



Report of the
**Independent
Observers**

Games of the XXII Olympiad, Sochi 2014

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2. Acronyms & Abbreviations

2009 World Anti-Doping Code	Code
2015 World Anti-Doping Code	2015 Code
Anti-Doping Administration and Management System	ADAMS
Anti-Doping Organization	ADO
Athlete Biological Passport	ABP
Athlete Passport Management Unit	APMU
Court of Arbitration for Sport	CAS
Doping Control Officer	DCO
International Biathlon Union	IBU
International Federation	IF
International Olympic Committee	IOC
International Skating Union	ISU
International Ski Federation	FIS
International Standard for Laboratories	ISL
International Standard for Testing	IST
Major Event Organization	MEO
National Anti-Doping Organization	NADO
National Olympic Committee	NOC
Olympic Identity and Accreditation Card	OIAC
Registered Testing Pool	RTP
Russian Anti-Doping Agency	RUSADA
Sochi 2014 Winter Olympic Games	Sochi Games
Sochi Organizing Committee of the Olympic Games	Sochi2014
Test Distribution Plan	TDP
Therapeutic Use Exemption	TUE
Therapeutic Use Exemption Committee	TUEC
WADA Independent Observers	IO
World Anti-Doping Agency	WADA

3. Acknowledgements

The objectives of the Independent Observer Program could not have been achieved without the support of all those responsible for the planning, management and execution of the 2014 Sochi Olympic Games anti-doping program. The IO wishes to thank all those responsible, all those who interacted with the IO team and all clean athletes at the Sochi Games.

In particular, the IO wishes to acknowledge and thank the IOC for its excellent cooperation during the Sochi Games. While maintaining the independence of the program, the IO was able and encouraged to work very closely with the IOC to improve the anti-doping program throughout the Games.

4. The Athlete Perspective

As recommended in previous IO Reports, one objective of this IO mission was to capture the athletes' perspective of the anti-doping program conducted at the Sochi Games. The IO Athletes Representative visited the dining halls of all three Athletes Villages on many occasions throughout the Games to ensure their voice was heard. Despite their busy schedules, many athletes were very generous with their time and provided constructive feedback on the following topics.

Testing Period

Some athletes felt that all athletes should be tested before being allowed to compete at the Games, but others thought that the main focus of the anti-doping program should be on higher level athletes, such as the top ten in world rankings. The timing of pre-competition testing was a recurring concern for most of the athletes with many feeling that it should be conducted before the start of the Games. The athletes thought this could help prevent situations where an athlete is tested on the days before and after his or her competitions in addition to the routine in-competition testing, which can result in many tests in a short time period of time. This is a situation which was reported to have occurred several times during the Games. The time of the notification was also described as being problematic, particularly in the first week of the Games, as some athletes complained they were notified for pre-competition testing late at night.

Selection of Athletes

All the athletes asked agreed that the top three athletes of every competition should always be tested, and that the balance between target tests and random selections for post-competition testing was good. When asked about random testing in particular, many athletes felt it was less important than the target testing, but that it should not be ignored. Most athletes agreed that high risk sports should be targeted more often than the lower risk sports, and confirmed that this is what they had observed during the Games.

Sample Collection Procedures

The athletes indicated that they were satisfied with the overall sample collection procedures, and this seems to be supported by the very few comments that were noted on the doping control forms reviewed by the IO. They did however mention that there was some confusion about the Games procedures which they found to be different to which they are accustomed. For example plastic bags were not used to wrap the A and B bottles samples after sealing and there were different ways by which the extra sample code stickers were discarded. The athletes also voiced that communication was an issue, as most Chaperones had a very basic understanding of English, and some nurses performing the blood collection spoke only Russian. The athletes also told us that in general, the waiting rooms in the doping control stations were overcrowded and that there was too much movement in and out of the processing rooms, which they found disturbing at times.

Protect the Clean Athletes

Finally, every single athlete that we met agreed that the anti-doping program is not only important but necessary at the Games to prove they are clean and their performances are legitimate. They were very supportive of the presence of WADA through the IO Program. They did however indicate they felt there was a negative connotation to the word "anti-doping", and that a more positive concept such as "protect the clean athletes" should more rightfully capture the essence of the Games anti-doping program.

5. Executive Summary

The IO observed all elements of the anti-doping program at the Sochi Games. As a result of these observations as well as discussions with the IOC, this report details the long term recommendations of the IO for the further improvement of the Games-time anti-doping program, with particular reference to the impact that the 2015 World Anti-Doping Code will have on future Olympic Games. In addition, the IO has documented an assessment of the anti-doping program delivered at the Sochi Games.

The 2015 Code offers an opportunity for the IOC to review current and established practices, systems and structures so that an athlete-friendly and effective anti-doping program can continue to be delivered in the future. Specifically, the 2015 Code has a number of new provisions that can positively impact on how the IOC protects the integrity of the Games and sets a benchmark for other Major Event Organizations. When considering the 2015 Code, the IO has highlighted the impact of changes and, importantly, has provided possible solutions for consideration by the IOC. Recommendations include those related to athlete whereabouts, enhanced coordination of the Olympic Games anti-doping program and the development of internal anti-doping expertise at the IOC.

The IOC had planned the most ambitious anti-doping program for the Sochi Games and should be highly commended for the concept of significantly increasing the amount of testing conducted before the athletes competed. Where challenges were identified the IOC was quick to respond to issues and at all times the IOC was receptive to the suggested improvements raised by the IO. The IO was granted full cooperation by the IOC at the Sochi Games. Collectively, the IO members had participated in over twenty past IO missions and none had ever experienced such a collaborative approach between the IO and the IOC.

Overall, the IO was of the view that the Sochi Games were a milestone in the evolution of the Olympic Games anti-doping program and that the initiatives observed will, if further progressed, have a positive and long lasting impact for clean athletes in the future.

6. Recommendations for the Future

Observations from the IO at the Sochi Games identified a number of areas which will require revision, change and evolution. While the observations made at the Sochi Games relate to the 2009 Code, the following recommendations focus on the fact that on 1 January 2015 a revised World Anti-Doping Code will come into force, and that many of the new provisions and principles in the 2015 Code will have a significant impact on future Major Events including the Olympic Games.

6.1 Summary of Recommendations

Theme	Recommendation
IO Reports and Recommendations	WADA should review all IO Reports with relevant MEOs focusing on the 2015 Code and formally report, on a regular basis and at a minimum annually, to the WADA Executive Committee as to what extent the recommendations have been implemented and what challenges exist in such implementation.
Enhanced Taskforce	The IOC should establish, in cooperation with WADA, a Taskforce which is independently chaired and includes international experts in the field of anti-doping. The Taskforce should primarily assess information and intelligence gathered by the IOC and agree on target testing plans for the extended period of the Games. The Taskforce should be established at least one year before each Games and should also be present during the Games.
Test Planning and Delivery	The host nation's NADO should be considered to coordinate the preparation and delivery of the entire testing program on behalf of the Organizing Committee and the IOC. The capacity of the Laboratory needs to be maximized through establishing improved formal communication between the enhanced Taskforce and the Laboratory during Games-time. IF Protocols should be reviewed to provide for a more flexible testing program.
Athlete Biological Passport Programs	The IOC should establish a mechanism by which IF and NADO ABP data can be assessed by the enhanced Taskforce to assist with target testing at the Games. The IOC should only permit ABP programs at the Games if part of an agreed targeted Games-time program working in partnership with the relevant IF.
Athlete Whereabouts	The IOC should work with WADA and active athletes to establish an athlete-friendly whereabouts system for the extended period of the Games, including educating athletes on their requirements and the imposition of consequences for those that fail to comply.
Hearings for Athletes	The IOC should consider, in cooperation with CAS, to what extent CAS can support an optional disciplinary process at the Games so as to further reinforce a fair hearing process for athletes.

Competition Periods	The IOC should amend its rules to recognize the extended testing jurisdiction, revise its in-competition definition and introduce an out-of-competition definition consistent with the 2015 Code so as to minimize the risk to clean athletes of inadvertent Anti-Doping Rule Violations.
Additional Professional Expertise and Resources	The IOC should take the opportunity of the introduction of the 2015 Code to review its internal anti-doping structure and available resources to ensure they have the necessary and sufficient in-house professional skills and expertise.
Testing Figures and Reporting	WADA should define a standard public reporting format which focuses simply on the number of athletes tested in each sport. The IOC and other MEOs should not publicize the number of planned tests before Major Events and in all cases only report on the outcomes once the event has concluded.

6.2 IO Reports and Recommendations

The IO Program continues to evolve and it is widely recognized as providing assistance to the IOC, the Organizing Committee and clean athletes. However, in order to reap the most benefit from the program and continually improve anti-doping delivery at Major Events, there needs to be a system to record and monitor the implementation of IO recommendations.

The IO observed that a number of the system challenges experienced at the Sochi Games had been identified in previous IO Reports (e.g. athlete whereabouts, dilute samples). Recurring issues may suggest that either the recommendations are not acted on or that they are impractical in nature and therefore difficult to implement.

Either way, it is critical for WADA and the IOC to understand why the same challenges persist so that different ways of support can be identified for effective changes to the system. This is particularly true with the 2015 Code coming into force and the need to understand and learn from any practical challenges that arise in its implementation. This would also assist future IO teams and enable them to focus on potential solutions from an informed position and not replicate work previously conducted.

Recommendation – WADA should review all IO Reports with relevant MEOs focusing on the 2015 Code and formally report, on a regular basis and at a minimum annually, to the WADA Executive Committee as to what extent the recommendations have been implemented and what challenges exist in such implementation.

