

2015 Code Review - Second Code Consultation Phase

Showing: Purpose, Scope and Organization of the World Anti-Doping Program and the Code (35 Comments)

Purpose, Scope and Organization of the World Anti-Doping Program and the Code (8)

Australian Athletes' Alliance

Laura Sigal, Executive (Australia)

Sport - Athlete

Doping is a very important issue to Athletes. We want to compete in a clean game, enforced through a fair system that recognises human and employment rights. As the ones most affected by the Code, Athletes should have a significant role in determining the rules through the representatives of their choosing.

International Rugby Board

Caroline Nolan, PA to Legal Department (Ireland)

Sport - IF – Summer Olympic

Purpose, Scope and Organization of the World Anti-Doping Program and the Code

The Draft introduces an additional sentence under the header " The Code" (page 9) as follows:

"The Code shall be applied in a manner that respects the principles of proportionality and human rights."

The IRB would be grateful for clarification in relation to the effect, if any, this additional sentence is intended to have, particularly with respect to the sanctions.

Recommendation

We would suggest that if this comment is to remain it may be helpful to avoid any potential misunderstandings that a comment be inserted to the effect that "this is not intended to undermine the mandatory minimum sanctions" given that this principle applies as a matter of law in any event.

International Golf Federation

Michele Verroken, Representative (United Kingdom)

Sport - IF – Summer Olympic

We welcome the inclusion within this introductory section that the Code will be applied in a manner which respects the principle of proportionality and human rights.

New Zealand Olympic Committee

Kereyn Smith, Secretary General (New Zealand)

Sport - National Olympic Committee

The New Zealand Olympic Committee (NZOC) is pleased to submit on a number of key points on the WADA Code review. We have also been consulted as part of Drug Free Sport NZ's submission on behalf of many New Zealand sporting organisations. Overall we support the position DFSNZ are taking on substantive matters of the Code Review.

The key points relating to the Code the NZOC feel strongly about are:

(i) Ensuring resources and efforts are focussed on preventing and/or identifying cheating athletes and programmes. (Noting focus should be on performance enhancing substances as a core function)

(ii) Ensuring the heaviest sanctions are applied to cheats.

(iii) Ensuring bans are applied to cheats that prevent them from competing at the next Olympic Games where the ban does not otherwise cover it.

(iv) Noting the importance of effective NADO's in countries participating in global sporting events.

(v) Simplification of processes and systems that enable sports and nations to manage effectively the WADA compliance (i.e. whereabouts processes, TUE's etc)

Note that in late September 2012, at the Commonwealth Games General Assembly in Uganda, the Oceania CGF's (all of whom with the exception of Australia are NOCs as well) strongly endorsed the position outlined as above by the NZOC. In particular points 1 - 3. They asked for the NZOC to note their position in this submission.

In making this submission the NZOC has only commented on substantive issues as outlined above. DFSNZ has provided more detailed feedback and review based on their role and experience in Code implementation in New Zealand.

The NZOC suggests that a number of contentious matters, which have been exposed during the review process, are best dealt with by workshops of experts representing the core differing viewpoints who may well be able to provide consensus positions. Submissions typically promote a preferred position rather than explore compromise solutions.

Purpose & Scope

NZOC supports the new wording incorporating the principles of proportionality and human rights.

National Anti-Doping Agency (NADA Austria)

David Müller, Education, Prevention, Public Relations, Quality Manager (Austria)
NADO - NADO

The new orientation of the international anti-doping work must include a change in the structure of WADA. The current favors two stakeholders, the International Federations and governments. A substantial part of the work is conducted by ADOs and anti-doping laboratories, which in the present constellation have only minor participation rights. These representatives of the operational anti-doping work can contribute their expertise only inadequate, but must implement the negotiated conclusions. In the future, representatives of the operational anti-doping work are to be included in boards and committees (eg Foundation Board, Executive Board, Advisory Board, Committees).

Japan Anti-Doping Agency

YaYa Yamamoto, Senior Manager (Japan)
NADO - NADO

JADA does not object the insertion of "proportionality" in light of human rights.

