

REPORT OF THE

INDEPENDENT OBSERVERS

XVIII ASIAN GAMES
JAKARTA PALEMBANG 2018



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1. Introduction

At the invitation of the Olympic Council of Asia (OCA), the World Anti-Doping Agency (WADA) appointed an Independent Observer (IO) Team to attend the 2018 Asian Games ('the Games') in Jakarta/Palembang, Indonesia. Originally launched at the 2000 Olympic Games in Sydney, the IO program was established to enhance athlete and public confidence at major sporting events by monitoring and reporting on all phases of the doping control and results management processes in an objective manner.

Over time, the IO program has evolved to meet the needs and demands of organizations responsible for delivering major events. For this edition of the Games, an audit-style approach was adopted. The IO Team, through its observations, assessed whether or not procedures were in line with the World Anti-Doping Code ('the Code') and relevant International Standards and provided onsite advice, guidance and assistance to the relevant organizations involved in the delivery of the doping control program.

For the 2018 Games, the Olympic Council of Asia (OCA) and WADA agreed that the IO Team would observe and provide guidance on the following areas:

- Test Distribution Planning (TDP);
- Implementation of the out-of-competition and in-competition testing programs;
- Athlete selection;
- Athlete notification;
- Sample collection procedures;
- Transport and chain of custody of samples;
- Therapeutic Use Exemptions (TUEs);
- Results management process (including hearings that were held during the IO Team's presence);
- Development and implementation of general anti-doping policies and procedures; and
- Any other relevant areas.

The IO Team's formal onsite observations began on 14 August 2018 and ended on 2 September 2018 (inclusively). During that time, the IO Team visited 40 venues and observed doping control for 49 sports/disciplines (see Annex A for a detailed list). In addition, at least one member of the IO Team attended the OCA Medical Committee and Anti-Doping Commission (MCADC) daily meetings to report on the team's observations and to provide ongoing feedback. In addition to verbal feedback, the IO Team submitted daily written reports of its observations and recommendations to the OCA MCADC. Those reports addressed a number of technical and operational opportunities for improvements. Many of these recommendations for improvements were acted upon and implemented promptly throughout the period of the Games. The IO Team attended the National Olympic Committee (NOC) Team Physician introductory meeting (16 August) as well as its concluding meeting (1 September). The IO Team also observed two results management hearing processes while onsite during the Games.

1.1 IO Team

The IO Team consisted of:

- Jeremy Luke (Chair), Canadian Centre for Ethics in Sport
- Karine Henrie (Vice-Chair), WADA
- Ying Cui (Team Manager), WADA
- Thomas Delaye-Fortin, Badminton World Federation
- Nishel Kumar, Anti-Doping Agency of Malaysia
- Ben Sandford, WADA Athlete Committee

- Say Po Yeo, Anti-Doping Singapore

1.2 Acknowledgements

The success of the IO Team's mission is due in large part to the warm welcome the team received from the OCA, the Indonesia Asian Games 2018 Organizing Committee (INASGOC), the Professional Worldwide Controls (PWC) and all the doping control staff. Our work was greatly facilitated by the excellent cooperation and support all these groups provided. In particular, we extend our gratitude to OCA MCADC Chair, Dr. Tan Sri Jegathesan, OCA Manager, Doping Control Department, Ms. Nadiah Al-Shamali, INASGOC Head of Doping Control Service Program, Mr. Hario Dilasto and PWC Manager of International Relations, Dr. Alexander Kirchbichler – all of whom not only accepted our work but encouraged it and always gave careful consideration to our observations and recommendations. We also want to thank all the Games volunteers, from our transportation coordinators to our drivers who enthusiastically cared for our scheduling needs, demonstrated extreme patience when Jakarta traffic was at a crawl and were committed to our safe return to the hotel after each mission. To all, thank you!

2. Executive Summary

The purpose of this report is to share with the OCA, and the anti-doping community more broadly, the IO Team's observations from the 2018 Games and recommendations for improvements. Notwithstanding these objectives, the IO Team would like to commend the OCA for the efforts put in place to protect the rights of clean athletes to compete on a level playing field. Specifically, the anti-doping program implemented in Jakarta/Palembang demonstrated significant progress in a number of areas compared to previous Asian Games. In particular, the IO Team would like to highlight the following:

1. The development and implementation of a Test Distribution Plan (TDP) based on the principles for effective and intelligence-based testing. The TDP was developed based on a proper risk assessment, was comprehensive and was continuously reviewed during the Games.
2. The introduction of separate out-of-competition and in-competition testing periods during the Games (whereas in the past the entire testing period from the opening of the athlete village until the closing ceremony was defined as in-competition). This was recommended in previous IO reports in order to eliminate the confusion the 'pre-competition' and 'post-competition' terms might cause within the athlete community when all the samples were analyzed for substances prohibited in-competition. In the view of the IO Team, limiting the in-competition period is also fairer to athletes.
3. The identification of a priority list of athletes for out-of-competition testing based on an intelligence-based risk assessment rather than on random selections. International Federations (IFs) (and other relevant Anti-Doping Organizations [ADOs]) were invited to contribute to this priority list and specific considerations were given to those target tests.
4. The expertise, professionalism and resourcefulness of sample collection personnel, in particular Doping Control Officers (DCOs). Throughout the Games, sample collection was conducted in a very efficient manner and with minimum inconvenience to the athletes. On a number of occasions, DCOs were observed addressing challenging situations with extreme sensitivity and care.

The IO Team congratulates the OCA for those significant enhancements, which certainly contributed to a more robust and intelligence-based anti-doping program. While the report provides more detail on the strengths of the program, it also contains 39 recommendations, in an effort to provide assistance and guidance to the OCA for future Games. Within this Executive Summary, the IO Team highlights what it considers to be the five most critical recommendations for the OCA's consideration:

1. The OCA should move away from the traditional approach of managing anti-doping operations through the OCA Medical Committee and Anti-Doping Commission (MCADC). Instead, the OCA should contract out and make fully independent its anti-doping responsibilities (including results management) to a third-party independent organization (e.g., a NADO, the International Testing Agency [ITA] or another service provider), with expertise in anti-doping. While the OCA MCADC does excellent work in this area and is extremely committed to clean sport, externalizing its anti-doping effort would have two major benefits. Firstly, anti-doping independence is critical for sport organizations to avoid any conflicts of interest that may be perceived through both promoting and policing its Games. Secondly, anti-doping is a complex, sophisticated business and should be managed by an organization whose sole focus on a daily basis is anti-doping. It is the view of the IO Team that moving in this direction would dramatically increase the credibility and effectiveness of the OCA anti-doping program effort. It is also worth noting that the International Olympic Committee (IOC), along with many IFs, have chosen this course of action.
2. The OCA, through an independent third-party organization (e.g., a NADO, the ITA or another service provider), should follow the lead of the IOC and the Commonwealth Games, in establishing a taskforce months prior to the Games, to conduct an intelligence-based risk assessment on likely participants and ensure appropriate levels of testing are occurring on these athletes prior to their arrival at the Games. It is well understood that athletes who may chose to dope will likely do so in the lead-up to a major games. Given athletes attending the Games may not be on the radar of IFs, and may come from non-Olympic sports with limited anti-doping programs, the OCA should consider the establishment of such a Taskforce to further protect the integrity of its Games in the months prior to the actual commencement of the Games.
3. The OCA should make education a condition of participation in the Games for athletes and athlete support personnel. Previous IO reports specific to the Asian Games have identified, and this IO Team has also observed, a very clear lack of education among many athletes and support personnel attending the Games. While the OCA requires National Olympic Committees (NOCs) to provide education to their delegation, this alone is not sufficient, especially if there are no mechanisms in place to monitor or enforce this requirement. Prior to any athlete or support personnel being able to register for the Games, the OCA should require that they complete, for example, the Athlete Learning Program about Health and Anti-Doping (ALPHA) contained within WADA's Anti-Doping e-learning platform (ADeL) and obtain a certificate of completion. Moreover, the OCA is encouraged to work more broadly through Asia to implement anti-doping awareness and education campaigns prior to its Games to help build a clear culture of doping-free sport.
4. The OCA should position doping control as an equal priority to other operational aspects of the Games. Athletes should experience the same look and feel in doping control areas as they would in any other aspect of the venues, including the athlete lounges, VIP areas, field of play, press, etc. This was not the case for these Games. For many athletes this was their first experience with doping control and unfortunately they experienced doping control stations that initially did not meet basic privacy or comfort expectations and were well below standards compared to other aspects of the venues.
5. Major sporting events have a tremendous opportunity and an important social responsibility to ensure they leave a lasting and sustainable legacy in every aspect possible. Legacy is a critical component to bids and hosting agreements for these reasons. While attempts were made to involve the local National Anti-Doping Organization (NADO) and Regional Anti-Doping Organization (RADO), those were unsuccessful. It was unfortunate to see that legacy was not a requirement when it came to anti-doping. The anti-doping operations for the Games could have been planned in such a way as to have developed and enhanced the capacity of the local NADO and RADO. NADO and RADO capacity is a major priority for WADA and the anti-doping movement, and it is a lost opportunity for such a major event, despite good intentions to do so, not to have contributed to enhancing global anti-doping capacity through legacy. For

future Games, the OCA should require host countries and cities to incorporate anti-doping into their legacy initiatives.

Overall, despite a number of issues and challenges identified in this report, some of which were foreseeable and avoidable (i.e., lack of education, poor quality of doping control stations, lack of arrangements of sample transportation, etc.), the IO Team did also observe a number of initiatives that enhanced the anti-doping program in place for the 2018 Asian Games (i.e., separate in-competition and out-of-competition testing periods, out-of-competition priority list, professional and experienced Doping Control Officers, etc.). Notwithstanding this, given the status of the Asian Games – described as the biggest multi-sport games after the Olympic Games and the most prestigious event organized by the OCA – the IO Team did note that many issues raised as areas for improvements by previous IO Teams were recurring issues at these Games. For the benefit of the OCA, the IO Team in Annex B has provided an analysis of which recommendations were implemented from the 2014 IO Report for the 2018 Games.

The IO Team shares its recommendations in the spirit of continued improvement and hopes the OCA will give thought to how these recommendations can be incorporated for future Games. The IO Team also encourages the OCA to build on the significant achievements highlighted in this report to ensure they are replicated for future Games. As an important stakeholder in the fight against doping, there must be some accountability placed on the OCA. As such, the IO Team invites the OCA and WADA to meet to discuss how the OCA can ensure the improvements noted continue and the recommendations provided in this report (and in previous reports) are implemented where possible.

