

Independent Observers Report for the 17th Pan American Games, Toronto 2015

Background

The World Anti-Doping Agency (WADA) and the Pan American Sports Organization (PASO) signed an agreement in October 2014 for an Event Advisory style Independent Observer (IO) program to be in effect for the 2015 Pan American Games (Games) in Toronto, Canada. The intention of the program was for PASO, Toronto 2015 (the local organizing committee) and WADA to work collaboratively in delivering an effective anti-doping program for these Games and to take the opportunity to further develop anti-doping capacity in the region for future Games.

The Event Advisory program provides a longer period of support from WADA as opposed to the traditional IO Games only audit style. Assistance for these Games started a year prior to the Games and continued until the week after the closing ceremony. The 3 person IO team were present in Toronto from the 6th to 16th July to provide their observations and recommendations for the pre-competition period and the first week of post-competition testing.

PASO and Toronto 2015 should be praised for their commitment to include WADA in the planning for these Games. Invitations were received for a number of key meetings and conferences where plans were shared, items discussed and guidance and feedback provided.

Throughout the pre-event phase of the Games, WADA made a number of observations and recommendations on the PASO and Toronto 2015 anti-doping program. These included:

- A review of the Test Distribution Plan (TDP) against the requirements of the Technical Document for Sport Specific Analysis (TDSSA) and feedback on the proposed distribution of hGH samples;
- Sharing of intelligence to inform the TDP and athlete selections;
- A review of Games specific publications and procedures including advice on the planned whereabouts procedures;
- Feedback on the Toronto 2015 sample collection procedures;
- Identification of opportunities to build anti-doping capacity and experience in the region by facilitating DCO positions for Peru, the host of the 2019 Pan American Games.

The IO team selected for this mission consisted of Kevin Haynes, Senior Manager, Standards and Harmonization, David Julien, Manager, RADO/NADO Relations, (both WADA staff) and Luis Horta, UNESCO consultant currently assisting the Brazilian NADO ABCD.

The team would like to sincerely thank the PASO MC, especially the Chair, Dr Eduardo de Rose for his support and partnership and Matthew Koop and James Sclater from Toronto

2015 and CCES. The team would also like to congratulate PASO and Toronto 2015 for the competent and enthusiastic anti-doping staff, sample collection personnel and volunteers.

Anti-Doping Program Strengths

In order to deliver the anti-doping program for these Games, PASO entered into an agreement with the Toronto 2015 organizing committee to sub-contract anti-doping services to CCES, the National Anti-Doping Organization (NADO) in Canada. The strengths of the program for which PASO and Toronto 2015 should be proud of and look to transfer and develop for future Games, included;

- The testing program implemented by PASO, Toronto 2015 and CCES should be considered a success with 1505 tests collected. One indicator was the high number of Adverse Analytical Findings (AAFs) reported (18 athletes from 13 countries across 8 sports) as a result of an intelligent TDP.
- The targeted collection of 35% of tests (532) during the pre-competition period should also be commended as it contributed to 14 of the 18 AAFs reinforcing the effectiveness of pre-competition testing. This proportion of pre-competition tests was unprecedented for the Pan American Games and should be used as a model for future Games.
- In sub-contracting CCES to provide anti-doping services at these Games, PASO should be praised. CCES with their experience of Major Events (e.g. Vancouver 2010) were able to provide dedicated resources, including; experienced anti-doping staff, experienced sample collection personnel and access to the anti-doping network in the region in light of CCES's existing contracts with a number of International Federations participating in the Games. It is recommended that PASO continue to utilize the expertise and local knowledge of NADOs for future editions of the Games.
- The decision to sub-contract Laboratory services to the WADA-accredited Laboratory in Montreal in their existing permanent facilities enabled PASO and the Laboratory to focus on analytical capacity (instead of building a temporary satellite facility) which resulted in AAFs for substances still in clinical trials such as FG4592 and GW1516.
- The early creation of the relationship between PASO and CCES allowed a number of years of thorough planning of the anti-doping program. This was particularly evident in the development of the risk assessment and an intelligent and effective TDP, described above. The risk assessment was thorough and took into account a number of factors which greatly removed the need to conduct random testing or allocate tests equitably across the countries participating.
- Toronto 2015 and CCES should receive significant praise for their pre-Games anti-doping education programs which were both innovative and intuitive and easily accessible on the Toronto 2015 website, well in advance of the Games.
- The targeted recruitment of Doping Control Officers (DCOs) from a variety of countries in the region including Brazil and Peru can only help build experience and capacity in the region for the upcoming Olympic and Paralympic Games and future Pan American Games.
- The utilization of Blood Collection Officers (BCOs) from the commercial agency, Lifelabs (sub-contracted and trained by CCES as part of the Canadian Anti-Doping

Program), ensured that blood collection was of the highest standard and BCOs observed were highly skilled and efficient in their work.