Anti-Doping Norway

Anne Cappelen, Director Systems and Results Management (Norway)
NADO - NADO

The introduction of respecting the principle of proportionality and human rights is an important statement to be used throughout the Code and Standards.

The principle of Proportionality - using risk evaluation as a tool

Anti-Doping Norway applauds the focus of proportionality identified in the Code v1-2015.

In order to ensure the needed proportionality, an objective risk evaluation should be the basis from which an anti-doping organisation should be carrying out all tasks related to anti-doping, being doping control programs, education programs, science, intelligence programs etc. Strategic focus should be on those sports, disciplines and athletes being identified as a higher risk of doping.

Requirements of a risk evaluation are identified in the International Testing Standard, but should be a requirement in the Code encompassing all anti-doping related tasks. Such a physiologically risk evaluation should be as objective and empirically based as possible for each sport. The Anti-Doping Organisation should be responsible for carrying out this evaluation, having WADA responsible for approving the result of the risk evaluation. Alternatively, WADA should be responsible for writing an overall risk assessment for all sports.

The principle of subsidiarity – allowing details to be planned where they should be carried out

Anti-Doping Norway is of the opinion that international rules are an important tool to move towards standardisation in anti-doping, giving a minimum of what must be applied and adhered to. The rules must not be detailed, but allow for several practices and approach depending on the differences where the rules shall be applied.

The international rules must be phrased so that there is no misinterpretation or misunderstanding of the intention of the rule, but still leave the practices and details to each Signatory.

WADA should monitor the Signatories adaption of the International Rules ensuring adherence to the rules, and give guidance for best practices when implementing the rules.

The principle of using “comments” in the Code

The “comments” today consists of rules, exceptions to the rules, examples and explanations. Such “comments” must not be part of the rules. Rules or exceptions to the rules must be made part of the actual rule and not identified in a comment. Filing Failures and Missed Test in article 10.3.3 is an example where exceptions to the rules are identified as a comment.

Examples and explanations should be identified in Guidelines and not in the Code.

Institute of National Anti-Doping Organisations (iNADO)

Joseph de Pencier, CEO (Canada)

NADO - NADO

Here is a “top ten” list of fundamental matters in the Code about which there is considerable support among the current and prospective members of iNADO:

1. The need for an explanatory document on the changes between the current Code and the version to be circulated for comment in Phase 3.
2. The need for WADA’s process for reviewing the Prohibited List, and adopting changes to it, to be more transparent and proposed changes properly explained.
3. Retention of the B sample.
4. Revision of proposed Article 6.4 so that it supports, and does not impede, intelligent testing.
5. Recognition of Code-compliant national TUEs for international competition.

6. Revision of the whereabouts provisions of the IST, to make them simpler and more logical, and to stand alone as a separate IS.
7. The positive direction of the changes to Article 10.6 and broadening the scope of aggravating circumstances.
8. Retention of the current Article 15.4 provisions on ADO results management authority: they are working well.
9. The positive direction of making mandatory anti-doping Education programmes.
10. Revision of the proposed changes to the definition of “international-level athlete,” which are counterproductive because they limit the authority of Code-compliant NADOs, to the detriment of athletes.

Process: The Need for an Explanatory Document and Teleconferences

The next draft version of the Code, and of the International Standards, should also include the WADA Project Team’s reasoning for significant changes. This is vital for better stakeholder engagement in improving the Code and Standards. The Code and the Standards are complex and lengthy. It is very difficult even in English-speaking countries to read through the red-lined version, identify the changes, determine what is meant by these changes, and then try to engage national stakeholders. For the majority of WADA’s stakeholders, the Review Process is a considerable challenge. Without proper explanation of proposed changes, stakeholders are less able to fully participate in an informed and constructive way. Some risk being disenfranchised.

