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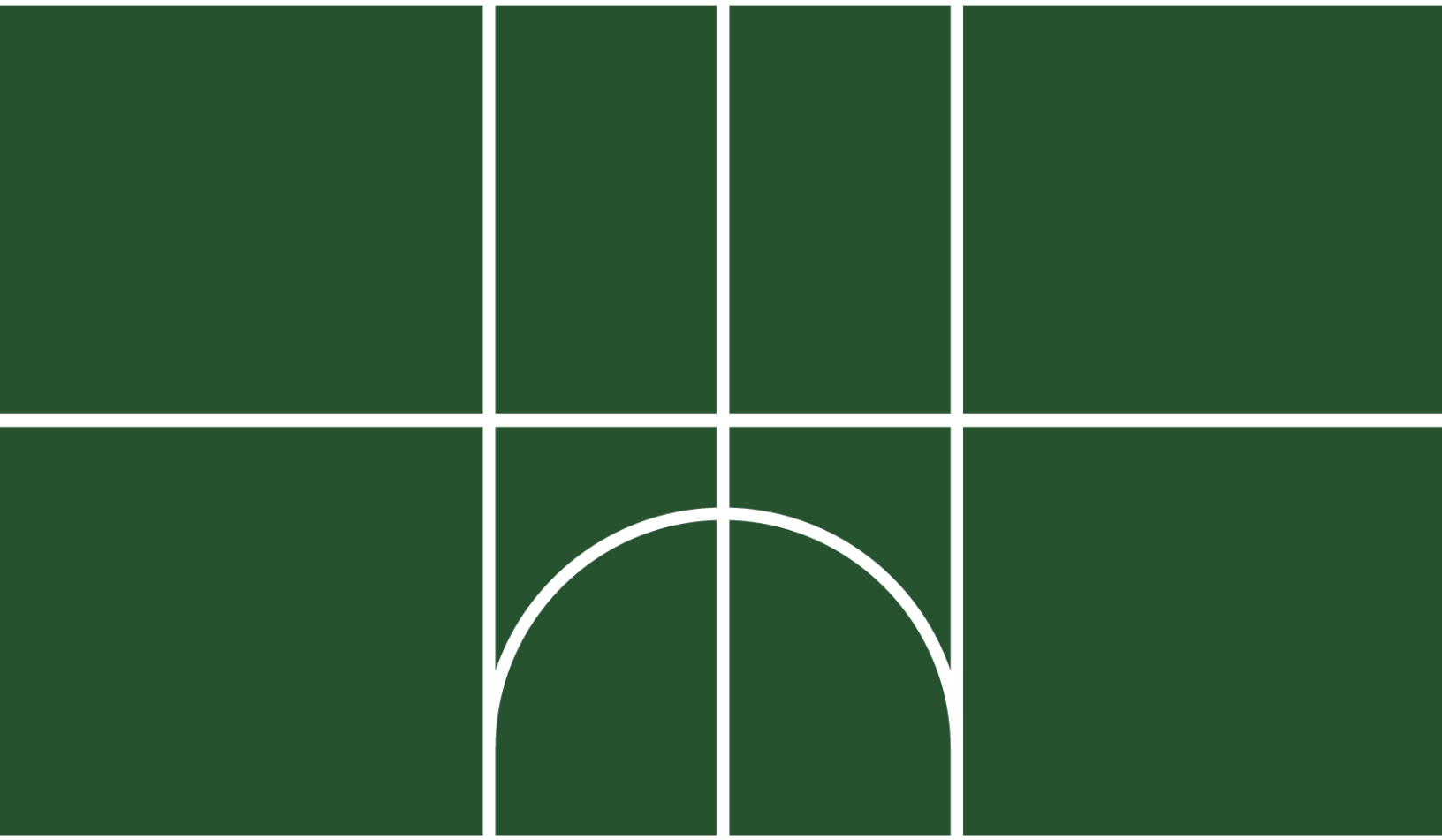
World Anti-Doping Code and International Standards Implementation Guide



2027

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I. Introduction

In preparation for the upcoming Sixth World Conference on Doping in Sport, the World Anti-Doping Agency (WADA) has prepared this Implementation Guide to assist stakeholders in their understanding of the substantive changes to the World Anti-Doping Code (Code) and International Standards as well as to inform Code Signatories of their obligations to ensure that their legal frameworks and anti-doping programs fully comply with the requirements of the 2027 Code and International Standards which will come into effect on 1 January 2027. This Guide also provides stakeholders and Signatories with key information as it relates to the upcoming Code Implementation Support Program (CISP) that will help Signatories prepare for the implementation of the 2027 Code and International Standards.

Following a short presentation on the history of the World Anti-Doping Code and Program (**Section II**), this Guide provides an overview of the 2027 Code and International Standards Update Process (**Section III**), including a specific consideration of feedback received from the athlete community (**Section IV**). This is followed by a summary of the key substantive changes in the 2027 Code (**Section V**) and International Standards (**Section VI**) as well as a presentation on the new International Standard for Intelligence and Investigations (**Section VII**). Finally, this Guide provides Signatories with practical Code compliance steps to follow after the adoption of the 2027 Code and International Standards at the upcoming World Conference on Doping in Sport (**Section VIII**) as well as other Code compliance considerations (**Section IX**) and information on the upcoming CISP (**Section X**).

II. History of the World Ant-Doping Code and Program

The Code is the fundamental and universal document upon which the World Anti-Doping Program is based. Its purpose is to advance the anti-doping effort through universal harmonization of anti-doping policies, rules, and regulations within sports organizations and among public authorities. The goal is for all athletes to benefit from the same anti-doping procedures and protections, no matter the sport, their nationality, or the country where they are tested, so that all athletes may participate in competition that is both safe and fair.

The Code is intended to be specific enough to achieve complete harmonization on issues where uniformity is required, yet general enough in other areas to permit flexibility on how agreed-upon anti-doping principles are implemented. The Code is supported by different International Standards, which focus on different technical and operational areas of an Anti-Doping Organization's program and on other key anti-doping related activities implemented by WADA, most notably its Compliance Monitoring Program. The Code and International Standards have been drafted with consideration of the principles of proportionality and human rights.

In January 2003, the first Code was approved in Copenhagen, Denmark during the Second World Conference on Doping in Sport. At the time, WADA committed to ensuring that the Code would be a living document, subject to periodic review. Accordingly, subsequent reviews have occurred and culminated in revised versions of the Code in 2009, 2015, and most recently in 2021. International Standards have also followed this review and update process; however, some have been updated more frequently than the Code due to the constant evolution of the anti-doping ecosystem and the need to progress certain technical requirements. The 2027 Code & International Standard (2027 Code & IS) Update Process follows this original commitment to periodically reinforce and strengthen the Code and International Standards through extensive consultations with the global anti-doping community.

III. 2027 Code & IS Update Process

1. Overview

As summarized in the following Timelines & Key Phases document, the 2027 Code & IS Update Process was launched in September 2023 and was structured to offer stakeholders extensive opportunities to provide feedback on successive working drafts of the 2027 Code or International Standards and culminates in the approval of final versions of the 2027 Code and International Standards by respectively the WADA Foundation Board and Executive Committee at the Sixth World Conference on Doping in Sport, set to be held in Busan, Republic of Korea from 1 to 5 December 2025. This World Conference will gather athletes, representatives from the sport movement, public authorities and anti-doping organizations, along with other anti-doping experts and members of the media to consider the continued evolution of clean sport and engage in high-level discussion and debate on the global anti-doping program.

2. Drafting Teams

Similar to previous Code and International Standard review processes, Drafting Teams have been an integral part of the 2027 Code & IS Update Process and have been specifically tasked with considering feedback and providing expert advice, as well as recommendations and contributions to successive working drafts of the 2027 Code and International Standards. The nine different Drafting Teams are composed of members from WADA and external experts from various Signatories and organizations who were appointed based on their relevant experience, expertise, and knowledge in anti-doping.

To better facilitate their work, provide clarity on their key responsibilities, and in keeping with governance best practices, each Drafting Team was established as a formal Working Group in accordance with WADA's Governance Framework and Regulations. The principal objectives and key responsibilities of the Drafting Teams and their members are housed in specific terms of references and this information can be found on the WADA Website under the Governance & Working Group Sections.

As part of their mandate, the Drafting Teams have cumulatively organized more than 70 meetings (in-person and virtual) and have given countless hours in reviewing feedback, meeting with stakeholders, and drafting proposed amendments to the documents. WADA is thankful for the invaluable contributions of the Drafting Team members and wishes to underline their importance to the continued practical improvement of the global clean sport movement.

3. Stakeholder Consultations

Over the course of the six-phase 2027 Code & IS Update Process, there have been three distinct consultation phases. First, stakeholders were invited to provide feedback on the proposed concepts for consideration, which orientated and guided the work and mandates of the Drafting Teams, before subsequently being invited to provide comments and feedback on the proposed first and second drafts of the 2027 Code. Along with the Code, the following International Standards[1] were considered and reviewed as part of the 2027 Code and IS Update Process:

- International Standard for Code Compliance by Signatories (ISCCS)[2]

[1] The review excluded the List of Prohibited Substances and Methods, which is reviewed annually via a separate stakeholder consultation process.

[2] A revised version of the International Standard for Code Compliance by Signatories entered into effect on 1 April 2024 and was therefore not the subject of revision during the First Drafting Phase.

- International Standard for Data Protection (ISDP)[3]
- International Standard for Education (ISE)
- International Standard for Intelligence and Investigations (ISII) ***New***
- International Standard for Laboratories (ISL)
- International Standard for Results Management (ISRM)
- International Standard for Testing (IST)[4]
- International Standard for Therapeutic Use Exemptions (ISTUE)

To ensure transparency, the proposed drafts of the 2027 Code and International Standards were published on the Code Review section of the WADA website, and were accompanied by summaries of substantive changes, clean and redline versions as well as WADAConnect submissions made by stakeholders.

WADA is confident that the 2027 Code & IS Update Process has extensively and transparently offered stakeholders the opportunity to provide comments and feedback. Across the three consultations, and excluding the athlete-centered consultation (see section IV below), more than **5000 comments** from **160+ unique commenters** in **50+ countries** were cumulatively received in WADAConnect and these contributions, especially those based on experiences of practical implementation, have been essential in the drafting of the proposed 2027 Code and International Standards and ensuring that they are fit for purpose in the promotion of clean sport.

4. Statistics

First Stakeholder Engagement Phase (September – December 2023)

Document	Number of Comments
Code	362
ISCCS	14
ISDP-ISPPPI	75
ISE	253
ISII	137
ISL	71
ISRM	169
IST	202
ISTUE	270

Total: 1553

Organization Type	Number of Commenters
Academic Institutions	4
Athlete Commissions	1
International Federations	13
Laboratories	2
National Anti-Doping Organizations	47
National Olympic and Paralympic Committees	5
Other Sport Entities	3
Private Entities/Individuals	4
Public Authorities	4
Regional Anti-Doping Organizations	1

Total: 83

[3] Currently the International Standard for the Protection of Privacy and Personal Information (ISPPPI).
[4] Currently the International Standard for Testing and Investigations (ISTI).

Second Stakeholder Consultation Phase (May – October 2024)

Document	Number of Comments
Code	618
ISDP-ISPPPI	81
ISE	376
ISII	77
ISL	174
ISRM	144
IST	274
ISTUE	197

Total: 1941

Organization Type	Number of Commenters
Academic Institutions	4
Athlete Commissions	3
International Federations	10
Laboratories	9
Major Event Organizations	2
National Anti-Doping Organizations	56
National Olympic and Paralympic Committees	5
Other Sport Entities	4
Private Entities/Individuals	6
Public Authorities	6
Regional Anti-Doping Organizations	1

Total: 106

Third Stakeholder Consultation Phase (February – May 2025)

Document	Number of Comments
Code	588
ISCCS	58
ISDP-ISPPPI	37
ISE	262
ISII	41
ISL	131
ISRM	117
IST	317
ISTUE	147

Total: 1698

Organization Type	Number of Commenters
Academic Institutions	2
Athlete Commissions	1
International Federations	8
Laboratories	8
Major Event Organizations	1
National Anti-Doping Organizations	36
National Olympic and Paralympic Committees	4
Other Sport Entities	2
Private Entities/Individuals	9
Public Authorities	8
Regional Anti-Doping Organizations	1

Total: 80

5. Acknowledgments

WADA sincerely thanks all stakeholders who participated and provided valuable insights and feedback during this Process. It is such collaboration that ensures the continued strength of the Code and International Standards, and by extension, of the global anti-doping system.

IV. Athlete Engagement

1. 2027 Code & IS Update Process

As emphasized in its Strategic Plan, WADA is an athlete-centered organization and endeavors to mobilize athlete engagement and participation in the development and evolution of the global anti-doping framework. In collaboration with the Athlete Council, WADA has actively sought to ensure that athlete voices have been fully heard as part of the 2027 Code & IS Update Process.

In keeping with this commitment, WADA organized athlete-focused webinars and presentations on the Process and proposed changes to the Code and International Standards. Notably, in April 2025, WADA also launched an Athlete-Centered Consultation which called on all athletes and athlete commissions to participate by sharing their feedback on some of the proposed changes to the Code and certain, relevant International Standards, or, in some cases, on current issues affecting athletes. While this feedback was crucial as part of the 2027 Code & IS Update Process, it also helps WADA identify where athletes may require further support or resources to fully comply with the relevant requirements of the Code and International Standards.

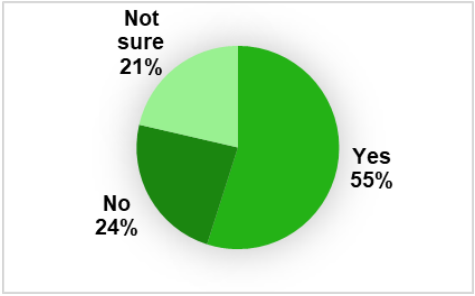
2. Feedback from the Athlete-Centered Consultation

More than **600 athletes/athlete commissions** from **60+ countries** and **70+ sports/sport disciplines** participated and responded to the Athlete-Centered Consultation. The following sections will offer a summary of the feedback received as part of the Consultation. Where a proposed change has received majority support from the athlete respondents, it is indicated as such. Where a proposed change has not received majority support from the athlete respondents, but shall nevertheless be implemented, specific reasoning is given.

i. 2027 World Anti-Doping Code

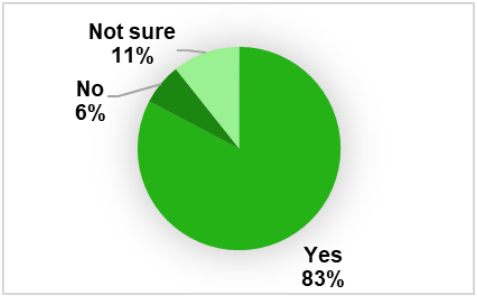
a) Shorter periods of ineligibility for reckless as opposed to intentional violations of the Code (**Code Article 10.2**)

A majority of respondents indicated that they were in favor of shorter periods of ineligibility for anti-doping rule violations where an athlete has demonstrated reckless as opposed to intentional conduct.



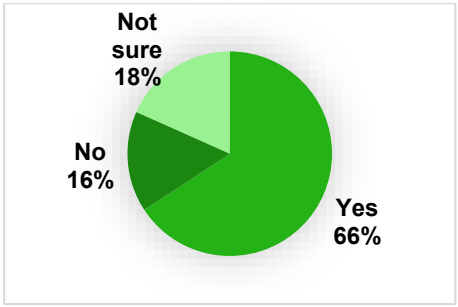
b) Changes to the period of ineligibility in cases involving Substances of Abuse (**Code Article 10.2.3**)

A majority of respondents indicated that they were in favor of the proposed adjustments to the period of ineligibility in cases involving substances of abuse.



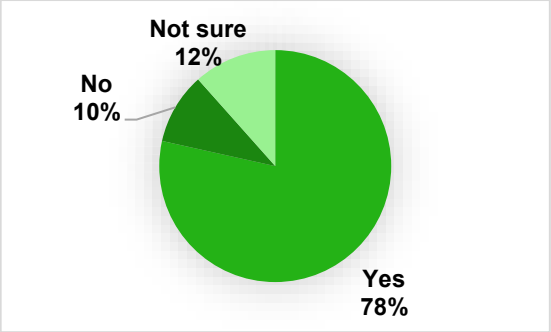
c) Use of samples for other purposes than anti-doping (**Comment to Code Article 23.2.2**)

While a majority of respondents supported that samples collected for anti-doping purposes (under the World Anti-Doping Program) may be used by National Anti-Doping Organizations or International Federations for purposes unrelated to doping, such as enforcing safety, Code of Conduct policies and eligibility rules, several of the qualitative comments questioned whether this should be within the scope of the Code.



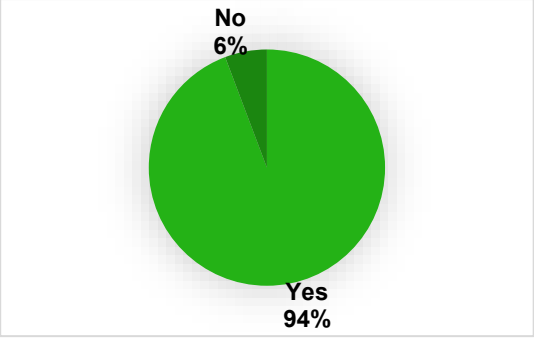
d) Non-publication of determined “No Fault or Negligence” anti-doping rule violations (**Code Article 14.3.3**)

A majority of the respondents indicated that an exception to the typical public disclosure rule where the anti-doping organization must publish the results, including the name of the athlete, the sport, the anti-doping rule violated, the prohibited substances or methods (if any) and the related consequences, would balance fairness and respect for athletes’ rights alongside transparency and credibility of the anti-doping system for cases of “No Fault or Negligence”.



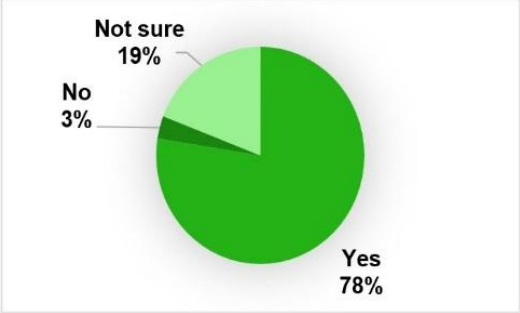
e) Additional examples in the Code of the permitted and prohibited activities of a person who is serving a provisional suspension or period of ineligibility (**Code Article 10.14.1**)

A majority of respondents indicated that the addition of further examples of those activities which a person can and cannot do while serving a period of ineligibility is clear and helpful.



f) Importance of the Fundamental Rationale of the Code

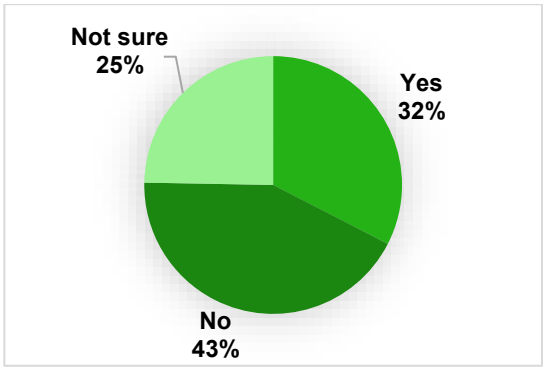
A majority of respondents considered that the “Fundamental Rationale of the Code”, as reconfigured in the 2027 Code notably vis-à-vis the idea regarding the “Spirt of Sport”, was important.



ii. 2027 International Standard for Data Protection (ISDP)

a) Retention of whereabouts information for 10 years (**ISDP Annex A**)

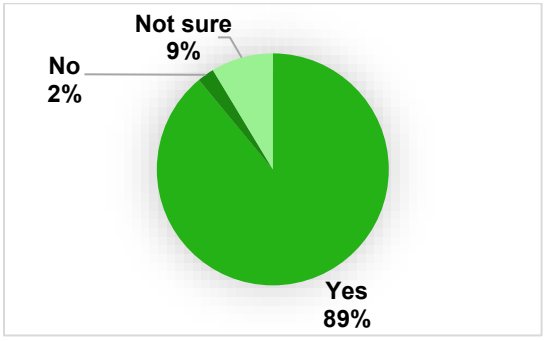
While 32% of the respondents indicated that they had concerns regarding whereabouts information being kept for 10 years, 43% and 25% of the respondents respectively indicated that they had no concerns or were not sure. This noted, the proposed 10-year retention period has been retained in the third draft of the 2027 ISDP, as following consultation with technical experts and stakeholders, it was determined that this would be better aligned with recent developments in anti-doping investigations and intelligence techniques, where such data has taken on a renewed importance in detecting Code violations.



iii. 2027 International Standard for Education (ISE)

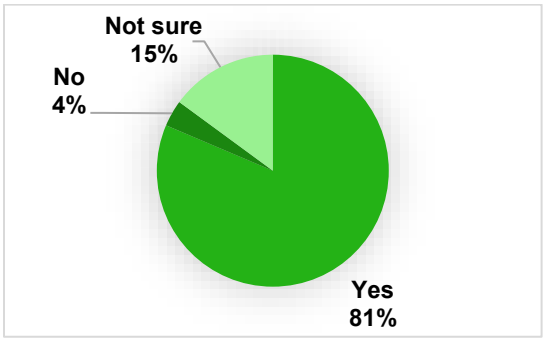
a) The broadening of an Anti-Doping Organization's Education Pool **(ISE Article 6)**

A majority of respondents indicated that they were in favor of broadening an Anti-Doping Organization's Education Pool to include more groups who must receive education such as minors competing internationally and athlete support personnel.



b) The addition of "unintentional doping" as a mandatory education topic (**ISE Article 8**)

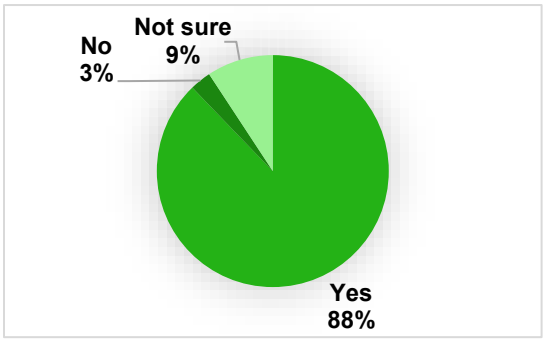
A majority of respondents indicated that they were in favor of adding the topic of "unintentional doping", including topics relating to the risk of supplement use, as a mandatory education topic.



iv. 2027 International Standard for Intelligence and Investigations (ISII)

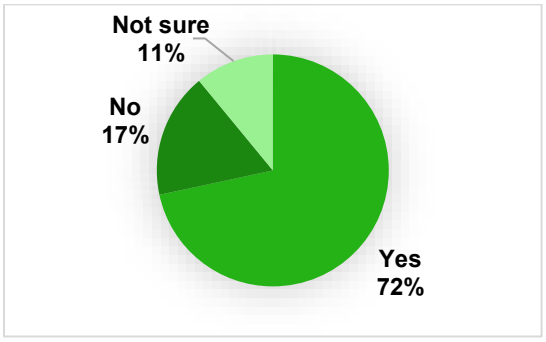
a) Divulgation of Confidential Sources (**ISII Article 4.2.5**)

A majority of respondents agreed that the removal of the requirement for Anti-Doping Organizations to disclose the identities of their confidential sources to WADA in the event of an investigation by WADA would better protect the privacy and safety of such confidential sources.