3. Games Overview

3.1 2018 Asian Games

The Asian Games are described as the biggest multi-sport games after the Olympic Games and the most prestigious event organized by the OCA. In 2018, Jakarta/Palembang, Indonesia received the honors of hosting the 18th edition of the Games. The sports program for these Games included the full summer Olympic program, plus 14 non-Olympic sports (10 IOC-recognized sports and 4 sports from the Alliance of Independent recognized Members of Sports (AIMS): Ju-Jitsu, Sambo, Sepak Takraw, and Soft Tennis) as well as 3 sports specific to the Asian region (Kabaddi, Kurash and Pencak silat).

3.2 Key Players

The OCA is the governing body for the Asian Games and is responsible to develop and enforce Code-compliant anti-doping rules. Within the OCA, the MCADC, through its Chair, Dr. Tan Sri Jegathesan, is ultimately responsible for the anti-doping program implemented during the Games.

Tasked with organizing and delivering on a number of operational aspects of the doping control program for the 2018 Games – some of which are identified in this Report as areas of improvement – and reporting to the OCA MCADC, was the Indonesia Asian Games 2018 Organizing Committee (INASGOC). INASGOC contracted the WADA-accredited laboratory in Doha, Qatar to analyze all samples collected during the Games and to report its findings in accordance with WADA's International Standard for Laboratories (ISL). While the original plan involved contracting the local NADO, the Lembaga Anti-Doping Indonesia (LADI), to assist with test planning and the provision, recruitment and training of sample collection personnel, there appear to have been a disagreement between INASGOC and LADI which led to LADI not being involved at all with the anti-doping efforts for the Games.

With a big gap to fill less than two months prior to the commencement of the Games, INASGOC contracted the private service provider Professional Worldwide Controls (PWC). Based in Germany, PWC has been providing doping control services to various sport organizations around the world since 1994. While the operational aspects that PWC was asked to deliver for these Games would typically require many months of preparation, given the

predicament of the OCA and INASGOC, it decided to offer its services notwithstanding only having seven weeks to prepare. PWC still suggested to the OCA and INASGOC that LADI should be involved in some capacity in order to leave a legacy, but LADI continued to refuse any involvement. While the OCA attempted on numerous occasions to involve the local NADO, from the IO Team's perspective, this represents a significant lost opportunity for LADI to leverage these Games in order to further develop its capacity and operations. A legacy of these Games should have been a more capable and experienced NADO in Indonesia.

3.3 Operational Approach

The OCA's operational approach to anti-doping is to manage anti-doping through its MCADC, which is charged with the responsibility of implementing the World Anti-Doping Program for the defined jurisdictional period of each iteration of the Games. The MCADC is supported in its anti-doping duties through a part-time OCA staff person. All of the members are volunteers.

During major games, such as the Asian Games, an organizing committee is usually entrusted with the operation aspects of implementing a doping control program. For these Games, with the local NADO absent, development and implementation of a number of operational aspects of the doping control program was divided between INASGOC and PWC, some of which overlapped. While the delineation of responsibilities appeared to be clear, having two organizations responsible for overlapping areas (i.e., scheduling of workforce) was less than ideal and some of the tasks allocated to INASGOC were, a few days into the Games, taken over by PWC (i.e., sample transport procedures). To ensure all operations are running smoothly, it may have been more efficient to have one organization responsible for delivering on the operational aspects of the anti-doping program.

This operational approach to anti-doping at a major game is quite traditional; yet, in the view of the IO Team it is also becoming somewhat outdated and perhaps not as effective as it could be. Notwithstanding the very good work done by the OCA MCADC and their very committed team, given the current importance placed on sport organizations externalizing their anti-doping operations to independent agencies – to avoid the inherent conflict of interest that exists when a sport both promotes and polices its sport – the IO Team recommends that the OCA moves to completely outsource its anti-doping operations on a permanent basis.

In addition to the benefit of independence, outsourcing anti-doping operations (whether to a NADO or service provider) can also be beneficial as it places this critical responsibility with an organization that deals with anti-doping on a daily and ongoing basis. With the increased complexity of anti-doping operations, engaging experts whose sole business is to work in anti-doping would bring an increased level of experience and professionalism to the OCA anti-doping program.

Recommendations

Recommendation 1: While attempts were made to leave a legacy for these Games by involving the local NADO, in the end, this did not occur. Leaving an anti-doping legacy should be a mandatory component of hosting a major games. As such, the IO Team recommends that the OCA, as a condition of its host city agreement, requires that a legacy plan be developed outlining how the Games will ultimately benefit the local NADO and/or RADO.

Recommendation 2: Three different organizations, the OCA, INASGOC and PWC, were responsible for various areas of the anti-doping program. To ensure efficient operations, the IO Team recommends that only one organization, which reports to the OCA, be responsible for operational matters. This would not prevent the delegation of duties to other organizations, however it would avoid the issues that arise when two organizations of equal status have overlapping responsibilities.

Recommendation 3: Notwithstanding the very good work currently accomplished, the IO Team recommends that the OCA externalize its anti-doping operations by contracting with a third-party independent anti-doping service

provider (whether a NADO, the ITA or another service provider). This would truly make its anti-doping program independent and the OCA would benefit from the vast amount of experience and expertise that a specialized anti-doping organization could bring to their Games (and ongoing) operations.

4. OCA Anti-Doping Rules (and other publications)

The OCA Anti-Doping Rules ('OCA Rules') are the governing document that sets out how the anti-doping program will operate. While the OCA Rules were previously reviewed by WADA and deemed to be in line with the 2015 Code, the Rules were further reviewed ahead of the Games and some changes were proposed. The OCA accepted those proposed changes but unfortunately, the OCA Rules were not finalized until a couple of days prior to commencement of the Games. To ensure NOCs can provide information and education to their delegations well ahead of the Games, the OCA Rules should be finalized well in advance of the commencement of the Games and made available to NOCs and their delegations.

The OCA Rules, for the most part, appeared to follow the WADA Model Rules for Major Event Organizations (MEOs). The IO Team did, however, notice an inconsistency between the Model Rules and the OCA Rules. The Model Rules define in-competition testing as the entire event period, while the OCA decided to change its approach from previous Games (which followed the Model Rules definition of in-competition) and to define in-competition testing as per the definition in the Code. The IO Team supports this change, and it also reflects a recommendation that was brought forward in the 2014 Asian Games IO Report.

While the OCA changed its definition of in-competition, it would appear that Article 5.2.1 of the OCA Rules should have been altered as well to reflect the change in the definition. This was not the case. The IO Team suggests that for future Games, further clarification be provided within this Article (5.2.1.) as was done by the IOC for the PyeongChang 2018 Olympic Games and recently for the Buenos Aires 2018 Youth Olympic Games. Other areas of the OCA Rules (such as whereabouts and results management) may also warrant a further review to increase clarity. Furthermore, the IO Team noticed a number of grammatical and editorial errors throughout the OCA Rules. Given the importance of the OCA Rules in legal proceedings, the OCA should exercise great care in ensuring the final document is as accurate as possible in all respects.

In addition to the OCA Rules, the OCA published a Doping Control Manual which was provided to NOCs a few months prior to the Games. The IO Team also came across a sport specific 'Handbook' for Athletics. The Manual and the Handbook contained additional information intended to supplement the OCA Rules and to explain how the anti-doping program would be managed during the Games. Unfortunately, certain aspects of the Manual and the Handbook were inconsistent with the OCA Rules and with the operations of the Games. Most notably, with respect to the OCA Rules, the Manual and the Handbook defined the period of the Games as being in-competition and informed all NOCs that all samples collected would be analyzed against the full menu screen. Regarding the operations of the Games, the Manual and the Handbook contained a number of inaccuracies. There were numerous instances where the Manual, for example, described procedures such as transport, chain of custody, etc., that were quite different from what occurred onsite. This is not to suggest that one approach is correct while the other is not. It is simply to point out that the Manual and the Handbook were not accurate and could have been misleading for NOCs and athletes who received it. It could have also proved to be an issue during results management from the perspective of how internal procedures were being managed and implemented during the Games.

Producing additional documentation such as the Manual and Handbook are great ways to provide information to athletes and athlete support personnel about specific games-time anti-doping procedures. The IO Team commends the OCA for these initiatives and encourages the OCA to continue. However, a review of all publications should be conducted to ensure they are consistent with the OCA Rules as well as reflective of processes in place during the Games.

Recommendations

Recommendation 4: In order to ensure appropriate information and education can be provided to NOCs and athletes well ahead of the Games, any revisions to the OCA Rules should be finalized and, those should be published, at least six months prior to the Games.

Recommendation 5: The OCA, in collaboration with WADA, should further review the OCA Rules to ensure all necessary modifications have been made to accurately reflect its new definition of in-competition. Other sections of the OCA Rules should also be reviewed to ensure they are still accurate.

Recommendation 6: It is crucial that athletes and athlete support personnel receive correct and consistent information. The OCA should ensure a thorough review of its Doping Control Manual (and any other sport-specific handbook) to ensure consistency with the OCA Rules and with the operations of the Games-time anti-doping program.

Recommendation 7: While the IO Team recognizes that plans may change at the last minute, as they did for these Games, but if this occurs, the OCA should ensure that updated information is provided to NOCs. For these Games, this could have been achieved by way of a circular sent to all NOCs to advise of changes made to the OCA Rules and, in conjunction, to its Doping Control Manual (and any supplementary handbook produced).

5. Athlete Perspective

Just as the Games are for the athletes, so is the anti-doping program. It is in place to protect the rights of clean athletes to compete on a level playing field. The IO Team wanted to ensure that athletes' voices were heard and that their perspective was captured. As such, the IO Team athlete representative visited both athlete villages on a few occasions to gather feedback on the doping control program put in place for this edition of the Games. The IO Team athlete representative also sought recommendations from athletes on what could be improved for future editions.

5.1 Knowledge is power

As the saying goes, 'knowledge is power.' In order to ensure athletes and support personnel can respect the rules and fulfill their responsibilities, they must be informed about those rules. Among the athletes the IO Team spoke with, there were clear differences between their level of education and awareness of anti-doping. While some had received education from their respective NADO or NOC, many had received no prior education. While those athletes were keen to learn about anti-doping, they had little to no knowledge about their rights and responsibilities and a limited understanding of the sample collection process. All wanted to be informed about anti-doping and were supportive of education being a mandatory component of attending major games.

