEGOC produced a mobile app that included full athlete profiles including up to date photographs. This app was a tremendous mobile resource for Doping Control Officers to carry out their task effectively.

b. Testing Grant Program

In an effort to increase the probability of a clean event, without having to extend its own testing jurisdiction, the EOC adopted a novel approach to seeing that chances were maximized that participating athletes might be tested in advance of their arrival in Baku. In late 2014, the EOC and BECOG advised European NOCs that they were eligible to receive a testing grant which could be used to test athletes in the lead up to the games. The particular objective of this initiative was to encourage testing on potential participants who may not have been otherwise a part of their countries' testing program.

In summary 158 tests were conducted under the grant program by multiple ADOs and the program did lead to at least one adverse finding between February and May preventing one potential athlete from arriving at the games. 30 of the 50 participating NOCs made applications and a budget had been set aside to support 200 tests. The remaining 42 tests therefore were reinvested into the games-time program.

The IO program believes that this initiative was a good one. The team was able to discuss the project with the EOC and BEGOC and a number of recommendations are included herein in order to enhance such a program further should the EOC decide to advance this initiative at future editions of the games or should other Anti-Doping Organizations (ADOs) wish to adopt a similar strategy for their major events. These include:

Greater promotion of the program to European NOCs and NADOs

By mid-November 2014, the EOC had received only a few NOC requests for the testing grant program. Reminders improved the rate of replies but a number of big European sporting nations did not seize this opportunity and did not request any tests. This could be partly remedied by improving general communication and promotion and extending the channels of communication directly to the NADO community rather than relying exclusively on the NOCs. In most of the European countries, anti-doping is under the responsibility of a NADO. This program resulted in a number of situations where there was some confusion – including in terms of testing jurisdiction – between the NOC, which is the point of contact of the EOC and which was responsible for requesting the testing grant, and the NADO, which was responsible for conducting the test. Clearer communication from the EOC and the local organizers encouraging better communication between the NOCs and their respective NADOs could allay some of these concerns and logistical issues.

Improved integration of the program within global anti-doping activities

In part as a result of the previous point, the program was not optimally coordinated with and integrated within anti-doping activities worldwide. In order to better coordinate anti-doping activities worldwide, it is suggested (as was offered by WADA at the time of the grant announcement) that the EOC provide WADA with the long list of potential participants and the list of countries that have requested a testing grant. This would allow WADA to 1) identify, through ADAMS, potential gaps in terms of testing of specific countries, sports

and/or athletes; 2) make recommendations to the EOC or the local organizer, for integration into its allocation of tests; and 3) coordinate with IFs and European NADOs/RADO to ensure that gaps can be filled by potentially conducting target testing, as part of their "normal" program, on countries, sports or athletes that may be at risk but may not be covered by the EOC/local organizing committee grant.

Additionally, for the purpose of enhanced test targeting and effectiveness, it is suggested that the management of this grant be included in the contract signed by the EOC with the organization responsible for delivering the Games' anti-doping program, be it the local NADO or another service provider. This would also facilitate proper follow-up of some countries or athletes and coordination between the pre-Games testing program and the Games' "out of competition" testing program (i.e. preceding the opening of the event but during the Games period). For this to happen, though, the contract needs to be signed well ahead of the Games.

Optimization of program administration

The management of this program required significant time and human resources from the organizing committee. Ideally, it could be managed by the EOC but the number of EOC staff is very limited. Based partly on the points above, while maintaining the involvement and objective decision-making of the EOC in terms of identification of the athletes to be target tested as part of this pre-Games testing program, it could make sense to outsource the management of the program by the EOC to the NADO or service provider that will deliver the Games' anti-doping program in collaboration with the organizing committee. It may also be worth considering including an Education Grant Program as part of the administration of the budget made available for this program. This may include delivery of seminars to the national teams travelling to the Games. WADA would be happy to consult further on the development of this. This would ensure a focus on prevention as well as detection and deterrence through the Testing Grant Program.

c. The TUE process.