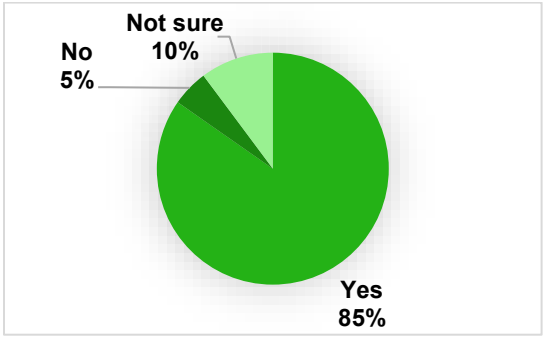
b) Threshold to initiate investigations (**ISII Article 5.3.1**)

A majority of respondents agreed the new threshold of “reasonable cause”, which is necessary for initiating mandatory investigations, will help ensure fair and justified investigations.



c) Fair and adequate balance regarding the requirement to cooperate with an investigation (**ISII Article 5.4.2**)

A majority of respondents agreed that the balance struck between the requirements for athletes to cooperate with investigations and their procedural safeguards and rights is fair and adequate.

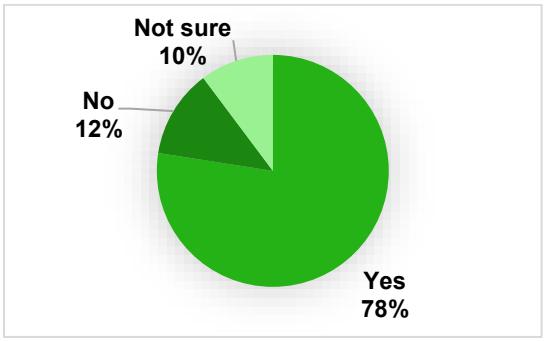


v. 2027 International Standard for Results Management (ISRM)

a) 25% reduction in ineligibility for an athlete accepting anti-doping rule violations

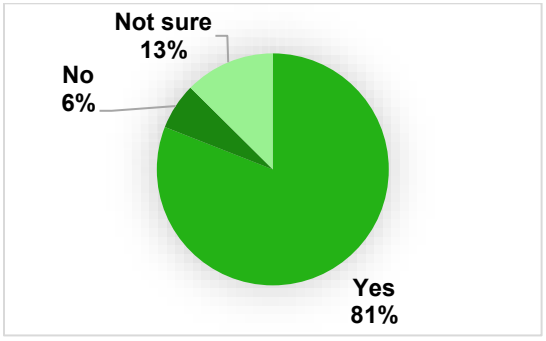
(**ISRM Articles 5.1.2.1 (f) and 7.1 (d) (i)**)

A majority of respondents agreed that an athlete's (or person) acceptance of an anti-doping rule violation and the related consequences warrants a 25% reduction in the applicable period of ineligibility.



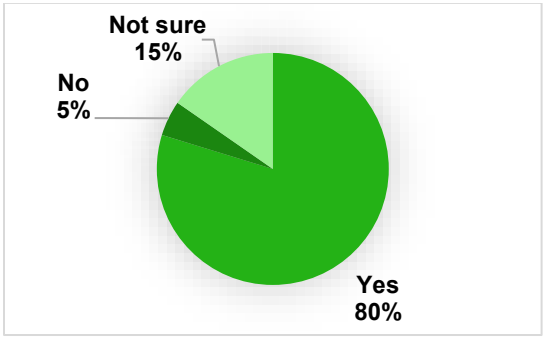
b) Independent Review Expert Case Review (**ISRM Article 5.5**)

A majority of respondents agreed that in rare cases, such as cases where an anti-doping organization determines that the existence of multiple AAFs is likely due to a contaminated source and therefore considers closing a case without proceeding with the normal results management process, the goal of ensuring consistency and transparency for athletes will be achieved if such cases are submitted for review by an Independent Review Expert.



c) Removal of administrative review process for individual whereabouts failures (**ISRM Article B.3.4 (e)**)

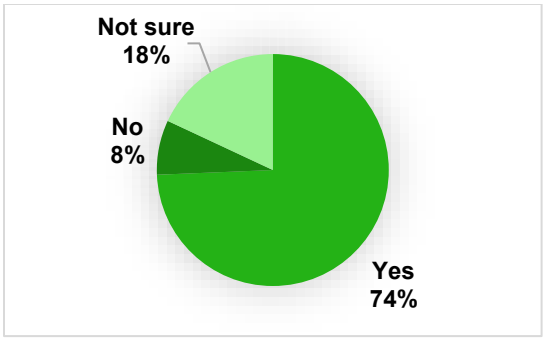
A majority of respondents agreed that the removal of the administrative review process for individual whereabouts failures will streamline the process without having a negative impact on athletes' rights.



vi. 2027 International Standard for Testing (IST)

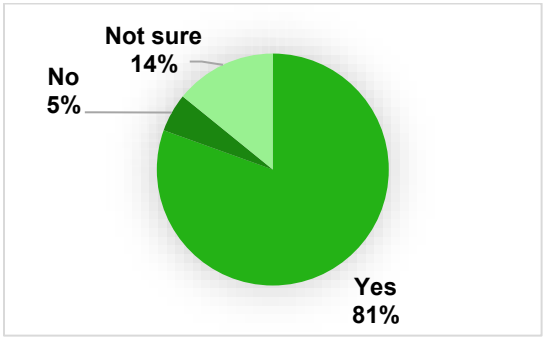
a) Whereabouts Deadlines (**IST Article 4.6.10.1**)

A majority of respondents agreed that the requirement for registered testing pool athletes to file their whereabouts by the 15th of each month preceding the start of a calendar quarter (i.e., 15 March, 15 June, 15 September, and 15 December), instead of by the first day of each calendar quarter, is reasonable and manageable.



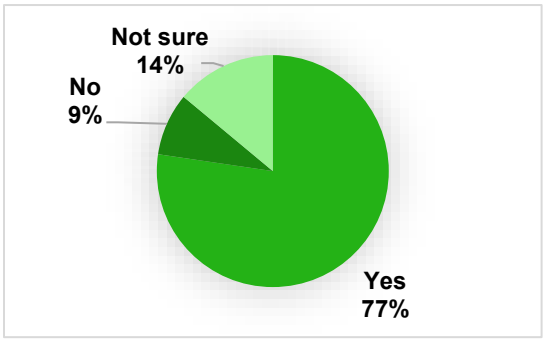
b) Phone Calls to Athletes (**IST Article 5.3.2**)

A majority of respondents agreed that doping control officers should be able to call athletes outside of their 60-minute time slot in the following circumstances: (i) a doping control officer receives reliable information regarding an athlete's location, that is not otherwise part of their whereabouts submission, and the doping control officer attempts to locate the athlete at such location but is unable to access the location due to restrictions (e.g., security does not permit access to the location); or when a follow-up test or target test is recommended by a Laboratory and is time sensitive.



c) Sample collection procedure for athletes whom the sport gender is not identified under the applicable sport rule (**IST Article C.4.5.1**)

A majority of respondents agreed that the proposed changes in the 2027 IST, regarding the sample collection procedure for athletes whom the sport gender is not specified under the applicable sport rules, adequately addresses the needs and concerns of athletes who compete in open or mixed-gender sport categories.



d) Removal of the requirement to submit training locations when filing whereabouts (**IST Article C.4.5.1**)

Notwithstanding the fact that a majority of respondents indicated that the removal of the requirement to submit training information or any other regular activities would make it easier for them to ensure their whereabouts information is accurate and up-to-date, 2027 IST nevertheless includes the mandatory requirement for RTP Athletes to file on a quarterly basis, as part of their whereabouts submission, a primary training location as well as the days during the quarter the athlete plans to train at such location.

This stems notably from the following important considerations:

- Athlete training information is critical to conducting no advance notice testing as this adds to the unpredictability of an anti-doping organization's testing programs by not only having the ability to test athletes at their overnight address (i.e., an athlete's personal and private space) but also in their sporting and training environment;

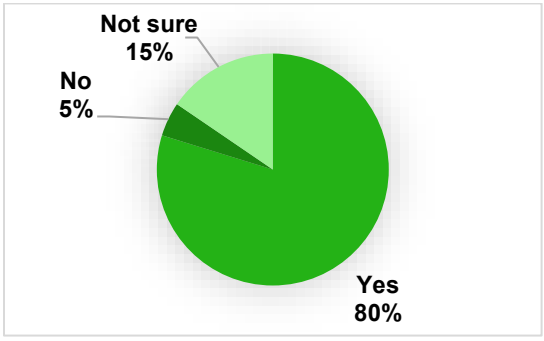
- The filing of athlete training information will assist anti-doping organizations in achieving a greater number of successful test attempts as the restricted access to athletes at their overnight address will likely lead to a greater number of unsuccessful attempts which results in additional costs to collect a sample; and

- The filing of athlete training information will create net financial positives for anti-doping organizations as it will provide them with the possibility to test a few additional athletes during the same testing mission versus only one at a time – something which would otherwise occur if testing was only possible at an athlete's overnight address.

vii. International Standard for Therapeutic Use Exemptions (ISTUE)

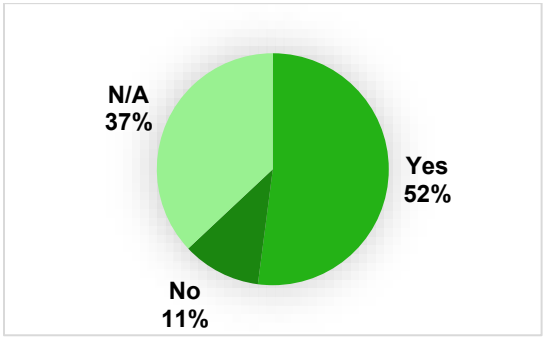
a) Reorder and restructured 2027 ISTUE for greater criteria and process clarity (**ISTUE Article 4 and 6**)

The reordered and restructured 2027 ISTUE further clarifies the process for athletes to apply for a therapeutic use exemption and a majority of respondents indicated that the process to apply for a TUE is clear.



b) Therapeutic Use Exemption Recognition Process (**ISTUE Article 7**)

The therapeutic use exemption recognition process has been revised in the 2027 ISTUE to create a more streamlined and athlete-centered system and a majority of respondents indicated that automatic recognition is helpful.



3. Summary

Feedback received in relation to the above-mentioned questions (21 in total) demonstrates that among those athletes who responded to the Athlete-Centered Consultation, there is strong support for key athlete-related changes which will be implemented with the adoption of the 2027 Code and International Standard. Indeed, for 19 of the 21 questions asked, a majority of respondents agreed with the changes. While not exhaustive in nature, WADA considers this as a positive indication that for the key athlete-related changes that will be implemented in the 2027 Code and International Standards, there is strong support from those to whom these requirements will apply.

4. Acknowledgments

WADA sincerely thanks all athletes who participated in the Athlete-Centered Consultation for taking the time to share their insights and experiences. This unique input will help us ensure that we continue to build a fair and harmonized anti-doping program for all athletes; one that better reflects athletes' realities and needs.

V. Substantive changes between the current 2021 Code and the proposed 2027 Code[5]

As has come to be expected from experience in drafting the previous Code amendments, the stakeholder feedback which the Code Drafting Team received this time, both in meetings and in writing, was voluminous and highly valued. From that feedback, more than 3,400 individual changes are now found in the 2027 Code. None of those changes were gratuitous. Each had a specific purpose. In some cases, the changes were made in response to stakeholder questions requesting interpretation, pointing out inconsistencies, or identifying potential legal loopholes and ways to address them. Other changes were made to ensure a level playing field through better harmonization or were changes designed to make the fight against doping through the Code more effective and efficient. Still other changes were made to make the Code fairer through increased flexibility and with particular attention to human rights and Athletes' rights.

The best way to see all of the 2027 Code changes is to look at the redline of the 2027 Code to the 2021 Code which WADA has posted online. Another useful tool to understand the 2027 Code changes is the 2027 Code and IS Update Process Fourth and Final Draft: Summary of Major Changes which describes the most significant changes made in each of the four major 2027 Code drafts. That document is also posted online.

Before describing specific changes made in individual articles of the 2027 Code, five general themes which underline the 2027 Code amendments are worth noting.

1. Additional Focus on Human Rights. The importance of human rights was a topic which was also addressed in the 2021 Code. As part of the 2027 Code Update Process, WADA sought additional advice from two highly regarded human rights experts, Snežana Samardžić-Marković and Michael Beloff KC. All of their recommendations have been incorporated into the 2027 Code.

2. Other Significant Changes Made to Address Athlete Interests and Rights. First, Athletes have a strong interest in ensuring that the playing field is level and that the Athletes competing against them have not gained an unfair advantage through doping. They have a right to clean sport. Thus, all of the many changes which make the 2027 Code a better, stronger and more effective deterrent to doping should very clearly be included in the category of Athlete interests and rights. The second way to look at Athletes' rights involves the fairness of the system. The specific articles which promote more fairness in the system include the following:

   - Expansion of the grounds to lift a mandatory Provisional Suspension (Article 7.4.1) and eventual possibility of an appeal to the CAS to lift a Provisional Suspension for all Athletes (Article 7.4.3).

[5] Most capitalized terms in this section refer to defined terms in the 2027 Code.

- More flexible approach to Article 10.2:
    - Greater range of sanctions and more avenues for reduction depending on the circumstances of the case (Articles 10.2.1 and 10.2.2).
    - Introduction of reduced two-month sanctions for cases in which an Athlete meets the criteria under ISTUE Article 4.2 but not the criteria required for a retroactive TUE (Article 10.2.4).
- Expansion of reduction in sanction for early admission and acceptance of sanction (Article 10.7.2) so that a 25% reduction on the applicable period of ineligibility (as set out in the charge letter) is available not only for violations carrying a period of ineligibility of four years or more, but for all violations.
- Lower threshold to obtain a suspension of a period of Ineligibility for providing valuable information:
    - Introduction of a provision allowing a Results Management Authority to suspend up to 15% of the otherwise applicable period of Ineligibility upon the receipt of valuable information which does not otherwise meet the criteria for Substantial Assistance (Article 10.7.4).
- Expanded appeal rights for Athletes:
    - International Level Athletes retain the right to appeal first instance decisions directly to the CAS. Other Athletes and Persons can appeal first instance decisions to the national level appellate body and can now appeal that body's decision to the CAS (Article 13.2.3.2).
- Consent required for publication of No-Fault cases (Article 14.3.3).
- Clarification that an Athlete's duty to cooperate with an Anti-Doping Organization is subject to appropriate legal safeguards, including without limitation, the right to legal counsel and the right to not self-incriminate (Article 21.1.6).
- Expansion of protections for Minors and Protected Persons:
    - Violations of Article 2.7 (Trafficking), Article 2.8 (Administration) or Article 2.9 (Complicity) involving Minors and/or Protected Persons are particularly serious and can lead to longer periods of Ineligibility (Articles 10.3.3 and 10.3.4).
    - Information and assistance regarding the doping of Minors and/or Protected Persons is particularly valuable (Article 10.7.3.1 and 10.7.4).

3. Mitigating the Potential for Bias in the Doping Control Process. The worldwide anti-doping system has come a long way since the Code first went into effect in 2003. However, some stakeholders still continue to have concerns that other stakeholders are not following the rules. In particular, they fear that other stakeholders' actions are biased in favor of their own high-level Athletes. There have certainly been high-profile examples, like the McLaren Russian investigation where this has been proved to be absolutely true. At a more general level, WADA sees this problem in some of the cases coming up from national level tribunals. The addition of Code provisions to protect the system against this type of actual or perceived bias started in 2021 in response to suggestions from CAHAMA and the Council of Europe. Additional protections have been put in place through changes to the Code definitions of Institutional

Independence (appellate panels – and appointment of panel pools – independent of National Anti-Doping Organization with Results Management Authority as well as national sports governing bodies and national sport organizations), Operational Independence (hearings shall not be conducted by persons appointed by, or under the authority of, national sports governing bodies or other national sports organizations), National Anti-Doping Organization Operational Independence (new definition to ensure independent implementation of the National Anti-Doping Organization's anti-doping program including prohibiting any person with a real or potential conflict of interest to be involved in the National Anti-Doping Organization's operational activities; this would disqualify persons who were also concurrently involved in the management or operational activities of a national governing body, national sports organization or government department with responsibility for sport or anti-doping). New language has also been added to the beginning of Article 20 which specifically prohibits delegation of any aspect of doping control, including, without limitation, testing and results management to a national sports governing body other national sports organization or other party where such delegations could reasonably lead to a potential or actual conflict of interest.

4. The Problem of Contamination. The risk that a non-doping Athlete may inadvertently be exposed to a Prohibited Substance by contamination resulting in an Adverse Analytical Finding is a legitimate problem. On the other hand, many doped Athletes who get caught raise contamination as either a public relations excuse or legal defense (and very often both). Steps to try to address this problem, through the Code and otherwise, have been ongoing. Progress has been made, but to date no perfect solution has been found. Many hearing panels have wrestled with this issue with inconsistent or problematic results, primarily at the first instance level but in some cases even at CAS. Much has been done to warn Athletes about the danger of contaminated supplements. A science and legal panel assembled by WADA has been working for almost a decade to establish tailored regimes (including Minimum Reporting Levels) for a range of known and prevalent contaminants such as growth promoters used in the livestock practices of some countries as well as certain prohibited diuretics and masking agents found in innocuous commercial products. WADA has also recently formed a new Working Group on Contamination which is taking a more holistic approach to addressing the contamination problem, which itself is working in close coordination with the education-focused Taskforce on Unintentional Doping. The 2027 Code includes several important changes which address contamination. The 2021 Code already included Article 10.6.1.2 which provides that an Athlete who can establish that their Adverse Analytical Finding came from a Contaminated Product can reduce their period of Ineligibility to a range between a reprimand and two years. The problem is that this article only applied to Contaminated "Products". More and more cases have arisen where the Athlete can establish that the source of the contamination was not from a product that was contaminated but rather from other sources such as intimate contact with a third person or physical contact with objects touched or handled by the third person. This situation has been addressed in the 2027 Code by expanding the Contaminated Products provision to now include "Contaminated Sources". Another change in this area is the addition of new Article 10.2.1.3 described below which allows an Athlete to reduce the otherwise applicable four-year period of Ineligibility for an anti-doping rule violation related to a Non-Specified Substance from four years to two years where there is reliable scientific evidence that the Adverse Analytical Finding was not compatible with the intentional use of a Prohibited Substance.

5. Increased Emphasis on the Responsibility of Athlete Support Personnel.

   Athlete Support Personnel play an important role in protecting their Athletes against the risk of doping whether intentional or unintentional. Sometimes they are the party responsible for their Athlete's doping. The 2021 Code already contains a number of Articles which provide for additional consequences to be imposed on Athlete Support Personnel who are involved in doping. New 2027 Code changes focusing on Athlete Support Personnel include:

- The responsibility of Signatories to conduct an automatic investigation involving an anti-doping rule violation by their Athlete who is a Protected Person or Minor or where the Athlete Support Person has provided support to more than one Athlete found to have committed an anti-doping rule violation (e.g., Article 20.1.10).

- Signatories are required to adopt and implement Code of Conduct provisions allowing the imposition of disciplinary action against Athlete Support Personnel who violate their obligations under Article 21.2 where such violation would not otherwise constitute an anti-doping rule violation (e.g., Article 20.1.17).

- The roles and responsibility of Athlete Support Personnel have been expanded to include the obligation to make themselves available for education (Article 21.2.2); the obligation to exercise the highest duty of care in protecting Athletes from the risk of an unintentional anti-doping rule violation (Article 21.2.9); a provision providing that no person subject to a period of Ineligibility shall provide Athlete Support Personnel services to any Athlete or other person who is bound by rules adopted pursuant to the Code (Article 21.2.8).