5.2 First-time experience

Among the athletes the IO Team spoke with, many reported that it was their first experience with doping control. As such, they expressed being very nervous when they were notified of their selection for testing. Given these athletes were away from home, in a foreign country and many did not have strong English skills, they highlighted that receiving education and information ahead of time would have appeased their worry. They also noted that they would have preferred their first experience with doping control to have occurred at home. Athletes would have also appreciated some information and education material to be available in doping control stations (in different languages and/or in visual form). While for many this was their first experience with doping control, all seemed satisfied with the sample collection process.

5.3 Support for clean sport

Through the IO Team's dialogue with athletes, the message that resonated loud and clear was that athletes want clean sport and support it. They agree that anti-doping programs are not only important but necessary to demonstrate that they are competing doping-free. While some expressed that doping control can sometimes be inconvenient, they nevertheless saw it as an important part of sport and one that is necessary to guarantee fair sport competitions. Athletes were very supportive of WADA's presence at the Games through the IO and Outreach programs.

6. Anti-Doping Awareness and Education

'The main objective of the OCA is to develop sport, culture and education of Asian youth as well as to promote international respect, friendship, goodwill & peace through sports.' (OCA website)

While education is a core objective of the OCA, is currently mandated by Code Article 18 and will be regulated by the new International Standard on Education being developed for 2021, the OCA delegated this important area to its NOCs. Specifically, in terms of education initiatives, the onus is placed on NOCs to ensure their delegations are aware of the OCA Rules, that athletes are informed of their rights and responsibilities in terms of anti-doping and that athletes are cognisant of the sample collection process.

While it may be acceptable to delegate such responsibility to member NOCs, delegation does not alleviate such responsibility. The OCA should have systems in place through its NOCs to ensure such education has been delivered and received by athletes and athlete support personnel. This could be done using ALPHA contained within WADA's ADeL which offers access to all topics related to clean sport and anti-doping. Using this platform ensure that courses completed can also be tracked and recorded. The OCA could require that all athletes (and support personnel) attending the Games complete the relevant modules and courses and provide proof of completion. In the absence of doing so, such athletes (and support personnel) should not be eligible to participate in the Games. Consequences could also be attached to any NOC that has not met these requirements.

While the OCA invited WADA to implement its Outreach Program at the Games, this initiative, while excellent and very engaging, is not sufficient in ensuring athletes participating at these Games have been informed about the OCA Rules (and anti-doping in general) ahead of the Games. Outside of the Outreach Program, there was no other anti-doping information visibly available to athletes.

Recommendations

Recommendation 8: The OCA should make education a condition of participation in the Asian Games for athletes and athlete support personnel. Previous IO reports specific to the Asian Games have identified, and this IO Team has also observed, a very clear lack of education among many athletes and support personnel attending the Games. While the OCA requires NOCs to provide education to their delegation, it is not sufficient to do so, especially if there are no mechanisms in place to monitor or enforce this requirement. Prior to any athlete or support personnel being able to register for the Games, the OCA should require that they complete, for example, the ALPHA course and obtain a certificate of completion. Moreover, the OCA could work more broadly throughout Asia to implement anti-doping awareness and education campaigns prior to its Games to help build a clear culture of doping-free sport.

7. Therapeutic Use Exemption (TUE) Procedures

The OCA Rules require that all athletes needing to use a prohibited substance or prohibited method for a medically justified reason, and who do not already have a Therapeutic Use Exemption (TUE), should apply to the OCA TUE Committee (TUEC) for a TUE as soon as the need arises and, in any event, no later than 30 days prior to the Games. Notwithstanding previous comments regarding the fact that the OCA Rules were not finalized until the eve of the Games, the OCA TUE Form was available on the OCA website well ahead of the Games and the TUE process was managed in a prompt and efficient manner, thereby ensuring that athletes were not prevented from competing because of medically justified conditions.

Ahead of the Games, the OCA TUEC¹ received requests to recognize five TUEs granted by IFs or NADOs. Of those, all were recognized. In addition to those, the TUEC received five TUE applications of which two were granted, one was rejected and two were for substances that did not require a TUE. The majority of the TUEs were received during the Games. A total of 25 TUE applications were submitted, of which eight were granted, one was for an athlete who did not participate in the Games, 11 were not required, two were rejected, and three were returned as incomplete. As was the case for previous Games, very few TUEs were submitted 30 days prior to the Games as stipulated in the OCA Rules and almost half of the TUEs submitted were for substances that did not require a TUE, reinforcing the need for education initiatives to be implemented ahead of the Games.

The IO Team did not review the TUE files or how the TUEC evaluated the International Standard for Therapeutic Use Exemption (ISTUE) criteria for recognizing or granting a TUE as this was not within the scope of its mandate. All TUEs granted were promptly entered into ADAMS.

Recommendations

Recommendation 9: In line with the IO Team's recommendation around mandatory education, given the large number of TUEs submitted for substances that did not require a TUE, the OCA should take additional steps to increase awareness of TUE requirements among NOCs, athletes and athlete support personnel. Furthermore, and to ensure there is sufficient time for the provision of additional information when required, the OCA should also be more stringent in requiring that TUEs are submitted well ahead of the Games.

8. Test Distribution Plan (TDP)

The Test Distribution Plan (TDP) was designed following a appropriate risk assessment of the sports and disciplines on the Games program and was the result of a joint exercise between the OCA and PWC. The TDP called for conducting approximately 1,500 tests (with at least 20% conducted out-of-competition). While this represents a decrease compared to what was accomplished during the last two Asian Games, the IO Team is of the view that, overall, the TDP was suitable and in accordance with the International Standard for Testing and Investigations (ISTI). Specifically, it allocated tests between the different sports and disciplines commensurate with the risks as well as based on intelligence and information received from IFs and NADOs; it was compliant with the Technical Document for Sport Specific Analysis (TDSSA); and it focused on a specific list of athletes for out-of-competition testing.

¹ The OCA TUEC operates year-round, regardless of whether or not Games are taking place. During the Games, TUEC members were onsite to review and assess applications from 17 August 2018 to 2 September 2018. Specifically, two groups of four were present for the period of the Games, one to cover the first half, with its Chairman, Dr. Abdulwahab Al- Musleh, and the other to cover the second half, having as its Chairman Dr. Saleh Konbaz.

In the end, 1,460 sample collection sessions were conducted with 1,499 urine samples, 114 blood samples and 8 Athlete Biological Passport (ABP) samples collected from 1,292 athletes from 43 different NOCs during the period of the Games. Of those overall tests, 1,151 were collected in-competition and 309 out-of-competition. For further detail, please consult Annex C.

8.1 In-Competition Testing

In-competition testing was based on a sport risk assessment and then largely consisted of testing all gold medallists and randomly selecting between silver and bronze medallists. More in-competition tests were allocated to higher risk sports. For team sports, one to two athletes per team were randomly selected both during preliminary rounds and during medal matches. The IO Team recommends that a priority list of athletes could have been determined for in-competition testing (in addition to the focus on medallists and perhaps instead of random selections). Given the risk assessment conducted and the ISTI requirement to focus on target testing (Article 4.5), the IO Team recommends this be considered for future Games.

8.2 Out-of-Competition Testing

On behalf of the OCA, and based on a well conducted risk assessment, PWC identified a list of over 300 priority athletes that would be the focus of the out-of-competition testing program ('OOC priority list'). This list was generated by first classifying high-risk sports and then identifying at-risk athletes. The specific athletes included on the OOC priority list were determined by assessing the country risk profile, by reviewing athlete ranking and by seeking IF recommendations. The OOC priority list could have been further refined had PWC gained access to athlete testing history and received a confirmed list of participants (instead of working off the 'Short List²'). To ensure that precious resources are not allocated to testing athletes who have been subject to robust testing in the lead-up to the Games, the OCA should ensure access to this information (i.e., testing history in ADAMS and confirmed list of participants) is provided.

The IO Team wishes to commend PWC for developing such an intelligence-based OOC priority list and more importantly, for ensuring, as best as possible, that all athletes from that list were tested. The OCA also deserves praise for allowing PWC to develop and manage this list independently. The OCA did not know which athletes were selected for out-of-competition testing and only received a daily report once athletes had been tested. In the end, 309 athletes were tested out-of-competition of which 252 were from the OOC priority list. The athletes from the list that were not tested were either not participating in the Games – a confirmed list of participants would have avoided this – or were target-tested in-competition. The additional athletes ultimately tested out-of-competition were supplementary target requests or athletes from teams or countries deemed as higher risk. While no formal procedure was in place for the OCA or PWC to receive information and intelligence during the Games, some IFs and WADA did request some target testing. While this was promptly acted upon, a formal process to receive information and to encourage relevant IFs and NADOs to provide such information could further enhance the anti-doping program for future Games.

A deficiency with the out-of-competition testing program was that it was primarily conducted at the athlete villages in Jakarta and Palembang between 13 August 2018 and 30 August 2018. Exceptionally, out-of-competition did take place at nearby hotels twice in order to test athletes who were not residing in the Athlete Village. Aside from that, no testing was attempted outside of the Jakarta/Palembang villages, no testing was conducted internationally (where athletes reside) prior to athletes' arrival, and no testing was conducted between 2 August (opening of the villages) and 13 August 2018. Given the OCA acquires testing jurisdiction on the date of the opening of the village(s), it is important that the planning of its anti-doping program also begins on that date and incorporates testing athletes abroad, in their home country and also within the country hosting the Games but outside of accredited areas.

² A list provided by NOCs that refers to athletes who could potentially participate in the Games.

In addition and given the lead-up to a major games represents an increased risk period, the OCA should consider establishing a Pre-Games Taskforce ('Taskforce'). This Taskforce could review testing information and intelligence in order to establish a list of athletes that should be subject to testing (or increased testing) in the lead-up to and during the Games. For these Games, the work of such a Taskforce could have further strengthened the OOC priority list while also informing athlete selection for in-competition testing.

Recommendations

Recommendation 10: Given limited resources and the requirement to consider previous testing cycles (ISTI Article 4.2), previous athlete testing history should be considered in the development of any OOC priority list. This can be done through an ADAMS access agreement with the relevant IFs and this additional information would avoid repetitive and unnecessary testing of athletes.

Recommendation 11: Further to the above recommendation, the OCA should have access to a confirmed list of participants to assist with proper out-of-competition (and in-competition) planning. Having access to such a list also ensures that the OCA has a clear understanding of the athletes over which they have jurisdiction (Code Article 5.2.3 and ISTI Article 4.3).

Recommendation 12: Following the approach that was implemented for out-of-competition testing, a similar priority list of athletes could have also been determined for in-competition testing (in addition to the focus on medallists and perhaps instead of random selections). Given the risk assessment conducted and the ISTI requirement to focus on target testing (Article 4.5), the IO Team recommends this be considered for future Games.