Management and administration of the EOC Therapeutic Use Exemption program was conducted in a highly professional and thorough manner. Of the nearly 6000 participating athletes, just 39 held a valid TUE from their IF or NADO which was recognized by the EOC. 17 of these TUEs were available based on information present and accessible through ADAMS, and another 20 TUEs were referred to the EOC Medical and Anti-Doping Commission prior to the games themselves. Only two new applications were submitted and approved during the competition period itself. The EOC is to be commended for ensuring a clear process was available to participating NOCs and athletes. This process included a dedicated 24/7 phone line for TUE enquiries, and diligent monitoring of Doping Control Forms to identify possible patterns of use of prohibited and monitored substances that may require TUE education or NOC follow up.

d. Efforts to provide an anti-doping legacy in Azerbaijan

A significant challenge to the implementation of a robust anti-doping program at the 1st European Games was the absence of an established NADO to provide infrastructure and expertise to games operations. It was for this reason primarily that BEGOC and the EOC needed to put such services to tender and why PWC ultimately fulfilled this role. That all being said, the EOC would appear to have made all reasonable efforts to include the Azerbaijani NADO AZADA in their thoughts and plans as operations advanced.

Over the course of the event, eight AZADA DCOs acted as Chaperone Supervisors following a workshop conducted by PWC in the spring to assess their competencies. Given the intimate involvement of the Azerbaijan Sports Ministry in the direction of BECOG and given this same Ministry oversees the operation of AZADA, it was regrettable that these games could not have acted more as a catalyst for the advancement of the NADO in terms of staff training (being embedded in the organizing committee), recruitment of additional DCOs and chaperones, training of local physicians and educators, as well as the general experience of hundreds of tests being conducted in a short space of time representing more testing than AZADA has conducted over the span of multiple years. WADA will be addressing these shortcomings with AZADA and government authorities following a number of meetings with them which these games facilitated.

4. General Observations and Recommendations for the Future

a. Staffing and Doping Control Operations/Procedures

The most obvious beneficial attribute of the Games staffing operations was having a full time staff member from PWC embedded within BEGOC. This position could have begun even earlier to optimize PWC's influence on testing intelligence matters given that the majority of this individual's time was spent on personnel recruitment, training and related logistics. The enhanced development of the EOC Test Distribution Plan and an increased focus on solicitation and collection of information from IFs and NADOs to support a smart testing program could have been achieved with more staff or time available. Increased training opportunities may have also been possible for less experienced personnel. It may also have improved the administration and uptake of the Testing Grant Program as mentioned in section 3b.

These limitations manifested themselves to a limited extent in some inconsistencies observed during doping control. In particular, amongst some of the less experienced local chaperones, the following aspects of EOC procedures were implemented inconsistently:

- i. Lack of familiarity with the doping control forms ;
- ii. Advising athletes of their rights and responsibilities upon notification of their selection;
- iii. Minors on occasion not being advised of their additional rights or being afforded too much leeway (i.e. lack of direct observation);
- iv. Partial sample procedure.

None of these deficiencies would appear to have jeopardized the integrity of the doping control process as a whole at any time, but could reasonable be viewed as a reflection of limited training and testing opportunities in advance of the games.

b. Test Events

The lack of test events that included the doping control function was disappointing as many of the wrinkles in the program could have easily been ironed out by such 'practice run' opportunities. That being said, the IO acknowledges the limitations that BECOG faced in this regard, namely the unique ownership arrangement of many of the sport venues whereby few games functional areas had advance access to these facilities to see that their requirements had been met and more importantly that procedures could be tested in advance. It is recommended therefore that the future remit of anti-doping workforce should include such opportunities.

Such test events could also have had the added value of affording the volunteer chaperone workforce with practical opportunities to perform their duties in advance of the games with any issues or challenges being remedied appropriately either through additional training or other corrective actions.

5. Conclusions and Recommended next steps

The EOC is commended for the technical proficiency of the Baku anti-doping program and the innovative aspects of the anti-doping program implemented, especially in light of the fact that this was the first such event under the authority of the EOC.

Going forward, WADA would be pleased to have the opportunity to review these recommendations with the EOC at the appropriate time, to see how they may be taken onboard as the EOC prepares for the next edition of the European Games to be held in 2019. Furthermore, once the next host city has been identified for the next edition of the European Games, WADA will be pleased to partner with the EOC and its stakeholders to develop anti-doping plans for that event which build upon the successes of Baku.