A non-exhaustive list of significant changes found in the 2027 Code which were made in response to stakeholder feedback include:

i. Anti-Doping Rule Violations (Article 2)

Comments numbered 7 and 10 to Articles 2.1.1 and 2.2.2 clarify two points. First, an Athlete cannot be charged with use of a Prohibited Substance before they became subject to anti-doping rule violations – although that could be a legitimate basis for denying the Athlete membership in the organization. However, once an Athlete becomes subject to anti-doping rules, the presence of a Prohibited Substance in their Sample is an anti-doping rule violation notwithstanding the fact that the Adverse Analytical Finding came from the substance having been used before the Athlete became subject to the rules.

ii. Therapeutic Use Exemptions (Article 4.4)

See comments to Article 10.2 below.

iii. Authority to Test (Article 5.2)

It is vital that Anti-Doping Organizations can effectively exercise testing authority over relevant Athletes per Article 5 of the Code. Following the recommendations in the World Aquatics and the Cottier Reports calling for additional testing of Athletes by Anti-Doping Organizations beyond their own National Anti-Doping Agency (in particular in advance of Major Events), a new Article 5.2.7 has been added to ensure that testing by others outside the National Anti-Doping Organization is not unduly restricted.

iv. Retired Athletes Returning to Competition (Article 5.6)

Revisions to Articles 5.6.1 and 5.6.2 make clear that in addition to making themselves available for testing, retired Athletes returning to competition must also agree to be bound by applicable anti-doping rules during the waiting period before they are allowed to compete. Further, a

comment to Article 5.6.2 has been added which states that nothing in the Code precludes a sport organization from adopting and enforcing eligibility rules that allow the organization to deny or revoke the membership of an Athlete who has engaged in conduct during retirement, if such conduct would have constituted an anti-doping rule violation had it occurred while the person was bound by anti-doping rules.

v. Analysis of Samples and Assessment of Analytical Data for Anti-Doping Purposes (Article 6.2)

Laboratories are permitted to analyze samples and data for anti-doping purposes. Although he did not identify it as a requirement, Michael Beloff's human rights opinion suggested that the description of the types of laboratory analysis considered to be "anti-doping purposes" could be listed in a single place. This has been done in a reorganization of Articles 6.2 and 6.3.

vi. Further Analysis of Samples Prior to or During Results Management (Article 6.5)

This Article has been revised to make clear that a laboratory may conduct repeat or additional analysis on a sample prior to the time the Results Management Authority notifies the Athlete that their sample is the basis for an anti-doping rule violation charge, or after that case has been finally resolved. Between the time that the Athlete has been charged and completion of the case, additional analysis on the sample may only be performed with the consent of the Athlete or the approval of the hearing panel.

vii. Responsibility for Conducting Whereabouts Failure Results Management (Article 7.1.6)

Generally, Results Management for whereabouts failures is conducted by the Anti-Doping Organization with which the Athlete files their whereabouts information. An exception to that general rule has been added in Article 7.1.6 which provides that where an attempt to test by an Anti-Doping Organization (other than a Major Event Organization) leads to the discovery of a potential whereabouts failure, the Results Management for the potential failure shall be administered by the Anti-Doping Organization that initiated the test unless the two Anti-Doping Organizations agree otherwise.

viii. Provisional Suspensions (Article 7.4)

Under the 2021 Code, stakeholders have noted the difficulty of conducting the Results Management process and imposing a Provisional Suspension for Substances of Abuse when the period of Ineligibility is so short. As modified, the mandatory Provisional Suspension applicable to Adverse Analytical Findings and Adverse Passport Findings for Non-Specified Substances will not be applicable to Substances of Abuse.

Under the 2021 Code, Results Management Authorities were required to impose mandatory Provisional Suspensions "promptly" after notification to the Athlete and subject to the Athlete's right to have a Provisional Hearing before or shortly after the Provisional Suspension was imposed. In practice, "promptly" often turned out to be a long time. Article 7.4.1 now provides that a mandatory Provisional Suspension shall be imposed by the Results Management Authority when the person is first notified of the potential anti-doping rule violation. It may be lifted by the same Results Management Authority based not only on a likely Contaminated Source but also the likelihood of a finding of no anti-doping rule violation, No Fault or

Negligence, or the time already served by the Athlete under the Provisional Suspension will exceed the Period of Ineligibility asserted in the charging letter for the anti-doping rule violation. The process by which an Athlete may challenge the imposition or failure to lift a Provisional Suspension has also changed. Anti-Doping Organizations are required to have rules which require an application to lift to be submitted to the Anti-Doping Organization. Anti-Doping Organizations may also allow a further challenge of the Provisional Suspension to the first instance hearing panel. If the Anti-Doping Organization denies the application to lift, Athletes are given the right to lodge an appeal with CAS. Where an Anti-Doping Organization does not possess authority to lift a Provisional Suspension, the Anti-Doping Organization shall provide in its anti-doping rules that an Athlete upon whom a Provisional Suspension has been imposed shall, as a prerequisite to an appeal to CAS, submit an application to lift the Provisional Suspension to the first instance hearing panel.

This approach gives Athletes the opportunity to challenge a Provisional Suspension quickly and in their own language and the Anti-Doping Organization an opportunity to consider the Athlete's arguments and, if it agrees, lift the Provisional Suspension before the CAS process is initiated. This approach is supported by both Athletes and Anti-Doping Organizations.

ix. Retirement from Sport (Article 7.7)

In addition to the new provisions in Article 5.6 discussed above, an additional provision has been added to Article 7.7 which provides that when a retired Athlete or other Person tampers with the ongoing Results Management of an anti-doping rule violation for which they have been charged, notwithstanding their retirement, the Athlete or other Person shall remain subject to the authority of all relevant Signatories for the violation of Tampering with Results Management under Article 2.5.

x. Cases Subject to Review by Independent Review Expert (Article 7.8)

This is a new Article based on the recommendations of the Independent Prosecutor Eric Cottier, in addressing the Chinese swimming matter. In summary, this Article makes clear that when an Anti-Doping Organization receives the report of an Adverse Analytical Finding and there are no apparent departures from the International Standard for Testing or International Standard for Laboratories, and the Athlete does not have a Therapeutic Use Exemption, the Anti-Doping Organization cannot simply close the case without notifying the Athlete and instead must follow the following process: 1) the Athlete must be notified and a mandatory Provisional Suspension, if applicable, must be imposed; 2) before closing the case, the Anti-Doping Organization must submit a request for an opinion from the Independent Review Expert with a copy to WADA and the other parties entitled to appeal; 3) after reviewing the file and any other information deemed necessary, the Independent Review Expert will issue a written opinion and recommendation to the Anti-Doping Organization with a copy to WADA and the other parties with a right to appeal advising whether a departure from the normal Results Management process is justified in the particular circumstances of the case; 4) after receiving the Independent Review Expert's opinion and recommendation, the Anti-Doping Organization shall issue a written decision on whether it will proceed with normal Results Management or dismiss the Adverse Analytical Finding; 5) copies of the Anti-Doping Organization's decision along with the Independent Review Expert's opinion and recommendation will be provided to each of the other parties entitled to appeal the decision, which appeal will be directly to CAS; and 6) where an Anti-Doping Organization dismisses an Adverse Analytical Finding case without seeking an opinion and recommendation from the Independent Review Expert or fails to go forward with

the normal Results Management process in contravention of the Independent Review Expert's opinion and recommendation, and where it is ultimately determined on appeal that an anti-doping rule violation did occur, then under Article 24 of the Code and the International Standard for Code Compliance by Signatories, the Anti-Doping Organization may be subject to non-compliance outcomes and will also be required to reimburse the appealing parties for costs and reasonable legal fees incurred in connection with the appellate process. This Article must be incorporated without change into each Signatory's rules (Article 23.2.2). Further detail on the Independent Review Expert process will be provided in the International Standard for Results Management and Guidelines.

The expectation is that this process will only be utilized in the very rarest of cases (for example, the approach taken to trace clenbuterol test results in Mexico and China, where the potential for meat contamination was well known and the current policy based on a Minimum Reporting Level and investigation had not yet been developed). Now, with the 2027 Code requirement for Athlete notification and imposition of a mandatory Provisional Suspension, even clenbuterol type violations would likely be resolved through the normal Results Management process.

xi. Sanctioning Scheme for Presence, Use or Attempted Use or Possession Under Article 10.2 (Article 10.2)

Generally, the sanctioning scheme has been made more flexible (and thus fairer) by taking into consideration the type of substance (Non-Specified, Specified, or Substance of Abuse) as well as consideration of whether or not the use was intentional; was unrelated to sport performance; or involved a substance which was not prohibited Out-of-Competition; and the exceptional contamination scenario where the Athlete cannot establish the source of the Prohibited Substance in their system but based on "reliable scientific evidence" can establish that the anti-doping rule violation was not compatible with intentional doping.

Greater flexibility results in greater complexity, but the Code Drafting Team has done its best in Articles 10.2.1 "Non-Specified Substances", Article 10.2.2 "Specified Substances" and Article 10.2.3 "Substances of Abuse", to make clear how these different factual scenarios should be addressed. An Appendix to the Code also provides two useful charts which illustrate these different factors related to sanctioning decisions.

Stakeholder feedback on the 2021 Code's treatment of Substances of Abuse was generally favorable. However, questions were raised in the following areas:

- The potential one-month period of Ineligibility did not give the Results Management Authority sufficient time to evaluate and process a case.
- It was logistically impractical to require that the Athlete "complete" a Substance of Abuse program to have their period of Ineligibility reduced from 3 months to 1 month.
- Requiring enrollment in a Substance of Abuse program was overkill for many first-time violators.
- There are some circumstances, like the inadvertent ingestion of coca tea, where requiring rehabilitation to reduce the period of Ineligibility was simply not appropriate.

- A number of stakeholders continue to argue that having to deal with rehabilitation at all is outside their area of expertise.

These concerns resulted in the following 2027 Code changes involving Substances of Abuse:

- If the Athlete can establish that the use occurred Out-of-Competition and was unrelated to sport performance, then the period of Ineligibility is a flat two months. The opportunity for treatment is encouraged but not required.

- For any subsequent violation involving any Substance of Abuse, the period of Ineligibility is four months which may be reduced to two months if the Athlete enters a Substance of Abuse treatment program approved by the Anti-Doping Organization with Results Management authority.

- If the use occurred In-Competition, but the Athlete can establish that the context of the ingestion was unrelated to sport performance, then the period of Ineligibility is between six months and two years depending on the circumstances of the case.

- Where none of the above apply, then the period of Ineligibility is determined under the applicable provisions in Article 10.2.1 or 10.2.2.

Finally, on the recommendation of the WADA TUE group after extensive communications with stakeholders, a very important change was made to the sanctioning scheme applicable to the situation where the Athlete had a legitimate medical condition at the time the Prohibited Substance was used but failed to apply for a TUE at the time and also, under the rules, the Athlete is not eligible for a retroactive TUE. The 2027 Code provides in a new Article 10.2.4.1 that if at the time the Prohibited Substance was used it met all the criteria in Article 4.2 of the International Standard for Therapeutic Use Exemptions (except for the need to show there was no reasonable permitted Therapeutic alternative), the sanction is a flat two months of Ineligibility.

xii. Sanctions and Results Management for Whereabouts Failures (Article 10.3.2)

The sanction for a whereabouts failure violation under Article 2.4 is two years subject to reduction down to a minimum of one year, depending on whether the Athlete can establish circumstances mitigating the Athlete's degree of fault. The changes to this Article make clear that fault shall be assessed equally against all three whereabouts failures with the expectation that the Athlete should be on heightened alert after the first and second failures.

xiii. Contaminated Source (Article 10.6.1.2)

See discussion in general theme (4) above.

xiv. Early Admission and Acceptance of Sanction (Article 10.7.2)

Article 10.8.1 of the 2021 Code allowed an Athlete charged with an anti-doping rule violation which would result in a four-year period of Ineligibility to admit the violation no later than twenty days after receiving notice of the charge and have the period of Ineligibility reduced by one year. Stakeholders have reported that this has been a very useful tool to quickly resolve cases

and have requested that the scope of Article 10.8.1 be expanded. Accordingly, this provision has been renumbered (Article 10.7.2) and expanded to apply to anti-doping rule violations with the charged period of Ineligibility of less than four years providing for a reduction of 25% of the period of Ineligibility stated in the charging letter.

xv. Substantial Assistance (Article 10.7.3)

There was widespread stakeholder support, particularly among those stakeholders with investigation units, to expand the scope of Article 10.7.1. It was pointed out that the utility of 10.7.1 was limited by the requirement that the substantial assistance had to "result" in criminal or disciplinary action. That requirement has been softened to require only that the information results in the Anti-Doping Organization, criminal or disciplinary body, discovering facts constituting or bringing forward a case. A provision has also been added allowing the Results Management Authority to suspend a smaller portion of the period of Ineligibility in an initial decision and, based on later reconsideration of the value of the information received, increase the amount of the period of Ineligibility suspended.

xvi. Other Valuable Information and Assistance in the Effort to Eliminate Doping in Sport (Article 10.7.4) ***New Article***

This new provision allows a Results Management Authority to suspend up to 15% of the otherwise applicable period of Ineligibility based on receipt of valuable information which does not otherwise meet the criteria for Substantial Assistance under Article 10.7.3. For example, an Athlete provides information on how he has doped and avoided detection, but without identifying any third-party with culpability as required by Article 10.7.3.

xvii. Status During Ineligibility or Provisional Suspension (Article 10.14.1)

This Article describes what a person serving a Provisional Suspension or period of Ineligibility can or cannot do. Participation during Ineligibility or Provisional Suspension results in Consequences but is not by itself an independent anti-doping rule violation. Numerous Code provisions related to anti-doping rule violations have been expanded to include violations of Article 10.14.1.

Multiple stakeholders asked that the language in this Article be expanded, and examples provided. The Article has been further clarified in response to those questions from stakeholders and the existence of inconsistent practices in the current application of this Article. The prohibition on involvement or employment with a Signatory or its member organizations during a period of Provisional Suspension or Ineligibility has been further refined to apply to: serving as a board member, officer, director or official or senior executive, or any position involving Doping Control or involving direct contact with Athletes or Athlete Support Personnel – employment in other positions is not prohibited. The scope of this prohibition has been repeated in the roles and responsibilities of the different Signatories set forth in Article 20. In response to a request for clarification from Athlete representatives, a comment has been added to Article 10.14.1 which makes clear that when an Athlete serving a period of Ineligibility or Provisional Suspension is under a contract of employment for athletic services, Article 10.14.1(vi) does not prohibit a club from continuing to make contractual payments to the Athlete during the period of ineligibility or Provisional Suspension so long as the Athlete does not engage in any of the activities prohibited in Article 10.14.1(v).

xviii. Changes Related to Appeals (Articles 13 and 14.2.2)

Article 13.2.2 Appeals to CAS by Athletes and Other Persons

In his human rights opinion, Mr. Beloff concluded that under the principle of "equality of arms", if WADA has a final appeal right to CAS then all Athletes and other Persons must have the same right. His opinion applies to both appeals on the merits and challenges to Provisional Suspensions. The incorporation into the Code of the human rights principles identified by Mr. Beloff relating to appeals to CAS may have an impact on the resources, financial and otherwise, of National Anti-Doping Organizations, WADA and other international Signatories should they choose to get involved in the CAS appeal. This issue could only be addressed once Mr. Beloff's opinion was received, which was well after the close of the Second Draft Consultation Phase. The Code Drafting Team has explored all alternatives which take into account the requirement to give all Athletes the right to appeal both final and Provisional Suspension decisions to CAS. Important factors which have been considered include avoiding delay in the final resolution of cases; the need for a quick resolution of challenges to Provisional Suspension decisions; the impact on the resources of National Anti-Doping Organizations, WADA, other international Signatories and on the Athletes and to coordinate the concurrent proceedings in an efficient manner. The 2027 Code provides that:

- International-Level Athletes retain the right to appeal final hearing panel decisions directly to CAS. WADA and other international Signatories retain the same right.

- Other Athletes and Persons retain the right to appeal final hearing panel decisions to the national level appellate body – they have a new right to appeal that body's decision to CAS. WADA and the other international Signatories retain the same rights.

Article 13.1.2 provides that in CAS proceedings where WADA, an International Federations or Major Event Organization is a party, the proceedings may only be conducted in French or English unless the parties agree otherwise.

Article 13.1.4 provides that appeals against decisions made by WADA shall be made exclusively to CAS and the appellate standard shall be whether WADA's decision was arbitrary.

Article 13.2.3.4 establishes a uniform appeal deadline for parties other than WADA which is 21 days after receipt of the decision or, where the appealing party makes a timely request for the complete file, 21 days after the receipt of the file.

Article 13.2.5 describes WADA's right to intervene in a case on appeal.

Article 14.2 provides that the case file shall be produced in machine-readable form and, to the greatest extent practicable, in electronic, digital, and word searchable format. For documents in the file in a language other than English or French, an index shall be provided which provides a short description of such documents.

xix. Mandatory Public Disclosure After the Final Decision in a Case (Articles 14.3.2 & 14.3.4)

The general requirement under Article 14.3.2 is that after a final decision in a case, the Results Management Authority must publicly disclose the result. Article 14.3.4 in the 2021 Code makes

an exception to that general principle and requires the consent of the Athlete where the Athlete has been found not to have committed an anti-doping rule violation. During the 2027 Code consultation process, there was considerable debate whether or not this exception should be extended to cases where the final decision was that the Athlete had No Fault or Negligence. After considering all of the comments from stakeholders where the balance between the importance of transparency vs. the potential reputational damage from publication to Athletes who have been acquitted or have been found to have committed a violation with No Fault or Negligence was considered, the 2027 Code provides that where it has been determined after a hearing and appeal that an Athlete did not commit an anti-doping rule violation or had a No Fault or Negligence for the violation, the Athlete's consent to publication is required unless the identity of the Athlete is already public, Consequences have been or are being imposed, or there are other compelling circumstances supporting public disclosure. However, in the interest of transparency, Article 14.4 requires an Anti-Doping Organization to annually publish a statistical report (maintaining the anonymity of Athletes and other Persons involved) listing all of its anti-doping decisions finding No Fault or Negligence under Article 10.5 which include the year of the decision, the sport involved, the Code Article violated, the Prohibited Substance or Prohibited Method involved and whether the decision was appealed. Interestingly, the number of No Fault decisions reviewed by WADA each year is minuscule compared to the total number of decisions reviewed. For example, between 2021 and 2024, WADA reviewed approximately 3000 cases per year and the number of No Fault decisions during that period averaged less than 19 per year.

There is also an addition to Article 14.3.7 which requires that any publication under Article 14 in a case involving a Minor, Protected Person, or Recreational Athlete be proportionate to the facts and circumstances of the case, taking into consideration the best interest of the individual. This has been modified so that in exceptional cases, the credibility to the anti-doping system may be subsidiarily considered.

xx. Education (Article 18)

The importance of the role of education in protecting Athletes and promoting clean sport has been recognized and elevated in the 2027 Code.

See also discussion in on Articles 21.2.8 and 21.2.9 below.

xxi. Additional Roles and Responsibilities of Signatories and WADA (Article 20)

Two important provisions have been added to the beginning of this Article. The first is a provision requiring Anti-Doping Organizations to work together ethically and in good faith to achieve the purposes of the Code. The second is a clarification that Anti-Doping Organizations shall not delegate any aspect of Doping Control where the delegation could reasonably lead to a potential or actual conflict of interest.

Additional, or clarified, obligations applicable to Signatories include publishing their policies and rules online where they are readily accessible to Athletes and other Persons (e.g., 20.1.1); and ensuring enforcement of Consequences as part of the obligation to vigorously pursue all potential anti-doping rule violations by Athlete Support Personnel or other Persons (e.g., comment to Article 20.1.9).

xxii. Roles and Responsibilities of International Federations (Article 20.3)

Article 20.3.2 obligates International Federations to require their national federations to use best efforts to ensure that the National Anti-Doping Organization in their country possess complete authority to implement its anti-doping activities over all Persons under the jurisdiction of the national federation and that members of the national federation are in compliance with the Code and International Standards.

xxiii. Roles and Responsibilities of National Olympic Committees and National Paralympic Committees (Article 20.4)

Article 20.4.3 has been expanded to require that National Olympic Committees and National Paralympic Committees use best efforts to ensure that the National Anti-Doping Organization in their country possesses complete authority to implement its anti-doping activities over all Athletes and other Persons under the jurisdiction of the National Olympic Committee or National Paralympic Committee.

xxiv. Additional Roles and Responsibilities of Athletes and Other Persons (Article 21)

Since the 2015 Code, Articles 21.1.6 and 21.2.6 have required Athletes and Athlete Support Personnel to cooperate with Anti-Doping Organizations investigating anti-doping rule violations. Article 21.3.3, imposing the same responsibility on other Persons was added in the 2021 Code. A comment to these Articles explains that the failure to cooperate is not an anti-doping rule violation under the Code but may be the basis for disciplinary action under a Signatory's rules. Based on input from Athletes and Michael Beloff, that comment has been expanded to provide that the responsibility to cooperate is subject to appropriate procedural safeguards, including without limitation, the right to legal counsel and the right to not self-incriminate, as further described in the International Standard for Intelligence and Investigations.

Articles 21.2.8 and 21.2.9 require both Athlete and Athlete Support Personnel to make themselves available for Education.

New Article 21.2.8 includes the requirement that no person who is subject to a period of Ineligibility shall provide Athlete Support Personnel services to a person who is bound by rules adopted pursuant to the Code.

New Article 21.2.9 requires Athlete Support Personnel to exercise the highest duty of care to protect their Athlete against risk and unintentional doping.

xxv. Involvement of Government (Article 22)

Two new provisions have been added to this Article. New Article 22.2 sets forth each government's commitment to the principles of the Code and to support WADA's mission as defined in its statutes. New Article 22.11 addresses government support for anti-doping education and training programs.

xxvi. Use of Anti-Doping Samples for Sport Regulation Purposes Other Than Anti-Doping (Article 23.2.2)

The 2021 Code contains a reference in Comment 114 under Article 23.2.2 to the permitted use of Doping Control Samples for other sport regulation purposes. This principle has been retained. The 2027 Code, however, makes clear that any such purpose would involve the organization acting outside of its capacity as a Signatory.

xxvii. Additional Roles and Responsibilities of Signatories and WADA (Part Three)

The following three requirements have been added to the roles and responsibilities of each of the Signatory Groups identified in Article 20:

- To conduct an automatic investigation of Athlete Support Personnel in the case of an anti-doping rule violation involving a Protected Person or Minor who they support and to conduct an automatic investigation of any Athlete Support Personnel who have provided support to more than one Athlete found to have committed an anti-doping rule violation (e.g., 20.1.10).

- To adopt and implement Code of Conduct provisions, allowing the imposition of disciplinary action against any Athlete Support Personnel who violate their obligations under Article 21.2 (to attend anti-doping education and provide accurate information to Athletes who they support) where such violation would not otherwise constitute an anti-doping rule violation (e.g., 20.1.17).