Recommendation 13: The OCA anti-doping program should begin on the date of the opening of the athlete village(s). Given that a higher risk period for doping is prior to arrival at a major games, efforts should also be made to assess whether some athletes – especially those who arrive at a later date like those in the sports of athletics and triathlon – should be tested prior to their arrival. The IO Team recommends this be incorporated into future TDPs and that testing agreements with relevant IFs and NADOs be put in place to facilitate such testing outside of village(s) and Games venues.

Recommendation 14: Given the lead-up to a major game represents an increased risk period and following initiatives implemented ahead of the Olympic Games and the most recent Commonwealth Games, the OCA, in collaboration with relevant NADOs and IFs, should establish a Taskforce which is independently chaired and includes international experts in the field of anti-doping. The Taskforce should be established at least one year in advance of the Games and be able to review information and intelligence in order to establish a list of athletes – at a minimum athletes from high risk sports – that should be subject to testing (or increased testing) in the lead-up to and during the Games.

9. Whereabouts Information

The OCA Rules indicate that NOCs must provide detailed information no later than the date of the opening of the athlete village for the Games about the intended locations of their athletes during the period of the Games. This information must be updated as needed during the Games. The OCA Rules also explain that if an athlete is in a Registered Testing Pool (RTP), the OCA will not require that athlete to file any different whereabouts information.

Further to its Rules, the OCA provided a template for NOCs to submit their athletes' whereabouts information. This document asked NOCs to provide information from 18 August 2018 (opening ceremonies) to 2 September 2018 only. While the IO Team acknowledges that very little out-of-competition testing was planned for the first half of August, and the IO Team certainly supports only collecting whereabouts information if it is needed, this was

giving a clear indication, to NOCs at least, that out-of-competition testing was unlikely to occur prior to 18 August 2018.

The issue of whereabouts – its collection and management – during major games has been posing a challenge for many years and for a number of MEOs. For the Asian Games, while the provision of whereabouts information was a clear requirement and many NOCs provided it along with regular updates during the Games, the IO Team questions whether the collection of such a large amount of information was warranted and useful. Whereabouts information should only be collected to the extent that it is needed in order to implement an intelligence-based and effective testing plan. While PWC developed a significant list of OOC priority athletes no analysis was conducted to determine: 1) which of these athletes were already included in an IF or NADO RTP; 2) whether the OCA could work with IFs/NADOs to add athletes to a RTP and; 3) which remaining athletes from the OOC priority list the OCA might then need additional whereabouts information. Moreover, not only was whereabouts information requested from a large number of athletes but the OCA did not monitor this information, did not verify it for accuracy or completeness, nor did it contemplate consequences for NOCs who did not comply.

Ultimately, the information that was provided by NOCs was not used to locate athletes for out-of-competition testing. As it planned its daily missions, PWC would first verify if the athlete selected was providing whereabouts information through ADAMS. If no information was in ADAMS, PWC reviewed the village arrivals and departures information and also worked with athlete residences personnel. These individuals were very helpful with providing information which assisted in finding athletes (i.e., check-in information as well as room numbers). In Palembang, PWC gained access to the accreditation database (Games Management System – GMS) which was tremendously helpful in knowing where athletes were. Unfortunately, such access was not provided in Jakarta. All in all, while PWC staff and DCOs were very resourceful in locating athletes for out-of-competition testing, they did so using information other than what was provided by NOCs, which begs the question as to why this information was requested in the first place and whether the OCA should continue to collect such information.

Recommendations

Recommendation 15: Whereabouts information is not an end in itself, but merely a means to an end. While many MEOs face challenges with whereabouts, the OCA should determine ahead of the Games, and based on the requirements of its out-of-competition testing program, the type of whereabouts information it needs. For example, if a similar OOC priority list is developed for future Games, an analysis of the list should be conducted in order to determine what whereabouts might already exist, what might be required and how best to obtain that information. This would ensure that whereabouts information is only collected to the extent that it is needed.

Recommendation 16: To minimize the burden on NOCs (and athletes) and to utilize information that is already available, as part of the requirements for the accreditation systems in place for their Games, the OCA should build in the need to provide appropriate mechanisms to enable anti-doping personnel to access the accreditation database.

Recommendation 17: If the OCA continues to request whereabouts information, it should request information be provided for the whole Games period and should have a process in place to allow for monitoring, tracking and imposing consequences on NOCs that do not provide the requested information. If it asks for this information, there is no reason why the OCA cannot track the receipt of this information, and sanction those that do not comply.

10. Doping Control Stations

While the colourful, vibrant and inspiring themes of the Games could be experienced in a number of facilities such as athlete lounges, VIP rooms, media rooms and field of play, unfortunately, this was not the case for the doping

control facilities. It was unfortunate to note that, aside from a few exceptions (namely at equestrian, golf and sailing), the doping control stations in Jakarta/Palembang posed not only numerous challenges for the operations of the doping control program but also gave the impression that doping control was an after-thought instead of a long-standing requirement in place since the 1974 Asian Games.

Doping control is in place to protect the integrity of sport and the rights of all athlete to compete in doping-free sports. The doping control stations are often where athletes celebrate winning a gold medal. With that in mind, the IO Team is of the view that doping control stations, while needing to ensure the privacy of athletes and protect the integrity of the doping control process, should offer the same 'look and feel' and excitement as other operational area facilities.

While providing a positive athlete experience (or even a neutral one) was a missed opportunity, the state of the doping control facilities posed other and often more serious challenges in terms of size, location, outfitting and security. Specifically:

- Some doping control station processing rooms were too small and could not accommodate the DCO, the athlete and the athlete representative.
- Others were temporary installations located in very public areas that offered minimal privacy (e.g., curtains as separations between processing rooms, small portable toilets not conducive to proper witnessing, roofless doping control stations located directly below broadcasting platforms, etc.).
- A number were poorly outfitted: they lacked appropriate furniture, had poor lighting, no washbasin for athletes to wash their hands, poor temperature control (e.g., a member of the IO Team noted that the temperature in one of the doping control stations was 41.7 degrees Celsius) and very few refrigerators to keep samples cool.
- Many lacked proper security: some doping control stations could not be locked (which meant staff had to leave with the sample collection equipment each day) and some could have benefited from a security staff to manage access.

In addition to the issues mentioned above, the doping control stations had no reading or educational material for athletes, no television and did not offer a choice of sealed beverages for athlete hydration. While education should occur well ahead of any competition, the doping control stations still offer a forum to raise awareness of anti-doping issues by providing such material.

The IO Team did not review the hosting agreement for these Games and therefore cannot comment on whether or not specific doping control station requirements were included or not. However, the IO Team is aware that numerous site visits were conducted ahead of the Games where requirements for doping control stations were provided and reviewed. At best, these were overlooked and at worse, ignored.

While the IO Team did not observe any situation that called into question the integrity, security and identity of the samples during the sample collection process, this can, in large part, be attributed to the doping control teams being extremely resourceful and creative in finding solutions to address challenges by: requesting and working with venue teams to add fencing around portable toilets; adding additional paper to cover windows; ensuring bottled water were available for athletes to wash their hands; bringing coolers to ensure minimal sample degradation; using cellphones for additional lighting, etc. While the IO Team commends the practical solutions implemented by sample collection personnel, this should not have been needed and unfortunately this had a direct impact on the implementation of the TDP as some testing missions were either outright cancelled or altered (i.e., number of tests was reduced). As the second largest major games event, it is unacceptable that an intelligence-based and effective TDP must be adjusted because doping control facilities are not ready and/or not appropriate.

Recommendations

Recommendation 18: As clearly stated in ISTI Article 6.3.2, the doping control station, at a minimum, must ensure the athlete's privacy. As such, the OCA should include specific requirements into its hosting agreements regarding the location, size, outfitting and security of doping control stations. Similar to the field of play needing to be ready and appropriate for athletes to compete, clear and unequivocal requirements should apply for the doping control stations. The OCA should contemplate the need for consequences against organizing committees should this not be met.

Recommendation 19: During the Games, the experience provided to athletes was totally inconsistent with other function areas such as VIP rooms and press rooms. Providing a positive athlete experience should be a priority. The OCA should ensure that for future Games, not only are the doping control stations fit for purpose (i.e., meet mandatory requirements), they should also have the health (i.e., proper room temperature) and enjoyment (e.g., reading, educational materials, posters, television, etc.) of the athlete top of mind.

11. Sample Collection

11.1 Sample Collection Personnel

This year's Games carried the theme of 'Energy of Asia' and it was said that the 'soul' of this energy was embedded in the diversity of cultures, languages, and history which are fused together, creating a powerful energy boosting the spirit of camaraderie and sportsmanship. If this was the case for the Games, the soul and energy of doping control was certainly the sample collection personnel. Through the diversity of culture, languages and expertise, this group provided podium-worthy performances every day and, through their professionalism, resourcefulness and care, ensured that, despite the state of the doping control stations, athletes subject to doping control were provided with the best possible experience. This was a real strength of the doping control program in Jakarta/Palembang.

In order to deliver on the anti-doping program for the Games, over 100 DCOs and approximately 115 Chaperones attended the Games. That group was comprised of 22 DCOs/Blood Collection Officers (BCOs) from PWC's existing roster; 52 International DCOs invited by the OCA and, despite LADI not being involved, 39 local LADI DCOs. All Chaperones were local individuals.

The IO Team commends the work accomplished by this group in providing quality sample collection to athletes, who were no doubt very impressed. We believe this can be attributed to a few key things that we encourage the OCA to replicate for future Games:

- DCOs received training onsite before the Games started (provided by PWC) on sample collection procedures and in particular Games-time procedures to ensure consistency amongst everyone.
- In addition to mastering sample collection procedures, training and scheduling focused on language skills. Given English is the primary language of the OCA, English skills were assessed to ensure individuals participating either as DCOs or Chaperones could effectively communicate in English. Where other languages were spoken, these were considered in assigning personnel to certain sports where it was known (or could be predicted) that athletes fluent in another language could be selected for doping control.
- DCOs with the most experience and expertise were assigned as Station Managers.
- DCOs with less experience were paired with those that had more experience with sample collection.
- All out-of-competition notification and chaperoning – usually those that require more searches and inquiries to locate athletes paired with discretion but also assertiveness – were conducted by DCOs. While

Chaperones were responsible for in-competition notification and chaperoning, notification was often overseen by a DCO.