6.3 Enhanced Taskforce

The IOC aims to conduct one of the most intensive testing programs in the world and has evolved to incorporate more information gathering and target testing over recent years. It has been observed that there are a number of sources which can provide information including (but not limited to) WADA, IFs, the Olympic Laboratory, NOCs, NADOs, law enforcement agencies, athletes and their athlete support personnel. With the exception of law enforcement agencies, there appears to be few limitations to the amount of information that can be accessed and used to inform a more targeted anti-doping program for the Games.

The IO observed that the concept of the Taskforce is excellent but it needs to evolve with the new emphasis of the 2015 Code. An enhanced Taskforce will need to operate well in

advance of the Games and take into account the new Code provision extending the jurisdiction of the IOC before the opening of the Olympic Village¹.

In the opinion of the IO, the Taskforce should be reconstructed to be more international and independent in nature and to include the necessary enhanced skills required to deliver an intelligence-led anti-doping program. In consultation with WADA, an independent Chair of the Taskforce should be appointed by the IOC and be assisted by IOC staff and international anti-doping experts. While the exact scope of the Taskforce should be agreed by the IOC, one of its key roles should be to assess information received by the IOC and agree on what actions, primarily the target testing of athletes, should be taken as a result of the information received. Importantly, outcomes of the agreed actions would be reviewed by the Taskforce to ensure that all actions are monitored and desired outcomes achieved.

One challenge to such an enhanced system which requires consideration is that there may be reluctance from partners to share information. To resolve this, the IOC and WADA would firstly need to reinforce the requirements in the 2015 Code that all ADOs work in partnership². Secondly the IOC would need to establish formal information sharing agreements and systems, setting out how such information would be used and to what extent ADO partners would be consulted. This is necessary to encourage the sharing of information, to provide confidence to other ADOs and to ensure that the on-going investigations being conducted by those partners are not negatively impacted by the actions and decisions of the Taskforce.

Practically and given the extended jurisdiction of the IOC, the Taskforce would need to be convened one year before the Games and conduct a number of regular meetings (remotely and in person). No later than one week before the Athlete Village opens, the enhanced Taskforce would need to convene in person to ensure that appropriate plans are in place well ahead of the testing in Accredited Venues.

Recommendation – The IOC should establish, in cooperation with WADA, a Taskforce which is independently chaired and includes international experts in the field of anti-doping. The Taskforce should primarily assess information and intelligence gathered by the IOC and agree on target testing plans for the extended period of the Games. The Taskforce should be established at least one year before each Games and should also be present during the Games.

6.4 Test Planning and Delivery

The planning and delivery of an effective and intelligent test plan is an increasing challenge at Major Events given the need to operate in a more targeted manner. The IO considered the existing practices in place in the test planning phase and how they might relate to future Olympic Games.

IF Protocols

¹ 2015 Code – Article 5.2.3 - *Each Major Event Organization, including the International Olympic Committee and the International Paralympic Committee, shall have In-Competition Testing authority for its Events and Out-of-Competition Testing authority over all Athletes entered in one of its future Events or who have otherwise been made subject to the Testing authority of the Major Event Organization for a future Event.*

² 2015 Code – Article 20.3.13 (IFs), 20.4.13 (NOCs), 20.5.3 (NADOs) – *To cooperate with relevant national organizations and agencies and other Anti-Doping Organizations.*

The IO considered the IF Protocols as well as comments from previous IO Reports and concluded that given the 2015 Code, it would be appropriate to review the purpose of such Protocols. The Protocols include agreements on how post-competition testing will be conducted and also how athletes will be selected (e.g. random, placed). This rightly allows the Organizing Committee to plan the post-competition program and informs them of the necessary resources required for each competition venue. However, it also commits a large number of tests to the post-competition program and potentially constrains the IOC in delivering a more targeted and integrated pre-competition and post-competition program.

In the future, the IOC should retain full control and responsibility for all tests conducted within their jurisdiction, discussing and coordinating testing in partnership with the IFs in advance of the Games, but keeping the ability to modify the test plan based on advice and guidance from the enhanced Taskforce or relevant IF. In addition, it would be helpful for the Protocols to not only include logistical arrangements but also to detail how information and intelligence (such as ABP data) can be accessed by, and shared with, the IOC through the enhanced Taskforce so that clear lines of communication are established. This includes any IF requests for target tests during the Games based on intelligence the IF may have received from its own sources/experts.

The IO also considered to what extent testing should be random at the Olympic Games when there are a significant number of tests at the IOC's disposal. With the 2015 Code requiring a targeted approach to testing and by introducing an information management system, there is no reason why the IOC should not be able to generate a significant list of sports, disciplines and athletes of interest. With this in mind, the primary focus of testing at the Olympic Games should be the targeting of specific athletes at specific periods of the Games, including post-competition. Random testing should be by exception and predominantly for low risk sports. Lastly, as the Olympic Games are owned by the IOC, it should be the IOC that determines to what extent medal winners and place holders are tested. Any such decision should take into account the ability to store and re-analyze samples for up to ten years.

NADOS

In terms of the delivery of a Games-time program, the IO observed that using different sample collection authorities for the pre-competition and post-competition periods presents some new challenges, notably their coordination. In Sochi the services of the host nation's NADO were limited to aspects of the pre-competition program. This model should be revised to the extent that where there is a competent NADO (as determined by the IOC) in the host nation, that NADO should be contracted by the Organizing Committee to deliver all anti-doping services. This approach would be beneficial in cases where the host nation has such a NADO and where there exists knowledgeable professionals who are working in the field of anti-doping all year round, potentially of considerable assistance to the IOC.

Recognizing that any NADO would need to expand to deliver such a service, this model would leave a national legacy for the host nation NADO and ensure that experts are delivering the IOC's anti-doping program. Any perceived or real conflict of interests would be managed by the independent nature of the enhanced Taskforce who would oversee athlete selection and testing in both the pre-competition and post-competition programs. Where a competent host nation NADO does not meet the IOC's requirements, the IOC could contract the services of another ADO capable of delivering such services.

Laboratory

Previous IO Reports have stated that Olympic Laboratories rarely fully maximize their full analytical capacity and the same was observed in Sochi. A system needs be developed so

that real time communication between the enhanced Taskforce and the Laboratory occurs. This would ensure that the resources and instruments available for analyses are fully utilized and maximizing the number of samples that can be processed in the laboratory. Such objectives would ensure that the anti-doping program is working at maximum capacity for the duration of the Games.

Recommendation – The host nation’s NADO should be considered to coordinate the preparation and delivery of the entire testing program on behalf of the Organizing Committee and the IOC. The capacity of the Laboratory needs to be maximized through establishing improved formal communication between the enhanced Taskforce and the Laboratory during Games-time. IF Protocols should be reviewed to provide for a more flexible testing program.

6.5 Athlete Biological Passport Programs

ABP programs have evolved consistently over the last Olympic cycle and will continue to do so for the foreseeable future. The purpose of an ABP is twofold, to collect data that informs target testing and to collect data that is presented as evidence of doping (e.g. to proceed with a possible Anti-Doping Rule Violation). In place currently are two modules of the ABP, notably the Steroidal Module formally introduced by WADA on 1 January 2014 and the Hematological Module that has been in existence for some years. To date ABP programs have been implemented by a number of IFs and NADOs, but not across all Olympic IFs and not by the IOC. The expertise required to assess ABP data is highly specialized and is different for both ABP modules.

The IO considered how the IOC can make best use of IF and NADO ABP programs at the Games while keeping in mind the desire to minimize the anti-doping burden on clean athletes. The best model for the future must be one where there is a coordinated approach to ABP programs at the Games, led by the IOC and fully integrated into the regular testing program delivered. IFs have access to their own athletes all year round and have the ability to conduct mass screening³ outside of the Olympic Games. IFs also have their own designated Athlete Passport Management Unit (APMU) which provides advice and guidance to the IF on target testing and/or cases to prosecute. What is required for the Olympic Games is a system by which information from IF and NADOs APMUs is provided to the IOC (through the enhanced Taskforce) and for the IOC to determine what actions are to be taken as a result. By doing so, all requests for sample collection are centralized and coordinated and thus the IOC would be in a position to respond to ABP data effectively and efficiently.

In practice this will require effective communication between the IF and NADOs APMUs and the enhanced Taskforce, and the need for expertise in both the Steroidal and Hematological modules within the Taskforce. The IOC will require full access to the Long List⁴ through ADAMS to make the best use of the ABP. To reduce the burden on clean athletes at one of the most important events of their career, ABP testing should only be used as part of a targeted program consistent with the IOC’s testing program and in compliance with the ABP Operating Guidelines.

³ Mass screening is where IFs use the opportunity of having many athletes together in one place to conduct ABP-type blood profiling testing, often by advance notice, over a short period of time to monitor haematological parameters to inform their own ABP and/or testing program.

⁴ It is normal practice for NOCs to provide the IOC with a list of athletes who have the potential to compete at the Games. This is normally provided three to four months before a Games, is subject to considerable change in the lead up to the Games and is commonly referred to as the ‘Long List’.

The IO considered the implications of such an approach on the results management of ABP cases. It is recognized that proceeding with an ABP case as a possible Anti-Doping Rule Violation is a time consuming process. It is therefore anticipated that it would be unlikely for an ABP sample collected during the Games which indicates doping to be satisfactorily concluded (e.g. a hearing held and a reasoned decision published) before the conclusion of the Games. However, where an IF is in a position to charge an athlete with a possible Anti-Doping Rule Violation before or during the Games, the IF should be able to provisionally suspend the athlete from competition, a suspension which the IOC would recognize and therefore apply to the Games. This would assist the IOC in ensuring that only clean athletes compete at the Games and equally ensure that the IF retains the responsibility of Results Management Authority beyond the Games.

Recommendation - The IOC should establish a mechanism by which IF and NADO ABP data can be assessed by the enhanced Taskforce to assist with target testing at the Games. The IOC should only permit ABP programs at the Games if part of an agreed targeted Games-time program working in partnership with the relevant IF.