WADA should take the time to prepare a detailed explanatory document which can aid Signatories and other stakeholders (especially Athletes) in understanding the next draft version. And, WADA should consider holding a series of teleconferences to provide explanations and answer the questions of Signatories and other stakeholders. This would enable WADA to moderate some form of dialogue between those holding opposing views on the key fundamental issues with a view to seeking and agreeing on common ground.

The Code (14)

Australian Athletes' Alliance

Laura Sigal, Executive (Australia)
Sport - Athlete

In any decision regarding the WADA Code, we urge that the following principles be applied:

1. The Code must recognise the labour rights of professional athletes, including the right to negotiate terms that apply to their employment, including those arising from the Code, through representatives of their own choosing;
2. WADA must be transparent in the manner that it enforces the Code, including in the manner that it determines the substances and methods to be included and the procedures to be applied.
3. The Code must implement provisions that apply principles of Human Rights, including proportionality of penalties, prohibition against guilt by association, and the presumption of innocence. If the strict liability principle is to be maintained, then this should be confined to violations of an analytical nature involving substances that are per se performance-enhancing and/or are masking agents.
4. Professional athletes should not be denied their livelihoods unless they have sought to enhance their performance through improper means: professional athletes should not be suspended for purely technical violations.
5. Decisions regarding the substances and methods such as the concentrations required for a positive finding

must be evidence-based and WADA must publish the evidence in a manner accessible to an athlete of average intelligence and education.

6. Data regarding testing and sanctions should be available for analysis to ensure that the Code is meeting its goals without unintended negative consequences.

WADA Athlete Committee

- , - (Canada)
Sport - Athlete

Introduction: Inclusion of the words proportionality and human rights

Why is it the included? What does proportionality mean in this context? This is not very concrete and could lead to interpretation. Members are not in favor to such a sentence, but could probably live with it if it does not create new legal challenges.

International Cricket Council

Lorinda Rugless, Anti-Doping Manager (United Arab Emirates)
Sport - IF – IOC-Recognized

Stakeholders within the sport of cricket (including the ICC's anti-doping team) are collectively of the view that the primary purpose of the Code ought clearly to be identified as the protection of the Athlete's right to participate in clean sport - any 'health' benefits are only a secondary purpose and that ought to be reflected in the language.

International Aikido Federation

Stefan Stenudd, Appointed by the Chairman (Japan)
Sport - IF – Non IOC-Recognized SportAccord

“The Code shall be applied in a manner that respects the principles of proportionality and human rights.”
This is an excellent addition! It can be questioned, though, if the Code actually follows these principles throughout. Where the Code may oppose human rights, can it really stand proper legal testing - and should it? And if it deviates from proportionality, as it is understood in society as a whole, should it be pursued?

Norwegian Olympic and Paralympic Committee and Confederation of Sports

Henriette Hillestad Thune, Head of Legal Department (Norway)
Sport - National Olympic Committee

The complexity requires further emphasis on the protection of the legal rights of the athletes.

The Code and the Standards are increasingly becoming more extended and complex with detailed wording. The complexity itself requires further emphasis on the legal rights of the athletes. Furthermore, as the Code, in order to ensure harmonized and coordinated anti-doping rules at the international and national level, understandably makes use of non-flexible regulations, the combination of complexity and this lack of discretionary assessment, requires even stronger support for the athletes' legal rights. In this respect we are pleased with the new amendment in the introduction to the Code, stating that the Code shall be applied in a manner that respects the principles of proportionality and human rights.

Against this background, we urge WADA to simplify the requirements and use guidelines as a method of understanding and to increase common practical approaches, and we urge WADA to implement more specified requirements on the hearing process and other means to guarantee legal protection and due process. Please confer below on Article 8.

SportAccord

SportAccord DFSU, Doping-Free Sport Unit (Switzerland)
Sport - Other

We fully agree with the sentence added to Draft Version 1.0 of the 2015 Code, "*The Code shall be applied in a manner that respects the principles of proportionality and human rights*".

PPF

Simon Taylor, General Secretary (United Kingdom)
Sport - Other

We welcome the inclusion within this introductory section that the Code will be applied in a manner which respects the principle of proportionality and human rights.