General Observations and Recommendations for the Future

All observations and recommendations made in this report were communicated to PASO and Toronto 2015 throughout the period of collaboration. All observations were provided in good faith to prevent integrity failures, improve the anti-doping program or align practices to the requirements of the World Anti-Doping Code (Code) and Standards.

WADA Guideline - Reporting and Management of Human Chorionic Gonadotrophin (hCG) and Luteinizing Hormone (LH) Findings in male athletes.

- In the week prior to the opening of the athlete village, WADA released version 2 of the guideline for Reporting and Management of hCG and LH findings. As a result the Laboratory reported Atypical Findings (ATFs) for 66 samples from 48 athletes between 7th July and 13th July for low LH readings.
- It is recommended that prior to any future Pan American Games (and any Major Event to that matter), WADA, PASO and the contracted Laboratory review any new guidelines and discuss the potential impact on operations, the TDP and related procedures, however PASO and Toronto 2015 should be applauded for the flexibility they demonstrated in following the recommended action suggested by the guideline.
- It is also recommended for future Games that PASO allocate a portion of tests in the TDP for additional target testing and contingency purposes.

Intelligence and Law Enforcement Agencies

- A number of attempts were made by PASO and Toronto 2015 to facilitate a meeting with the relevant Canadian law enforcement agencies, in particular, the Canada Border Services Agency (CBSA). Despite their best efforts no meeting was arranged and therefore no anti-doping intelligence was received from law enforcement in Canada for these Games.
- A recommendation for future Games is that PASO initiate these discussions with the relevant law enforcement agencies earlier in the planning phase to take into account any delays in arranging such meetings and implementing any resulting policies.

Collaboration with ADOs prior to the Games

- Although PASO and Toronto 2015 collaborated with some International Federations in particular in relation to the Athlete Biological Passport (ABP) program implemented at the Games, a number of established NADOs suggested that they had not been contacted in any regard prior to the Games. For future Games PASO should facilitate the sharing of intelligence and gathering of test histories from all International Federations, NADOs and RADOs in the region and request the assistance of WADA in countries where a key contact person is missing.
- Greater collaboration not only assists test planning but also allows PASO to clearly understand if there are any pending results management cases. In addition, the revised 2015 Code allows for increased flexibility in defining the Games jurisdiction

period therefore tests can be allocated prior to the traditional first day of testing (usually when the athlete's village opens at the Games). This approach and recommendation is further reinforced by the success at these Games in catching cheats as a result of the increase in pre-competition tests.

Definition of out-of-competition (OOC) testing and in-competition (IC) testing

- Throughout the Games period PASO and Toronto 2015 used the term OOC in relation to tests collected from the opening of the athlete village until an athlete competed in their event. Within the Athlete Guide and Pharmacy Guide OOC was described in the same way however it was also stated in the Athlete Guide that all samples would be screened for the full IC menu of Prohibited Substances and Methods. The Athlete Guide was therefore contradictory to the Pharmacy Guide.
- This issue was discussed at the NOC Sport Physicians meeting and PASO were comfortable that all NOCs understood the difference but it was unclear if the Pharmacists operating at the Games and trained to follow the Pharmacy Guide would dispense medication accordingly.
- DCOs were also trained to state that tests collected during the pre-competition period were OOC and also ticked a box on the Doping Control Form (DCF) to confirm that the test was OOC. In ADAMS too some DCFs were marked as OOC even though the analysis to be performed would be an IC screen.
- It is recommended for future Games that the PASO Anti-Doping Rules should be revised to apply OOC and IC test menus as defined in the Code and record as IC or OOC in the documentation for the Laboratory. This consistency would also enable reporting in ADAMS to be more effective.