6.6 Athlete Whereabouts

The purpose of the provision of whereabouts information from Olympic athletes is to locate athletes for testing both before and during the Games. The rules outlining this requirement are detailed in Article 4.4 of the IOC Anti-Doping Rules.

As also evidenced in previous IO Reports, the IO observed that there have been challenges to the IOC in establishing an athlete-friendly whereabouts program that enables athletes to be located for testing in a timely manner. These challenges will be exacerbated by the extended jurisdiction of the IOC from 2015. Any system introduced needs to reinforce the responsibility of the athlete to be available for testing while also recognizing that the Games are often the most significant event of an athlete's career and that clean athletes should have the right to be able to prepare without unnecessary distraction.

Athletes who usually compete at the Olympic Games are either included in an IF or NADO Registered Testing Pool⁵ (RTP) or Testing Pool⁶, or do not provide any whereabouts information at all. Also, athletes competing at the Olympic Games either reside in the Olympic Village or outside the Olympic Village. The IO observed from the whereabouts information provided by RTP athletes and the location information provided by NOCs, that one of the most important pieces of information is the room number of where the athletes are residing. All other information is available to the IOC through different routes (e.g. training and competition schedules are typically known to the Organizing Committee and the IOC, as is the apartment block where athletes reside). Lastly, and most importantly, Olympic venues (competition and non-competition) are the most secure environments found in sport, where athletes are required to electronically check in and checkout of venues.

The following recommendations are based on these basic observations. In addition, these recommendations attempt to offer a solution for most situations observed while recognizing that there may be exceptional cases where alternative solutions may be required.

⁵ RTP refers to a pool of top level athletes established separately by IFs and NADO who are subject to both in-competition and out-of-competition testing. Athletes in an RTP are required to file quarterly whereabouts including a daily one hour slot.

⁶ Testing Pool refers to the second category of whereabouts requirements which requires athletes to file quarterly whereabouts but not a daily one hour slot.

- To address the varied anti-doping education provided to athletes around the world, it would be beneficial for all athletes placed on the Long List for the Olympic Games to be required to complete an online education model. Part of this education model should be to reinforce the requirement to provide whereabouts and provide practical information about how they will need to do so.
- If athletes are part of a RTP, then the principle should be that they remain on the RTP during the extended period of the Games and continue to file whereabouts as they would normally do, including the room number of where they are residing.
- If athletes are not part of a RTP and they are included on the Short List⁷ then they are included in an IOC Testing Pool during the extended period of the Games and have to file whereabouts, except during the time they are residing in the Olympic Village. As soon as they enter the Olympic Village they should be required to file only their room number and update this information if and when it changes. If they move out of the Village for one night or more they are required to file whereabouts for those days as they had been doing since their inclusion on the Short List.
- For all athletes who do not reside in the Village for the Games, they should be required to provide whereabouts information for the entire duration of the Games, either as part of their RTP responsibilities or their new responsibilities by way of their inclusion on the Short List (i.e. the IOC Testing Pool).
- If a non-RTP athlete on a Short List is not selected by their NOC to participate at the Games or once Olympic athletes have finished competing and have left the host city, their responsibility to provide whereabouts information should be removed unless they are part of an IF RTP, NADO RTP or other Testing Pool which requires them to continue to provide certain whereabouts as defined by their IF or NADO.

Practically the above can be achieved by using two electronic tools, notably ADAMS and the Olympic Identity and Accreditation Card (OIAC) system. All athletes identified on the Short List are automatically included in ADAMS by the IOC and therefore each Short List athlete receives an ADAMS profile, which can be used to submit whereabouts information. The online education tool will have informed them of how to do so. The responsibility for filing whereabouts information would be that of the athlete, albeit they would be able to formally delegate the responsibility of filing whereabouts to an athlete support person (e.g. an NOC official) as they already can when using ADAMS. The athlete's relevant IF or NADO would be able to use this information to conduct their own testing and the enhanced Taskforce would be able to identify any athlete of interest who fails to file whereabouts information to the IOC for target testing, to issue a whereabouts failure or if required to proceed with a possible 'evasion' Anti-Doping Rule Violation.

The OIAC system is a key tool which could be used to confirm whether athletes are complying with their responsibilities. In cases where the athlete was not available for testing at a particular time in the Village, the IO considers it proportionate that the OIAC system could be used by the IOC to request the entry/exit log of a particular athlete for testing. The entry/exit log could be used to check whether the athlete was in the Village (and the Chaperone simply failed to find them) or that they had left the Village overnight and failed to

⁷ The 'Short List' is the list of athletes who have qualified for a particular Games. This is normally confirmed within one month of the Games and is subject to final confirmation once the Athlete Village has opened.

provide the necessary whereabouts information. This would benefit clean athletes and would allow them to focus on competition if they were consistently residing in the Village.

Finally, as with any whereabouts program, it is critical to monitor and oversee the quality of information filed by athletes. The IOC should actively issue whereabouts failures when athletes have failed to comply with their responsibilities. In order to allow all athletes to be held responsible, it would be beneficial for the IOC Anti-Doping Rules and/or Athlete Participation Agreement (as appropriate) to allow for whereabouts failures to be imposed by the IOC on athletes within the IOC Testing Pool in the same way as is currently the case for RTP athletes.

Recommendation - The IOC should work with WADA and active athletes to establish an athlete-friendly whereabouts system for the extended period of the Games, including educating athletes on their requirements and the imposition of consequences for those that fail to comply.

6.7 Hearings for Athletes

Results management activities at an Olympic Games are normally very intense with the potential for numerous Adverse Analytical Findings to be reported in quick succession. This, coupled with the obvious time pressure in having to resolve cases for athletes who are yet to compete (or who have already competed but are due to compete again), places a very considerable burden on the IOC administration. The IOC needs to act swiftly to preserve the integrity of the competitions of which it is guardian, at the same time as affording athletes a due process and a fair hearing. From the athletes' perspective, the Olympics Games represent the pinnacle of their sporting career and they are entitled to expect an adjudication system that is fair and robust.

The IOC Anti-Doping Rules provide for the entire procedure not to exceed 24 hours from the time the athlete is informed of an alleged Anti-Doping Rule Violation⁸. This timeline informs the nature of the disciplinary process that is conducted at the Olympic Games. The IOC Anti-Doping Rules afford the right to an oral hearing before any Anti-Doping Rule Violation is adjudicated, but the reality is that 24 hours provides the athlete with little or no time in which to understand the nature of the case that is being brought⁹ and to prepare a meaningful defence¹⁰.

The hearings before the IOC Disciplinary Commission themselves are inquisitorial rather than adversarial in nature. They become fact finding missions with much of the questioning coming from the Chair of the Disciplinary Commission assisted by the IOC's Legal and Medical Directors respectively, with the evidence often limited to the laboratory's analytical certificate and basic chain of custody documentation. The athlete's presence is seemingly more to provide an explanation for what has happened than to provide a real opportunity to challenge the evidence in support of the charge. The Director of the Laboratory that has reported the Adverse Analytical Finding is not usually present at the hearing to

⁸ IOC Anti-Doping Rules - Article 6.2.14 - This time can be extended by the IOC President depending upon "*the specific circumstances*" of the case.

⁹ For example, whilst the athlete is given the opportunity to request a full Laboratory Documentation Package for the A and B sample analyses, scope for proper review of these important documents is limited when hearings are sometimes conducted within only a few hours of the B sample analysis taking place (or even before the B sample analysis has taken place).

¹⁰ IOC Anti-Doping Rules - Article 6.2.9 - The athlete has an opportunity to adduce relevant evidence provided it does not require the use of "*disproportionate means*".

explain the scientific results and is not made available for cross-examination, although a laboratory expert from the IOC's Games Group is made available to attend hearings, if required.

Against this background, the IO has considered how additionally the IOC might look to preserve the rights of athletes to a fair hearing at the Olympic Games, specifically taking into account the provisions of the 2015 Code and the established presence of an ad hoc CAS office on-site at the Games. More particularly, it has considered whether the 2015 Code provision allowing for Anti-Doping Rule Violations to be determined by a single hearing before CAS with the mutual agreement of all parties concerned¹¹ could be incorporated within the existing IOC disciplinary framework.

The IO considers in this regard that it may be possible to devise a secondary system, complementary to the existing Disciplinary Commission process, whereby athletes charged with a possible Anti-Doping Rule Violation are given the option to proceed directly to CAS¹² (with no right of appeal) on the narrow grounds of whether they have committed an Anti-Doping Rule Violation and should be disqualified from the Games.

The benefit of such an approach would see the IOC utilizing CAS's considerable expertise at the Games (which has been physically present at every Olympic Games since 1996). Under CAS Rules, athletes are guaranteed an opportunity to exchange evidence and to test the evidence in full in an adversarial process before a panel that is expert in anti-doping procedures. Timing issues would inevitably still exist but, as with the current IOC Anti-Doping Rules, urgent applications could still be made to CAS seeking interim relief to compete at the Games where appropriate. Legal representation for athletes would still remain an issue under such a proposal but one that the IO feels could be easily addressed by the pool of pro bono lawyers available to assist the parties on-site (which worked successfully at the London 2012 Olympic Games and in Sochi).

It is worth stressing that this recommendation is limited to a procedure for addressing the commission of an Anti-Doping Rule Violation occurring during the Olympic Games period and disqualification from the Games. In accordance with the IOC Anti-Doping Rules, athletes would still be afforded a full hearing under the IF's jurisdiction to determine any sanction beyond the Olympic Games, including future ineligibility from the sport in question (and in principle a further CAS appeal on any sanction imposed by the IF).

Recommendation - The IOC should consider, in cooperation with CAS, to what extent CAS can support an optional disciplinary process at the Games so as to further reinforce a fair hearing process for athletes.