- To respect the autonomy and independence of National Anti-Doping Organizations as well as the requirements of National Anti-Doping Organization Operational Independence (e.g., 20.1.18).

xxviii. Monitoring and Evaluating Compliance with the Code and UNESCO Convention (Article 24)

The changes to Code Article 24 and the International Standard for Code Compliance by Signatories notably include: clarification that WADA must issue a formal notice to a Signatory alleging (a) the non-compliance (b) the proposed consequences and (c) a timeline for the Signatory to respond (Article 24.1.2); confirmation that the Signatory's response to WADA's formal notice may include a dispute of the alleged non-compliance and proposed consequences, as well as WADA's characterization of a requirement as Critical or High Priority, in which case the CAS shall resolve the dispute (Article 24.1.5); a requirement that a Signatory who wishes to dispute any part of WADA's formal notice must deposit CHF 5'000 as a security deposit for the costs that WADA will incur in referring the dispute to CAS. Such deposit shall be returned in full by WADA if the dispute is resolved before the costs are incurred or if directed by CAS (Article 24.1.3); confirmation that a Signatory may resolve the dispute by correcting the non-compliance at any point prior to the final decision by CAS (Article 24.1.8.6); clarification of a Signatory's right to dispute WADA's contention that the imposed reinstatement conditions have not yet been met (Article 24.1.7); clarification that the withdrawal of WADA privileges for non-compliance will not necessarily include access to WADA's educational resources (Article 24.1.4.1 (c)); clarification regarding consequences affecting the display of national flags and the playing of national anthems (Article 24.1.4.8); and clarification of which Signatory

representatives are covered by consequences imposed for non-compliance (Code definition of "Representatives").

A comment has been added to Article 24.1.4.10 (d) which provides that exclusion of Athletes from participation should be considered only where, absent such exclusion, there is a risk to the integrity of the Event and fairness to the competitors, and only after first considering whether it is feasible to create and implement a mechanism to enable the Athletes to demonstrate that they are not affected by the Signatory's non-compliance and that allowing the Athletes to compete in a neutral capacity would not make the Signatory Consequences less effective, would not be unfair to their competitors, and would not undermine public confidence in the integrity of the Event.

xxix. Protected Persons, Minors, and Recreational Athletes

The special protections provided to Protected Persons and Recreational Athletes in the 2021 Code have not been changed. However, a new comment has been added to the definitions of Protected Persons and Recreational Athletes, which makes clear that those circumstances in which special treatment should be given to Protected Persons and Recreational Athletes are specifically set forth in the Code and it should not be assumed that special treatment was intended with respect to other parts of the Code where it is not expressly stated.

New provisions have been added expanding the special treatment afforded to Protected Persons and/or Recreational Athletes. In addition, some, but not all, of the special treatment afforded Protected Persons and/or Recreational Athletes has now been extended to Minors who are not Protected Persons (elite 16 and 17-year- olds). For example:

- Violations of Articles 2.7 (Trafficking), 2.8 (Administration) or 2.9 (Complicitly) involving Protected Persons or Minors are particularly serious and may lead to longer periods of Ineligibility. (Articles 13.3.3 and 13.3.4).

- Substantial Assistance: information and assistance related to doping of Protected Persons and Minors is particularly valuable. (Articles 10.7.1(iv) and 10.7.2.)

- Mandatory Public Disclosure of anti-doping rule violations is not required in cases where the violator is a Protected Person, Minor or Recreational Athlete, and any optional Public Disclosure shall take into consideration the best interests of the individual (Article 14.3.6).

- Required investigation of Athlete Support Personnel where a Protected Person or Minor who they support has committed an anti-doping rule violation (e.g., 20.1.10). Requirement that Athlete Support Personnel attend anti-doping education presentations and provide accurate information to Athletes who they support, particularly Protected Persons and Minors (Article 21.2.2).

- Government commitment to support anti-doping education and training programs focused on Protected Persons and Minors (Article 22.11).

xxx. Definitions (Appendix 1)

Aggravating Circumstances: The fact that the anti-doping rule violation was committed as a part of a sophisticated anti-doping scheme or plan has been added to the list of circumstances which may trigger the imposition of an increased period of ineligibility based on Aggravating Circumstances.

Athlete: A comment has been added to make clear that, except as provided in this definition of Athlete, an Anti-Doping Organization may not adopt different rules for lower-level Athletes with respect to Therapeutic Use Exemptions except as otherwise provided in the Code or an applicable International Standard. Further, a comment has been added which requires International Federations to publish the criteria which they use to define which Athletes are considered to be International Athletes.

Recreational Athlete: The definition of which participants are Recreational Athletes, and thus receive special treatment under the Code, is made by the Athlete's National Anti-Doping Organization. To ensure harmonization and to avoid the situation where some National Anti-Doping Organizations are classifying high-level competitors as Recreational Athletes, additional restrictive criteria have been added to this definition including whether in the proceeding five years the Athlete has participated in the sport in a professional capacity or has competed in an International Event or National Event.

The changes to the Definitions of Institutional Independence, Operational Independence and National Anti-Doping Organization Operational Independence were already discussed in general theme (4) above.

VI. Substantive changes between the current International Standards and the proposed 2027 International Standards

This section will provide a summary of the substantive changes[6] in the following 2027 International Standards as compared to their current and in-force versions[7] : (i) **ISCCS**; (ii) **ISDP / ISPPPI**; (iii) **ISE**; (iv) **ISL**); (v) **ISRM**; (vi) **IST / ISTI** ; and (vii) **ISTUE**[8].

1. Summary of Substantive Changes between the 2024 ISCCS and proposed 2027 ISCCS

The purpose of the International Standard for Code Compliance by Signatories (ISCCS) is to set out the relevant framework and procedures for ensuring Code Compliance by Signatories.

i. The Watchlist Procedure (Article 8.4.5)

Under the previous version of the ISCCS, the so-called "Watchlist" procedure gave a Signatory the opportunity to be granted an additional four-month timeframe to correct non-conformities before

6 Please note that the substantive changes listed in this section do not constitute an exhaustive list of the proposed changes to the relevant International Standards. Furthermore, it should be noted that further changes may be made before the formal approval and adoption of the proposed International Standards by the WADA Executive Committee.

7 Most capitalized terms in this section refer to defined terms in the 2027 Code and International Standards.

8 It is to be noted that in all 2027 International Standards, defined terms have been moved to an appendix to harmonize the Standards format and structure with the Code.

being formally alleged non-compliant with the World Anti-Doping Code (Code), provided that the Signatory provides a Corrective Action Plan (CAP) that explains to the satisfaction of the Compliance Review Committee (CRC) how the Signatory would correct the relevant non-conformities within four months.

Under 2027 ISCCS Article 8.4.5, this additional time period granted to a Signatory when it is placed on the Watchlist has been extended from four months to nine months where the non-conformity relates to the adoption of rules, regulations, and/or legislation. It has also been clarified that during the Watchlist Procedure, no Signatory consequences shall be imposed. Finally, it is explicitly stated that the inclusion in, or removal from, the Watchlist Procedure may be publicly reported on WADA's website and sent to WADA's stakeholders.

ii. Event of Force Majeure (Article 8.6)

The ISCCS contains a Force Majeure mechanism where a Signatory's ability to achieve full Code compliance is affected by acts, events, omissions, or accidents that are beyond the reasonable control of the Signatory (e.g., natural physical disaster, war, military operations, etc.). In such cases, the 2024 ISCCS provides that WADA's Executive Committee (Exco) can either (i) delay or suspend a compliance procedure while the Event of Force Majeure continues to have that effect, or (ii) determine to waive the relevant non-conformities and close the compliance procedure.

Under 2027 ISCCS Article 8.6, the term "compliance procedure" has been replaced with "action", in order to broaden the scope as to when an Event of Force Majeure can be invoked. For instance, an Event of Force Majeure could take place before the expiration of corrective action deadlines set in a Corrective Action Report (CAR), which would be before a compliance procedure is opened.

iii. Transparency (Article 8.7)

The addition of this provision aims to enhance transparency within WADA's compliance monitoring program, permitting (i.e., not requiring) WADA to publicly report on its website and/or communicate directly to its stakeholders with respect to pending Signatory compliance proceedings, including details of any CAR issued to a Signatory, subsequent steps taken in respect of the non-conformities identified in that CAR, progress (or otherwise) made to implement the CAP and, if applicable, any further enforcement action taken by WADA further to 2027 ISCCS Article 9.

iv. Consideration by WADA's Exco following a CRC recommendation (Articles 8.3.4.1 and 9.2.2)

This provision now specifies that where the CRC makes a recommendation on a case that is referred to WADA's Exco for decision, if WADA's Exco disagrees with the CRC's position and refers the matter back to the CRC, WADA's Exco shall indicate the specific issues as well as any documents or information it wishes the CRC to consider.

v. Public reporting of formal notice on WADA's website (Article 9.2.5)

This provision now contains additional text indicating that WADA may publicly report on its website the steps taken by WADA and a Signatory after a formal notice has been issued to that Signatory, including (without limitation) when a Signatory corrects all the non-compliances identified in the formal notice and the termination of any Court of Arbitration for Sport (CAS) proceedings commenced against the Signatory.

vi. Conditions to dispute a formal notice alleging non-compliance (Article 9.3.1 and 9.3.1.1)

The conditions to dispute a formal notice alleging non-compliance are now twofold. In addition to the single requirement under the 2024 ISCCS (i.e., the Signatory must send WADA a formal written confirmation of the dispute which must be received by WADA within twenty-one days or receipt of the formal notice alleging non-compliance), the Signatory will also be required to send WADA a CHF 5,000 security deposit, no more than twenty-one days after receipt of the formal notice alleging non-compliance.

This CHF 5,000 security deposit will be returned to the Signatory, in full or in part, in the following scenarios:

- If the Signatory withdraws the dispute prior to WADA incurring any costs, in which case WADA will return the CHF 5,000 to the Signatory in full;
- If WADA incurs less than CHF 5,000 in drawing up the complaint referring the dispute to CAS, in which case WADA will return any part of the CHF 5,000 that exceeds the amount of costs actually incurred by WADA; and
- If the dispute goes to CAS, WADA will return any part of the CHF 5,000 that CAS does not order the Signatory to pay towards WADA's costs in the final award.

Furthermore, a comment to this provision has been added which clarifies that WADA may in its absolute discretion waive some or all of the CHF 5,000 security deposit where the Signatory demonstrates (i) that it has a good faith basis for disputing the allegation of non-compliance; and (ii) that without such waiver, it would not be able to contest that allegation at CAS. Any such request, and WADA's consideration thereof, will not suspend or delay the twenty-one-day deadline for receipt by WADA of the Signatory's written confirmation of the dispute.

If WADA has not responded to the request for waiver by that deadline, the Signatory does not have to make the CHF 5,000 security deposit by that deadline, but it must file the written confirmation of dispute by that deadline, or else Article 9.3.1.2 will apply, meaning that the Signatory will be deemed to have admitted the allegation of non-compliance and to have accepted the Signatory consequences as well as any Reinstatement conditions proposed by WADA in the Article 9.2 formal notice, and that notice will automatically become a final decision that is enforceable (subject to Article 9.3.1.3) with immediate effect in accordance with Code Article 24.1.9.

If WADA subsequently decides not to waive the entire CHF 5,000, the Signatory must pay the outstanding amount so that it is received by WADA no more than seven days after the Signatory is notified of WADA's decision on the request for waiver, or else Article 9.3.1.2 will apply.

This important provision has been drafted to ensure that disputes to CAS are made in good faith and do not simply constitute dilatory strategies to delay the coming into force of any Signatory consequences linked to non-compliance, a recent trend which has been observed by WADA and the CRC.

vii. Process before CAS (Articles 9.4.2 and 9.4.3)

The following additional clarifications have been provided:

- The CAS Panel's authority to determine the allocation of arbitration costs between the parties and the possibility to grant the prevailing party a contribution towards its legal fees and other expenses incurred in connection with the proceedings, in accordance with the CAS Code of Sports-related Arbitration.
- In the event that a Signatory corrects the non-conformities to WADA's satisfaction at any time before CAS issues its decision, and WADA decides to terminate the proceedings, it is specified that in any event, the Signatory shall pay all of the costs of the arbitration proceedings and shall pay a contribution towards the legal fees and other expenses incurred by WADA in connection with the proceedings. It is also specified that the reasons and conditions of termination of proceedings shall be publicly reported by CAS and the parties.

viii. Signatory consequence relating to the exclusion of Athletes and/or Athlete Support Personnel (Article 10.2.6)

This provision, which sets the principle of proportionality in the context of Signatory consequences, further specifies that the Signatory consequence relating to the exclusion of Athletes and/or Athlete Support Personnel from participation in one or more Events, "*should only be considered where there is a risk to the integrity of the Events and fairness to the competitors (which could undermine public confidence in the integrity of the Events) absent such exclusion. In that context, consideration shall first be given to whether it is feasible (logistically, practically, and otherwise) for other relevant Signatories to create and implement a mechanism that enables the Athletes and/or Athlete Support Personnel in question to demonstrate that they are not affected by the Signatory's non-compliance*."

This is in addition to the current proportionality framework which already strongly favors neutral participation over the strict exclusion of Athlete and/or Athlete Support Personnel.

ix. Possibility to lift Signatory consequences over time (Article 10.2.9)

Under the 2024 ISCCS, while it is possible to increase Signatory consequences if the Signatory does not satisfy all the Reinstatement conditions by a set deadline, it is not possible to lift some Signatory consequences depending on the Signatory's progress in implementing some of its non-conformities.

Under the new version of the ISCCS, a decision by WADA's Exco imposing Signatory consequences may provide that where there is more than one non-conformity, and specific Signatory consequences are linked to specific non-conformities, then certain Signatory consequences may be lifted as and when the CRC determines that the related requirements have been met.

x. Reinstatement conditions (Article 11.2.1.4 (b))

As part of the conditions of reinstatement, it is now specified that a Signatory must pay in full "*the costs and expenses incurred by WADA in bringing proceedings before CAS pursuant to Article 9.4 in respect of a Signatory's non-compliance, including not only the legal fees and other expenses*

incurred by WADA in connection with those proceedings but also the costs of the proceedings referenced in CAS Code R64.4 (subject always to any contrary award made by CAS)".

xi. Process to dispute WADA's position on the Signatory not having met Reinstatement conditions (Article 11.3.4)

Where a Signatory wishes to dispute WADA's position that the Signatory has failed to meet the Reinstatement conditions, the proposed 2027 ISCCS now clarifies that it is the responsibility of the Signatory to file for arbitration with CAS within twenty-one days of receipt of WADA's notification, and where it does so, to notify WADA on the same day with a copy of said request for arbitration. The burden of proof will be on the Signatory to prove on the balance of probabilities that it has met all the Reinstatement conditions.

xii. Categories of non-compliance (Annex A)

Several requirements from the Code and International Standards have been added to Annex A as shown below.

General Requirement:

- **Annex A.1.b**: the retention of Education records in line with Article 12.2 of the International Standard for Education and the International Standard for Data Protection.

High Priority Requirements:

- **Annex A.2.b**: the publication of a summary of an annual Education Plan as per the template provided by WADA in English or French on a website.
- **Annex A.2.d**: the use of a curriculum that includes the mandatory core topics as per Article 8.1.1 of the International Standard of Education, which identifies learning outcomes and is adapted or aligned to the Athlete Pathway.
- **Annex A.2.f**: the active communication between Anti-Doping Organizations and laboratories and the timely response to Laboratory's requests within the established timelines contained in the International Standard for Laboratories, in accordance with Article 4.8.2 of the International Standard for Testing.

Critical Requirement:

- **Annex A.3.k**: the requirement for Anti-Doping Organizations with Testing Authority to pay the laboratories they use for sample analysis and/or related services in a timely manner in accordance with Article 4.8.1 of the International Standard for Testing.

The following requirement has been reclassified from a Critical requirement to a High Priority requirement:

- **Annex A.2.a**: the requirement for a Signatory to provide accurate and up-to-date information for Athletes and other Persons in accordance with the topics identified at Article 8.1.1 of the International Standard for Education, and where possible by posting it on a conspicuous place on a website.

The following requirements have been reclassified from High Priority to Critical requirements:

- **Annex A.3.d**: the requirement to have an Evaluation Report conducted in line with Article 16.4 of the International Standard for Education and provided to WADA upon request.
- **Annex A.3.v**: the requirement for reporting Therapeutic Use Exemption decisions into ADAMS as soon as possible and in any event within 21 days of receipt of the decision. This brings the entry of Therapeutic Use Exemption decisions into ADAMS in line with the entry of Doping Control Forms and Results Management decisions into ADAMS (both of which are Critical).

xiii. Signatory consequences (Annex B.3)

Where the Signatory is a National Anti-Doping Organization (NADO) or National Olympic Committee (NOC) acting as a NADO, the proposed 2027 ISCCS now provides for the possibility to impose as a Signatory consequence that the national anthem of the Signatory's country may not be played at (i) regional, continental or world championships or other International Events organized by those Major Event Organizations and/or International Federations, and/or (ii) the Olympic Games and Paralympic Games.
Furthermore, the Signatory consequences which are prima facie applicable for non-compliance with critical requirements where the Signatory is a NADO or NOC acting as NADO regarding the prohibition to display the national flag or play the national anthem, have been moved from Annex B.3.1 to Annex B.3.2. This means that instead of prima facie being applicable immediately upon being declared non-compliant as is the case in the 2024 ISCCS, these Signatory consequences would come into effect after twelve months of continued non-compliance. However, if the CRC determines that there are aggravating circumstances, these Signatory consequences can apply immediately.

2. Summary of Substantive Changes between the 2021 ISPPPI and proposed 2027 ISDP

The purpose of the International Standard for Data Protection (ISDP), currently known as the International Standard for the Protection of Privacy and Personal Information (ISPPPI) is to ensure that Anti-Doping Organizations apply appropriate, sufficient and effective privacy protections to the personal information they process when conducting anti-doping programs, in recognition of the fact anti-doping activities can impinge upon and implicate the privacy rights of individuals involved in and associated with organized sport, including Athletes and Athlete Support Personnel.

i. Privacy-by-Design (Article 5) *New Article*

The first requirement under this new Article sets out a general obligation to assess and mitigate data protection risks associated with personal information processing. This expands the obligation found in ISPPPI Article 9.6, which applied to sensitive personal information and whereabouts. It also sets out how to conduct this assessment and identifies certain high-risk contexts where additional assessments may be needed. The final two requirements consolidate obligations that are found under ISPPPI Article 6 involving the need to adjust safeguards or procedures when sensitive personal information is involved, and ISPPPI Article 5 involving measures to ensure data accuracy.

ii. Processing Relevant and Proportionate Personal Information for Limited Purposes (Article 6)

This Article has been substantially simplified considering the new and expanded privacy-by-design and risk assessment requirements, as well as the increasing level of detail set out in the Code and International Standards.

A new comment to Article 6.2 has been introduced to help with the proper application of this provision.

iii. Processing Personal Information in Accordance with a Valid Legal Ground (Article 7)

An amendment has been made to the comment to Article 7.3, concerning situations where Anti-Doping Organizations rely on consent to process sensitive personal information, in order to provide a few concrete examples of how they may evidence express consent from Athletes or others, such as by incorporating a tick box into a form or obtaining an Athlete's written signature or initials.

iv. Sharing Personal Information Responsibly (Article 9)

This Article has been simplified with respect to purpose limitation and proportionality, namely that sharing purposes and safeguards are already included in the Code and other International Standards, as well as the ISDP itself. This updated Article also consolidates specific sharing requirements applicable when working with a Third-Party Agent, which were previously found in the Article regarding security.

v. Maintaining the Security of Personal Information (Article 10)

A new comment has been added to Article 10.3, to reinforce the requirement under Article 10.3 that Anti-Doping Organizations shall apply appropriate security measures calibrated to the sensitivity of the personal information they process. Furthermore, considering Anti-Doping Organizations process certain categories of personal information for several years, such as information related to Therapeutic Use Exemptions, anti-doping test results, and results management information, they are reminded of the need to ensure security throughout its lifespan and of the possibility of removing information from "live" systems and archiving it, where practicable, to enhance its security.

vi. Limiting Retention of Personal Information and Ensuring its Destruction (Article 11)

This Article has been retitled to highlight its key purpose of ensuring data minimization at the storage stage of the data lifecycle. The first four requirements (Articles 11.1-11.4) are substantially similar to the current ISPPPI Articles 10.1-10.5.

Article 11.2, which requires Anti-Doping Organizations to establish retention times for categories of personal information *other than* the information described in Annex A, has been strengthened. Rather than requiring Anti-Doping Organizations to set retention times "where possible", Article 11.2 now requires Anti-Doping Organizations to always set clear retention times or, where that is not possible, at least establish "relevant criteria" that determines for how long personal information will be retained.

Article 11.3 has been amended to cross-reference the requirements of Article 5.3 which mandates that any sensitive personal information be retained in accordance with any specific safeguards or protections under applicable data privacy frameworks.

Articles 11.5 and 11.6 contain specific and limited exceptions to Annex A retention periods, as well as a requirement to assess the risk of and document any applicable exception. The listed exceptions consolidate exceptions previously identified in Annex A regarding ongoing investigations or legal proceedings. They also provide a framework for aligning with specificities of local legal frameworks with due regard to the data minimization principles set forth in the ISDP and the consensus on appropriate retention periods for anti-doping activities as reflected in Annex A.

vii. Annex A: Retention Times

- **The "Important Notes" to Annex A**: Retention Times – specifying explicit retention times for designated anti-doping records – has been amended so that Anti-Doping Organizations "shall" now – not just "should" – clean or purge incomplete data "as regularly as practicable" in order to improve the quality of the data.
- **Whereabouts**: A harmonization of the retention period for whereabouts to 10 years. The description used in Row 2 has also been reworded to align with the latest/updated text of the International Standard for Testing.
- **Investigations**: A new maximum retention period for records containing personal information associated with completed investigations.
- **Education**: A new, maximum retention period for individual education records.
- **Results Management**: A longer retention period for limited information tied to anti-doping rule violations, i.e., nature of the violation, duration of the period of ineligibility, prohibited substance/method and consequences imposed.
- **Therapeutic Use Exemptions**: Amendment to refer to Supplementary Report Forms to clarify their inclusion. The retention period has also been amended to include a separate retention period for retroactive Therapeutic Use Exemptions.
- **The final column in Annex A**: Retention Times, headed "Criteria", has been removed.

viii. Definitions (Appendix I)

The defined term "Sensitive Personal Information" has been amended so that it includes data categories defined as "sensitive" under "applicable laws", and not only those discrete categories listed in the definition. This amendment expands the scope of the term and reflects the fact that additional categories of personal data, besides those listed in the Standard, may be deemed "sensitive" under emerging national or regional data privacy frameworks and so warrant greater protection by Anti-Doping Organizations as well.