Whereabouts

- Although no clear confirmation was provided that all delegations provided accurate, up to date room lists, testing in the athlete village and training locations was observed as being effective, largely due to Toronto 2015 using all available systems, including; ADAMS, accreditation activation, training information and in particular arrival and departures. Also using experienced DCOs to accompany chaperones when attempting to locate athletes proved to be effective.
- The reallocation of tests from the pre-competition period to a targeted post-competition test was also a good way of ensuring that athletes identified for testing were tested at these Games.

Sample collection procedures and documentation

- Although the sample collection personnel observed were experienced and well trained, a Major Event provides an opportunity for sample collection agencies to look at their sample collection procedures to ensure they are as efficient as possible.
- Implementing a national program's sample collection procedures is not always appropriate for a Major Event, therefore PASO should encourage future organizing committees to look at the sample collection procedures to see if they can be streamlined for the Games. Opportunities to review the procedures include:
 - a) remove any duplication of data entry across the different documents used,

- b) allow DCOs to make minor amendments to the Doping Control Form (DCF) rather than complete new forms,
 - c) review the number of documents used,
 - d) consider the use of barcode stickers for bottle numbers,
 - e) process experienced athletes more quickly if they confirm they understand the procedure and their rights and responsibilities, and;
 - f) reduce the number of times the DCF is checked if the DCO, athlete and support personnel confirm its accuracy (delays were observed when waiting for the Doping Control Station Manager (DCSM) to come into the processing room to perform a final check of the DCF.
- Other specific sample collection observations worthy of note for consideration in the planning of future Games included:
 - a) The athlete's signature and other 'blacked out' sections were visible on the Laboratory copies of the DCF which resulted in DCOs removing certain sections of the DCF in order to preserve the athlete's identity.
 - b) DCOs were requesting that athletes should provide 100ml as the minimum volume required which is not compliant with the International Standard for Testing and Investigations (ISTI) minimum requirement of 90ml. One reason was related to the collection vessel not having 90ml marked on the measuring scale.
 - c) Once athletes had reported into the Doping Control Station (DCS) post notification they were often actively encouraged to leave the DCS to perform activities that may not be considered valid e.g. return to the seating area in the venue to watch the remainder of the competition. Although athletes were chaperoned at all times, this put a lot of unnecessary pressure on relatively inexperienced volunteer chaperones when a more appropriate solution would be to keep the athlete in the DCS under the observation of more experienced sample collection personnel.
 - d) It was also observed that the procedure for using temperature data loggers only provided data for the transportation period of samples from the DCS to the Laboratory and not the storage period. Due to the absence of refrigerators in the DCS's, the cool boxes were used to store samples and as they were opened frequently during the sample collection session, the temperature inside the cool box may not have been stable or within the acceptable temperature range.
 - e) Time of sample collection was not recorded on the DCF only the time the sample collection session was completed. This had the following implications:
 - a. For ABP samples the true time between sample collection and analysis at the Laboratory could not be accurately calculated.
 - b. For dilute urine samples it was impossible to determine the time period between dilute samples.
- Effective measures and 'work arounds' for the above issues were implemented almost immediately by Toronto 2015 however it is recommended that PASO should review the documentation, equipment and procedures to be used in advance of the

Games to identify any discrepancies between the sample collection procedures to be adopted and the ISTI.

- The time of sample collection in ADAMS (which is a mandatory field) and the ISTI mandatory requirement to only record the time the sample collection session is completed will be reviewed by WADA.

Specific gravity (SG)

- The directive of PASO was to only collect one additional sample from an athlete if their first sample was dilute and did not meet the Suitable Specific Gravity for Analysis.
- These Games resulted in 180 dilute urine samples (11% of the total urine samples collected). Of the 94 athletes who provided a dilute first sample, 86 provided a second dilute sample. Only 8 athletes provided a second sample that met the ISTI requirement of 1.005 or greater.
- It was apparent that athletes were also aware of the protocol and some provided two dilute samples in quick succession. From a review of ADAMS, none of the 86 athletes were identified for a follow up target test.
- As a recommendation, PASO should either comply with the ISTI requirement to continue collecting samples until one is provided within the acceptable SG range or devise a strategy to consider follow up tests on athletes at another point during the Games.

Sport / disciplines in ADAMS

- It was noted and raised with the PASO MC that the sport and discipline of the athlete was sometimes not compliant in ADAMS with the TDSSA. This can affect reporting and compliance with the mandatory TDSSA and PASO should ensure future organizing committees are entering accurate information into ADAMS.