6.8 Competition Periods

The impact of the 2015 Code on the IOC's definition of in-competition, and therefore on clean athletes, cannot be understated. The current and past rules of the IOC define in-competition for the Olympic Games as the period from the opening of the Olympic Village to the Closing Ceremony. During this period, samples are collected using the terms

¹¹ 2015 Code – Article 8.5 - *Single Hearing Before CAS - Anti-doping rule violations asserted against International-Level Athletes or National-Level Athletes may, with the consent of the Athlete, the Anti-Doping Organization with results management responsibility, WADA, and any other Anti-Doping Organization that would have had a right to appeal a first instance hearing decision to CAS, be heard directly at CAS, with no requirement for a prior hearing.*

¹² In accordance with the CAS Arbitration Rules (cf. Article 16) in force for the Olympic Games, a panel of the CAS ad hoc division has full power to establish the facts on which an application is made.

pre-competition and post-competition but importantly all athletes are subject to an in-competition analytical screen. The introduction of the extended testing jurisdiction for the IOC presents an opportunity to refine their definition of in-competition to be 12 hours before the competition, remove the terms pre-competition and post-competition, and only refer to out-of-competition and in-competition periods. This would be less confusing for athletes.

If a definition of out-of-competition is not implemented there will be limited means by which the IOC can exercise its ability to coordinate testing under its own jurisdiction for the extended period of the Games. In addition, with the increased focus on testing in the lead up to competition, the IOC will need to avoid increasing the risk of clean athletes being prosecuted for inadvertent Anti-Doping Rule Violations (e.g. the use of a supplement or cold remedy four months before the Games) when, in routine testing situations, they would not be held accountable within an out-of-competition period.

The IO also sees this opportunity as one where changes to the current in-competition definition can assist clean athletes in removing the possibility for confusion regarding which analytical screen they are subject to in specific periods of the IOC's jurisdiction. Ultimately, athletes need clarity on what substances they are legitimately entitled to use which do not have a performance enhancing benefit for competition periods. The closer the IOC can come to agreeing definitions that are more consistent with those of athlete's IFs and NADOs the better for clean athletes.

Recommendation - The IOC should amend its rules to recognize the extended testing jurisdiction, revise its in-competition definition and introduce an out-of-competition definition consistent with the 2015 Code so as to minimize the risk to clean athletes of inadvertent Anti-Doping Rule Violations.

6.9 Additional Professional Expertise and Resources

The implementation and delivery of the 2015 Code will require new skills and expertise. Therefore there is a need for the IOC to increase its professional technical skills and human resources in anti-doping, particularly as doping is regularly stated as being one of the biggest threats to the integrity of the Games. Irrespective of whether the proposed enhanced Taskforce model is adopted, there remains a number of revisions that the IOC could practically make to their internal structure to ensure that they are maximizing the considerable expertise at their disposal both in planning for and during the Games.

The role of the IOC Medical Director is wide ranging and anti-doping is just one area of responsibility. It is unrealistic to expect someone at this level to understand all operational aspects of anti-doping, which is an increasing complex part of sport. In order to support the IOC Medical Director, an additional three professional staff should be considered as follows:

- An anti-doping professional with current experience in the delivery of major anti-doping programs. This would still enable the IOC Medical Director to provide operational guidance and advice without having to be involved in detailed decisions and discussions, while having confidence that there is the necessary operational oversight of the program.
- A resource to manage the flow of information in and out of the IOC, and to the enhanced Taskforce. This role would be responsible for ensuring that communication, information sharing systems and protocols are established and well managed. It would also be the central point of contact for IFs and NADOs (including APMUs) who have information and/or intelligence of use to the IOC and the Olympic Games. This

requires a specialist skill set and, given the sensitivity of information that this role would need to manage, will need to have proven experience and expertise.

- An expansion of the IOC's current resources dedicated to supporting and educating athletes would be beneficial for clean athletes and the Games themselves. The provision of practical information and education programs should be expanded significantly as well as the support offered to athletes to assist them with their whereabouts and TUE requirements. This role would not be to duplicate the work of developing or developed IFs, NADOs, RADOs or even WADA, but to provide Games specific support and to work with those that already deliver such programs to Olympic athletes.

The proposed positions would support the planning and the monitoring of the anti-doping programs for all future Games. It would also allow for the IOC to work closely with the host nation to ensure progress in building their anti-doping capabilities, a lasting benefit to the Olympic Movement.

In addition to resources in the Medical Department, it would be worth considering whether the IOC Legal Department could also benefit from additional legal resources for issues related to anti-doping. This may not be required on a full time basis but the IO believes that there is at least an argument to recruit additional legal specialists for the period of the Games so as to support the Senior Legal Counsel of the IOC.

Recommendation - The IOC should take the opportunity of the introduction of the 2015 Code to review its internal anti-doping structure and available resources to ensure they have the necessary and sufficient in-house professional skills and expertise.

6.10 Testing Figures and Reporting

The quality of anti-doping programs is often articulated by the number of tests conducted, which the IO believe is an inadequate measure for determining whether the program has been successful. As soon as numbers are introduced into the public domain, or even internally, there is naturally a focus on ensuring that the required numbers are met. This can result in a lack of focus on quality since the emphasis is on collecting a sample rather than collecting one sample from the right athlete at the right time and using an intelligent analytical screen.

The manner in which many ADOs report on the number of tests conducted is inconsistent. Some count the number of sample types (i.e. urine and blood) collected, meaning that a urine and a blood test from the same athlete at the same collection session count as two. Some ADOs also include an ABP sample as an additional test, so if an athlete provides an ABP sample, a urine and blood sample at the same collection session, this counts as three samples. In addition, a dilute sample will lead to the collection of a further urine sample from the same athlete thereby a potential to count up to four tests when all came from the same athlete at the one collection session. Further, some ADOs go so far as to report their testing program by sample analyses (e.g. EPO, IRMS) which gives a false impression of a greater number of tests than is actually being conducted. It is therefore difficult to compare programs against each other and it potentially impacts on the athlete and public's understanding of anti-doping programs.

WADA should use the introduction of the 2015 Code to work with MEOs, including the IOC, to define a more consistent approach to how testing programs are reported after Major Events. It is the IO's view that the most important number to provide the public, sports fans and clean athletes is the number of athletes tested at least once at a Games followed by the

number of athletes tested on multiple occasions at a Games. For professional anti-doping practitioners, there is a need for more detailed statistics to be published (e.g. sample type, analysis type, etc.) so that they can be assessed and learnt from. There is no doubt that ADAMS is now the tool from which this can be achieved.

The IOC has always reported on the number of tests conducted at the end of the Games and this best practice should be continued. However, MEOs should be discouraged from announcing the expected number of tests to be conducted before the event itself. Anti-doping programs are more than ever focusing on the quality rather than the quantity and by publishing numbers before a Major Event there is an unintended consequence of placing a disproportionate focus on how many tests were conducted rather than the quality of those tests.

Recommendation – WADA should define a standard public reporting format which focuses simply on the number of athletes tested in each sport. The IOC and other MEOs should not publicize the number of planned tests before Major Events and in all cases only report on the outcomes once the event has concluded.

7. The 2014 Sochi Winter Olympic Games Program

This section contains the observations of the IO and an overall assessment of the anti-doping program delivered at the Sochi Games. All observations were shared with the IOC and Sochi2014 during the course of the Games.

7.1 Summary

For the Sochi Games, the IOC sought to implement the most comprehensive program ever seen at a Winter Olympic Games (see table below). The doping control program was authorized by the IOC and primarily executed by Sochi2014. The coordination of samples collected outside of the Russian Federation was delivered by RUSADA. Sochi2014 managed all aspects of the post-competition program, with the exception of the Doping Control Officer training which was delivered by RUSADA.

Type of tests ¹³	Planned ¹⁴	Tests Reported by		Actual Total
		Sochi Laboratory ¹⁵	Other Laboratories ¹⁶	
Urine	1932	1917	54	1971
Blood	509	417	38	455
Blood Passport	-	47	0	47
Total	2441	2381	92	2473

Number of Athlete Tested (as reported in ADAMS)	Number	% out of 2902 Olympic Athletes participating
Athletes Tested (once)	817	28%
Athletes Tested (more than once)	494	17%
Athletes Tested (total)	1311	45%

¹³ A test at the Games was defined by the IOC by the type of sample collected (i.e. urine and blood). Therefore, if an athlete provided a urine and a blood sample at the same time this would count as two tests (refer to 6.10 Testing Figures and Reporting for further comments).

¹⁴ By reference to the TDP provided by the IOC to the IO on 4 February 2014.

¹⁵ Figures as reported by the Sochi Laboratory in ADAMS, which exclude dilute samples (refer to 7.9 Sample Collection for further comments), four samples which were not analyzed by the Laboratory due to sample bottle leakage, four ABP blood samples attributed to FIS as the Testing Authority and 15 ABP blood samples reported in ADAMS with IBU as the Testing Authority.

¹⁶ The Cologne, Montreal and Lausanne laboratories conducted analysis of test samples collected pre-competition by several Sample Collection Authorities, under the auspices of the IOC as the Testing Authority.

Number of tests by Sample Type (as reported in ADAMS)	Number	Pre-Competition ¹⁷		Post Competition
		Sochi Laboratory	Other Laboratories	
Urine Samples – Excluding dilute samples	1971	925	54	992
Urine Samples – Dilute samples only	215	145	4	66
Urine Samples (total)	2186	1128		1058
Blood Samples	455	231	38	186
Blood Passport Samples	47	21	0	26
Samples Collected (total)	2688	1418		1270

7.2 Games-Time Responsible Parties

There were the following parties responsible for elements of the anti-doping program at the Sochi Games.