Norwegian Ministry of Culture

Eva Cathinka Bruusgaard, Senior adviser (Norway)
Public Authorities - Government

The Norwegian Ministry of Culture is strongly supporting the Code. This is a fundamental document identifying the most important issues needed to secure world-wide common and transparent anti-doping systems and methods.

Council of Europe

Council of Europe, Sport Convention Division (France)
Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

CAHAMA noted that the first draft of the 2015 Code has introduced a reference that the Code should be applied in a manner that respects the principles of proportionality and human rights.

Recommendation:

CAHAMA welcomed this reference, as the Council of Europe has repeatedly emphasized the relevance of human rights and the principle of proportionality.

Antidoping Switzerland

Matthias Kamber, Director (Switzerland)
NADO - NADO

The Code should be applied in a manner that respects the principles of proportionality and human rights. Antidoping Switzerland *welcomes this reference.*

UK Anti-Doping

Graham Arthur, Director of Legal (United Kingdom)
NADO - NADO

We note that there is an attempt in the redline draft to bolster the status of the Commentary to the Code by making them “mandatory in substance”.

The Commentary to the Code is (generally speaking) a useful interpretative tool. Whilst we agree that the Commentary should be followed and adopted when it comes to implementing the relevant provisions of the Code (for example, by applying them via a series of Anti-Doping Rules), we are not sure what assistance is offered by making such Commentary “mandatory”.

Rather, the Code might helpfully state that the Commentary to the Code has been prepared to assist in understanding the meaning and intent of the Code, and as such should be followed unless to do so, in specific cases, would be contrary to the interests of fairness. (For example, the Commentary says that an Athlete could not meet the requirements of No Fault or Negligence with a “spiking” defence, even if it was unequivocally clear that an Athlete had been maliciously “spiked” by a person who took advantage of their access to the Athlete to try and do him or her harm.)

This will avoid any complications that might otherwise arise.

Canadian Centre for Ethics in Sport

Elizabeth Hindle, Manager, Anti-Doping (Canada)
NADO - NADO

A new sentence has been added to the section titled “The Code”: “The Code shall be applied in a manner that respects the principles of proportionality and human rights.”

CCES supports this addition. CCES suggests that WADA clarify how they are defining human rights (i.e. United Nations, instead of national legislation, etc)

Swedish Sports Confederation (SSC)

Hakan Nyberg, Anti-Doping Programme Manager (Sweden)
NADO - NADO

SSC/SOK supports the amendment under “The Code”.

Swimming World Magazine

Steven Selthoffer, Coach/Investigative Journalist (USA)
Other - Other (ex. Media, University, etc.)

The IOC and WADA executives, the International Sport Federations, the NADO personnel ALL should live under the same Code as the athletes. It's time to "eat your own dog food" as they say in IT. You must file WhereAbouts Forms etc, and be prosecuted as a doping cheat for not knowing where you will be for one hour, every day, six months in advance. The STASI and KGB could never do that on anyone.

The World Anti-Doping Program (2)

International Aikido Federation

Stefan Stenudd, Appointed by the Chairman (Japan)
Sport - IF – Non IOC-Recognized Sport Accord

It is unsatisfactory that all parts of the regulations are not included in the Code, and revised in the same democratic process.

Swimming World Magazine

Steven Selthoffer, Coach/Investigative Journalist (USA)

Other - Other (ex. Media, University, etc.)

WADA should be in charge of the anti-doping program, NOT the ISFs, or the NADOs. We need ONE police force, not multiple ones with no oversight or accountability. No one knows the contracts the Lausanne lab has with the ISFs. The ISFs are doing the finger pointing and driving the convictions.

International Standards (7)

International Aikido Federation

Stefan Stenudd, Appointed by the Chairman (Japan)

Sport - IF – Non IOC-Recognized Sport/accord

The International Standards, being mandatory, should be included in the Code and revised in the same democratic manner.