Conflict of interest

- There is always a fine balance between providing sport specific knowledge and a potential conflict of interest which should be carefully identified and managed by the PASO MC. It is recommended that PASO MC should analyze all potential (perceived or actual) conflict of interests by ensuring members of the PASO MC and sample collection personnel sign conflict of interest disclosure agreements in advance of the Games. This would allow the effective deployment of individuals to roles and sports that wouldn't compromise the integrity of the anti-doping program and protect the individuals themselves from being placed in situations where a conflict could evolve.

Laboratory

- In the daily review of AAFs reported by the Laboratory, one sample was reported as an AAF with no prohibited substance recorded but a reference to a certificate of analysis. When raised with the Laboratory Director by the IO on behalf of the PASO MC, the Laboratory Director responded that it was reported in error and was a negative result. It was immediately updated in ADAMS by the Laboratory and there

were no consequences in terms of results management. This illustrates the value of establishing and maintaining a reliable mechanism for clear and continuous communication between the MEO and the Laboratory in order to address discrepancies in an efficient and timely manner.

Results Management

- Procedures to be followed at these Games were well documented in the PASO Anti-Doping Rules.
- The timeframe for notifying athletes of their AAF was observed as being inconsistent and could have been standardized through an agreed procedure within the PASO MC. It is recommended that athletes are notified as soon as possible following the report of an AAF to prevent them from competing again in the Games.
- Once athletes were notified of their AAF they were given 48 hours to respond which seemed to be a generous amount of time which could be expedited for future Games.
- The Laboratory reported three AAFs for Clenbuterol involving Mexican athletes in which the concentration identified was consistent with the consumption of contaminated meat. PASO MC confirmed verbally that they did follow up with the Mexican delegation to ascertain whether the athletes had been in Mexico before arriving in Toronto, however no evidence was reported or documented in ADAMS (at the time of writing this report). A more thorough documentation process is recommended including the appropriate notification to the athlete and other relevant organizations (IF and NADO) of the case outcome.
- On one occasion an athlete was served with a notification of an AAF only to subsequently produce a valid TUE. When the IO investigated the matter the athlete was duplicated in ADAMS and the PASO MC could not see the athlete account containing the TUE. It is recommended that WADA look at the issue of duplicated athletes during the development of the new ADAMS system to prevent this issue occurring, especially the unnecessary stress caused to the athlete and delegation.
- A review of outstanding results was also provided to PASO by the IO the week after the closing ceremony and it is recommended that PASO identify a dedicated member of the MC to monitor test results and ensure that all samples collected have a result reported in ADAMS in a timely manner. The majority of cases were due to incorrect bottle codes being entered into ADAMS.
- As a final observation on results management it is recommended that PASO review all AAFs (including those with a valid TUE and the Clenbuterol cases) and provide the appropriate notifications and documentation in line with the Code. These AAFs should also be used as intelligence to inform the TDP for the 2019 Games in Peru.

Legacy of these Games

1. Opportunity to facilitate and improve anti-doping programs in the region

With the significantly high number of AAF's reported for these Games there is a real opportunity for Governments and Sports in the region to allocate more resources into anti-doping. The wide array of performance enhancing substances (some of which are still in

clinical trials) detected at these Games highlights the risks and lengths athletes are willing to take in order to seek an advantage over their competitors. The lack of testing and education at the national level in some parts of the region and the presumed easy access to sophisticated performance enhancing substances and techniques would appear to be a particular problem that requires a coordinated approach to rectify. PASO can use its position in the region to drive change, share best practice and assist in the development of effective anti-doping programs in the region.

2. Sample retention policy

Similarly, as a result of the number of AAFs reported at these Games, PASO should also carefully consider the identification of specific samples for storage and reanalysis at a later stage. WADA and CCES can provide assistance in this regard.

3. Transfer of Knowledge

Finally, with the next Games in Peru, PASO, WADA and Toronto 2015 were able to facilitate an initial 'transfer of knowledge' meeting around the risk assessment and TDP. Identifying similar opportunities will be critical in ensuring the excellent collaborative approach observed in Toronto is replicated in Lima.

WADA would like to reinforce its commitment as a partner for PASO in their preparations for Lima and would recommend that opportunities are identified to review the recommendations in this report and work towards another successful anti-doping program in Lima 2019.