IOC Medical Commission	The body ultimately responsible for the anti-doping program at the Sochi Games. The IOC Medical Commission delegated its responsibility to the Games Group for the period of the Games.
IOC Games Group	Appointed by the IOC President and included members of the IOC Medical Commission, experts from medical and anti-doping fields, future Chief Medical Officers of Olympic Games Organizing Committees and WADA-Accredited Laboratory Directors (deployed in the Sochi Laboratory). The Games Group met daily to provide feedback and recommendations on all areas related to the remit of the IOC Medical Commission and to provide feedback to the IOC Medical Director.
Sochi Taskforce	A group including representatives of the IOC, Sochi2014 and RUSADA to report on its observations and provide recommendations for improvement and target testing. The Taskforce met daily to predominantly focus on practical matters related to the delivery of the program and required corrective action. On occasion information was assessed and discussed so as to inform the TDP.
IOC Professional Staff	IOC oversight and guidance of the program was provided practically by the IOC Medical Director and his team. Within his team were two ¹⁸ contracted staff responsible for the management of whereabouts and location information, and one staff member responsible for the overall administration of the program. Legal

¹⁷ The term “pre-competition” is undefined in the IOC Anti-Doping Rules applicable to the XXII Olympic Winter Games in Sochi. For the purposes of the Games and this report, “pre-competition” should be understood as any sample collection conducted which was not immediately after a competition (e.g. Speed Skating, Ladies 1000m).

¹⁸ One staff member left Sochi around the time of the Opening Ceremony.

	support was provided by the IOC Legal team.
Sochi2014	Responsible for the overall delivery of the testing program, both pre-competition and post-competition, with the exception of testing in non-accredited venues.
RUSADA	Contracted by Sochi2014 to deliver training to DCOs and contracted by the IOC to coordinate testing at non-accredited locations anywhere in the world.
Ministry of Sport of the Russian Federation	Provided the IOC with a link to Russian law enforcement agencies and facilitated the sharing of information from the Russian authorities to the IOC. In addition, the Ministry appointed a laboratory expert to be present at the Sochi Laboratory for the duration of the competition period of the Games.
IOC TUE Committee	A panel appointed by the IOC Medical Commission from within the Games Group to review and assess TUEs submitted by athletes participating at the Games.
IOC Disciplinary Commission	A commission appointed on a case by case basis by the IOC President to hear cases related to a possible Anti-Doping Rule Violation, pursuant to Article 6.2.5 of the IOC Anti-Doping Rules.

The WADA IO was invited to and attended, where possible, formal meetings of the abovementioned groups, with the primary interaction being through the Sochi Taskforce.

Overall it was observed that the respective roles of the above-mentioned parties were lacking in clarity, which at times made it difficult for the IO to determine who was responsible for the monitoring and reporting of certain aspects of the program. It is the view of the IO that the number of different formal and informal channels of communication impacted on the efficiency of the systems in place.

7.3 Therapeutic Use Exemption Procedure

The IOC Anti-Doping Rules required that athletes with a documented medical condition requiring the use of a Prohibited Substance or a Prohibited Method must first have obtained a TUE. The IO observed the IOC TUE procedure and processes at the Olympic Games but did not review the TUE files content, medical information and evidence, or how the TUEC evaluated the ISTUE criteria for recognizing or granting a TUE as this was not within the scope of the IO.

The IOC Medical Commission appointed a TUEC of four physicians among experts in the Games Group to assess existing TUEs that athletes already had approved by their NADO or IF (under the mutual recognition provisions of the Code) and to consider new TUE applications. It was unclear whether the TUEC was appointed formally, although four names (including the Chair) appeared at the bottom of an internal document that was circulated among members for the review of each file.

All TUEC Members signed a declaration of conflict of interest and the decisions of the TUEC were deemed to constitute decisions of the IOC without need for further internal review. However, the IO noted that the TUEC Members were part of the Games Group and as such

were not truly independent of the IOC given that the Games Group was ultimately “responsible to the IOC Medical Commission and its Medical and Scientific Director”¹⁹.

There were 53 existing TUEs granted by IFs and NADOs for athletes participating in the Games, including two with an expiry date falling during the Period of the Games. The IO did not observe a routine procedure for the review of these TUEs, but was advised that WADA had reviewed many of these prior to the Games.

There were 16 TUEs submitted directly to the IOC during the period of the Games (either via a dedicated IOC TUE e-mail address, or by hard copies submitted via mailboxes at the Polyclinics in the three Athletes Villages). Upon receipt of an application, the Chair of the TUEC selected three members who met in person to review the file. By the end of the Games of the 16 requests received, six did not require a TUE, one was withdrawn and all others were approved.

It was observed that the IOC did not routinely enter TUEs into ADAMS and as a result WADA did not have the ability to review the granting or denial of these TUEs in accordance with Article 3.2.3.1 of the IOC Anti-Doping Rules.

7.4 Information and Intelligence Gathering

Information and intelligence was received by the IOC through a number of sources.

Customs

There is no criminal legislation in Russia for the offence of doping, but there is criminal legislation related to the general supply and trafficking of certain substances. From the opening of the Village, a representative of the Ministry of Sport of the Russian Federation provided digital images of luggage from accredited and non-accredited persons that had been scanned by the Russian Federal Customs at Sochi-Adler International Airport. The scanned images were checked to see if there was any image that could suggest the importation of possible medication and doping paraphernalia. Where luggage was identified as containing medication or needles, the intended process was for a representative of the Games Group to visit the relevant NOC to check the list of declared medication against what exactly existed. In cases of a discrepancy, a formal approach to the NOC was made. The IO is unaware of how many times, if at all, this occurred and what actions were taken as a result.

Towards the end of the Games, the IO was presented with a draft report from the Ministry of Sport of the Russian Federation which included the following:

- 16,000 bags had been scanned by the Federal Customs since 20 December 2013;
- Seven named nations were identified as importing “large amounts of intravenous systems” as well as other medical equipment;
- On five occasions the Federal Security Services “detected the use of needles and syringes in the living quarters” of named NOCs.

The IO had not been privy to this information before the presentation of the report and is unaware of what actions were taken as a result.

The concept of this approach was good and reflected the IOC’s desire to use intelligence to inform the testing program, evidenced by the Medical and Anti-Doping information seminar for NOC medical staff held prior to the start of the Games where it was outlined that no intravenous equipment, blood analysis machines or oxygen tanks were

¹⁹ Role of the IOC Games Group – IOC Letter dated 14 January 2013.

permitted in any of the Villages. However, there were limitations to what could be seen on the digital images and what actions could be taken as a result, evidenced by the fact that only two target tests were conducted as a result of this exercise. It was also evident that there was a deficiency in the skill set required for this type of work and that both the Ministry of Sport of the Russian Federation and the IOC would have benefited from a professional with expertise in the assessment of this type of intelligence.

WADA

During the period of the Sochi Games WADA provided intelligence in the form of a priority list of athletes to be tested on a number of occasions. By the end of the Games all of the athletes which were suggested had been tested either pre-competition or targeted post-competition.

IFs and NADOs

On 23 January 2014, RUSADA communicated with IFs and NADOs explaining that RUSADA had been contracted by the IOC to test athletes all over the world on the IOC's behalf. Further, RUSADA requested that any relevant intelligence and/or information held be shared with RUSADA for use by the Taskforce. This request resulted in responses from only two ADOs stating that they did not hold any such information. No other responses were received by RUSADA.

The FIS provided a list of 47 Athletes to the IOC on 28 January 2014 to be target tested prior to the Games based on intelligence from their own anti-doping program. Of the 47 Athletes, 32 were tested between 28 January 2014 and the Opening Ceremony (some of which were tested outside of the Russian Federation) and by the end of the Games all tests had been conducted. The ISU provided the IOC with a list of 15 Athletes on 31 January 2014 to be target tested for specific types of analysis prior to the Opening Ceremony based on intelligence from their own anti-doping program. Unfortunately these tests were not conducted as requested with a communication breakdown with Sochi2014 cited as the reason.

7.5 Sochi Laboratory

The Sochi Laboratory provided formal feedback to the IOC (by the Laboratory Director to the IOC Medical Director) on negative samples which produced a finding of interest. It was noted that this information was rarely discussed at the Taskforce meeting and therefore the IO is unaware of what actions took place as a result of this intelligence.

In addition, members of the Games Group who operated within the Laboratory were observed to be regularly reviewing data and reporting directly to the IOC Medical Director.

7.6 Test Distribution Planning, Monitoring and Reporting

The TDP was designed for both periods of the testing program (pre-competition and post-competition) and included a record number of pre-competition and post-competition tests at a Winter Olympic Games. The pre-competition program was promoted before the Sochi Games as being the biggest ever with over 50% of all tests to be conducted in this manner.

Pre-Competition

The increase in pre-competition numbers was a significant challenge to deliver, particularly in the Accredited Olympic Venues. The combination of the increase in test numbers, the limited whereabouts and location information, the initial absence of a

coordinated approach between the Villages and training venues, as well as the lack of experience of Chaperones all contributed to a very challenging pre-competition program. As a result, the pre-competition testing fell considerably behind schedule and had to increase once competition started, rather than taper as originally intended.

Once the issues had been identified corrective actions were undertaken by the IOC and Sochi2014 (with assistance from the IO²⁰) and the program improved to the extent that by the end of the Games the expected number of pre-competition tests had been exceeded. The single biggest cause of this situation was that planning before the Games had not taken into account the different skills, systems and extra training required to successfully deliver such a substantial pre-competition program. The impact was that when it became apparent that the pre-competition testing programme was behind schedule there was a need to focus on achieving numbers. As a result, the opportunity to test athletes at high risk periods may have potentially been missed.

Post-Competition

The post-competition program was designed primarily through the traditional way of negotiating with the relevant IF in the form of a Protocol. The Protocols for Sochi were agreed in the latter half of 2013, with four finalized as late as December 2013 placing time pressure on Sochi2014 to plan effectively and to allocate the necessary resources to each competition venue. Sochi2014 should therefore be recognized for the manner in which the post-competition TDP was delivered. The IO observed many post-competition testing sessions and was very satisfied with the chaperoning, the sample collection and the excellent facilities.