3. Summary of Substantive Changes between the 2021 ISE and proposed 2027 ISE

The purpose of the International Standard for Education (ISE) is to support the preservation of the spirit of sport as outlined in the Code and to help foster a clean sport culture.

i. Introduction and Scope (Article 1)

The Introduction and Scope have been modified to capture the benefits of developing and delivering robust clean sport Education Programs for Athletes and Athlete support personnel including formally acknowledging their right to education as identified in the Athlete's Anti-Doping Rights Act and the UN Sustainability Goal 4 related to quality education.

ii. Key Principles (Article 2.2)

The ISE is a principled-based Standard that both accommodates and recognizes the diverse educational approaches and methods delivered around the world and within the sporting community. To demonstrate this more thoroughly, key principles have been added to the ISE that all Signatories are encouraged to adopt to inform their Education Programs.

These principles reaffirm the accepted ideal that Athletes start in sport clean and therefore an Athlete's first experience with anti-doping should be through education rather than testing. To recognize the evolution of education practice, reference is made to the need for education to be delivered throughout an Athlete's career, the importance of educating Athlete Support Personnel and that the outcome of Education Programs is the establishment of behaviors and the reinforcement of values that help protect clean sport. It is also highlighted that education remains an essential element of an anti-doping program and that such programs should be balanced in line with the prevention model presented in the Code. Finally, it is signaled that the principles that underpin education can be applied to other areas of anti-doping where training or the development of people is required.

iii. Conducting a Sport System Analysis (Article 5)

As part of the process to determine the sporting context within which a Signatory operates, now referred to as a sports system "analysis" rather than "assessment", Signatories shall now provide a general or typical "Athlete Pathway" as part of that process.

iv. Establishing an Education Pool (Article 6)

This Article introduces a more structured and comprehensive approach to establishing an Education Pool by clearly defining the two main groups that shall be considered – Athletes and Athlete Support Personnel – as well as the specific categories within these groups which are mandatory or optional for inclusion. Mandatory inclusion in an Education Pool has been expanded to:

- Athletes in Testing Pools;
- Minors competing internationally;
- Athlete Support Personnel such as coaches, medical professionals, parents/guardians of Minors competing at International Events where testing takes place; and
- Participants accredited by a Major Event Organizer.

In addition, Signatories are required to include individuals who have been notified of a potential anti-doping rule violation in their Education Pool. This is to ensure that a mechanism exists to provide information (or equivalent) relating to the Results Management process to those impacted. Finally, a comment has been added to this Article to emphasize that while not all individuals within a specific category may be reached, Signatories are required to develop and deliver Education Activities for these categories, and endeavor to reach them.

v. Educators (Article 7) *New Article*

A new Article has been specifically introduced to define the framework for recruiting, training and assessing Educators, including an overview of the key areas an Educator shall be competent in. Educators shall be accredited by a Signatory (as per the definition of Educator) and further requirements related to the accreditation and reaccreditation of Educators are outlined.

vi. Developing the Education Program (Article 8) *New Article*

Articles 8 and 9 (originally Article 5 in the 2021 ISE) bring greater clarity and structure to education planning by clearly distinguishing between the Education Program (the overarching longer-term strategy) and the Education Plan (the annual delivery plan of Education Activities for specific categories).

Article 8 sets out the core foundational elements required of a Signatory to develop an Education Program based on their sport system analysis. This includes the requirement to have a curriculum that covers all the mandatory topics (as listed in ISE Article 8.1.1) that are aligned to the Athlete Pathway, the identification of resources required to deliver the program as well as the encouragement to use research to underpin the program.

As it relates to the mandatory topics, the concept of unintentional doping has been strengthened by expanding it beyond the “risks of supplements”, and a new topic, ”Anti-Doping governance” has been added which is intended to build Athletes’ understanding of the overall anti-doping system and its structures. Signatories shall also ensure relevant educational content for all mandatory topics is available on their websites, including practical advice to reduce risk.

The Article also states that an Education Program shall be documented and importantly clarifies what that will contain. It is recommended that Signatories publish a summary of their Education Program to encourage collaboration and reduce duplication.

vii. Delivering Education Programs (Article 9) *New Article*

Article 9 focuses solely on the development of an annual Education Plan. The terms “Education Activity” and “Clean Sport Behaviors” have been formally defined. This Article also allows for flexibility in how the mandatory topics are delivered, depending on learner needs, with reference to the need to consider the appropriate safeguarding and legal requirements when such delivery is with Minors.

Clear guidance is now added to explain the minimum information required to be documented in a Signatory’s Education Plan.

viii. Coordinating Education Delivery (Article 10) *New Article*

This Article outlines the steps Signatories shall take to maximize the effectiveness of their Education Programs and importantly reduce the duplication of education delivery to the same categories of learners. A specific reference has been made to consider International-Level Athletes where the confluence of Signatories trying to reach this specific category of Athletes is the greatest. To achieve the above, this Article explains that a summary of the Education Plan shall be published on a website; Education records should be shared (in line with the International Standard for Data Protection), collaboration with other Signatories is encouraged; and that prior learning, particularly the prior completion of eLearning programs should be acknowledged.

The focus has shifted from recognizing entire Education Programs to acknowledging specific Education Activities, aiming to reduce duplication and better allocate resources to Athletes who have not yet received education or who require reinforcement. Signatories still retain the discretion to provide additional Education as needed.

ix. Event-Specific Education (Article 11) *New Article*

Article 11 has been significantly refined to clarify the scope, structure, and responsibilities related to Event-Specific Education. The term now serves as an overarching category encompassing both Pre-Event Education (i.e., Education Activities specific to an event that are delivered prior to the event starting) and Event-Based Education (i.e., the delivery of Education Activities at an event), with tailored content aligned to the anti-doping rules and procedures of each specific event.

This Article has been elevated to a standalone section and divided into sub-articles to differentiate between International and National Events, with clearer expectations for each. It now specifies that Major Event Organizers and International Federations are primarily responsible for delivering Event-Specific Education at International Events, while also encouraging coordination with other Signatories to achieve the goal of educating those aiming to participate at the Event and in advance of the Event. Clarifications have also been made to distinguish generic clean sport education from Event-Specific Education and associated content, aiming to minimize duplication particularly for International-Level Athletes.

x. Monitoring and Evaluation (Article 12) *New Article*

Article 12 (originally Articles 4 and 6 of the 2021 ISE) establishes the components required to monitor and evaluate an Education Program. These requirements have been significantly expanded and clarified. For monitoring the Education Plan, requirements include collecting data on the numbers of learners reached, maintaining education records, and assessing learning outcomes and the experiences of learners. To support a more robust evaluation process, the evaluation of the overall Education Program has been strengthened, and the determination of its impact has been added for those wishing to advance their evaluation efforts. These components, previously found in guidance documents, have now been incorporated directly into the ISE to strengthen implementation and consistency in approach.

xi. Roles and Responsibilities (Articles 14 and 15)

Articles 14 and 15 have been revised and reorganized to provide a clearer, more structured framework for roles and responsibilities in clean sport education. While the 2021 ISE outlined the general obligations for Signatories, the 2027 ISE now offers more detailed and role-specific

guidance. While Article 14 outlines responsibilities by Signatory type, Article 15 indicates the roles of key stakeholders beyond Signatories, including Athletes, Athlete Support Personnel, National Federations, and Governments in developing and delivering Education Programs to complement the Code. Within Article 14, a new recommendation has been added to encourage International Federations to integrate clean sport education into training and accreditation programs for Athlete support personnel and encourage similar efforts at the national level. To reduce duplication and improve alignment with the Code, common requirements for all Signatories have been consolidated under Article 16, ensuring that Articles 14 and 15 focus solely on responsibilities specific to each group.

xii. Part Four: Accountability (Article 16)

To improve clarity regarding ISE-related compliance requirements, the 2027 ISE consolidates all mandatory documentation into a single section. Signatories are now required to maintain and submit the following four key documents: (i) an Education Program; (ii) a curriculum; (iii)an annual Education Plan; and (iv) an Evaluation Report. This consolidation reinforces the accountability structure within the ISE.

xiii. Definitions (Appendix I)

- A new definition for **"Evaluation Report"** has been added to clarify expectations for monitoring and evaluating Education Programs.
- A new definition for **"Education Pool"** has been added to align with revised Article 6 provisions and improve clarity on who should be included in Education efforts.
- A new definition for **"Talented Level Athletes"** has been added to define a specific category within the Athlete Pathway, clarifying associated education expectations.
- A new definition for **"Event-Specific Education"** has been added to align with revised Article 6 provisions and improve clarity on who should be included in education efforts.

4. Summary of Substantive Changes between the 2021 ISL and proposed 2027 ISL

The purpose of the International Standard for Laboratories (ISL) is to ensure that Laboratories (i.e., WADA-accredited Laboratories and WADA-approved Athlete Biological Passport Laboratories) report valid test results based on reliable evidentiary data, and to facilitate harmonization in Analytical Testing of Samples by Laboratories and in the analysis of the Markers of the Hematological Module of the Athlete Biological Passport by both Laboratories and ABP Laboratories.

i. Transfer of Content to new ISL Technical Documents (TDs)

Several provisions of the 2021 ISL regarding certain specific procedural requirements have been removed from the 2027 ISL and have been transferred to new ISL TDs, which will become effective at the same time as the 2027 ISL and allow for greater flexibility for any future revisions of such requirements. These new ISL TDs will be dedicated to Method Validation Requirements (ISL TD VAL); the WADA External Quality Assessment Scheme (ISL TD EQAS) and the WADA Laboratory Performance Evaluation (ISL TD PERF).

ii. Laboratory ISO/IEC 17025 Accreditation

Considering recent developments in the international Laboratory accreditation system, references to the International Laboratory Accreditation Cooperation (ILAC) have been replaced by the Global Accreditation Cooperation Incorporated. If the Accreditation Body is not a full member of this new organization, then it shall be a full member of one of the approved and recognized Regional Accreditation Cooperation Bodies, i.e., African Accreditation Cooperation (AFRAC), Asia Pacific Accreditation Cooperation Inc. (APAC), Arab Accreditation Cooperation (ARAC), European co-operation for Accreditation (EA), Inter American Accreditation Cooperation (IAAC), or Southern African Development Community Cooperation in Accreditation (SADCA).

iii. Introduction and Scope (Article 1)

Articles 1.1.2 Technical Documents (TDs), 1.1.3 Technical Letters (TLs), 1.1.4 Laboratory Guidelines (LGs) and 1.1.5 Technical Notes (TNs) have been subdivided to better describe the processes of approval/publication, implementation and application of these Laboratory normative documents.

In addition, the following clarifications have been included:

- The implementation of a new ISL TL that does not become effective immediately may occur prior to the effective date and shall occur no later than that effective date. Furthermore, where a newly approved ISL TL works to the benefit of the Athlete, it shall be applied to the analysis of Samples as soon as it is approved by the WADA Executive Committee and published on WADA's website. Conversely, if the application of the new ISL TL would lead to an increased likelihood of reporting an Adverse Analytical Finding (e.g., reduction of a Minimum Reporting Level for a Non-Threshold Substance), then the new ISL TL requirements shall not be applied to Samples collected before the effective date of the ISL TL.
- While Technical Notes (TNs) remain confidential to Laboratories, it has been clarified that the Laboratory may provide hard copies of TNs to representatives from ISO/IEC 17025 Accreditation Bodies, confidentially and upon request, for use during Laboratory assessments.
- It has been clarified that Laboratory Guidelines (LGs) are models of best practice, and therefore their implementation is not mandatory for purposes of Laboratory compliance. Accordingly, mention of LGs has been removed throughout the document when referring to mandatory requirements.

iv. Applicant Laboratory for WADA Accreditation (Article 4.1.1)

Revised requirements for Applicant Laboratories have been included in the following sub articles:

- **Article 4.1.1.2 (Submit Initial Application Form)**

  The specific requirement that the National Anti-Doping Program in an applicant Laboratory's host country shall collect at least 3,000 Samples per year, of which at least 2,500 shall be urine Samples, has been removed, since this minimum number of Samples shall be met collectively by all Signatories and/or Delegated Third Parties (DTPs) confirming to provide Samples to the Laboratory, as established in Article 4.1.1.3. This requirement has been removed considering that it could otherwise jeopardize the establishment of WADA-accredited Laboratories in small countries from underserved regions, which could offer anti-doping testing services in their region.

- **Article 4.1.1.3 (Provide Letters of Support)**

  For better clarity, it has been established that the official letter(s) of support from Signatories and/or DTPs shall collectively guarantee that their Sample collection activities include the collection of at least 3,000 Samples (including urine, whole blood, ABP blood, and DBS Samples) per year, of which at least 2,500 shall be urine Samples.

v. Candidate Laboratory for WADA Accreditation (Article 4.1.2)

Modified requirements for Candidate Laboratories have been included in the following sub articles:

- **Article 4.1.2.1 (Submit Initial Application Form)** ***New Article***

  This new Article describes that once approved by the WADA Executive Committee, the Candidate Laboratory shall pay WADA the first part of the non-refundable fee, as determined by WADA, to cover the costs related to the initial accreditation process and preparation of the EQAS samples necessary for the Pre-Probationary Test (PPT).

- **Article 4.1.2.5 (Establish a Mentoring Agreement)**

  This new Article has been added to reinforce the importance of establishing mentoring agreements (contracts or Memorandums of Understanding) between Candidate Laboratories and WADA-accredited Laboratories to ensure the successful preparation of the Candidate Laboratory towards obtaining WADA accreditation.

- **Article 4.1.2.6 (Analytical Testing Procedures of Candidate Laboratory)** ***New Article***

  This new Article advises the Candidate Laboratory to focus their efforts on acquiring Reference Materials and developing Analytical Testing capacity in order to analyze a defined list of Prohibited Substances and Prohibited Methods during the PPT EQAS.

- **Article 4.1.2.7 (Pre-Probationary Test and On-site Assessment)**

  The Candidate Laboratory should be ready for the PPT and on-site assessment within two years of being granted Candidate Laboratory status by the WADA Executive Committee.

- **Article 4.1.2.8 (Duration of Candidate Phase of WADA Accreditation)**

  This Article clarifies that a Laboratory can remain as a Candidate Laboratory for a maximum of three years; otherwise, the Laboratory may have their candidate status revoked by the WADA Executive Committee.

vi. Probationary Laboratory for WADA Accreditation (Article 4.1.3)

The order of Articles within 4.1.3 has been modified to better reflect the different steps of the probationary phase of WADA accreditation. In addition, new requirements for Probationary Laboratories have been included in the following sub articles:

- **Article 4.1.3.2 (Payment of Probationary Phase Fee)** ***New Article***

  This new Article establishes that before entering the probationary phase of accreditation, the Laboratory shall pay the second part of the accreditation fee to WADA to cover the costs related to the probationary phase accreditation activities.

- **Article 4.1.3.4 (Provision of Renewed Letters of Support)**

  This is a new requirement whereby the Probationary Laboratory shall provide renewed letters of support from the Laboratory's host organization(s), Signatories and/or DTPs to ensure that they continue receiving proper support to achieve WADA Laboratory accreditation.

- **Article 4.1.3.8 (WADA Accreditation Assessment - Final Accreditation Test)**

  This Article establishes that the Probationary Laboratory should satisfactorily participate in the Final Accreditation Test (FAT) and on-site assessment within two years of becoming a Probationary Laboratory. In addition, the Probationary Laboratory will have a maximum of one year to correct and improve any pending nonconformity(-ies) from the FAT and on-site assessment, otherwise it may need to reapply for Candidate Laboratory status.

- **Article 4.1.3.12 (Duration of Probationary Phase of WADA Accreditation)** ***New Article***

  This new Article establishes that the maximum length of time during which a Laboratory can remain as a Probationary Laboratory is three years (unless WADA determines that there are exceptional circumstances that justify an extension of this period).

vii. WADA-Accredited Laboratory (Article 4.1.4)

New requirements for WADA-accredited Laboratories have been included in the following sub articles:

- **Article 4.1.4.2.1 (Payment of Annual Re-accreditation Fee)** ***New Article***

  This new Article establishes the requirement for Accredited Laboratories to pay an annual reaccreditation fee.

- **Article 4.1.4.2.4 (Maintain ISO/IEC 17025 Accreditation)**

  This Article clarifies that Laboratories may apply Analytical Testing Procedures, which are not within the Laboratory's Scope of ISO/IEC17025 Accreditation, to the analysis of doping control Samples only under exceptional circumstances, upon informing WADA, and after having validated the method in conformity with ISO/IEC17025 accreditation and ISL requirements, including its applicable ISL TD(s) and ISL TL(s).

- **Article 4.1.4.2.9 (Implement Research and Development and Sharing of Knowledge Activities)**

  This Article combines and includes additional requirements for Research and Development (R&D) and Sharing of Knowledge activities and clarifies that having adequate R&D and Sharing of Knowledge programs is a mandatory condition for maintaining WADA accreditation.

viii. Applicant ABP Laboratory (Article 4.2.1)

New requirements for Applicant ABP Laboratories have been included in the following sub articles:

- **Article 4.2.1.3 (Provide Letter(s) of Support)**

  The requirement for the Applicant ABP Laboratory to provide letters of support from Signatories and/or DTPs, which collectively guarantee that a minimum total number of 300 whole blood Samples for analysis of the Markers of the Hematological Module of the ABP annually will be provided for analysis once the Laboratory is approved as an ABP Laboratory.

- **Article 4.2.1.4 (Provide Business Plan)**

  The requirement for the Applicant Laboratory to submit a business plan upon request from WADA.

ix. Candidate ABP Laboratory (Article 4.2.2)

New requirements for Candidate ABP Laboratories have been included in the following sub articles:

- **Article 4.2.2.2 (Compliance with the ISL Code of Ethics)**

  This Article includes additional details vis-à-vis the requirement for a Candidate ABP Laboratory to not conduct any anti-doping Analytical Testing activities for Signatories or WADA, and to not accept Samples directly from individual Athletes, individuals, or organizations acting on their behalf.

- **Article 4.2.2.7 (Obtain Professional Liability Insurance Coverage)**

  The professional liability risk insurance coverage required of ABP Laboratories has been reduced from no less than two to no less than one million USD annually since it is considered that ABP Laboratories analyze fewer Samples and carry less risk than Accredited Laboratories.

- **Article 4.2.2.8 (Duration of Candidate ABP Approval Phase**)

  The Candidate ABP Laboratory shall achieve ABP approval within one year, unless otherwise determined by WADA due to exceptional circumstances.

x. ABP Laboratory (Article 4.2.3)

In Article 4.2.3.2, additional requirements have been established for an ABP Laboratory to maintain their ABP approval status, including (i) maintenance of the Laboratory's independence and impartiality; (ii) continued payment of WADA EQAS fees; (iii) providing letters of support; (iv) the analysis of a minimum 300 blood Samples for the Markers of the Hematological Module of the ABP annually; (v) participation in WADA and Accreditation Body assessments; and (vi) cooperation in support of the Results Management activities of ADOs.

xi. Laboratory Accreditation Requirements for Major Events (Article 4.3)

This Article largely incorporates the content of 2021 ISL Annex B, including the requirement for the Laboratory to advise WADA when it becomes aware that it will be providing Analytical Testing services for a Major Event (so that WADA may consider whether a Major Event-specific Laboratory monitoring schedule needs to be implemented) as well as the following additional provisions:

- **Article 4.3.1.1 (Participate in WADA Laboratory Assessments)**

  It has been clarified that (i) a Major Event's Test Distribution Plan will also be considered by WADA to determine the number and type of assessments that will be conducted to assess the Laboratory prior to the Major Event; and (ii) the Laboratory's dedicated space and security measures for the "B" Sample opening procedure shall ensure the confidentiality of the Athlete(s).

- **Article 4.3.1.2 (Participating in the WADA External Quality Assessment Scheme)**

  It has been included that, in addition to the request from the Major Event Organization (or responsible Testing Authority), WADA may also, at its sole discretion, submit double-blind EQAS samples for evaluation of the Laboratory while testing during a Major Event.

- **Article 4.3.2 (Major Event Analytical Testing in "Satellite" Laboratory Facilities)**

  If the Analytical Testing for a Major Event is to be conducted in a Laboratory's "satellite facility", the Laboratory must now establish the "satellite facility" sufficiently in advance of the Major Event to allow for the timely transfer of Laboratory operations and validation of test methods.

- **Article 4.3.2.1 (Participate in WADA Laboratory Assessments)**

  It has been clarified that the initial WADA assessment of a Laboratory's "satellite facility" is at the Laboratory's expense.

xii. Laboratory Personnel (Article 5.2.2)

The main changes in this Article apply to the following provisions:

- **Article 5.2.2.2 (Laboratory Quality Management Staff)**

  Instead of a single staff member appointed as the Laboratory Quality Manager, the Laboratory may have a defined Quality Management Team.

- **Article 5.2.2.3 (Laboratory Responsible(s) for Research and Development Activities)**
  New Article

  This new Article defines the qualifications and requirements for the person(s) appointed as responsible for R&D activities.

- **Article 5.2.2.4 (Laboratory Certifying Scientists)**

  This Article now includes an additional requirement for the qualification of Laboratory staff members as "Certifying Scientists".

- **2021 ISL Article 5.2.2.4 (Laboratory Supervisory Personnel)**

  This Article has been removed since this qualification is not consistently applied among Laboratories, and it is widely covered by the main positions of Laboratory Director, Quality Manager (Team), and Certifying Scientists.

xiii. Laboratory Facilities and Environmental Conditions (Article 5.2.3)

The main changes in this Article are for the following provisions:

- **Article 5.2.3.1 (Laboratory Facilities)**

  Two main changes have been made to this Article: (i) the requirement to have a person assigned as the security officer has been removed since personnel security assignments vary in accordance with institutional and local policies; and (ii) the performance of a risk assessment as a new requirement for the security of the Laboratory facilities, equipment, and systems against unauthorized access.