The attention given to the points above ensured well-managed doping control stations as well as smooth, efficient and effective sample collection procedures that usually took less than 20 minutes. While the IO Team was impressed with the quality, expertise and diversity of the sample collection personnel, we do have two concerns to raise:

- It was unclear if local DCOs, international DCOs and Chaperones had signed any conflict of interest, code of conduct and confidentiality agreements. Given doping control involves dealing with private and sensitive athlete information, the OCA should ensure that its sample collection personnel sign such agreements as a condition of participation.
- While all sample collection personnel performed their duties very well during the Games, the IO Team is uncertain if any minimum experience requirements regarding the amount and frequency of sample collection sessions was a criterion for recruitment. It also appears that Chaperones did not require any previous experience. Previous experience (and frequent and ongoing experience) should be a mandatory requirement of participation.

11.2 Sample Collection Process

Overall, and in large part due to the excellent sample collection personnel, the doping control process implemented during the Games was very good. Any minor issues that were identified by the IO Team during daily meetings was promptly addressed and corrected. Few, if any, issues were identified by athletes directly or by way of comment on the Doping Control Form related to sample processing. The observations raised here highlight a few areas that could benefit from written procedures to ensure operations are clear and streamlined for future Games.

11.3 Athlete Selection

While some instructions regarding athlete selection were very clear – gold or silver medallists – others lacked clarity. For instance, regarding random selections, it was unclear when those should occur, who should be involved, whether alternate selections should be drawn, etc. For some sports (e.g., rugby), the lack of clarity caused some initial frustrations amongst the teams. The IO Team also observed on a number of occasions that team staff were aware of the athletes selected for doping control well ahead of the completion of the match. These protocols were in breach of ISTI Article 5.3.1 as they can provide advance notice to the athletes of their selection for doping control. Clear and sport-specific protocols that provide no advance notice should be established well ahead of the Games.

11.4 Notification and Chaperoning

As mentioned above, workforce was a key strength of the program. While Chaperones may have lacked some anti-doping experience and expertise, they were all very committed and courteous individuals, keen to learn and very familiar with the different parts of the venues.

While Chaperones were very good at identifying athletes, establishing contact and maintaining visual contact, proper athlete notification was seldom observed. Often notification consisted of Chaperones locating the athlete they needed to notify by announcing 'Doping Control.' Rarely was proper notification conducted including: explaining the rights and responsibilities to the athletes, completing the notification portion of the Doping Control Form, reviewing it with the athlete, having the athlete sign the form and providing to the athlete the pink copy of the notification portion of the Doping Control Form at the time of notification. The IO Team often observed the athlete signing the notification only when they reported to the doping control station and athletes were usually provided with the pink notification copy only at the end of the doping control process. While the notification process did improve over time, it is crucial that athletes be informed of their rights and responsibilities immediately when

they are notified of testing and provided with their 'notification' copy to avoid unnecessary difficulties in cases where an athlete fails to comply with the request to provide a sample for testing. Towards the end of the Games, the IO Team observed that some doping control teams had a document that outlined the rights and responsibilities in various languages that the athletes could consult, which greatly facilitated notification. This would be beneficial to replicate for future Games and the OCA should ensure that all personnel are provided with this documentation.

Regarding the location for notification, Chaperones were instructed to notify athletes prior to the mixed zones. While this was appropriate for most sports, in some instances, that area was very crowded and not conducive for appropriate or private notification. In other instances, attempting to intercept the athlete for notification interfered with the post-competition flow and some technical delegates requested notification take place after the mixed zones. While both are acceptable, to avoid confusion during the Games, post-events protocols that identify the best location for notification and that are agreed upon with all relevant functional areas should be developed.

A number of procedures were also implemented differently at different venues, especially in the early part of the Games. For instance, some athletes were required to report to doping control immediately (as is mandated by the ISTI) while others did not. Some athletes were also allowed to shower (while continuously being observed) while others were not permitted to do so. Some athletes were allowed to use cellphones in the doping control stations while others were not. Some teams had a notification summary in various languages, which greatly assisted with notification, but most did not. In addition to post-event protocols, the OCA is encouraged to establish clear guidelines around those issues.

11.5 Records

The Games offered the possibility to establish a number of new records: national records, Asian records, Asian Games records, World records, etc. While for the most part, it appeared to be clear to the doping control teams that any athlete who established an Asian Games record would be selected for doping control and subject to testing, the process to follow for other records was not as clear. Could the doping control team accept other requests? Did the athlete need to sign a form acknowledging they were requesting testing and also responsible for the cost of analysis? Did the athlete have to be tested immediately post-competition? During the last week of the Games, a form was developed and provided to the doping control personnel in an attempt to provide clarity regarding records. While this helped, it should have been available well ahead of the Games, provided to NOCs and reviewed with the doping control team. Given doping control stations were very busy post-competition, the OCA should also give thought to whether an athlete seeking to provide a sample in order to validate a record should report to the doping control station at the competition venue or the athlete village.

11.6 Dilute Samples

The ISTI clearly states that 'the DCO should continue to collect additional samples until the requirement for suitable specific gravity 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'. For these Games (as with previous ones), the OCA required that only one additional sample be provided by athletes who provided a dilute sample (regardless of whether or not the second sample met the requirement for suitable specific gravity). This is contrary to the ISTI.

The OCA also did not proactively track dilute samples provided by athletes. In reviewing ADAMS data, the IO Team noted that 38 athletes provided dilute samples during the Games (a total of 75 dilute samples were provided). Of those athletes, only 10 athletes provided a second sample that met the requirement for specific gravity. For the other 28 athletes, even though the second sample still did not meet the requirement for specific gravity, the sample collection session was concluded without any exceptional circumstances being documented as required by ISTI Annex G.4.6. The only target test conducted on an athlete in relation to the provision of dilute samples was conducted based on a request from the IO Team.

Given the ISTI requirement and the possibility of athletes being able to manipulate their sample by overhydrating, the OCA should review this practice. The IO Team also notes that the issue of dilute samples has been the subject of the previous two IO reports and recommendations to change this practice were noted in both reports. The IO Team supports previous recommendations made and is repeating some of them here.

Recommendations

Recommendation 20: The OCA should establish clear minimum requirements for all sample collection personnel involved at its Games. For instance, DCOs/BCOs should be required to have conducted a minimum number of doping control sessions per year (and every year). Chaperones should also have performed relevant duties ahead of the Games. They could gain this experience through local NADO involvement or through any test events occurring ahead of the Games. Similar to officials responsible for sport management, results, judging, etc., one would not expect those officials to be performing their responsibilities for the first time at major games. It should be the same for sample collection personnel.

Recommendation 21: Since the doping control process involves dealing with sensitive athlete information, the OCA should ensure that all personnel participating in the Games sign appropriate and relevant documentation such as: confidentiality, conflict of interest and code of conduct agreements.

Recommendation 22: The OCA should develop clear protocols for athlete selection (for every sport/discipline where it is needed) that identify how the selection should be done, who is responsible for athlete selection, who will be present, and when it is to be conducted. Athlete selection protocols should also ensure no advance notice is provided to athletes (as per ISTI Article 5.3.1).

Recommendation 23: To meet the requirements of ISTI Article 5.3.5, and to ensure the best place for notification is identified and that responsible venue individuals are aware of the notification and chaperoning requirements, the OCA should develop 'post-event protocols.' These protocols should identify the best area for notification and ensure that all relevant function areas (e.g., media, medal, sport technical delegate, etc.) are involved in the dialogue. All relevant parties should be asked to sign off on the agreed upon post-event protocol.

Recommendation 24: To comply with ISTI Article 5.4.1, athletes must be informed to report immediately for sample collection (unless there are valid reasons to request a delay). Given many Chaperones lack experience, the IO Team recommends that the OCA considers a process whereby athletes are encouraged to report to the doping control station immediately, perform a check-in and request permission and approval from the DCO to delay sample collection for valid reasons (e.g., perform a cool down, medal ceremony, etc.).

Recommendation 25: In addition to the post-event protocol, there should be clarity on a number of issues that may occur post-competition (such as the use of cellphones in the doping control station, the ability to shower, who provides approval in terms of delay, etc.). The OCA should develop clear procedures on all those items (and any relevant others) in order to provide guidance to DCOs/Chaperones and to ensure consistency throughout. These procedures should also be included in any documentation developed and provided to athletes and NOCs ahead of the Games.

Recommendation 26: To ensure that athletes are fully aware of their rights and responsibilities, and in particular the potential consequences if they refuse to submit to testing, it is important that athletes be informed of their rights and responsibility and be required to sign the notification form at the time of notification and not when they report to the doping control station. The OCA should ensure this is reinforced during training. In addition, the OCA should make available to doping control personnel a summary of the rights and responsibilities, key words or phrases to describe the different steps of the doping control process in different languages. This would greatly facilitate exchanges between sample collection personnel and athletes.

Recommendation 27: Given this is a recurring theme from Games to Games, the OCA should have a clear process on how to deal with all the potential records that can be established. This process should detail where the athletes report in order to request testing, the costs they must bear and any documentation they must sign. This documentation should be distributed ahead of Games to the NOCs as well as available in the doping control stations.

Recommendation 28: The OCA should give further consideration to collecting additional samples as required by ISTI Article G.4.6. at least when doing so would not compromise the athlete's preparations for competition the next day. Given this has been a recurring deviation from the ISTI, the IO Team recommends that WADA reviews this issue with the OCA to ensure compliance for future Games.

Recommendation 29: The OCA should actively monitor dilute samples and conduct follow-up testing as appropriate.

Recommendation 30: DCOs should be required to consult with the Doping Control Command Centre manager before ending a session without having obtained a sample that meets the requirement for specific gravity.

12. Doping Control Documentation and Equipment

The Doping Control Form used for the Games was compliant with the requirements of the ISTI. However, it provided very little space to write medications or supplements and for athletes to provide comments on the doping control process. All the Doping Control Forms printed for the Games included a pre-determined 'in-competition' box. This was inconsistent with the OCA Rules where samples were being collected and analyzed for both out-of-competition and in-competition. This situation was promptly addressed (prior to any samples reaching the laboratory) and rectified by informing the laboratory to disregard that box and only follow instructions written on the Chain of Custody.

The DCOs routinely completed Supplementary Report Forms to document any issues that arose during doping control. All forms were reviewed for errors and inaccuracies prior to being entered into ADAMS. The IO Team also reviewed Doping Control Forms and while the number of errors were nominal, this could further be reduced by using a paperless system. Previous IO reports have also suggested using such a system. The OCA should reconsider this approach for future Games.

Berlinger kits were used for the Games. No issues were identified with the kits except for one instance where two kits were in the wrong box (i.e., the sample code number on the kits did not match the one on the box). The athlete was instructed to select a new kit until all the numbers matched (third kit) and this issue was promptly reported to Berlinger.