With respect to the Protocols, and taking into account the challenges of the pre-competition program, the IOC decided to target athletes of interest post-competition. This required the agreement of the relevant IFs²¹ and the IOC sought such agreements, albeit informally, once it was agreed that targeted post-competition testing would improve the program. This resulted in additional target tests being added to relevant post-competition Mission Orders.

Athlete Biological Passport Programs

In addition to the pre-competition and post-competition testing program three IFs²² collected blood samples for their own ABP and blood profile programs. The implementation of ABP testing fell outside of the jurisdiction and responsibility of the IOC (the IOC Anti-Doping Rules are silent on ABP programs and they were not identified in the IF Protocols).

In all three programs the selection of athletes was made by the responsible IF, the IFs provided advanced notification to the athletes, and the data was collected and processed by the IF independently of the IOC. The analysis and reporting of the ABP and blood profiles were normally completed within 24 hours allowing the IFs to review the data and make any required target selections reasonably quickly. Where target testing was required as a result the IF provided a written request to the IOC.

²⁰ It was agreed on 5 February 2014 that the IO scope would be brought forward to allow observation of the challenges and so as to provide assistance to the IOC and Sochi2014 (see Annex 1 – Scope of the IO).

²¹ All International Federation Protocols include the following provision: *This agreement may be amended and further detail added, but only by written agreement signed by all parties no later than December 2013.*

²² IBU, ISU and FIS.

The FIS undertook over 300 ABP tests on its Cross-Country and Nordic Combined athletes prior to the Games starting. This resulted in 20 follow up target tests all of which were conducted by the IOC. The ISU conducted over 500 blood profile screens during the Games. This resulted in eight follow up target tests all of which were conducted by the IOC. In addition, the IBU requested 41²³ ABP tests in the latter half of the Games all of which the Sochi Laboratory conducted in agreement with the IOC.

Where the three programs differed was that all three IFs had slightly different rules and practices and they used their own equipment and technicians to analyze the samples²⁴ (although one IF began using the Sochi Laboratory after their own equipment failed). All three IFs had different means of reporting the sample analysis data, with only one using ADAMS.

The impact of the operational differences was that the respective IFs had sole responsibility for their target testing and there was little coordination between the ABP programs and the delivery of the IOC's TDP. Further, this meant that opportunities to collect ABP or other samples from athletes who were being tested by the IOC (and vice-versa) on the same day were not maximized.

It is worth noting that ADAMS had been redesigned to include an ABP Adaptive Module which provided an objective evaluation of the athlete's endogenous steroid parameters in urine samples and therefore could provide an indication of whether an abnormal profile was potentially indicative of doping and whether an IRMS analysis should be conducted. Following this it is not unusual for an expert to provide their own judgment to reach a final decision. In Sochi the ABP Adaptive Module was used, however access to the data was only arranged with the relevant IF a number of days after the opening of the Village. The decision when to activate an IRMS analysis was the responsibility of a Games Group member with specific expertise in endogenous steroid metabolism and analysis, who had been assigned the task of acting as the IOC's APMU and to assess the steroid profiling data and request IRMS on samples of interest.

TDP Design, Adjustments and Decision Making

The TDP was originally designed by Sochi2014 and subject to input by the IOC and RUSADA before the Sochi Games. The model used was to identify the post-competition testing required by the IF, commit those tests to the plan, conduct a risk assessment of the 15 disciplines and allocate those tests to nations, sports, disciplines and athletes. This resulted in a fixed post-competition program agreed with the IOC and managed by Sochi2014, and a flexible pre-competition program managed by Sochi2014. While Sochi2014 was responsible for the vast majority of pre-competition tests, it was noted that RUSADA was entrusted with the management of a priority list of athletes 'of interest' without any formal agreement.

The IO observed that, as expected, the priority list identified for pre-competition testing grew over the period of the Sochi Games, due to the information and intelligence received (see 7.4 Information and Intelligence Gathering). This resulted in the priority list expanding by 25% from the opening of the Village. RUSADA were diligent in the management of this part of the program. However, the IO observed that as athletes were added to the

²³ 15 ABP blood samples were reported in ADAMS by the Laboratory with IBU as the Testing Authority, and therefore were not included in the summary figures of this report.

²⁴ All such methods were accredited by WADA.

priority list there was limited guidance from the IOC to prioritize the athletes on that priority list.

The critical aspect to the management of any flexible testing program is clear and well defined communication and decision making. The IO observed that the decision on the overall test plan was made by the IOC, as is appropriate. The IO was advised after the Games that Sochi2014 selected athletes from the priority list to test, managed the Mission Orders, monitored which individual athletes were tested, updated the priority list on a continuous basis, and reviewed this list with the IOC on a daily basis. All targeted athletes were eventually tested. However, during the Games and in the IO's view it was unclear as to which organization was ultimately responsible for the determination of which athletes to test, and when and how the delivery of the pre-competition program was monitored. The impact of this was that there appeared to be little formal coordinated assessment of intelligence taking into account the test plan and the priority list.

7.7 Athlete Whereabouts and Location System

The whereabouts system for the Sochi Games was a bespoke system set out in the IOC Anti-Doping Rules (Article 4.5). Broadly, it required athletes already in an RTP competing at the Sochi Games to continue to provide whereabouts and updates in the usual manner and also for NOCs to provide daily 'location information' of all their athletes (including those in an RTP) directly to the IOC. While the NOC was responsible for the filing of location information, an athlete in an RTP remained responsible for their own whereabouts filing. NOCs were advised of these provisions in writing on 29 July 2013.

The procedure that was implemented required NOCs to complete a spreadsheet issued by the IOC (with drop down menus to select which Athletes Village or location address if the Athlete was outside the Village) every day no later than 6pm with accommodation details, rooming lists and locations for all athletes. Importantly, the NOC was required to resubmit this information every day rather than provide updates on the originally submitted information. NOCs were provided with this template on 8 January 2014 and requested to provide the first submission no later than 24 January 2014, potentially placing undue pressure on NOCs who were preparing for their team's departure to Sochi.

The IOC staff encouraged NOCs to comply with this requirement with daily and repeated communication but a significant number of NOCs failed to comply with this request every day. On 10 February four NOCs who had failed to comply with these requirements were issued with a notice to comply within 24 hours. While the IOC Anti-Doping Rules allowed for the imposition of sanctions for NOCs who failed to comply with this request, no whereabouts failures or sanctions were issued during the period of the Sochi Games.

Overall the quality of the location information was varied and the impact of requiring a full daily submission, rather than updates, created at times an unmanageable workload on IOC staff, which in turn slowed down the provision of useful location information to the Sochi2014 staff who were issuing the individual Mission Orders for the pre-competition program.

7.8 Location and Notification of Athletes

Sochi2014, with the assistance of RUSADA, recruited and trained a total of 295 Chaperones via the volunteer program, the majority of which were young, enthusiastic and committed.

Many previous IO Reports had highlighted the importance of effectively locating athletes and notifying them for pre-competition testing in a timely and professional manner.

At the Sochi Games the limited location information, the varied quality of this information and the limited training of Chaperones resulted in significant challenges in locating athlete outside of competition venues. Fundamentally, the Chaperones were not made aware of the philosophy of the pre-competition program (i.e. that specific athletes should be tested at specific times). Additionally, the Chaperones had not been trained to locate athletes who are constantly moving and have flexible schedules, which required Chaperones in particular to be more diligent and innovative in seeking out athletes at the right time and location.

Once this issue had been highlighted and identified, a number of corrective actions were implemented by the IOC and Sochi2014, including provision of instructions by way of a PowerPoint presentation (provided by the IO) to every Doping Control Station on how to use the IOC location information, how to use the Sochi 2014 Info system²⁵ and how to use ADAMS when preparing to locate athletes. When it became apparent that there was delays to the issuing of Mission Orders and problems with real time monitoring the IOC agreed that one of their staff members and an expert on secondment from the Rio 2016 Organising Committee would relocate (albeit for one day only) to the Sochi2014 offices so that face to face discussions and cooperation could take place with the Sochi2014 staff setting up the Mission Orders in ADAMS. Two extra staff were also brought in by Sochi2014 to help with the issuing and monitoring of Mission Orders. The IOC also requested that the reasons for why athletes were not tested as planned be documented and provided on a daily basis, which occurred on occasion. Lastly, a system was introduced to encourage greater communication and cooperation between the Athlete Villages and the training venues, so that athletes could be notified and tested at the training venues rather than waiting for them to return to the Athlete Village.

The IO observed that chaperoning at competition venues was well executed, the staff knew their venue, worked well as a team and were proficient in their role. This outcome was achieved by venue specific training in advance of the Sochi Games.

7.9 Sample Collection

Sochi2014 deployed a total of 142 DCOs, with 32 sourced from RUSADA, 24 sourced from other international Anti-Doping Organizations and 86 were newly trained for the purpose of the Sochi Games. Of the DCOs, 24 were appointed as Doping Control Station Managers.

Training was provided by RUSADA for candidates chosen by Sochi2014 from medical universities in Moscow and Krasnodar. The training program was in two phases with the first training including four days of theory and practical sessions and a further two days training for chaperones (again theory and practice). The second phase was ensuring that successful candidates were involved in the Test Events so as to gain more practical experience. At the end of the training, RUSADA reported to Sochi2014 on the successful candidates and the determination of who to use for the Sochi Games was the responsibility of Sochi2014.

Overall, sample collection was conducted in a professional manner with few issues and none which were substantial. The IO observed that the model of using both domestic and international DCOs worked well and the IOC, Sochi2014 and RUSADA should be congratulated on this element of the program.