- **Article 5.2.3.3 (Environmental Control)**

  It has been clarified that the Laboratory environmental conditions shall be in accordance with the requirements of ISO/IEC 17025 (or ISO 15189, as applicable for ABP Laboratories). It has been also specified that the Laboratory policy to ensure appropriate electrical services and environmental conditions shall be based on a risk assessment.

- **Article 5.2.3.4 (Maintain Confidentiality of Data, Information and Operations)**

  The Laboratory is now required to implement a procedure(s) for maintaining the confidentiality of Laboratory information and operations, for the appropriate use and protection of access badges during and outside of working hours, and for addressing risks of unauthorized access by third parties.

- **Article 5.2.3.5 (Control and Security of Electronic Data and Information)**

  The requirements in this Article now include the implementation of a secure-access software-based data and information management system, which supports and maintains proper traceability of Laboratory operations and facilitates information and data exchange capabilities between the Laboratory and ADAMS.

xiv. Laboratory Equipment (Article 5.2.4)

This Article clarifies that the Laboratory shall operate and maintain its equipment in accordance with the requirements of ISO/IEC 17025 (or ISO 15189, as applicable for ABP Laboratories).

xv. Metrological Traceability - Use and Control of Chemicals, Reagents and Reference Materials (Article 5.2.5)

This Article has been expanded to cover requirements for the use of chemicals, reagents, and kits, which are currently covered in 2021 ISL Article 5.2.7. In addition, it has been clarified that the

Laboratory shall maintain a record of reference standards utilized in Analytical Testing. Other important changes to this Article include:

- **Article 5.2.5.1 (Reference Materials)**

  This Article clarifies that, where justifiable, the Laboratory may consider using in-house prepared Reference Materials (in accordance with ISO Guide 80) or extending the Reference Material expiration date. The process to extend the expiration date of a Reference Material, Reference Collection, or solution shall be described in the Laboratory's Management System documentation.

- **Article 5.2.5.2 (Reference Collections)**

  An important modification has been made to this Article to clarify that past doping control Samples may not be used as Reference Collections. This does not preclude, however, their use as quality control samples in accordance with the requirements for the secondary use of Samples for Quality Assurance established in the ISL.

- **Article 5.2.6 (Externally Provided Analytical Services)**

  A comment has been added to this Article to clarify that subcontracting the analysis for the Markers of the Hematological Module of the ABP to another Laboratory or ABP Laboratory is not a recommended practice due to the limited time requirements for such analysis. Further modifications have been made to this Article to clarify the Laboratory responsibilities when subcontracting analyses.

- **ISL 2021 Article 5.2.7 (Purchasing of Services and Supplies)**

  This Article has been removed since the elements pertaining to the use of controlled chemicals and reagents, waste disposal and environmental health, and safety policies are covered under ISO/IEC 17025 requirements (or ISO 15189, as applicable for ABP Laboratories) as referenced in 2027 ISL Article 5.2.3.3 ("Environmental Control"). Likewise, the use of chemical and reagents, including the extension of the expiration date of Reference Materials or Reference Collections is now covered in ISL 2027 Article 5.2.5 ("Metrological Traceability – Use and Control of Chemicals, Reagents and Reference Materials").

xvi. Article 5.3 (Process Requirements)

The provisions in this Article have been reorganized to better represent the Sample flow in the Laboratory from Reception (Article 5.3.1) through Acceptance of Samples for Analysis (Article 5.3.2), Initial Storage and Aliquoting (Article 5.3.3), Analysis (Article 5.3.4), Assuring the Validity of Analytical Results (Article 5.3.5), Results Management and Reporting (5.3.6), Storage of Samples (Article 5.3.7), Secondary Use or Disposal of Samples and Aliquots (Article 5.3.8), Complaints (Article 5.3.9), and Control of Nonconformities (Article 5.3.10).

Several important changes have been made to this Article, including:

- **Article 5.3.1 (Reception, Registration and Handling of Samples)**

  A new requirement has been added for Laboratories to identify the Samples with Laboratory internal Sample codes. In addition, it has been clarified that the inspection of each individual Sample for irregularities includes Dried Blood Spots (DBS) Samples that are collected with urine Samples during the same Sample Collection Session (SCS) from the same Athlete and are transferred to storage without being analyzed.

- **Article 5.3.2 (Acceptance of Samples for Analysis)**

  It has been clarified that, except as otherwise provided in this Article, urine or whole blood Samples from a Signatory shall not be accepted by a Laboratory for the sole purpose of long-term storage or for later analysis without first being subject to an Analytical Testing Procedure. As an exception, DBS Samples collected with urine Samples during the same SCS may be put directly in storage (without an initial analysis), provided that the Testing Authority has requested the Laboratory to do so in advance. A detailed description is provided of the procedure to be followed by the Laboratory and the Testing Authority in those cases.

  Furthermore, it has been clarified that when a Laboratory combines different Samples, collected from the same Athlete during a single SCS, the analytical result obtained for the combined Sample shall be reported independently for each Sample analyzed, while clarifying in the Test Report that the result was obtained after the analysis of the combined Sample.

- **Article 5.3.2.1 (Samples with Irregularities)**

  This Article has been expanded to provide more examples of Sample irregularities caused by inadequate transportation conditions, issues with Sample collection documentation, and unusual Sample conditions, as well as to classify the irregularities into those that may or may not (marked with an asterisk*) impact the Sample's chain of custody/unique identification or the suitability of the Sample to be analyzed with the requested Testing menu.

  In addition, specific guidance is provided for Laboratories to inform and seek instructions from the Testing Authority on the performance of Analytical Testing on Samples with irregularities. Furthermore, it has been established that when the Laboratory does not receive a timely reply (within seven days) from the Testing Authority on whether a Sample with irregularity(-ies) should be analyzed or not, the Laboratory may, at its discretion, analyze the Sample (for example, if Sample substitution is suspected).

- **Article 5.3.2.2 (Sample Splitting Procedure)**

  Further guidance is provided on the splitting and analysis of Samples whose integrity has been compromised. In addition, this Article describes what the Laboratory shall do when the Testing Authority does not respond to the Laboratory's request for a Sample splitting procedure in a timely manner (within seven days), or when the splitting procedure is requested after the Laboratory has already reported the Sample as Not Analyzed in ADAMS. One more important provision establishes that the Athlete and/or their representative(s) do not have the right to attend the Analytical Testing Procedures to be performed on the first split fraction, which is considered as the "A" Sample.

- **Article 5.3.3 (Initial Storage and Sample Aliquoting for Analysis)**

  This Article deals with the storage of urine (Article 5.3.3.1), whole blood (Article 5.3.3.2), and DBS Samples (Article 5.3.3.3).

  To differentiate the different kinds of blood Samples that can be collected for analysis, blood Samples have been classified into two broad categories: (i) whole blood Samples (collected in tubes containing an anti-coagulant (e.g., EDTA) either by venipuncture or from capillary blood vessels through puncture/incision of the skin); and (ii) DBS - capillary blood collected directly on an absorbent Sample support and allowed to dry. Explanatory footnotes have also been added to provide clarity on the collection and analysis of whole blood, the obtaining of serum or plasma from whole blood and the collection of DBS Samples.

xvii. Analysis of Samples (Article 5.3.4)

This Article has been reorganized, with the first part now describing the requirements for the analysis of Samples, including the use of validated, Fit-for-Purpose Analytical Testing Procedures, the application of In-Competition or Out-of-Competition Analytical Testing menus as well as the additional analyses that may be conducted on Samples as part of the WADA Monitoring Program, for results interpretation purposes, as requested during the Results Management process, as part of safety codes or for Quality Assurance purposes. Furthermore, it has been clarified that results from analyses other than those applied to detect the presence of Prohibited Substances or Prohibited Methods shall not be reported in ADAMS, unless specifically required by WADA. Further changes have been included in the following sub articles:

- **Article 5.3.4.1 (Selection and Validation of Analytical Testing Procedures**

  Pursuant to the reorganization of Article 5.3.4, this Article now contains the requirements for the selection and validation of Analytical Testing Procedures, with specific provisions dedicated to the Initial Testing Procedures (Article 5.3.4.1.1) and Confirmation Procedures (CP) (Article 5.3.4.1.2), including "A" Confirmation Procedure (Article 5.3.4.1.3) and "B" Confirmation Procedure (Article 5.3.4.1.4).

- **Article 5.3.4.1.1 (Initial Testing Procedures)**

  It has been clarified that results from Initial Testing Procedures (ITPs), which are Quantitative Procedures, can be included as part of Athlete Passports (e.g., Markers of hematological, steroidal, or endocrine modules of the ABP), provided that the method is Fit-for-Purpose.

- **Article 5.3.4.1.3 ("A" Confirmation Procedure)**

  Multiple modifications and clarifications have been made to the "A" CP requirements, including:

  - Target Analytes. Further guidance is provided on the CP(s) to be applied when more than one Prohibited Substance or Prohibited Method is detected by the ITPs, as well as the criteria for selection of the targets. In addition, it has been established that the Testing Authority (or Results Management Authority) shall inform the Laboratory which finding shall be subjected to confirmation in writing within seven days of being consulted by the Laboratory. In the absence of such timely information, the Laboratory shall proceed to confirm as many of the

findings as reasonably possible and accordingly invoice the Testing Authority for the costs of the analyses.

- Selection of Prohibited Substances subject to Therapeutic Use Exemption enquiries before confirming a Presumptive Adverse Analytical Finding in the "A" Sample. It has been clarified that the substance selection is based on criteria such as the prevalence of substance medical use or the non-mandatory status of the CPs for Laboratories. In addition, the list of substances subject to TUE enquiries has been expanded to include (i) clomifene (for female Athletes); (ii) narcotics; (iii) tamoxifen (for female Athletes); and (iv) any other Prohibited Substance or Prohibited Method for which the Athlete declared use in the Doping Control Form. In this regard, guidance is provided to Laboratories when not proceeding with the CP upon confirmation of the existence of an approved TUE by the Testing Authority.
- Changes have been included in this Article under points (e) "A" CP for Non-Threshold Substances (with or without MRL) and (f) "A" CP for Threshold Substances, to focus on the description of the type of Analytical Testing Procedures (e.g., Qualitative or Quantitative Procedures) and other requirements to be applied during the "A" confirmation analyses for these kinds of substances.
- The previous reporting requirements for "A" confirmation results have now been transferred to Articles 5.3.6.4.2 – Test Report for Non-Threshold Substances – and 5.3.6.4.3 – Test Report for Threshold Substances.
- The provision on the analytical requirements for Threshold Substances detected in the presence of diuretics or masking agents has been removed, since this will be dealt with in the revised ISL TD DL.

– **Article 5.3.4.1.4 – "B" Confirmation Procedure**:

Multiple modifications and clarifications have been made to the "A" CP requirements, including:

- Notification of "B" CP. It is now recommended that, if possible, the Results Management Authority should inform the Laboratory, in writing, within thirty days following the reporting of an "A" Sample Adverse Analytical Finding by the Laboratory, whether the "B" analysis is to be conducted. Furthermore, it has been established that if the Laboratory does not receive instructions from the responsible Results Management Authority on the conduct of the "B" CP or the transfer of the "B" Sample to long-term storage within the minimum applicable Sample storage time, the Laboratory shall then inform WADA and transfer the "A" and "B" Samples into long-term storage. The ADO shall bear the costs for the extended Sample storage.
- Timing of "B" CP. It has been clarified that when the timing of the "B" CP is strictly fixed within a very short period and without any possible postponement for valid reasons, and the Athlete or the Athlete's representative cannot be present, the procedure shall then be conducted in the presence of an Independent Witness.
- Under point (e), it has been noted that the Athlete and/or one representative may also have a reasonable opportunity to observe other steps of the "B" CP (in addition to the opening and aliquoting of the "B" Sample). However, this shall be done upon request and following the approval by the Laboratory Director (or designated person), and with a strict respect of the new requirements established in this Article. In addition, the number of non-Laboratory Persons that shall be authorized to attend the "B" CP has been reduced by removing the participation of persons that are not related to the Athlete, to the Results Management Authority, or WADA.

- “B” Confirmation Procedure with Negative Results. An added comment clarifies that a failure of a “B” CP to confirm the “A” Sample Adverse Analytical Finding does not necessarily mean that the “A” Sample result is incorrect. This underlines the importance that the “B” Sample confirmation, if requested, be conducted as soon as possible after the “A” Sample Adverse Analytical Finding is reported by the Laboratory.
- As for the “A” CP, this Article clarifies which type of Confirmation Procedure(s) (Qualitative and/or Quantitative) is applied for “B” confirmations of Non-Threshold Substances (with or without MRL), exogenous and endogenous Threshold Substances.

– **Article 5.3.4.2 (Further Analysis**)

For a better understanding of the process and requirements for Further Analysis, this Article has been structured to address the different requirements regarding (i) Requests for Further Analysis; (ii) Selection of Samples for Further Analysis; (iii) Selection of Laboratory for Further Analysis; and (iv) Analytical Testing Procedures for Further Analysis.

– **Article 5.3.5 (Assuring the Validity of Analytical Results)**

It has been clarified that QC-charts with appropriate warning and action limits shall be used to monitor method performance and inter-batch variability (where applicable), and that the Laboratory’s Internal Quality Assurance Scheme (iQAS) shall be based on a risk assessment. For Laboratory audits, it is now clarified that the conduct of an audit by Laboratory-selected external auditors (e.g., other Laboratory Directors) is considered as an internal audit.

– **Article 5.3.6.1 (Review of Results)**

“Request for Second Opinions”. It has been clarified that such requests are not permitted for analytical results associated with the blind or educational EQAS, unless approved or instructed by WADA. In addition, this Article establishes that when the second opinion provider is not a member of the relevant WADA Technical Working Group, they shall be at least a Certifying Scientist for the Analytical Testing Procedure and shall be approved to provide second opinions by the Laboratory Director.

– **Article 5.3.6.4 (Reporting Test Results)**

Important modifications have been included in this Article:

- Clarification is provided on the acceptable reasons and course of action to follow when the Laboratory cannot report Test Results in ADAMS within the recommended twenty-day deadline. In addition, it is recommended that, to the extent possible, any agreed extension to the “A” Sample reporting deadline should not surpass forty-five days from the date of reception of the Sample by the Laboratory.
- The extension of the “A” Sample results reporting timeline to twenty-five days of Sample receipt if GC/C/IRMS analysis has been requested as part of the initial Analytical Testing menu.
- It has been established, in line with the ISL TD BAR, that the reporting of results for the Markers of the Hematological Module of the ABP should occur in ADAMS within three days of receipt of the Sample.

- In the absence of feedback from the Testing Authority (or Results Management Authority, if different) within seven days of being notified by the Laboratory of an extended reporting deadline and its reason(s), it has been clarified that the Laboratory should assume that the extended reporting deadline has been accepted.
- Further clarifications have been added regarding the shorter reporting times required for specific occasions (e.g., in preparation for or during Major Events), including that such requests be made and agreed with the Laboratory and managed in ADAMS. For Olympic or Paralympic Games, the relevant Sample(s) should be prioritized by the Laboratory for expedited analysis and, where possible, results shall be reported, at the latest, seventy-two hours prior to the opening ceremony of the Games or, at the latest, seventy-two hours prior to the Athlete's first competition (as established in Article 4.8.3 of the 2027 International Standard for Testing (IST))
- WADA shall monitor Laboratory reporting times on a regular basis (e.g., quarterly) and request the Laboratory to provide a Corrective Action Report if reporting delays are considered extensive.
- Footnote 21 illustrates situations that justify a partial submission of Test Results.

– **Article 5.3.6.4.1 (Reporting Requirements)**

It has been clarified that, upon request by the Anti-Doping Organization, the Laboratory may report additional information directly to the Anti-Doping Organization after reporting the test results in ADAMS (for example, estimated concentrations of Non-Threshold Substances).

– **Article 5.3.6.4.2 (Test Report for Non-Threshold Substances)**

Important modifications have been made to this Article, including:

- A comment noting that the Laboratory may occasionally be unable to report the estimated concentration of the Analyte(s) for a Non-Threshold Substance not subject to an MRL (for example, in the absence of corresponding Reference Materials or when the identification of the Analyte(s) has been based on the use of a Reference Collection(s) for which the concentration of the Analyte(s) is unknown).
- A further explanation to clarify that the Minimum Required Performance Level (MRPL) is not a reporting requirement for a Non-Threshold Substance without an MRL and, therefore, the Laboratory should report the presence of a Non-Threshold Substance without an MRL at an estimated concentration below the MRPL if an Analyte of the Non-Threshold Substance is identified in the "A" Sample in accordance with the requirements of the ISL TD IDCR or other applicable ISL TD or ISL TL.
- The possibility for the Laboratory to report, under certain circumstances, the presence of a Non-Threshold Substance with an MRL if identified in a Sample at an estimated concentration below the MRL. Examples of such specific circumstances will be provided in the new ISL TD MRL. A new comment has also been added to this Article to clarify that nothing shall prevent the Laboratory, upon written request by the ADO, from disclosing information about the presence of a Non-Threshold Substance with an MRL at an estimated concentration below the MRL.

- A further comment has been added to clarify that, where applicable, the Laboratory shall record in the ADAMS Test Report the specific Analyte(s) of the Non-Threshold Substance that were identified in the Sample.

– **Article 5.3.6.4.3 (Test Report for Threshold Substances)**

Important modifications have been made to this Article, including:

- The requirement for the Laboratory to report a result for a Threshold Substance as a Negative Finding when the Analyte(s) exceeds the Threshold value but is less than or equal to (≤) the Decision Limit (DL), with the recommendation for the Testing Authority (e.g., in the comments section of the Test Report in ADAMS) to consider this result for Target Testing purposes.
- A new comment has been added to this Article to clarify that nothing shall prevent the Laboratory, upon written request by the Anti-Doping Organization, from disclosing information about the presence of a Threshold Substance at a concentration below the DL.
- The provision on the reporting of Threshold Substances detected in the presence of diuretics or masking agents has been removed from both 5.4.6.4.3 (a) - "A" Sample Test Report - and 5.4.6.4.3 (b) - "B" Sample Test Report - since this will be dealt with in the revised ISL TD DL.

– **Article 5.3.7.1 (Minimum Storage of Samples)**

An important provision has been included in this Article to clarify that unless there is a prior agreement in writing with the Laboratory, the Results Management Authority (or WADA) is responsible for requesting to the Laboratory an extension of Sample storage (including those Samples reported as Adverse Analytical Findings or Atypical Findings) beyond the applicable minimum Sample storage time. Requests for long-term storage to the Laboratory and confirmation by the Laboratory that the Sample(s) have been placed into long-term storage shall be made in ADAMS.

Table 1 relating to Minimum Sample Storage Periods has been modified to better represent the different Sample matrices (urine; whole blood, including whole venous or liquid capillary blood, plasma and serum; and DBS Samples) and their respective minimum storage times.

– **Article 5.3.7.2 (Long-term Storage of Samples)**

It has been clarified that any extended Sample storage initiated by an Anti-Doping Organization shall be conducted at the Anti-Doping Organization's expense. In addition, a comment to this Article has been included to clarify that IST Articles 10.2.3 to 10.2.5 shall be consulted when transferring the ownership of Samples to another Anti-Doping Organization with jurisdiction over the Sample after the applicable Minimum Sample Storage Periods, or when Samples have been placed under long-term storage.

– **Article 5.3.8.2 (Secondary use of Samples and Aliquots for Research and Quality Assurance Purposes)**

This Article aligns the requirements for the secondary use of doping control Samples and aliquots for research or Quality Assurance purposes with 2027 Code Articles 6.3 and 19, by establishing that direct identifiers shall be removed or irreversibly altered to prevent Samples and analytical data from being traced back to a particular Athlete. Once more, it is stressed that

Athlete consent must be obtained before analyzing Samples and/or using analytical data for anti-doping research purposes; however, such a consent is not needed for Quality Assurance activities.

xviii. Management Requirements (Article 5.4)

A footnote (footnote 25) has been added to clarify that while Articles 5.3.9, 5.3.10 and 5.4 are described for application by Laboratories in accordance with ISO/IEC 17025 (for testing Laboratories), they are also relevant, where applicable, for ABP Laboratories within the framework of ISO 15189 (for medical Laboratories).

- **Article 5.4.3 (Document Control)**
  A recommendation is provided for Laboratories to also consider implementing the guidance of best practice provided in LGs and TNs in their Management Systems and Standard Operating Procedures.

- **Article 5.4.5 (Cooperation with Customers and with WADA)**

  The following provisions have been added to point (c) "Laboratory Expert Opinions: (i) Laboratory expert opinions shall be in accordance with the ISL Code of Ethics; (ii) the Laboratory shall refuse to provide the requested expertise, if it falls outside its competence, knowledge or experience; and (iii) a comment has been included (transferred from 2021 ISL Article 5.3.6.4.1) regarding the Laboratory's policy for provision of opinions.

xix. WADA Laboratory Monitoring and Performance Evaluation Activities (Article 6) *New Article*

This is a new Article, which incorporates elements of 2021 ISL Articles 6 ("WADA External Quality Assessment Scheme") and 7 ("Evaluation of Laboratory EQAS and Routine Analytical Testing Performance") including:

- **Article 6.1 (WADA Laboratory Monitoring)**

  This Article describes the four main WADA Laboratory Monitoring Activities, which include: (i) the WADA EQAS Program; (ii) WADA Laboratory Assessments; (iii) Removal of Samples for Analysis, Further Analysis or Quality Assessment Purposes; and (iv) WADA Laboratory Monitoring and Assessment during a Major Event.

  - **Article 6.1.1 (WADA EQAS)**

    This Article provides a brief description of the WADA EQAS program. However, full details on the WADA EQAS, including types, number, and composition of EQAS samples, as well as Laboratory requirements for the analysis of EQAS samples and reporting of EQAS results, are included in the new ISL TD EQAS.

  - **Article 6.1.2 (Laboratory and ABP Laboratory Assessments)**

    This Article provides a full overview of the WADA Laboratory and ABP Laboratory assessment activities, including a description of the types of assessments (Article 6.1.2.1) and assessment requirements (Article 6.1.2.2), including composition of assessment teams, assessment agendas, and assessment reports.