Recommendations

Recommendation 31: Similar to recommendations that were made in previous IO reports, with the evolution of technology, the IO Team reiterates the recommendation to introduce a paperless system for the Asian Games when such a system is ready for implementation at major games. With such a system, many of the fields on the Doping Control Form could be pre-populated (from the accreditation system) and could further increase efficiency of the process while reducing potential errors.

13. Post-Sample Collection Processes

13.1 Sample Transport

The original sample transport plan called for the local courier company, Transport Services & Logistics (TSL), to collect samples at each venue once doping control was completed. They would then bring the samples to the airport for shipment to the WADA-accredited laboratory in Doha. This plan was very quickly revised when it was noted that TSL could not get access to the venues. While not in their scope of responsibility, PWC put in place a process whereby, post-sample collection, all samples would return to the 'command centre' (this being the PWC office at Grand Hyatt Hotel in Jakarta and the PWC office in the Polyclinic in Palembang) and TSL would pick up the samples from there. There, the Doping Control Forms and Chain of Custody were reviewed and prepared for shipment. Samples were not packed in 'specially-built' bags or boxes nor did they have a recorded seal. The IO Team observed samples being packed in a cardboard box provided by TSL or in the TSL employee's duffel bag. Documentation was provided in a separate envelop. TSL employees were asked to sign the Chain of Custody Form and a separate TSL document was signed acknowledging custody of the samples.

The IO Team did not observe the process once the samples arrived at the airport but we were informed that airport/courier employees were responsible for pooling samples and shipping to the laboratory. It also does not appear that any arrangements had been made with airport security regarding special procedures for the shipment of urine or blood samples (e.g., prompt receipt and shipment, whether they would go through x-ray screening or not, etc.) The lack of planning led to some delays in samples being shipped and received at the laboratory. As an example, the transportation of 21 samples which were collected in Jakarta in the early days of the Games took up to five days from the time of sample collection to reach the laboratory. Given the OCA was praised for the process in place at the 2010 Asian Games, it is unfortunate it was not replicated here or at least used as an example to implement a robust transport process for these Games. The OCA should ensure it replicates well functioning procedures from previous Games. The OCA should ensure that robust processes are in place for the transport of samples and that agreements with key stakeholders (such as airport security, customs, etc.) are in place well ahead of the Games.

13.2 Laboratory Reporting

The IO Team did not visit the laboratory as this was not in its scope of observations. In reviewing ADAMS data, the IO Team can however confirm that all results were reported within the agreed upon timelines, as defined in the agreement between INASGOC and the laboratory. All results were properly matched and accounted for in ADAMS by the OCA.

The OCA, with WADA's support, also arranged for two double blind EQAS samples to be sent to the laboratory during the Games. The IO Team commends the OCA for implementing this practice.

13.3 Sample storage

The OCA Rules state that samples may be stored and subsequently subjected to further analysis. When asked about their plan for sample storage, the OCA indicated they have no intention to keep samples longer than the three-month period identified in the laboratory contact. ISTI Article 4.7.3 mandates that a retention and re-analysis strategy be put in place. This requirement was also raised in the last IO report and the IO Team further reminds the OCA to develop such a strategy. While the OCA mentioned that, in the past, they had reached out to relevant IFs to see whether they were interested in keeping certain samples, this was not done for these Games. The strategy developed by the OCA should also consider the ability for samples to be transferred to applicable IFs or NADOs for long-term storage.

Recommendations

Recommendation 32: The OCA should ensure that prior arrangements and agreements are put in place as it relates to sample transportation. Meetings with all relevant stakeholders (e.g., courier company, airport security and customs, etc.) should take place well ahead of the Games in order to develop and implement a robust process that minimizes any delays in shipment and delivery to the laboratory.

Recommendation 33: To further strengthen the Chain of Custody process, the OCA should ensure that additional sample transport equipment such as special boxes/bags for transport of documentation and samples, security seals, etc. are available and used for sample transportation.

Recommendation 34: The OCA should keep and make available procedures and processes from previous organizing committees. In this regard, the IO report from the 2010 Asian Games was particularly complimentary on the transport system that had been put in place and suggested this procedure be made available to future event organizers. Given samples were also shipped via air transport, this would have been particularly helpful and relevant for these Games.

Recommendation 35: As this is required by ISTI Article 4.7.3 (and was also raised in previous IO reports), the OCA should put in place a sample retention and re-analysis strategy.

14. Use of ADAMS

All required information was promptly entered into ADAMS. The IO Team noted that all required TUE information was appropriately entered into ADAMS by the OCA. Doping Control Forms were entered into ADAMS on a daily basis (in the first few days of the Games by PWC staff and later on by OCA staff). Any errors or discrepancies noted by the IO Team regarding ADAMS data were promptly corrected. The IO Team would like to commend the OCA for their meticulous monitoring of ADAMS data.

15. Results Management

Throughout the Games, all results provided by the Doha laboratory were submitted through ADAMS. Staff from the OCA reviewed daily ADAMS reports to ensure that results were being provided in a timely fashion for all samples. The IO Team also observed the processing of reported adverse analytical findings, and in particular the initial review and disciplinary proceedings.

15.1 Initial Review

Upon the reporting of an adverse analytical finding, the OCA MCADC Chair establishes an initial review panel to review the finding and to determine whether the athlete has a TUE or whether there were any departures from the OCA Rules that could call into question the validity of the laboratory result. The initial review panel would then make a recommendation as to whether the matter should advance to a disciplinary matter. The IO Team observed three initial review cases and felt this process was well managed.

15.2 Determination of Anti-Doping Rule Violations

Following the recommendation of the initial review panel, the OCA would then proceed to contacting the athlete and applicable NOC to inform the athlete in writing (through a formal notice) of the adverse analytical finding. Through this communication, the athlete was invited to have their B sample analyzed and was also informed of

their right to a hearing in front of the OCA Disciplinary Commission. The IO Team suggests that the communication provided to the athlete expands on the hearing process, includes the sanction that may be imposed and be thoroughly reviewed to ensure the accuracy of the information (i.e., in some instances, errors were noted in the communication provided).

The OCA Disciplinary Commission was charged with conducting the results management hearing and then making a recommendation to the OCA Executive Board as to whether an anti-doping rule violation has occurred. The OCA Executive Board would then make a final decision.

The IO Team has two concerns with this approach:

- The OCA Disciplinary Commission, for the cases that the IO Team observed, was chaired by the Chair of the OCA MCADC and included two other members of the OCA from non-anti-doping areas. The Code requires that hearings be impartial (and the IO Team would suggest that while not a code requirement, a better practice is for hearings to be independent). The IO Team is not suggesting that the Chair of the MCADC is not impartial nor is it effacing the excellent work of the MCADC, however the IO Team does suggest that a better approach would be to exclude members of the MCADC from the Disciplinary Commission that deals with doping matters. The OCA should consider, as the IOC has implemented, whether the Court of Arbitration for Sport (CAS) could deal with its hearings during the Games.
- The Disciplinary Commission does not have the authority to ultimately determine whether an anti-doping rule violation has occurred. It can only make a recommendation to the OCA Executive Board. The IO Team sees no reason why the Disciplinary Commission, who hears the matter, should not be fully charged with making a determination. Engaging the OCA Executive Board in the decision may call into question the independence of the hearing process.

Notwithstanding the comments above, the hearings that the IO Team observed were well managed and the outcomes were in line with the Code. While this was the process in place during the Games, it is unclear what process the OCA follows in terms of results management once the Games are over. The IO Team was informed that once the Games were over, any outstanding cases would be referred to the relevant NOCs. If the results management process is different post-Games, this should be clearly identified in the OCA Rules. Currently, no alternative process is mentioned.

Of the hearings that the IO Team observed, the athlete involved did not have legal counsel. While the OCA Disciplinary Commission did an excellent job of explaining the situation to the athlete, ensuring the athlete understood their rights, had the opportunity to provide any submissions or comments they wished, the athlete would have been better served if they had legal representation. As such, the IO Team recommends that the OCA consider establishing a panel of *pro bono* legal counsel that athletes could have access to should they require assistance through the hearing process at the Games.

Recommendations

Recommendation 36: Given the importance of the results management process and the lack of familiarity with this process by many athletes, the OCA should ensure that the notification provides sufficient details around the hearing process, clearly indicates the potential sanction and be thoroughly reviewed to ensure its accuracy.

Recommendation 37: The OCA should revise its process whereby the decision of the OCA Disciplinary Commission is final and does not need to be adopted by the OCA Executive Board. This process calls into question the independence and impartiality of the hearing process. A further suggestion would be that the CAS Ad-Hoc Division be ultimately responsible for hearings as is the case during the Olympic Games.

Recommendation 38: If the results management process post-Games is different from what is included in the OCA Rules, this should be clearly communicated to all relevant stakeholders and the Rules should be revised accordingly.

Recommendation 39: To support athletes throughout the results management process (which is expedited during a major games), the OCA should consider making available pro bono legal representation.

Annex A – Venues and Sports/Disciplines Visited

VENUE NAME	SPORT /DISCIPLINE
Athlete Village Medical Centre	Various Sports-OOC Testing
GBK - Main Stadium	Athletics
Bendung Rentang Majalengka	Canoe Slalom
GBK - Aquatic Center	Aquatics - Artistic Swimming
GBK Senayan - Squash Stadium	Squash
Pondok Indah Golf & Country Club	Golf
GBK - Archery Field	Archery
GBK - ISTORA	Basketball - 5x5
GBK - Hockey Field	Hockey
GBK Rugby Field	Rugby Sevens
GBK - Baseball Field	Baseball
GBK - Softball Field	Softball
GBK - Tennis Center Court	Basketball - 3x3
GBK - Tennis Indoor Stadium	Volleyball - Indoor
JCC Cendrawasih	Fencing
JCC - Assembly Hall	Ju-Jitsu
JCC - Assembly Hall	Judo
Jakarta International Velodrome	Cycling - Track
Subang roads route	Cycling - Road Race
GOR POPKI Stadium Cibubur, East Jakarta	Handball
Pulo Mas International BMX Center	Cycling - BMX
Theatre Garuda East Jakarta	Kabaddi
Padepokan Pencak Silat, TMII, East Jakarta	Pencak Silat
JI Expo Kemayoran Hall A	Weightlifting
JI Expo Kemayoran Hall D	Gymnastics - Artistic
Tigaraksa - Tangerang	Modern Pentathlon
JI Expo Kemayoran Hall B	Table Tennis
JI Expo Kemayoran Hall B	Wushu
JI Expo Kemayoran Hall C	Boxing
ANCOL Beach; North Jakarta	Jet Ski
Sea Front - Marina, Ancol, North Jakarta	Sailing
Jakarta Int. Equestrian Park	Equestrian
Patriot Chandrabhaga Stadium (Jakarta)	Football - Men
Palembang Village	Various Sports-OOC Testing
Jakabaring Sports Center - Lake	Rowing
Jakabaring Sports Center - Shooting Range	Shooting
Jakabaring Sports Center - Beach Volley	Beach Volleyball
Jakabaring Sports Center - Ranau Hall	Sepak Takraw
Jakabaring Sports Center - Gelora Sriwijaya	Football - Women
Jakabaring Sports Center - Tennis Court	Tennis

Annex B – 2014 IO Report Recommendations

The IO Program was first invited to attend and observe the doping control operations at the 2006 Asian Games in Doha and has been present at the Asian Games since then. As the organization responsible for five major multi-sports events (the Asian Games, the Asian Indoor & Martial Arts Games, the Asian Youth Games, the Asian Beach Games and the Asian Winter Games), the OCA has accumulated a tremendous amount of experience and expertise over the years. Given the status of the Asian Games – described as the biggest multi-sport games after the Olympic Games and the most prestigious event organized by the OCA – many issues raised as areas for improvements by IO Teams seem to be recurring.