There were however a number of systems in place which could have been implemented more effectively. DCOs were scheduled to work very long hours and even at times when no sample collection was required or planned. While it is important to have a core

²⁵ Each Olympic Games has an Info system hosted electronically which includes athlete biographies and photos, training schedules and competitions schedules.

team operate at the Doping Control Stations, consideration should be given to the hours worked by DCOs so as to ensure a fresh and energized workforce. In addition, some Sample Collection Forms were required to be reviewed and approved by the Doping Control Stations Venue Manager before the samples were transported to the Sochi Laboratory. This appeared to be unnecessary given the quality of the DCOs operating at the Games. Finally, as is often the case at Major Events, the Doping Control Stations were very busy and it was often observed that individuals (including representatives of IFs and the IOC) entered and exited the processing rooms while an athlete was present. This was found as unnecessarily disruptive and should be avoided so as to provide a suitable environment for the athlete.

Sample Codes Stickers

At the Sochi Games, as at the London 2012 Olympic Games, the sample codes were identified on the Sample Collection Forms by way of a bar coded sticker. This saves time, removes the possibility of human error when writing down the sample code numbers and is now common practice in many developed ADO programs. During the Sochi Games it was observed that the stickers could be removed from the Sample Collection Forms, indicating a possibility that the sample code could be transferred to another athlete, potentially seriously compromising the integrity of the process. The IOC responded to this issue by requesting that the top sheet of each Sample Collection Form be initialed by the DCO so that the initial spanned the sticker and the form. It was agreed that this was the best solution to provide athletes with confidence in the system. This new instruction was communicated to all Doping Control Stations but was at times inconsistently applied. To the knowledge of the IO no incident was reported that would affect the validity or integrity of the process.

Dilute Samples

The issue of dilute samples has been a recurring one at past Olympic Games. In Sochi the same IOC Anti-Doping Rule²⁶ applied in that if an athlete provided a dilute sample (less than 1.005) then the athlete was required to provide a second sample, and irrespective of whether the second sample was in range, no additional samples were requested. Therefore, the IOC typically required athletes to provide one additional sample in the event that the athlete's sample does not meet the requirements for suitable specific gravity for analysis.

In Sochi, 103 athletes provided one or more urine samples which did not meet the specific gravity requirement measured by a digital refractometer. This resulted in 215 dilute samples being provided (10% of the total number of urine samples collected), of which 69% were collected pre-competition. On recognizing this issue, the IOC provided an additional instruction recommending that athletes wait a minimum of 40 minutes after providing a dilute first sample before they provided a second sample. The outcome of this 40 minute waiting period resulted in some minimal benefit to this issue and was therefore largely ineffective in its attempt to achieve a suitable sample for analysis as required by the IST.

Finally, with respect to sample collection, the IO was very encouraged to see educational material and posters at the Doping Control Stations, something that can now be considered standard practice and an excellent opportunity to inform athletes and support personnel.

²⁶ The International Standard for Testing (IST) states that "*the DCO should continue to collect additional Samples until the requirement for Suitable Specific Gravity for Analysis is met, or until the DCO determines that there are exceptional circumstances which mean that for logistical reasons it is impossible to continue with the Sample Collection Session.*"

7.10 Transport and Chain of Custody of Samples

The chain of custody process in Sochi, including the transfer of samples to the Laboratory reflected the practice adopted at previous Games. All samples and paperwork were transported and centralized at one of three logistics depot (the 'Hub') where they were then redirected to the Laboratory. There were deviations to this agreed approach in that on occasion samples were shipped directly to the Laboratory without going through the Hub. However, the IO was satisfied that overall this system operated successfully.

7.11 Samples Analysis

The laboratory anti-doping services were provided by a satellite laboratory facility within the Sochi Olympic Park. The Laboratory was accredited to the requirements of the ISL by WADA and the requirements of ISO/IEC 17025 by the Russian national accreditation body²⁷. The satellite facility was established by the WADA-Accredited Laboratory Antidoping Centre Moscow located in Moscow, Russia. As a result of its location, the Laboratory benefited from the highest level of security afforded to an Olympic venue. In addition, the space around the Laboratory itself was restricted and during the event, security personnel consistently controlled the only entrance into the Laboratory.

The Laboratory was equipped with the most advanced instrumentation available and the necessary complementary equipment, supplies, reagents and standards. The satellite laboratory was fully functional in November 2013 and had successfully participated in multiple rounds of the WADA External Quality Assessment Scheme (EQAS) for urine and blood as well as the WADA double blind EQAS up until the end of the Olympics.

The IO was given the full cooperation of the staff and access to all Laboratory operations and documentation. A member of the IO was present across various times of the day and night during the Games to provide a view of the Laboratory operations at all hours. The Laboratory procedures began upon receipt of urine and blood samples from the DCOs who did not have access to the Laboratory's restricted administrative and analytical areas. Once samples arrived, the Laboratory staff immediately began the process to verify, register and distribute the samples for various analyses.

The analysts displayed a high level of experience and competence and the resulting data demonstrated a high level of quality. The IRMS test was conducted to differentiate between the endogenous and exogenous nature of target steroids and the method included multiple target steroid analytes thereby increasing the likelihood that the application of an exogenous steroid would be detected. Testing was conducted on blood samples including for CERA, blood transfusion, HBOCs and to a limited degree blood variables for ABP. Due to circumstances outside of the control of the IOC or the Laboratory, the test for hGH was not available but samples were collected and stored for analysis at a later date.

The determination of what analysis to conduct on each sample (and therefore the type of sample to collect) was identified at the test planning stage and included in the TDP. As has been observed in previous Games, the Laboratory capacity outweighed the actual number of sample types received. This was a result of the initial challenges regarding the pre-competition program, the absence of an approved hGH test, and a number of other factors. In particular, the ABP instruments had very limited use due to the IFs managing these programs on their own accord (see 7.6 Testing Distribution Planning, Monitoring and Reporting – ABP Programs) and the IRMS instruments were initially underutilized.

²⁷ The Association of Analytical Centers "Analitica".

On identification of this issue, the IOC made a number of adjustments. Firstly, it was agreed that the IOC would communicate directly with the Laboratory to advise of the samples that required more than the standard urine screen (as well as retaining the communication flow via the Doping Control Station Manager). A significant number of samples were requested to be analyzed for EPO and requests were made daily for IRMS to ensure that the maximum sample load was reached each day.

All findings were electronically uploaded into ADAMS on a daily basis so that the blood and urine results could be provided to the IOC promptly including blood and endogenous steroid variables. ADAMS allowed a seamless and simultaneous notification of results to the IOC (as well as to the IO) for Adverse Analytical Findings and negative results. Several quality control samples were introduced into the doping control program unknown to the Laboratory which were appropriately identified and reported into ADAMS.

The IO observed that there were a number of different entities operating within the Laboratory. The Laboratory staff were responsible to the Laboratory Director, all of whom had been identified in the Laboratory Games Staff list under their ISO 17025 accreditation. In addition, some of the Games Group representatives and responsible to the IOC Medical Commission were also present in the Laboratory. However, there was also a representative of the Ministry of Sport of the Russian Federation who was not part of the Laboratory Games staff or the IOC Medical Commission and whose role was unclear to the IO.

7.12 Results Management Process

The IO's observation of the results management process at the Games extended both to the Initial Review of Adverse Analytical Findings reported by the Laboratory and to the conduct of cases that, following Initial Review, proceeded to a disciplinary hearing in accordance with the IOC Anti-Doping Rules. A summary of Adverse Analytical Findings is as follows:

- 27 AAFs reported by the Sochi Laboratory during the period of the Games
- 1 AAF by the Cologne Laboratory during the period of the Games
- 20 AAFs not taken forward following Initial Review (all but one because of a TUE on file or no TUE was required)
- 8 AAFs taken forward following Initial Review resulting in 5 Anti-Doping Rule Violations to date

Initial Review of Adverse Analytical Findings

The IOC had in place a defined procedure for verifying the validity of Adverse Analytical Findings that were reported during the Games period. Namely, Article 6.2.2 of the IOC Anti-Doping Rules provides for the Chair of the IOC Medical Commission, assisted by the IOC Medical Director, to verify if there is any reason why the Adverse Analytical Finding cannot be brought forward (e.g. the athlete has a valid TUE or there was a departure from the ISL and/or IST).

The Chair of the IOC Medical Commission delegated this responsibility in the case of TUEs to the Chair of the TUEC. In each case, the Chair of the TUEC verified that the athlete in question had a valid TUE on file (or that no TUE was required) before notifying the Laboratory in writing that no further action was required to be taken in relation to the sample. The letter from the Chair of the TUEC to the Laboratory was copied to the IOC Medical Director and the IOC Medical Department eventually recorded an entry of "No ADRV" in ADAMS against the sample number in question, although the IO observed that only three of such entries were recorded in ADAMS at the date of this report.

Valid TUE on File or no TUE Required

The IO was notified of five Adverse Analytical Findings reported to the IOC that were not taken forward following Initial Review because there was a valid TUE on file for the athlete concerned.

The IO was also notified of 11 Adverse Analytical Findings that were not taken forward following Initial Review because the prohibited substance had been administered by a permitted route. Such cases did not require a TUE but were either required to be declared under the IOC Needle Policy, which fell outside of the scope of the IO, or considered by the IOC as related to other permitted routes of administration (e.g. inhalation).

Finally, the IO observed that three Adverse Analytical Findings were not processed or recorded in ADAMS in a timely manner and a number of weeks after the conclusion of the Games.

Apparent Departure(s) from the ISL

The IO was notified of one Adverse Analytical Finding reported to the IOC that was not taken forward following Initial Review because the Chair of the IOC Medical Commission determined that there had been an apparent departure from the ISL.

The apparent departure related to the following reporting requirements of Section 4 of the WADA Technical Document TD2013MRPL with respect to Non-Threshold Substances which are prohibited only in-competition.