UCI

Philippe Verbiest, Attorney-at-law (Belgium)

Sport - IF – Summer Olympic

I suggest to delete in the comment: "while expressly incorporated into the Code by reference".

Reasons:

1. the international standards are not part of the Code: the Code and the standards are different elements of the world anti-doping program as stipulated in the section "the world anti-doping program"
2. the Code can be modified by the WADA foundation board only, while the standards can be modified by WADA's Executive Committee; if the standards are incorporated into the Code that would mean that WADA's executive committee can modify part of the Code, which is not acceptable.
3. it is enough for the Code to stipulate that adherence to the international standards is mandatory for compliance with the Code.

Council of Europe

Council of Europe, Sport Convention Division (France)

Public Authorities - Intergovernmental Organization (ex. UNESCO, Council of Europe, etc.)

CAHAMA noted that the text regarding the revision of International Standards in the 2009 Code has not been amended in the first draft of the 2015 Code. Hence, the concerns about sufficient and timely consultation (and, possibly, the discrepancy with the French text) that were submitted to WADA during the first consultation phase remain.

Recommendation:

(1) CAHAMA recommended resubmitting the recommendation with respect to International Standards that was submitted on behalf of the Council of Europe during the first consultation phase.

Consultation with stakeholders is of key importance before new or revised International Standards, Technical Documents or other requirements are adopted by WADA. The reference to consultation in the Code does not reflect the importance of the consultation process.

Recommendations:

a. The wording regarding consultation in the Code (currently: “reasonable consultation with the Signatories and governments”) is strengthened and clarified, and that emphasis is placed on the transparency of consultation process;

b. The term “signatories” is replaced by the more appropriate term ‘Stakeholders’, as WADA-accredited laboratories are not Signatories to the Code, but should be included in the consultation process;

c. The English and French versions of this text are brought in line with each other. The current wording in English (“reasonable consultation”) is not identical to the wording in French (“consultations suffisantes”).

(2) CAHAMA recommended to harmonise the revision cycles and timetables of the Code and the International Standards in the future, in order (i) to allow integration of changes in one document to be reflected in other relevant documents and (ii) to provide sufficient time for consultations.

(3) CAHAMA recommended upgrading the decisions on International Standards to the Foundation Board level.

ADoP

Luís Horta, President (Portugal)

NADO - NADO

International Standards: consultation revision

The wording regarding consultation in the Code (currently: “reasonable consultation with the Signatories and governments”) should be strengthened and clarified, and that emphasis is placed on the transparency of consultation process;

The term “signatories” should be replaced by the more appropriate term “Stakeholders”, as WADA-accredited laboratories are not Signatories to the Code, but should be included in the consultation process;

The English and French versions of this text should be brought in line with each other. The current wording in English (“reasonable consultation”) is not identical to the wording in French (“consultations suffisantes”).

ADoP recommends the harmonization of the revision cycles and timetables of the Code and the International Standards in the future, in order: (i) to allow integration of changes in one document to be reflected in other relevant documents and (ii) to provide sufficient time for consultations.

Prohibited List

ADoP recommends WADA to make the process of the changes and adoption of the List more concise and more transparent, e.g. (i) to upgrade the List Expert Group to a Committee of its own, rather than a subcommittee), (ii) to clarify the decision process from the draft to the adoption of the List, (iii) to eliminate, or at least minimize last-minute changes to the draft List, (iv) to share scientific data regarding substances included on the (draft) Prohibited List and the Monitoring Program, and (v) to clarify the process of including substances and methods in the List.

International Standard for Testing (IST)

ADoP recommends that the IST places more emphasis on conducting smart testing.

ADoP recommends that the proportionality approach to High Priority Athlete Pools is further emphasized and described in more detail in the IST and specific guidelines.

ADoP recommends that more emphasis should be placed on conducting risk analysis in order to evaluate in which sports (i) out-of-competition tests and (ii) whereabouts were necessary.

ADoP considers that article 11 of the IST on whereabouts stood alone in the IST. ADoP recommends that article 11 of the IST is made into a separate International Standard.