The IO Team reviewed the recommendations that were proposed in the 2014 IO Report and notes that out of 34 recommendations, 20 were not implemented in Jakarta/Palembang while 11 were and three were partially addressed. Unfortunately, of the recommendations where the IO Team observed an improvement, those were the result of PWC delivering on those areas. While we certainly commend PWC for all its work and the OCA and INASGOC for contracting PWC, this was a rescue mission rather than a well-executed game plan.

As such, in addition to the recommendations provided in this report, the IO Team also commented on the previous recommendations issued by the 2014 IO Team. The IO Team strongly believes that WADA and the OCA must work in close collaboration ahead of the next Games to ensure that recommendations are properly addressed. While recognizing that it might not always be possible to implement the recommendations proposed by IO Teams, there should at least be a requirement for the OCA to respond to the recommendations.

2014 IO Recommendations

Test Distribution Plan (TDP)

- The 2009 Code and the supporting International Standard for Testing (IST) require Anti-Doping Organizations to develop an intelligent and effective testing plan, based not just on quantity but on quality of tests, and the 2015 Code and International Standard for Testing and Investigations (ISTI) emphasize this requirement moving forward. The IST and ISTI set out in detail the various factors to be considered in developing such a plan, and should be made the foundation of the TDP for future editions of the Asian Games. The IO Team encourages consultation with IFs to help understand the requirements of their particular sports, but the Games organizers should retain ultimate authority to decide on how tests should be allocated, assisted by the Taskforce whose establishment is recommended above.

This was addressed in Jakarta/Palembang.

- The IO Team recommends that the TDP for future editions of the Asian Games allocates significant resources to out-of-competition testing, and that the organizers work in close coordination with IFs and NADOs/RADOs to deliver such testing. Again, a possible Taskforce mandate could be to support and guide the organizers in these efforts.

This was partially addressed in Jakarta/Palembang. No Taskforce in place.

- The TDP would also be improved by emphasizing and providing for significant target testing of athletes based on risk analysis and intelligence. For example, specific consideration should be given to targeting athletes who choose to stay outside of the Athlete Village after they have reached the host country. The OCA should invite relevant IFs, NADOs/RADOs and NOCs to provide any intelligence that might be relevant to the Games; and (in accordance with ISTI Article 11) should have a system in place for receiving, assessing and actioning such intelligence as necessary.

This was addressed in Jakarta/Palembang.

- The TDP must be a flexible document that is continuously revisited and re-assessed throughout the relevant period to respond to emerging intelligence and patterns of behavior identifying potential doping risks. As one example, the Incheon IO Team adopts and repeats the following recommendation made by the 2010 Asian Games IO Team: 'The OCA ought to be more aggressive about tracking dilute samples, analyzing for suspicious patterns, and initiating target testing or other follow-up investigations'.

This was partially addressed in Jakarta/Palembang. No dilute sample tracking.

- While the Organizing Committee is contacting each IF and asking it for its rules governing random selection of athletes for 'post-competition' testing, the Organizing Committee should make a point of including that information in a doping control personnel training guide for the Games so that it is easily available for reference as necessary. If there are gaps and certain IFs are not responding, the Games organizers should fill them with its own preferred method, to ensure integrity and consistency. We would expect WADA to also include some guidance in its Major Event Organization Guidelines.

This was not addressed in Jakarta/Palembang.

Whereabouts

- Whereabouts information is not an end in itself, but merely a means to an end: it should be collected only to the extent that it is needed in order to conduct the testing called for in the TDP.

This was not addressed in Jakarta/Palembang.

- Where a future TDP does call for testing of athletes prior to their arrival in the host city (which, as noted above, the IO would encourage), the OCA could consider the most effective and proportionate way of gathering the information required to conduct such testing. For example, if the athletes in question are already in a national or international Registered Testing Pool (RTP), then the OCA is entitled to access the whereabouts information they file with their IF or NADO/RADO in order to test them, and should do so in preference to any other system, so as to avoid overburdening the athlete and to ensure any missed test declared against that athlete based on that whereabouts information 'counts' under Code Article 2.4. Alternatively, if the athlete is involved in a team sport, it may be possible to locate him or her through the (national) team. Only if there is no other way of tracking down the athlete in the relevant period should he/she be required (either directly or through his/her NOC) to file whereabouts information. Ideally this should be done by getting the athlete added to his/her IF's or NADO's RTP.

This was not addressed in Jakarta/Palembang.

- The whereabouts requirements for periods when athletes are in the host country should be kept as simple as possible. A NOC should be required to file a list of all of its athletes, identifying the dates of their arrivals and departures from the host city and where they will be residing while they are there. This can be room number only if they are living in the Athlete Village; if they are living outside the Village, then a specific address must be provided that allows the Organizing Committee to find that athlete for testing where they are residing. NOCs should not have to file this information again every day; instead they should only update it as necessary to ensure the information it contains remains accurate. There could be sanctions for any NOC (not its athletes) that fails to comply with this requirement.

This was not addressed in Jakarta/Palembang.

TUE

- The deadline specified in the Handbook for submitting a new TUE application (60 days prior to the Games) fell before the qualification deadline for certain sports/disciplines, contrasted unfavorably with the 21-day deadline for submitting IF/NADO/RADO TUEs for recognition, and was not enforced in any event. We recommend that there be one deadline for submission both of requests for recognition and of applications for

new TUEs (e.g., 30 days before the Games), and that (as in Incheon) requests/applications made after that deadline be accepted and processed where earlier submission was not practicable.

This was addressed in Jakarta/Palembang.

Doping Control Stations

- The OCA could explore the possibility to ensure that there is an Organizing Committee representative with responsibility for anti-doping present throughout the process of choosing venues and getting them up to specification, including early in the process when space at the venues is allocated, to ensure that sufficient priority is given to anti-doping requirements. And just as the IF sends representatives to each venue to ensure that they have been organized to the required specifications, so too the Organizing Committee representative could visit each venue in advance of the Games to inspect and ensure that the DCS meets the requirements of the program. Whenever possible, doping control could also be run at test events to identify and iron out any practical issues at a venue in advance of the Games.

This was not addressed in Jakarta/Palembang.

- In particular, as was recommended in the 2010 Asian Games IO Report, the OCA could stipulate that the design and furnishing of the Doping Control Station must ensure privacy in the processing rooms from those in the waiting area or outside the station. If temporary partitions must be used, they should be sound proof and reach to the ceiling to ensure the privacy of the athlete.

This was not addressed in Jakarta/Palembang.

- In order to enhance the athlete experience, the waiting area in the DCS could be improved by having educational material in it. Some DCS had a television set showing coverage of the competition at the venue, to make the waiting less boring for the athlete and the Organizing Committee could explore if all DCS could have such equipment, also to ensure that the Lead DCO can track the progress of the competition in order to determine when chaperones should be sent out to notify athletes for testing and (in cases where the random draw was done by final placing) to determine which athletes to notify.

This was not addressed in Jakarta/Palembang.

Sample Collection Personnel

- Always ensure an appropriate gender balance of DCOs given the sport program and the TDP for any given day. The same applies to chaperones.

This was addressed in Jakarta/Palembang.

- Require Games organizing committees to provide additional pre-arrival orientation and training (on-line) to better integrate International DCOs into the Organizing Committee's anti-doping team. Experienced International DCOs would better adapt their practices to OC protocols; inexperienced International DCOs would receive more in-depth training and experience with which to return to their home programs.

This was addressed in Jakarta/Palembang.

- Doping Control personnel need to be more knowledgeable about the particular sports of their venues, and the demands they place on the athletes, including the culture and rituals of each sport. (...) Require Games organizing committees to provide the necessary training, relying on IF contacts if need be.

This was addressed in Jakarta/Palembang.

- Organizing committees also need to equip Doping Control Station Managers with more discretion and flexibility. Require them to plan for the worst case scenario at their stations (such as four athletes all having to give samples at the same time in a station with only one processing room). Use all available options to speed the athletes' completion of Doping Control and ensure their comfort during the process (such as

collecting sample in the changing room toilet if processing room in use or filling out portions of the Doping Control Form in the waiting area to free-up processing rooms).

This was addressed in Jakarta/Palembang.

- The training of DCOs and chaperones needs to cover not only the different steps of the sample collection process, but also why each of those steps is necessary, i.e., what purpose it serves (e.g., to respect the privacy of the athlete, to ensure the integrity of the sample, to avoid opportunities for tampering, etc.). This is important not only so that the DCO/chaperone can answer questions from athletes, but also so that if the session goes 'off script', i.e., if issues arise that are not specifically addressed in the Handbook, the DCO/chaperone is able to work out what to do because he/she knows what the underlying objective is.

This was partially addressed in Jakarta/Palembang. Yes for DCOs, less for Chaperones.

- High priority should be given to manning each DCS with a strong English speaker (English being the working language of the OCA and at the Games). In addition, international DCOs could be paired with athletes from their own countries/regions/language.

This was addressed in Jakarta/Palembang.

- During the Games itself, the Organizing Committee could maintain a register of issues raised by OCA MC and/or IO members, and of corrective actions taken, and could monitor and ensure compliance by sample collection personnel with those corrective actions.

This was addressed in Jakarta/Palembang.