"A confirmed identification of a Non-Threshold Substance at any concentration shall be reported as an Adverse Analytical Finding, with the following exceptions:

- *Non-Threshold Substances in classes S6 [...], which are prohibited in-competition only, should not be reported below 50% of the MRPL."*

Following the Initial Review, the Chair of the IOC Medical Commission deemed that an Adverse Analytical Finding for a Non-Threshold Substance in class S.6 should not have been reported by the Laboratory under TD2013MRPL because the concentration of the substance was reported at less than 50% of the MRPL. The IOC closed the matter on this basis and took no further action other than to treat the finding as intelligence for further target testing of the athlete at the Games.

The IOC's decision not to go forward with the Adverse Analytical Finding was reported by the IOC into ADAMS with a mention "No ADRV" and a copy of the reasoned decision of the Chair of the IOC Medical Commission was uploaded into ADAMS at the same time.

Any decision by the IOC not to bring forward an Adverse Analytical Finding is subject to appeal²⁸ and the IOC's notification of the decision through ADAMS was deemed to be due notification of the decision to all parties with an appeal right (being the relevant IF, NADO and WADA). The IO considers this to be an acceptable practice provided that all parties with an appeal right are registered users of ADAMS and are thus automatically notified of the decision by means of an ADAMS alert, as was the case in this instance. To the extent that one or more of the parties with a right of appeal are not registered users of ADAMS, the IOC must ensure that its decisions are notified by alternative means.

²⁸ IOC Anti-Doping Rules - Article 11.2.

It is unfortunate that confusion in this case should have arisen from the interpretation of a WADA Technical Document at an Olympic Games. To ensure the fight against doping retains credibility, anti-doping regulations must be clear in their meaning and they must be consistently applied. Legal certainty is a fundamental tenet of any regulatory framework and any ambiguities in the language and interpretation of TD2013MRPL should be addressed by WADA as soon as possible.

Disciplinary Hearings

Under the IOC Anti-Doping Rules, where the Initial Review did not reveal an applicable TUE or a departure from the International Standards, the IOC President was informed of the existence of the Adverse Analytical Finding and of the relevant details of the case. The President thereafter initiated a disciplinary proceeding by appointing a Disciplinary Commission and notifying the athlete concerned of the possible Anti-Doping Rule Violation. The Disciplinary Commission was composed in each case of a Chair, being the Chair or other member of the IOC Juridical Commission in his absence, plus two members of the IOC Executive Board and it was assisted in its work by the IOC Legal and Medical departments. The IOC President directed in each case that the decision of the Disciplinary Commission was to constitute the decision of the IOC itself.

Of the eight cases in Sochi that proceeded to a disciplinary proceeding following Initial Review, four proceeded to a full hearing before the Disciplinary Commission resulting in an Anti-Doping Rule Violation and exclusion of the athlete from the Games.

In two cases, because of the late notice of the Adverse Analytical Findings to the IOC and the fact that the athletes were imminently due to compete at the Games, the Disciplinary Commission convened on the limited issue of whether to impose a provisional suspension on the athlete pending the outcome of the proceeding and suspensions were imposed in both cases. In one of the two cases, the Disciplinary Commission, having excluded the athlete from the gold medal Ice Hockey match, later considered that it had sufficient information to pronounce on the Anti-Doping Rule Violation and did so without convening a further hearing. The athlete was found to have committed an Anti-Doping Rule Violation under the IOC Anti-Doping Rules but no further sanction other than his exclusion from the gold medal Ice Hockey match was imposed and he received a silver medal and a diploma.

The two remaining cases were notified to the IOC after the athletes had already competed at the Games and their cases were therefore postponed to a hearing of the Disciplinary Commission to be held at a subsequent date.

The IO was invited to attend all six cases that were heard by the Disciplinary Commission in Sochi and a representative of the IO attended the five oral hearings that actually took place²⁹. Representatives of the relevant IF were also present at the hearings that were conducted.

In accordance with the IOC Anti-Doping Rules³⁰, the entire disciplinary procedure (starting from the time the athlete is first notified of an alleged Anti-Doping Rule Violation) is

²⁹ In the remaining case, the athlete was withdrawn from competition following the Disciplinary Commission's imposition of a provisional suspension removing the necessity of holding a hearing on the morning of the athlete's scheduled day of competition.

³⁰ IOC Anti-Doping Rules - Article 6.2.14 - *The entire disciplinary procedure shall not exceed 24 hours from the time the Athlete or other Person concerned is informed of such anti-doping rule violation. However, the IOC President may decide to extend this time limit depending upon specific circumstances of a case.*

not to exceed 24 hours unless extended by the IOC President “depending upon specific circumstances of a case”. The IO observed that none of the eight cases in Sochi were completed within the stated 24 hour period nor were “specific circumstances” identified as a basis for extending time in any one of the eight cases. Rather, on each occasion, the IOC President (at the time of issuing the first notification letter to the athlete) invoked the provision allowing for an extension of time to be granted. The exception in Article 6.2.14 effectively therefore became the rule.

The IOC President is required to promptly notify the decision of the Disciplinary Commission by sending a full copy of the decision to all addressees. This occurred in all cases heard in Sochi.

Finally, all decisions taken by the Disciplinary Commission may be appealed to CAS for a final and binding determination. For the period of the Games, CAS established an ad hoc division of nine members present in Sochi to sit as an appellate body for this purpose but no appeals to CAS were either lodged or heard.

7.13 Information Management Systems

The use of centralized information managements systems has evolved significantly over the years and the use of ADAMS by the IOC and Sochi2014 was an illustration of how the effective management of athlete data can be of considerable use to ADOs.

ADAMS was used at the Games for:

- Whereabouts information of many (but not all) RTP athletes;
- Setting up of Mission Orders by Sochi2014 at their main office;
- Inputting Doping Control Forms by Doping Control Personnel at the Doping Control Stations;
- Reporting of negative results and Adverse Analytical Findings by the Laboratory;
- To a limited degree, recording the results of Initial Reviews and Anti-Doping Rule Violations by the IOC.

This allowed for real time reporting to a variety of responsible parties in different parts of Sochi and the world, and significantly reduced the need for other types of less secure communication (e.g. phone calls, email, faxes). The IO observed that the real value of ADAMS is the extensive reporting capability and the IO utilized this function to continually assess the progress of the IOC and Sochi2014 with respect to the delivery and quality of the TDP. The IO is of no doubt that ADAMS is an excellent solution for MEOs and the Major Event module in ADAMS should continue to be developed so that it meets the needs of its users.

Previous IO reports have noted the need for the development of a paperless system for doping control. As mentioned previously (see 6.6 Athlete Whereabouts) the existence of the Olympic Identity and Accreditation Card (OIAC) system at the Games makes the possibility of a truly paperless process a real opportunity for the IOC and WADA. In all aspects of the Games environment, accredited persons (including athletes) are required to check in and checkout of various locations. For Doping Control Stations to not be included in this system means that athletes are required to complete forms with data already held by the IOC and/or Organizing Committee through the OIAC and slows the doping control process. It is surely only a matter of time before this situation is rectified and an athlete-friendly system is introduced.

8. Annex 1 - Mandate and Work of the Independent Observer Program

The IOC and WADA signed an agreement outlining the framework for the IO Program for the 2014 Olympic Winter Games in Sochi. The observation period was due to commence on the date of the Opening Ceremony of the Games (7 February 2014) and formally completed on the day of the Closing Ceremony (23 February 2014). However, it was formally agreed by the IO Chair and the IOC Medical Director on 5 February 2014 that the observation period would commence on that same day. It is worth noting all parties agreed that this was an appropriate response to the situation and the IO's work was conducted in full agreement with the IOC.

Over the course of the Games period, the IO met on a daily basis with the IOC, Sochi2014 and RUSADA to report on its observations and provide recommendations for improvement. Written daily reports were also provided by the IO Chair with the intention of supporting continued program enhancement during the Games.

8.1 Scope of IO Report

The IOC provided the IO with access to every relevant aspect of doping control operations during the Games. This included:

- Therapeutic Use Exemption Procedure
- Information and Intelligence Gathering
- Athlete Whereabouts and Location System
- Test Distribution Planning, Monitoring & Reporting
- Notification of Athletes
- Sample Collection Procedures
- Transport and Chain of Custody of Samples
- Analysis of Samples
- Results Management Process

All comments and observations are made based on references to the relevant International Standards of the World Anti-Doping Code, the IOC Anti-Doping Regulations and Sochi2014 doping control procedures. The IOC Anti-Doping Rules were considered to be compliant with the World Anti-Doping so while references are made in this report for suggested improvements to those rules for the future, an assessment of the rules was not required by the IO.

Prior to the beginning of the agreed IO's remit 20% of all tests were conducted under the IOC's authority after the opening of the Athlete's Village (30 January). The IO was also not in a position to observe testing that occurred outside of Accredited Olympic Venues including outside of the Russian Federation.

Where this report is silent on elements of the Games anti-doping program this should be understood as either the element was delivered without issue or the IO were not able to observe the particular element.

8.2 IO Team Members

Role	Name	Position	Nationality
Chair	Andy Parkinson	Chief Executive, UK Anti-Doping	UK
Vice Chair	Rob Koehler	Director, Education & Program Development, WADA	Canada
Team Manager	Michèle Mercier ³¹	Manager, Program Development, WADA	Canada
Member	Thierry Boghosian	Manager, Laboratory Accreditation, WADA	United States
Member	Françoise Dagouret	Director, Doping-Free Sport Unit, SportAccord	France
Member	Tim Ricketts	Deputy Director, Standards & Harmonization, WADA	Australia
Member	Huw Roberts	Legal Counsel, IAAF	UK
Member	Annelies Vandenberghe	Athlete Committee Member, WADA	Belgium

³¹ Shannan Withers, Senior Manager, Executive Office, WADA assisted also in the establishment of the team and contributed to discussions and observations up until 12 February 2014.