- **Article 6.1.3 (Removal of Samples by WADA)**

  This Article is based on the 2021 ISL Article 4.5. An addition has been made according to which, in such cases, WADA shall provide notice (prior to or within a reasonable time after taking possession of the Samples) to the Laboratory and to the ADO(s) whose Samples have been taken.

- **Article 6.1.4 (WADA Laboratory Monitoring and Assessment during a Major Event)**

  This Article describes the activities that may be carried out by WADA to monitor Laboratory performance during a Major Event, including the presence of one or more observer(s) in the Laboratory during the Major Event and the submission of double-blind EQAS samples.

– **Article 6.2 (Evaluation of Laboratory Nonconformities)**

This Article provides a brief description of the WADA system of Laboratory and ABP Laboratory EQAS and routine Analytical Testing performance evaluation. However, full details on the WADA Laboratory performance evaluation procedures, including the classification of nonconformities, the process of review of Laboratory corrective action(s) to remedy nonconformities, the evaluation of False Adverse Analytical Findings and False Negative Findings are included in the new ISL TD PERF.

xx. Laboratory Disciplinary Procedures (Article 7) ***New Article***

This new Article combines 2021 ISL Articles 4.6.4 (“Withdrawal of WADA Accreditation”), 4.6.5 (“Consequences of Suspended or Revoked Accreditation or Analytical Testing Restriction”), 4.6.6 (“Reinstatement of Suspended Accreditation or Lifting of the Analytical Testing Restriction”) and 4.6.7 (“Voluntary Cessation of Laboratory Operations”). Given the importance and impact of these sanctioning procedures, these provisions have been incorporated in the 2027 ISL as a new Article. The key substantive changes include:

– **Article 7.1.1.1 (Laboratory Noncompliances that May Lead Leading to an Analytical Testing Restriction or Suspension of WADA Accreditation)**

In this Article, the non-compliance related to serious and repeated delays in reporting test results has been expanded to clarify that this includes frequent significant delays in meeting the recommended reporting deadline without informing the responsible Testing Authorities or based on invalid reasons such as noncompliances with the implementation of mandatory requirements of the ISL, ISL TDs or ISL TLs.

– **Article 7.1.1.3 (Cessation of Analytical Testing)**

An important modification has been made to this Article:

- The reporting by a Laboratory of a False Adverse Analytical Finding with Consequences for an Athlete would not lead to an immediate Laboratory Expert Advisory Group (Lab EAG) recommendation to the Chair of the WADA Executive Committee to provisionally suspend or impose a provisional Analytical Testing Restriction (ATR) on the Laboratory. Instead, the Laboratory shall immediately cease all affected analytical activities, inform its customers, and

implement satisfactory corrective action(s) to resolve the nonconformity within a reasonable time.

- If the non-conformity is satisfactorily resolved within the established timeframe, WADA nevertheless reserves the right to send extra EQAS and/or perform an assessment of the Laboratory before the Laboratory can resume Analytical Testing, and this shall be at the Laboratory's expense. WADA, at its discretion, may also give public notice of the Laboratory's non-conformity, as well as inform stakeholders of the Laboratory's satisfactory resolution of the non-conformity through the implementation of adequate preventive and corrective actions.
- When the non-conformity is not satisfactorily resolved within the established timeframe, the Lab EAG shall recommend the ATR or Suspension of the Laboratory, as applicable.

– **Article 7.1.2 (Revocation of WADA Accreditation)**

A comment has been added to clarify that Lab EAG recommendations for the Revocation of a Laboratory's WADA accreditation are made in consideration of the number of False Adverse Analytical Findings and/or False Negative Findings reported by the Laboratory, irrespective of the total number of points accumulated during this period, as well as to whether the Laboratory has satisfactorily corrected the noncompliances.

– **2021 ISL Article 4.6.4.4 (Resolution Facilitation)**

The concept of the "Resolution Facilitation Session" has been removed. The opportunity for a Laboratory to hold a session with the Lab EAG in the case of Suspension or ATR has been introduced at 2027 ISL Article 7.1.1.5 or in the case of a Revocation at Article 7.1.2.2.

– **Article 7.1.2.1 (Laboratory Noncompliances Leading to Revocation of WADA Accreditation)**

Additional conditions that justify a Revocation include: (i) the repeated accumulation of the maximum allowed number of points for the EQAS and/or Analytical Testing as determined by the application of the Points Scale Table described in the ISL TD PERF; and (ii) the repeated failure to implement and document adequate R&D and Sharing of Knowledge activities.

– **Article 7.1.2.2 (Revocation Procedures – Laboratory Not Under Analytical Testing Restriction or Suspension)**

An addition has been made that when the Lab EAG withdraws a recommendation for Revocation, WADA nevertheless reserves the right to send extra EQAS samples and/or perform an assessment of the Laboratory before the Laboratory can resume Analytical Testing, and this shall be at the Laboratory's expense.

– **Article 7.2 (Consequences of Suspended or Revoked Accreditation or Analytical Testing Restriction)**

This Article clarifies that the Laboratory shall continue to participate in the WADA EQAS during a Suspension or ATR and that WADA may require the Laboratory to analyze additional blind EQAS samples and/or perform a Laboratory assessment.

- **Article 7.2.1 (Analytical Testing Restriction)**

  This Article incudes further requirements including that the Laboratory shall immediately cease all analyses employing the affected Analytical Testing Procedure(s) regardless of the reason(s) for the ATR.

- **Article 7.2.3 (Revocation of WADA Accreditation)**
  An explanatory footnote (footnote 29) has been included explaining the responsibilities of a revoked Laboratory for the transfer of Samples to a Laboratory(-ies), chosen by the Testing Authority, within thirty days of being notified of the Revocation decision.

- **Article 7.3 (Extension of Suspension or Analytical Testing Restriction)**

  This Article now includes the possibility to initiate Suspension proceedings where a Laboratory has not satisfactorily corrected the noncompliance(s) that resulted in their ATR or where any additional ISL and/or ISL TD and/or ISL TL noncompliance(s) are identified during the initial ATR. Previously, only an extension of the ATR or Revocation were possible outcomes for the initial ATR period.

- **Article 7.5.1 (Reinstatement of Suspended Accreditation or Lifting of Analytical Testing Restriction)**

  An addition has been made that as a condition for reinstatement of WADA accreditation, WADA may require the analysis of additional EQAS samples and/or may conduct a Laboratory assessment, at any time and at the expense of the Laboratory.

- **Article 7.6 (Suspension or Revocation of ABP Laboratory)** ***New Article***

  This new Article describes the procedure for the Suspension or Revocation of an ABP Laboratory.

- **Article 7.7 (Reporting of False Analytical Findings During a Major Event)** ***New Article***

  This new Article establishes the procedures to follow when a Laboratory reports a False Adverse Analytical Finding or a False Negative Finding during a Major Event. The Article further clarifies that the failure to implement satisfactory corrective action(s) in a timely manner will result in the imposition of a Laboratory Suspension or an ATR, as determined by WADA, and the cessation of Analytical Testing during the Major Event.

xxi. Article 8 (Code of Ethics for Laboratories) ***New Article***

This new Article corresponds to 2021 ISL Annex A, and includes one key modification:

- **Article 8.5 (Duty to Preserve the Integrity of the World Anti-Doping Program and to Avoid any Detrimental Conduct)**

  For the avoidance of any doubt, this Article clarifies that any attempts of collusion between Laboratories, Probationary Laboratories and/or ABP Laboratories, as part of their participation in the WADA EQAS, shall be considered as a violation of the ISL Code of Ethics.

xxii. Definitions (Appendix I)

The main changes include:

- **Code Definitions**
  - Inclusion of new Code definitions for “Independent Observer Program”, “Quality Assurance”, “Monitoring Program”, and “Technical Letter”.
  - The definition of “Atypical Finding” indicates that the investigations for a final determination regarding a finding may also be directed by WADA.
  - The definition of “International Standard” clarifies that International Standards shall include any Technical Documents and Technical Letters issued pursuant to the International Standard.
  - The new Code definition of “Technical Letter” clarifies that Technical Letters also apply to specific Laboratory or ABP Laboratory procedures.

- **ISL Definitions**
  - The following new ISL definitions were added:
    - Applicant ABP Laboratory
    - Applicant Laboratory
    - Candidate ABP Laboratory
    - Candidate Laboratory
    - Qualitative Procedure
    - Quantitative Procedure
    - Probationary Laboratory
    - The ISL definition of “Provisional Suspension” has been replaced by “Provisional Laboratory Suspension” to differentiate it from the Code definition of “Provisional Suspension”, which is related to the consequences of anti-doping rule violations.
  - The following ISL definitions have been removed, since they are no longer used in the ISL but rather have been incorporated into the applicable ISL TDs:
    - Bias
    - Corrective Action Report
    - Intermediate Precision
    - Repeatability
    - Reproducibility
  - In addition, adjustments have been made to the following ISL definitions:
    - Athlete Passport Management Unit (APMU)
    - Confirmation Procedure (CP)
    - External Quality Assessment Scheme (EQAS)
    - Further Analysis
    - Independent Witness
    - Initial Testing Procedure (ITP)
    - Laboratory
    - Laboratory Chain of Custody (LCOC)
    - Laboratory Expert Advisory Group (Lab EAG)

- Limit of Identification (LOI)
- Limit of Quantification (LOQ)
- Major Event
- Measurement Uncertainty (MU)
- Selectivity
- Threshold Substance.

- Some other definitions were strictly subject to minor editorial changes.

– **IST Definitions**

- The definition of “Passport Custodian” is included as per the 2027 IST

5. Summary of Substantive Changes between the 2023 ISRM and proposed 2027 ISRM

i. Responsibility for conducting Results Management (Article 4.1) *New Article*

This is a newly introduced Article reflecting Code Articles 7.1 (responsibility for conducting Results Management) and 20 (the delegation of Results Management activities, which is no longer possible to national sports governing bodies or other national sports organizations due to the potential for conflicts of interest) to draw the attention of Results Management Authorities (RMAs) to these general principles.

ii. Confidentiality of Results Management (Article 4.2)

A comment to this Article has been added, clarifying if and how documents from the case file of a case can be produced in another proceeding and/or be disclosed.

iii. Therapeutic Use Exemptions (TUE) (Articles 5.1.1.1 and 5.1.2.5)

Adjustments have been made to this Article to ensure that the possibility for Athletes to apply for a retroactive TUE (r-TUE) does not interfere with the requirement arising from the Investigation Report by the Independent Prosecutor Eric Cottier (Cottier Report) to proceed with the initial notice being sent to the athlete within 21 days of the RMA receiving the Adverse Analytical Finding (AAF).

In that respect, RMAs are encouraged to draw Athletes' attention, in the letter notifying them of the AAF, to the possibility of requesting a r-TUE and to conduct the assessment of such applications without delay.

iv. Notification (Articles 5.1.2.1 to 5.1.2.12)

The amendments made to 2027 Code Article 10.7.2 (25% reduction of the period of ineligibility stated in this notification based on early acceptance of the potential anti-doping rule violation (ADRV)) as well as the introduction of the new Code Article 10.7.4 (other valuable information provided by an athlete or other Person) have been transposed into 2027 ISRM Article 5.1.2.1.

As per 2027 Code Article 14.1.1, the possibility given to RMAs, with WADA’s written approval, to delay or withhold the notification to other Anti-Doping Organizations (ADOs) where highly

confidential investigations are being conducted, has been reflected in 2027 ISRM Articles 5.1.2.11 and 5.3.2.4.

The “B” confirmation procedure has been clarified and provides a prompt, written and streamlined process to follow (2027 ISRM Articles 5.1.2.1 (c) to (e), and 5.1.2.6 to 5.1.2.8), and explains the steps to be taken after the “B” sample analysis.

Several recommendations deriving from the Cottier Report have been introduced in the notification process:

- Athletes shall be notified within twenty-one days of receipt of the AAF by the Laboratory (2027 ISRM Article 5.1.2.2) and, if applicable, the mandatory provisional suspension shall be imposed at the same time (2027 ISRM Article 5.1.2.1(h)).

- The RMA should state if it has been notified of AAFs and/or Atypical Findings (ATFs) for two or more Athletes and it is apparent that these findings resulted from a contaminated source (2027 ISRM Article 5.1.2.3).

v. Atypical Findings (Article 5.2.1)

For the sake of convenience and the centralization of information, all documents containing investigative steps relating to ATFs that RMAs shall follow have been cited and hyperlinked in the comment to this article.

vi. Decision Not to Move Forward (Article 5.4)

The requirements for the notification of decisions not to move forward, including the possibility of issuing simplified decisions in certain specific cases (TUEs, ATFs), have been clarified in a new comment to this Article (see also comment to 2027 ISRM Article 9.1.1).

vii. Cases Subject to Review by the Independent Review Expert (Article 5.5) ***New Article***

Further to the Cottier Report, and as per 2027 Code Article 7.8, this Article describes the procedure to be followed by a RMA – from the submission of the request to the Independent Review Expert (IRE) to the notification of the RMA’s decision based on the IRE’s opinion, including the appeal process and potential consequences for non-compliance – in those rare cases where the RMA considers closing a case or not proceeding with normal Results Management processes after it has received notice of an AAF. The new Code definition for the IRE, detailing the qualifications required and the process of appointing the expert, has been included in Appendix I (Definitions).

viii. Provisional Suspensions (Article 6)

This Article has been restructured, and certain provisions have been modified and/or added to reflect changes made to the 2027 Code:

- **Article 6.1.1.1** incorporates Substances of Abuse to the list of ADRVs for which a mandatory provisional suspension is not required.

- **Article 6.1.1.2** expands the grounds for lifting a mandatory provisional suspension (i.e., where the finding will likely result in no ADRV, no fault, or a reprimand or where the time already served would exceed the period of ineligibility to be served).

- **Articles 6.1.1.3 and 6.1.1.4** reflect amendments made to the comment to 2027 Code Articles 7.4.1 and 7.4.3, which deal with the application to lift, further challenge and/or appeal a mandatory provisional suspension.

- **Article 6.1.2.1 and its comment** confirm that the decision to impose an optional provisional suspension is discretionary and clarify that such measure may be imposed as early as the notification under 2027 ISRM Article 5.

- **Articles 6.1.2.2 and 6.1.2.3** reflect amendments made to the comment to 2027 Code Articles 7.4.1 and 7.4.3, which deal with the application to lift, further challenge and/or appeal an optional provisional suspension.
- **Article 6.1.3.5** specifies that the failure to request the lifting of a provisional suspension in a timely manner may be construed against the Athlete or other Person.

- **Article 6.1.3.6** clarifies the scope of provisional suspensions imposed by Major Event Organizations (MEOs).

- In accordance with the human right's opinion of Michael Beloff, the new 2027 ISRM Article 6.1.4 specifies that any decision not to impose a provisional suspension, to lift or not to lift a provisional suspension shall be appealable exclusively to the Court of Arbitration for Sport (CAS) (Article 6.1.4.1). As a condition to the admissibility of such appeal, notice shall be given to WADA (Article 6.1.4.2 and its comment), which shall have the right to intervene (Article 6.1.4.3). Any appeal challenging a provisional suspension shall be handled in a timely manner (Article 6.1.4.4).

ix. Charge (Article 7)

The amendments made to 2027 Code Article 10.7.2 (25% reduction of the period of ineligibility asserted by the RMA in the charge letter based on early admission), as well as the introduction to 2027 Code Article 10.7.4 (other valuable information provided by an Athlete or other Person), have been transposed into 2027 ISRM Article 7.1 (d) and (i) and in the comment to this Article.

In addition, clarifications were provided regarding the application of the twenty-one-day deadline granted to an Athlete or other Person to make an early admission or request a hearing (comment to 2027 ISRM Article 7.1 (d)).

x. Hearing Process (Article 8)

Several amendments and/or clarifications have been made to the following 2027 ISRM provisions to strengthen the hearing process:

- **Comment to Articles 8.1, 8.4 and 8.6** reflect the amendments made to 2027 Code Article 20 and the new Code definition of "NADO Operational Independence", which prevent national sports governing bodies or other national sports organizations from (i) being involved in Results Management activities and in the appointment of, and/or have authority over, panel members,

and (ii) having any of their members, consultants, or officials sitting as a panel member on a case involving an Athlete from the same sport and country.

- **Comment to Article 8.3** limits the composition of hearing panels to a maximum of three members.

- **Article 8.8 (c)** imposes a timeframe of two months from the hearing for issuing a decision, save in exceptional circumstances.

A new comment has been added to Article 8.1, encouraging RMAs and hearing bodies to make the necessary and reasonable efforts to accommodate Athletes with impairments.

xi. Decisions (Article 9)

Clarifications have been made to:

- The scope of Results Management decisions, which include those relating to provisional suspensions (comment to 2027 ISRM Article 9.1.1).

- The conditions under which case files must be produced and the related consequences vis-à-vis the deadline for appeals (comment to 2027 ISRM Article 9.2.4, which reflects amendments made to 2027 Code Article 14.2.2).

xii. Appeals (Article 10)

Article 10.2 (a) extends to national appellate instances the current requirement to give timely notice of any such appeal to all ADOs that would have a right of appeal, a requirement which is otherwise currently imposed on all parties regarding an appeal to CAS.

The following provisions of Article 10.3 have also been amended:

- **Comment to Article 10.3 (a)** now reflects clarifications made to 2027 Code Article 13.1.2, i.e., that no deference shall be given to the discretion exercised by the body whose decision is being appealed, except for WADA decisions under e.g., Code Articles 5.6.1 and 10.7.

- **Article 10.3 (b)** stipulates that all appeal proceedings before CAS involving WADA, an International Federation and/or a MEO as a party, may only be conducted in a language other than English or French if all parties agree with such request at their entire discretion.

- **Article 10.3 (c)** requires, as a condition to the admissibility of the appeal, that WADA and any other ADO with a right of appeal that is not a party to a CAS appeal shall be informed by the appealing party of such appeal. The comment to this Article also confirms WADA's entitlement to request the full CAS procedural file from the ADO(s) party to the proceedings.

- **Article 10.3 (d)** confirms that WADA's written approval is also necessary for matters settled out-of-court by parties whilst a CAS appeal is pending.

xiii. Violation of the Prohibition Against Participation During Provisional Suspension (Article 11)

The scope of this Article is now limited solely to violations of the prohibition against participation during provisional suspensions (either committed during results management or discovered after a final decision), since cases relating to violation(s) of the prohibition of participation during ineligibility have been added to ADRVs throughout the ISRM.

xiv. Results Management for Whereabouts Failures (Annex B)

Amendments made either to the 2027 Code or to the 2027 International Standard for Testing (IST) have been reflected, in particular in the following Articles:

- **Article B.1.3 (a) (i)** clarifies the deadline by when Athletes shall provide the required information and confirms the possibility of including an Athlete in a Registered Testing Pool (RTP) during the calendar quarter.

- **Comment to Article B.2.4** clarifies that the reasonableness of a Doping Control Officer's (DCO)'s attempt shall be assessed against the fundamental duty of the Athlete to be available and accessible for testing during their sixty-minute time slot.

- **Articles B.3.1 and B.3.6** reflect the 2027 Code amendments relating to the rules governing the responsibility for conducting Results Management for Whereabouts Failures (WFs), whereas 2027 ISRM Article B.3.2 provides for a dispute resolution process, applying by analogy Code Article 7.1.1.

- **Articles B.3.2** clarifies which decisions are appealable as per amendments made to 2027 Code Article 13.

In addition, substantive changes have been made to the following provisions, in an effort to streamline the Results Management process, clarify responsibilities, and ensure consistent and harmonized approaches:

- **Article B.1.3 (a) (ii) and (iii)** clarifies the date on which a filing failure – either the initial filing in advance of a quarter or an Athlete's failure to update their information, including where the inaccuracy involved consecutive days – will be deemed to have occurred.

- **Comment to Article B.2.4 (e)** clarifies the term '*negligence'*, using the definition given by case law.

- **Comment to Article B.2.3** clarifies that a first, second or third (alternative) WFs can be recorded where notice of a prior (alternative) unsuccessful attempt has not been received.

- **Article B.3.4** removes the administrative review process for individual WFs despite the request of several stakeholders to reinstate it, as such removal received overwhelming support from the Athlete's community, which considered that this will not have a negative impact on their rights. In this respect, it should be noted that the recording of an individual WF can still be challenged as per Article B.3.4 (d) and the decision to record an individual WF is not binding in the context of a Code Article 2.4 charge, as each of the three WFs will be considered on a de novo basis (see the comment to Article B.3.4 (e)).

- **Comment to Article B.3.6** confirms the possibility for RMAs to assert any additional WFs after the confirmation of a third WF, including during the Results Management process for a Code Article 2.4 ADRV, and clarifies that the sole purpose of the thirty-day timeframe set forth in this Article is to trigger appeal rights under Code Article 13.2 (i.e., a violation of Code Article 2.4 can be brought forward even after this thirty-day period).

xv. Results Management for the Athlete Biological Passport (Annex C)

Significant improvements have been made to 2027 ISRM Annex C to clarify and streamline the Athlete Biological Passport (ABP) process. In particular, the following roles have been clarified:

- The Passport Custodian may provide any relevant information to the experts for their review (Articles C.2.2.5, C.3.1, and C.3.3), further investigate and/or seek additional information from the Athlete (Article C.6.1), and submit, at any stage, a request to the Athlete Passport Management Unit (APMU) for the experts to provide any further explanation (Articles C.8.1 and C.8.2).

- The APMU shall: (i) assess the passport in case of a sequence abnormality (Article C.2.1.2); (ii) indicate in its report the reason for delaying the expert review of a passport (Article C.2.2.3); (iii) provide the same information to all three experts (Article C.3.1); (iv) compile the ABP Documentation Package in case of a unanimous "*likely doping*" (Article C.4.1); (iv) share all documents related to an adverse passport finding with WADA through ADAMS (Article C.5.1); (v) and ensure communication between the Passport Custodian and the experts (Article C.8.1).

- The experts shall: (i) conduct the initial review of the passport based on all relevant information shared by the Passport Custodian and/or requested through the APMU (Articles C.2.2.5, C.3.1 and C.3.3); (ii) should issue their report within one month from receipt of the ABP Documentation Package (comment to Article C.4.3); and (iii) can make recommendations to the Passport Custodian if they are no longer unanimous in their opinion of "*likely doping*" (Article C.4.4).