Notification/Chaperoning

- Timing of notification must be carefully planned; interference with the smooth running of the competition and/or delaying medal ceremonies must be avoided at all costs. The planning must also identify and address challenges presented by the particular sport and/or competition venue (e.g., limited access to poolside at swimming venues). We therefore repeat the following recommendation that was made by the 2010 Asian Games IO Team: 'The OCA should have games organizing committees ensure that their Doping Control Station Managers have excellent communication with the managers of other venue functions, that Managers clearly brief their chaperones on the post-competition schedule and coordination of medal ceremonies and media conferences, and that Managers empower their chaperones to insist athletes report (or report back) to the Doping Control Station promptly. Full venue test events would greatly enhance games-time coordination between Doping Control and other functions'.

This was not addressed in Jakarta/Palembang.

- To ensure that athletes are fully aware of their responsibilities, and in particular the potential consequences if they refuse to submit to testing, athletes need to be informed of their rights and responsibilities when they are notified of testing, not when they reach the Doping Control Station. This can be done by tearing off and providing them with the pink form at the back of the Doping Control Form (a carbon copy of the notification section of the DCF) and pointing out the list of rights and responsibilities on the back.

This was not addressed in Jakarta/Palembang.

- We repeat the recommendation made by the 2010 Asian Games IO team: 'All Doping Control Station Managers should ... have chaperones track athlete hydration and discourage overhydration (and the risk of a dilute sample)'.

This was not addressed in Jakarta/Palembang.

Doping Control Documentation

- Previous IO reports have noted the need to develop and introduce a paperless system for doping control, and this IO Team repeats and emphasizes that recommendation. With the accreditation system in use at the Games, and with suitable kits, it could be possible to have a paperless system that populates many of the fields in the Doping Control Form automatically, thereby speeding up the process considerably and so improving the experience for the athlete.

This was not addressed in Jakarta/Palembang.

- As the 2010 Asian Games IO team said: 'Doping Control personnel should be encouraged to use supplementary reports to record issues even if apparently trivial. This is important for operational improvements and can be critical in the results management process'.

This was addressed in Jakarta/Palembang.

Dilute Samples

- The recommendation of the 2010 Asian Games IO Team is repeated: 'The OCA ought to give further consideration to collecting additional samples, at least when to do so would not compromise an athlete's preparations for competition the next day, and also to having a plan to monitor dilute samples and possibly conduct follow up target tests as appropriate'.

This was not addressed in Jakarta/Palembang.

- DCOs should be required to consult with the Doping Control Command Centre manager before halting a session without having obtained a sample that meets the requirements for specific gravity.

This was not addressed in Jakarta/Palembang.

Sample Transportation

- Options could be explored to ensure samples are transported as soon as possible to the laboratory, mainly to expedite the analytical process so that athletes who have prohibited substances present in their systems can be removed from competition as quickly as possible.

This was not addressed in Jakarta/Palembang.

- The Chain of Custody form could be reviewed to ensure that it provides appropriate recording and assurance as to how samples get from the venue to the laboratory. Once the form has been perfected, IAGOC should monitor to ensure it is properly filled out.

This was not addressed in Jakarta/Palembang.

- The contract with the laboratory must specify clear and timely deadlines for the reporting of analytical results, including not only negative findings but also adverse analytical findings, preferably within 24-48 hours of receipt of a sample. The laboratory should ensure it has the capacity necessary to meet these deadlines, including exploring the option of bringing in a director from another WADA-accredited laboratory to consult.

This was not addressed in Jakarta/Palembang.

- In prevision of future editions of the Games, Art 4.7.3 of the 2015 ISTI requires ADOs, including Games organizers, to establish appropriate policies for the retention of samples for possible further analysis, e.g., based on new intelligence/improved analytical techniques, etc. Ideally samples should be retained for at least ten years, being the period of limitation for anti-doping proceedings under the 2015 Code. However, if cost constraints make that impossible, the IO Team recommends that the OCA require the laboratory to retain certain samples (identified through a risk assessment) for at least four years (the usual cycle of the Asian Games).

This was not addressed in Jakarta/Palembang.

Results Management

- 'The notification of the AAF to the Chef de Mission could be more detailed. It should set out the consequences for the ADRV asserted against the athlete. It should suggest that the athlete and his representatives review the results management and hearing procedures set out in the OCA Anti-Doping Rules prior to the hearing. While participating countries and their athletes are deemed to know the OCA Anti-Doping Rules, given the speed with which a hearing takes place, the notification could be more user-friendly and sensitive to the possible lack of familiarity of NOCs with these rules (and the likelihood that few if any athletes will know them)'.
This was not addressed in Jakarta/Palembang.
- Using the opportunity to revise their rules to be in line with the 2015 Code requirements, the OCA Anti-Doping Rules ought to be particularly revised to reflect the practices adopted during results management/disciplinary proceedings at the Asian Games, i.e., initial review of the file being conducted by the OCA Initial Review Panel rather than the Chairman of the OCA Medical Commission, requirement for NOC to conduct a hearing and report back findings to Disciplinary Commission in cases where athlete has already gone home, option for expedited appeal to CAS ad hoc Division onsite at Games. A copy of the OCA Anti-Doping Rules should be enclosed with the notice sent to the NOC summoning it and the athlete to the hearing.
This was addressed in Jakarta/Palembang.
- The IO also questions why the OCA Executive Board has to review and adopt 'recommendations' of the OCA Disciplinary Commission, rather than simply leave it to the OCA Disciplinary Commission to make the decision. The IOC abandoned this practice at the Sochi Games, and the OCA should consider following suit.
This was not addressed in Jakarta/Palembang.
- In most AAF cases, very few factual disputes arise that have to be resolved by the OCA Disciplinary Commission. However, if a non-analytical case were to arise (e.g., an alleged refusal to submit to a test, alleged tampering with sample collection, or alleged use or possession of a prohibited substance), there may well be factual disputes that the OCA Disciplinary Commission would have to resolve in order to determine the case. To ensure that the inquisitorial approach followed by the OCA Disciplinary Commission is sufficiently robust for these purposes, the IO recommends that (a) an OCA representative (someone who is not a member of the OCA Disciplinary Commission) should be present at the hearing, ready to address any factual issues that arise (since it is the OCA that has the burden of proof in all cases: see Article 3.1 of the OCA Anti-Doping Rules); (b) the OCA Disciplinary Commission should either have a legally qualified member or have a legal advisor present to assist it; and (c) ideally, a panel of lawyers should be established (as at London 2012 and Glasgow Commonwealth Games 2014) to step in to advise and represent athletes on a pro bono basis at hearings before the Disciplinary Commission and/or (on appeal) the CAS.
This was not addressed in Jakarta/Palembang.

Annex C – The Numbers

Testing overview

Number of tests	1460
Number of in-competition tests	1151
Number of out-of-competition tests	309
Number of samples	1621
Number of urine samples	1499
Number of blood samples	114
Number of ABP blood samples	8
Number of tested athletes	1292
Number of ESAs analysis	247
Number of GH analysis	114
Number of GHRFs analysis	184
Number of Adverse Analytical Findings (AAFs)	11
Number of Atypical Findings (ATFs)	1

Tests by sports/disciplines

Sport – Discipline	In Comp	Out Of Comp	Samples
Aquatics	147	31	178
Artistic Swimming	4		4
Diving	10	1	11
Swimming Long Distance 800m or greater	9	5	14
Swimming Middle Distance 200-400m	31	9	40
Swimming Sprint 100m or less	47	10	57
Water Polo	46	6	52
Archery	10		10
Archery	10		10
Athletics	119	33	152
Combined Events	6		6
Jumps	17	2	19
Long Distance 3000m or greater	35	10	45
Middle Distance 800-1500m	8		8
Sprint 400m or less	37	14	51
Throws	16	7	23
Badminton	24	5	29
Badminton	24	5	29
Baseball	24	6	30
Baseball	24	6	30
Basketball	56	13	69
3 on 3	20	2	22
Basketball	36	11	47
Bowling	4		4

Bowling	4		4
Boxing	20	5	25
Boxing	20	5	25
Canoe/Kayak	51	34	85
Canoe Slalom	8	6	14
Dragon Boat	20	6	26
Long Distance 1000m	6	6	12
Middle Distance 500m	10	8	18
Sprint 200m	7	8	15
Cycling	51	31	82
BMX	4	3	7
Mountain Bike	8	8	16
Road	6	11	17
Track Endurance	22	6	28
Track Sprint	11	3	14
Equestrian	2		2
Eventing	2		2
Fencing	12		12
Epee	4		4
Foil	4		4
Sabre	4		4
Field Hockey	22	7	29
Field Hockey	22	7	29
Football	83	8	91
Football	83	8	91
Golf	4		4
Golf	4		4
Gymnastics	16		16
Artistic	10		10
Rhythmic	2		2
Trampoline	4		4
Handball	33	8	41
Indoor	33	8	41
Jet-Ski	6		6
Jet-Ski	6		6
Judo	28	7	35
Judo	28	7	35
Ju-Jitsu	16	5	21
Ju-Jitsu	16	5	21
Kabaddi	7	2	9
Kabaddi	7	2	9
Karate	24	3	27
Karate	24	3	27

Kurash	14	2	16
Kurash	14	2	16
Modern Pentathlon	6	2	8
Modern Pentathlon	6	2	8
Pencak Silat	16	4	20
Pencak Silat	16	4	20
Roller Sports	8	6	14
Inline Speed Skating Distance greater than 1000m		3	3
Inline Speed Skating Sprint 1000m or less	4	3	7
Skateboarding	4		4
Rowing	24	25	49
Rowing	24	25	49
Rugby Union	12	7	19
Sevens	12	7	19
Sailing	3		3
Sailing	3		3
Sambo	8	1	9
Sambo	8	1	9
Sepaktakraw	20	6	26
Sepaktakraw	20	6	26
Shooting	49		49
Shooting	49		49
Soft Tennis	10		10
Soft Tennis	10		10
Softball	16	3	19
Softball	16	3	19
Sport Climbing	4	2	6
Combined	4		4
Speed		2	2
Squash	4		4
Squash	4		4
Table Tennis	12		12
Table Tennis	12		12
Taekwondo	20	8	28
Sparring	20	8	28
Tennis	10	7	17
Tennis	10	7	17
Triathlon	12	12	24
Triathlon	12	12	24
Volleyball	50	6	56
Beach	26	4	30
Volleyball	24	2	26
Weightlifting	45	11	56

Weightlifting	45	11	56
Wrestling	27	7	34
Freestyle	9		9
Greco-Roman	5		5
Women's Freestyle	1		1
Wrestling	12	7	19
Wushu	22	2	24
Sanda	6	1	7
Taolu	16	1	17
Grand Total	1151	309	1460