ADoP recommends WADA to (i) clean up the whereabouts provisions, (ii) make these provisions more accessible and comprehensive, and (iii) to place them in a more logical order.

International Standard for Laboratories (ISL)

ADoP recommends WADA to communicate to all stakeholders in a clear and timely manner when a new or revised Technical Document will enter into force.

International Standard for the Protection of Privacy and Personal Information (ISPPPI)

ADoP recommends WADA to bring the retention times mentioned in the various International Standards (especially the ISL) in line with the (annex to the) ISPPPI.

Antidoping Switzerland

Matthias Kamber, Director (Switzerland)
NADO - NADO

Antidoping Switzerland has the following comments:

a) The wording regarding consultation in the Code (currently: “reasonable consultation with the Signatories and governments”) is strengthened and clarified, and that emphasis is placed on the transparency of consultation process;

b) The term “signatories” is replaced by the more appropriate term ‘Stakeholders’, as WADA-accredited laboratories are not Signatories to the Code, but should be included in the consultation process

c) The English and French versions of this text are brought in line with each other. The current wording in English (“reasonable consultation”) is not identical to the wording in French (“consultations suffisantes”).

d) To harmonise the revision cycles and timetables of the Code and the International Standards in the future, in order (i) to allow integration of changes in one document to be reflected in other relevant documents and (ii) to provide sufficient time for consultations.

the decision on adoption of International Standards – due to their importance for anti-doping work - should be taken by the Foundation Board.

RUSADA

Anna Antseliovich, Head of Department (Russian Federation)
NADO - NADO

The Whereabouts requirements stand alone in the IST. Article 11 of the IST should be made into a separate International Standard. All Whereabouts requirements shall be clarified (methods of providing WhA Information, sharing of responsibilities, etc). Criteria of inclusion into RTP should be specified.

Swedish Sports Confederation (SSC)

Hakan Nyberg, Anti-Doping Programme Manager (Sweden)

NADO - NADO

The compulsory nature of the Standards and important role in terms of harmonization justifies in our view a broader basis before Standards are adopted. Decisions establishing new and revised Standards should therefore be moved from ExCo to the Foundation Board. There are examples of revised Standards that later were changed again, because of initial defects in the anchoring process. It is vital that WADA, which is still a young organization, learn from these experiences. As with the Prohibited List, it is important that the process of revision and time limits for implementation are clarified also for other Standards.

Models of Best Practice and Guidelines (4)

International Aikido Federation

Stefan Stenudd, Appointed by the Chairman (Japan)

Sport - IF – Non IOC-Recognized SportAccord

The Models and Guidelines, not being mandatory but advisory, should be completely excluded from the Code, not even mentioned in it, or their status is uncertain.

SportAccord

SportAccord DFSU, Doping-Free Sport Unit (Switzerland)

Sport - Other

WADA has also created Introductory Notes and Protocols, such as "Protocol for Article 15.1.1" and "Whereabouts Requirements - Introductory Note". The status of these documents needs to be clarified within the framework of the World Anti-Doping Program.

See also our comment to Art. 20.7.5 about WADA promptly communicating any changes.

National Anti-Doping Agency (NADA Austria)

David Müller, Education, Prevention, Public Relations, Quality Manager (Austria)

NADO - NADO

WADA has to develop from a “standardization agency” into an active supervisory agency that is in a position to identify inefficient doping control systems or inconsistencies and even unveil cronyism, complicity and cover-ups. To this end, WADA or a yet-to-be-established international commission (members of WADA, UNESCO, IF, governments, NADOs and Laboratories) has to conduct strict inspections in the countries, sports organizations and ADOs and assess their anti-doping efforts. A first move in this direction is the introduction of a benchmarking system, from which minimum standards can be derived later on.

Suggestions:

This benchmarking system could supervise:

- Code compliance; Implementation of the UNESCO Convention; national legislation.
- Anti-doping provisions in criminal law; coordination of national investigation authorities and ADOs
- Independence of ADOs; legal form; organizational structure; staff
- Budget; breakdown of budget items; balance between doping control system, research and prevention

- Certification according to quality standards (e.g. ISO standards).
- Number of federations for which ADOs are responsible; responsibility for results management and sanctions
- Composition of testing pools; ratio of testing pools and number of athletes to whom the anti-doping rules apply
- Testing statistics (number, ratio IC – OOC, blood tests, analysis methods applied, athlete biological passport, tests failed, tests ordered, test orders denied, etc.)
- TUE statistics (number of applications, TUEs granted, TUEs denied, time lapsed between application and decision, etc.)
- Violations of anti-doping rules (adverse analytical findings, atypical findings, missed tests, non-analytical evidence, etc.)
- Initiation of anti-doping rule violation proceeding; time lapsed between initiation and decision
- Acquittals; Acquittals because of formal defects; procedural defects
- Doping prevention statistics (presentations and seminars held, training sessions, workshops held, number of information roadshow venues, page views, social media use, etc.)

In addition to this benchmarking system and the minimum standards to be derived from it, daily routines and processes have to be monitored carefully and thoroughly, at least on the basis of random samples on site similar to the system already in place for the accreditation of anti-doping laboratories. Accrediting ADOs according to transparent criteria is the next logical step in international anti-doping efforts.

Suggestions:

- Appropriate checking and auditing procedures for the purpose of quality assurance
- Body composed of experts from WADA, UNESCO, IF, governments, NADOs and Laboratories
- Transparent assessment
- Taking into account material constraints, geographic and climatic conditions (e.g. transport of blood samples)

If any shortcomings of the anti-doping work of a country, a sports organization or an ADO has become evident, efficient sanctions have to be imposed. A number of possible consequences have been laid down earlier but are not being applied in practice.

Suggestions:

- Exclusion from international events (without consideration of potential economic losses for event organizers)
- Barring applications for hosting international events and withdrawal of permission for events previously approved. This also entails that countries without any laws prohibiting trafficking in doping substances are not allowed to host international events
- Imposing fines
- Withdrawal of ADO's accreditation
- Exceptionally harsh sanctions for ADOs, sports organizations or countries that cover up violations of anti-doping rules or get involved in complicity

Swimming World Magazine

Steven Selthoffer, Coach/Investigative Journalist (USA)
Other - Other (ex. Media, University, etc.)

WADA does NOT use best practice or best methods in communications. It is the most secretive and closed

group many have dealt with.

Communications- WADA does NOT answer questions in a timely manner. There is no public accountability in their condemnation of athletes before or during/or after the CAS cases. It is incredible to state that a senior WADA executive said an innocent, honorable athlete like nine time Olympic medalist, five time Olympic gold medalist, Claudia Pechstein belonged "in the same bucket as Tim Montgomery." She was completely 100% innocent. WADA and their executives got it 100% wrong. And the athlete nearly committed suicide. There are NO best methods, best practices in communications with the calculations on site of statistics, with open public accountability in the process with the press, or other experts.

Human suspicion drives WADA's mind set and zeal/encouragement to go after athletes, not facts and truth. WADA MUST answer questions down to the ppb like athletes submit to blood testing.

We demand 100% compliance to answer questions without evasion. Athletes lives depend on it.

It is NOT acceptable for WADA to attempt to wash their hands from the Pechstein case and say "They played by their own rules."

Restoration Program- It's amazing, there is no section on restoring athlete's lives who have been falsely accused by WADA and/or their experts and/or the ISFs or labs or CAS. WADA is responsible for the damage/destruction of the lives of Claudia Pechstein, GER, and any of the other young, teenage girl speed skaters with reticulate counts over 1% who were falsely accused.

There needs to be a Restoration Program where the lives of WADA officials and labs and ISFs officials can be equally prosecuted for falsely accusing innocent, honorable athletes.

Independent investigation- There needs to be and an independent investigation and committee into the Pechstein case with legal powers to obtain all emails, telephone records, data, conduct interviews, etc., and then to prosecute.