Furthermore, the following additions have been made to 2027 ISRM Annex C:

- **Article C.1.4** describes the role of the APMU.

- **Article C.2.2.6.1** confirms that an expert should refrain from making assumptions as to the specifics of a possible doping scenario and does not need to be satisfied of its existence for a conclusion of "*likely doping*".

- **Article C.2.2.6.3** clarifies that comments made on a passport by an expert as part of their initial review are not disclosable.

- **Comment to Article C.3.4** confirms the possibility of using a strong suspicion of doping that is insufficient to trigger an ABP proceeding in a violation of Code Article 2.2.

- **Comments to articles C.5.2 and C.6.2** clarify matters relating to the imposition of a provisional suspension within the context of Annex C.

- **Article C.6.3** allows the Passport Custodian to reinitiate Results Management if the explanations and/or evidence provided by the Athlete transpire to be untrue and/or forged. The comment to this Article provides that where the experts are unable to reach a unanimous opinion of "*likely doping*", any further review of an Athlete's passport should be conducted by a new expert.

- **Article C.7.2** provides further details regarding the re-setting of a passport and the allocation of a new passport ID, in cases where an Athlete has been acquitted or the charge against them has been withdrawn.

- **Comment to Article C.7.3** clarifies that where an Athlete is found to have committed an ADRV on any basis other than the ABP, the re-setting of their passport may be justified.

- **Articles C.8.1 and C.8.2** provide further details as to the investigation or inquiry that a Passport Custodian can conduct at any stage of the passport review.

6. Summary of Substantive Changes between the 2023 ISTI and proposed 2027 IST

The scope of the ISTI is to plan for and implement intelligent and effective testing, both in-competition and out-of-competition, and to maintain the integrity, identity, and security of the Samples collected from the point the Athlete is notified of their selection for testing, to the point that their Samples are delivered to the laboratory for analysis. To that end, the ISTI (including its Annexes) establishes mandatory requirements for test distribution planning (including the collection and use of Athlete whereabouts information), notification of Athletes, preparing for and conducting Sample collection, security/post-test administration of Samples and documentation, and transport of Samples to laboratories for analysis.

As a result of the development of the proposed new 2027 International Standard for Intelligence and Investigations (ISII), the Investigations (I) element of the IST(I) has been removed, and this International Standard shall be renamed as the International Standard for Testing (IST). As such, in the 2027 IST, current ISTI Article 11 ("Gathering, Assessment and Use of Intelligence") and Article 12 ("Investigations") have been merged into a new IST Article 12 ("Use of Intelligence to Support Testing Programs"). The non-testing elements of these Articles can now also be found in Articles 4 and 5 in the ISII.

It is acknowledged that several new IST requirements will require significant enhancements in ADAMS. Upon approval in December 2025, the IST Drafting Team, the ADAMS Testing Working Group, and WADA will work towards ensuring that these ADAMS enhancements are in place before January 2027.

i. Risk Assessment (Article 4.2)

Following feedback from WADA's Human Rights Senior Independent Expert, Snežana Samardžić-Marković, this Article indicates that when considering the physical and other demands of the relevant sport(s) (and/or discipline(s) within the sport(s)), Anti-Doping Organizations (ADOs) shall consider the risk in sports (and/or disciplines) for Athletes with impairments. The Article also includes the national interest for sports/disciplines as a risk factor that shall be taken into consideration as part of assessing risk, in particular, for rewards and potential incentives for Athletes. Finally, the last two factors that ADOs shall take into account in their risk assessment have been removed/relocated to other sections of the IST and have been replaced by the data analysis of the sport/discipline, including, but not limited to performance of the nation within the sport/discipline at an international level.

ii. IFs publishing Criteria for International-Level Athletes on their Website (Article 4.3.2)

International Federations (IFs) are required to publish on their website the criteria they use to classify Athletes as International-Level Athletes within their anti-doping rules so as to provide easier access to this information to National Anti-Doping Organizations (NADOs) and other ADOs with jurisdiction over such Athletes.

iii. Prioritizing between Different Athletes (Article 4.5)

References to a “major event” are replaced by an “International Event” which is a defined term in the Code. This Article also provides clarity concerning the individual factors to determine which Athletes shall be subject to Target Testing with respect to sport performance history and performance patterns, and suspicious whereabouts patterns and changes. Finally, text is included to define the ‘team’ as a group of Athletes competing in a Team Sport.

- **Article 4.5.2 (b) (iv)**

  Inclusion of language emphasizing the importance for Sample Collection Authorities (SCAs) to have the administrative ability to pay for Sample collection services conducted abroad as part of the requirement to test Athletes training or living abroad.

iv. Prioritizing between Different Types of Testing and Sample Collection (Article 4.6)

Text has been added to this Article to support the importance of in-competition (IC) testing and clarifies the optimum periods for when Out-of-Competition (OOC) testing should occur.

It also includes a revised breakdown of the types of Sample collection and analysis. The Sample collection is divided in collection of urine and blood Samples. The collection of blood Samples is divided in the following:

The collection of whole blood and analysis of:

- Whole blood, if collected in EDTA tubes. Analyses of whole blood include but are not limited to the Hematological Module of the Athlete Biological Passport (ABP), homologous blood transfusion (HBT), DNA analyses, and gene doping tests.
- Serum separated from whole blood, if collected in serum tubes. Analyses of serum include but are not limited to human growth hormone (HGH), the Endocrine Module of the ABP, the blood Markers of Steroidal Module of the ABP, steroid esters, erythropoietin receptor agonists (ERAs), and hemoglobin based oxygen carriers (HBOCs).
- Plasma separated from whole blood, if collected in EDTA tubes. Analyses of plasma include but are not limited to tests for ERAs, steroid esters, insulins, and HBOCs.

The collection and analysis of blood as Dried Blood Spots (DBS)

Whilst a Dried Blood Spot (DBS) is a blood Sample, for the purposes of the 2027 IST a “blood Sample” shall be defined as “whole blood” or “serum or plasma separated from whole blood” unless it is specified that it includes a DBS Sample. It is also specified that whole blood Samples may be

venous or liquid capillary blood to align terminology with the International Standard for Laboratories (ISL).

v. Test Distribution Plan (Article 4.7) *New Article*

This new Article summarizes the outcomes of the steps followed to develop a Test Distribution Plan (TDP) starting with a risk assessment in Article 4.2 through to prioritizing between different types of testing and analysis of Samples in Article 4.6. It also highlights the importance for an ADO to ensure that sufficient resources are obtained to implement its TDP. In addition, prior to Olympic Games and Paralympic Games, it outlines the importance for ADOs to monitor and test Athletes who may qualify or have qualified for such events as well as consider implementing testing recommendations received from external expert groups. For other International Events, outside of the Olympic and Paralympic Games, it is considered a best practice to follow these principles.

This Article also clarifies the importance of the unpredictability of an ADO's Testing program; the ADO shall employ various Testing strategies with examples listed.

vi. Sample Analysis (Article 4.8)

- **Article 4.8.1**

  This Article clarifies that Laboratories may also perform additional analysis on Samples for non-prohibited substances or methods or for research or Quality Assurance which would not be reported as an Atypical Finding or Adverse Analytical Finding, in accordance with the International Standard for Laboratories (ISL).

  ADOs with Testing Authority (TA) responsibility shall ensure that there are agreements in writing with Laboratories and ABP Laboratories (i.e., Laboratories) to analyze Samples and/or provide related services and ensure that the payment for such analyses and any related services is made in a timely manner to the Laboratory.

  For the avoidance of doubt and without limitation, WADA may initiate non-compliance proceedings against an ADO where payment is not timely to the Laboratory in accordance with this provision, in particular in circumstances where non-payment is recurrent or significant.

- **Article 4.8.2** *New Article*

  New sub-Article 4.8.2 highlights scenarios where TAs and/or Results Management Authorities (RMAs) shall maintain regular communication with Laboratories and respond to Laboratory requests within the established timelines as contained in the ISL. It is also noted that a failure by the TA and/or RMA to provide timely feedback to the Laboratory for these situations may result (as applicable to the Laboratory) in reporting the Sample as "Not Analyzed" or performing the necessary analyses at the TA's expense. It may also result in compliance measures being raised with the TA for a failure to respond to Laboratory requests.

- **Article 4.8.3**

  Where a Sample is collected from an Athlete within twenty days of their first competition at the Olympic or Paralympic Games (for which they have qualified or are likely to participate), such Sample(s) shall be prioritized for expedited analysis and, where possible, the results shall be

reported prior to the opening ceremony of the Olympic or Paralympic Games or at the latest seventy-two hours before the Athlete's first competition. Furthermore, the relevant ADO collaborating with the Laboratory shall also use the ADAMS Sample Management application to request and manage such prioritized analyses. Additional requirement for ADOs is to enter Doping Control forms for these Samples into ADAMS within five days of the Sample collection taking place.

The TA shall proactively communicate with the Laboratory when prioritized Sample analysis is required, so the Laboratory can determine whether it has the capacity to meet the request. Certainly, Laboratories will be required to prioritize the analysis of Samples from Olympic and Paralympic Athletes during such pre-game periods. It is acknowledged that there will be scenarios where Athletes will be tested close to the Olympic and Paralympic Games and the analytical results will not be able to be obtained prior to the Athlete competing.

Finally, where a Sample is collected from an Athlete earlier but close to twenty days prior the Athlete's first competition at the Olympic or Paralympic Games, prioritized analysis for such Samples should be considered by the TA.

vii. Retention of Samples and Further Analysis (Article 4.9) *New Article*

This new Article (current 2023 ISTI Article 4.7.3) includes specific requirements for the long-term storage, further analysis, and disposal of Samples. In this respect, ADOs shall be required to use the ADAMS Sample Management application and actively collaborate with the Laboratory to manage and request the long-term storage of Samples within the minimum Sample storage period based on the type of Sample, as outlined in 2027 ISL Article 5.3.7.

Among the circumstances that the ADO shall assess when considering long-term storage or Further Analysis of Samples, Athlete performance is a new addition.

Where an Athlete Passport Management Unit (APMU) recommends that a Sample be placed in long-term storage, and the ADOs does not agree with the APMU recommendation, the ADO should discuss this with the APMU. If the Sample is not stored, the reasons for not storing the Sample shall be recorded in ADAMS by the ADO.

Where an ADO puts a Sample into long-term storage and decides to discard the Sample prior to the expiry of the ten-year storage period and without conducting any Further Analysis, the ADO is required to record the reasons for discarding the Sample in ADAMS.

Finally, it is highlighted that ADOs are responsible for the costs associated with the long-term storage of Samples beyond the minimum required storage times established in the ISL unless otherwise agreed with the Laboratory. This Article emphasizes that ADOs shall allocate sufficient resources to ensure the implementation of their policy for long-term storage and further analysis by including a contingency of Sample numbers is included within their annual TDP to reflect this.

viii. Whereabouts Requirements for Athletes (Article 4.10) *New Article*

This new Article (currently 2023 ISTI Article 4.8) has been significantly amended to reflect the proposed changes to Athlete whereabouts requirements and to set out the required procedural steps for Athletes in a whereabouts pool.

The starting point of this Article stipulates that the outcomes of an ADO's risk assessment shall determine the Athletes that shall be included in its whereabouts pools rather than the amount of whereabouts information it requires to be able to test the Athlete, thus creating greater harmonization among ADOs and Athletes.

ix. Collecting Whereabouts Information (Article 4.10)

- **Article 4.10.4.1 (Requirements for RTP Athletes)**

  The minimum number of three OOC Tests planned to be conducted on Athletes in a RTP per year shall include at a minimum the collection of a urine Sample for each Sample Collection Session (SCS). If an IF or a NADO includes an Athlete in their RTP for a shorter period of time than one year, the minimum number of OOC tests planned shall be proportionate to the time period the Athlete is included in the RTP, e.g., for one quarter or less, at least one OOC test shall be planned and for two to three quarters, at least two OOC tests shall be planned.

- **Article 4.10.5.1**

  This Article outlines the requirement for the IF or NADO to record the start date when the Athlete is included in its RTP in ADAMS.

- **Article 4.10.5.2**

  This Article outlines the requirement for the IF or NADO to record the end date when the Athlete is removed from its RTP in ADAMS, and to document the reasons for removal either in ADAMS or in another secure way. Where documented outside ADAMS, this information shall be provided to WADA upon request.

- **4.10.5.4**

  In the written notice to an Athlete outlining their removal from an RTP, a number of requirements are listed which an ADO must include in this notice.

- **Article 4.10.6.1**

  This Article outlines the requirement for RTP Athletes to make quarterly submissions of their whereabouts information on the fifteenth day of the month preceding the start of the following quarter as well as the resultant consequences if they fail to do as such (e.g., an apparent Filing Failure).

  Exceptionally, and in accordance with 2027 IST Article 4.10.5.1, an IF or NADO may include an Athlete in a RTP during a calendar quarter and request the Athlete to submit their Whereabouts Filing within fifteen days of being notified of their entry to a RTP or less if there is compelling justification for the Athlete to submit their Whereabouts Filing within a shorter timeframe.

- **Article 4.10.6.2**

  - If an Athlete's travel (e.g., a flight which includes an overnight portion) does not permit the Athlete to have a physical overnight address to file, or due to the nature of such travel (e.g., long haul) prevents the Athlete from providing a sixty-minute time slot at a specific location

for a particular day, then the Athlete shall file their travel details for that particular day(s) as soon as the travel is known.

- The requirement for RTP Athletes to upload an accurate passport style photograph to their ADAMS Athlete profile page as part of their whereabouts filing in accordance with the requirements set out in ADAMS (see 2027 IST Article 5.3.7 below). Photographs shall be valid for a period of two years and can be updated on a quarterly basis if needed during an Athlete's whereabouts submissions. If an Athlete does not submit a photograph as part of their quarterly Whereabouts Filing, they will not be able to submit their quarterly Whereabouts Filing. The proposed requirement for an Athlete in a Whereabouts Pool to submit a passport-style photo as part of their whereabouts filing to support Athlete identification during testing has been discussed with WADA's Head of Privacy and Data Protection, and rather than the photo appearing on the Athlete's ADAMS profile page, it is proposed that this photo strictly appear within the whereabouts filing section to which limited persons will have access. The process to submit such a photo is envisaged to be via an online software module which will be integrated into the ADAMS whereabouts platform, and which will be user-friendly for the Athlete.

– **Article 4.10.6.2 (c) and 4.10.9**

Considering the feedback from both Athletes and ADOs, the IST Drafting Team has decided to replace regular activities in the current ISTI with a mandatory requirement for RTP Athletes to file on a quarterly basis, as part of their whereabouts submission, a primary training location for each day of the quarter.

This decision stems from the following important considerations:

- Athlete training information is critical to conducting no advance notice testing as this adds to the unpredictability of an ADO's testing programs by not only having the ability to test Athletes at their overnight address (i.e., an Athlete's personal and private space) but also in their sporting and training environment;
- The filing of Athlete training information will assist ADOs in locating the Athlete as the restricted access to Athletes at their overnight address will likely lead to a greater number of unsuccessful attempts which results in additional costs to collect a Sample;
- The filing of Athlete training information will create net financial positives for ADOs as it will provide them with the possibility to test more than one Athlete during the same testing mission (if there is more than one Athlete in an RTP training at the same training location) versus only one at a time if testing was only possible and successful at an Athlete's overnight address; and
- The filing of Athlete training information will reduce the administrative burden on RTP Athletes as well as the risk of whereabouts failures when compared to the initial proposed whereabouts changes in the first draft of the 2027 IST (i.e., daily training location for the quarter with general timeframes).
- The above noted, in the final draft of the 2027 IST, the following amendments have been implemented which the IST Drafting Team hopes will address concerns that such changes would be overly burdensome:
  - Athletes will not be required to file general timeframes when they train at the training location during the quarter;

- Athletes will not be required to update their training location nor the days filed at the start of the quarter unless there is a change to the primary training location; for example, the Athlete's overnight address changes and it is geographically impossible to train at the training location filed or the Athlete changes to a new training location which does not require an update to their overnight address. If the Athlete is required to update their overnight address, then they will be asked a question whether this change impacts their ability to train at the primary training location they have filed and if so, it can be updated at the same time as their overnight address; and
- If the Athlete is competing as per their competition/event schedule filed as part of their whereabouts submission, the Athlete will not be required to submit a training location on the days they are competing.

– **Article 4.10.6.3**

In addition to mandatory whereabouts requirements listed in Article 4.10.6.2, Athletes in a RTP may file as part of their Whereabouts Filing alternative location(s) such as work or school where the Athlete may be located for testing during the quarter. An Athlete may also provide additional travel information that may impact their availability for testing. Given the provision of this additional information is not mandatory, if the Athlete files additional whereabouts information listed in Article 4.10.6.3 but does not update such information or does not file any additional information, the Athlete shall not be subject to a Filing Failure.

– **Article 4.10.7 (Requirements for the sixty-minute Time Slot)**

- Where an unsuccessful attempt results from a test during an Athlete's sixty-minute time slot, the Doping Control Officer (DCO) is required to submit an Unsuccessful Attempt Report (UAR) to the TA within five days of the attempt. The TA shall upload the UAR into ADAMS within twenty-one days of the attempt. This will allow for the timely administration of a possible Missed Test for RTP Athletes if the attempt was conducted during the sixty-minute time slot.
- A clarification has been added to this Article that a DCO is not required to record video and/or audio of their attempts to locate the Athlete during the Athlete's sixty-minute time slot but shall record such attempts made to locate the Athlete on an UAR and file the UAR in accordance with Article 4.10.7.6 (a).
- Despite the DCO's reasonable efforts and as a last resort, when an RTP Athlete has not been located during their sixty-minute time slot, the DCO should phone the Athlete, unless the TA has instructed them otherwise, five minutes before the end of the sixty-minute time slot. The DCO shall use the Athlete's primary phone number (and if applicable an alternative phone number) provided in their Whereabouts Filing to confirm if they are at the specified location. If the Athlete cannot make themselves available for testing, the DCO shall file a UAR.
- Where the DCO makes a call to the Athlete during the last five minutes of the sixty-minute time slot and the Athlete answers the call, the DCO shall record the time period from when the Athlete answered the call to when the in-person notification occurred, and the TA shall record in ADAMS that a phone call was made and the time period between the call being answered and the in-person notification of the Athlete.

- **Article 4.10.12 (Testing Outside the sixty-minute Time Slot)**

  The requirement for ADOs to attempt conducting at least one of the three planned OOC tests on an RTP Athlete outside of the sixty-minute time slot (2027 IST Article 4.10.12.1). If the DCO's attempt to collect an OOC Sample outside the Athlete's 60-minute time slot is unsuccessful, the DCO shall file an UAR to the TA.

- **Article 4.10.13 (Testing Pool)**

  The TP includes individual Athletes from individual sports/disciplines, or teams from Team Sports who are from a lower priority and/or lower risk sports/disciplines than those Athletes on a RTP. The TP has been split to include an Individual TP and a Team Sport TP as outlined below:

  - An Individual TP will include Athletes from individual sports who compete at an international or national level; and
  - A Team Sport TP will include (i) national teams from Team Sports who compete at International Events; and (ii) non-national teams that compete internationally or nationally (e.g., clubs/provinces/states, etc.).

  The final draft of the 2027 IST proposes separate minimum testing requirements for the Individual TP and the Team Sport TP. Whilst an IF or a NADO shall plan to test Athletes in an Individual TP at least once per year, the number of planned tests on national teams in a Team Sport TP is proposed to be annually at least half (50%) of the number of Athletes on a team's starting list including substitutes; for example, for football/soccer at least eight annual OOC tests; for basketball at least six annual OOC tests; and for volleyball at least seven annual OOC tests. For non-national teams that compete internationally or nationally, the number of planned annual OOC tests is proposed to be at least a quarter (25%) of the number of Athletes on a team's starting list including substitutes.

  For national teams in a Team Sport TP, an IF or NADO shall plan to conduct OOC Tests on national team Athletes across the whole year including on those Athletes who play in a national club competition and/or may live and compete abroad and not solely when the national team comes together immediately prior to an International Event.

- **Article 4.10.13 also clarifies that:**

  - The IF or the NADO shall plan, independently or in agreed coordination with other ADOs with TA over the same Athlete, to meet the minimum testing requirements of the Team Sport TP.
  - The minimum number of planned OOC Tests to be conducted on Athletes in an Individual TP or across all teams of a sport/discipline in a Team Sport TP per year shall include at a minimum the collection of a urine sample for each Test conducted during a sample collection session.
  - If an IF or NADO includes Athletes in an Individual TP or teams in a Team Sport TP for a shorter period of time than one year, the minimum planned OOC Test requirements shall be met during the shorter period of time.

The final draft of the 2027 IST also proposes separate whereabouts requirements for the Individual TP and the Team Sport TP. Whilst Athletes in an Individual TP shall be required to submit an overnight address, a primary training location, a competition/event schedule and an accurate passport style photograph, teams in a Team Sport TP shall be required to submit a list of Athletes who are part of the team roster, Team Activities and team competition/event schedule. In addition to the mandatory whereabouts requirements, Athletes in an individual TP may file other alternative location(s) such as work or school where the Athlete may be located for Testing during the quarter, and travel information that may impact their availability for testing.

Teams in a Team Sport TP may file other alternative location(s) such as Athlete residential address where the Athlete may be located outside of Team Activities for testing during the quarter. However, in periods where there are no Team Activities scheduled (e.g., the off-season) or where an Athlete is not participating in Team Activities (e.g., is rehabilitating after an injury), they may be required by the IF or NADO rules or procedures to provide more individualized whereabouts, e.g., residential address to enable No Advance Notice Testing of the Athlete during these periods.

The timing for the filing of whereabouts for TP Athletes shall be the same as RTP Athletes, i.e., the fifteenth day of the month preceding the following quarter. However, for the Team Activities for Team Sport TPs, the IF or NADO may set their own filing deadlines for this type of whereabouts based on the nature and requirements of the team sport which shall be documented in their rules and procedures, e.g., weekly, bi-weekly, or monthly. Such submissions shall be made in ADAMS including the start and end date of the Athletes inclusion to/removal from the TP. Further technical enhancements shall be implemented in ADAMS to enable the streamlined upload of TP Athlete information.

The whereabouts shall remain accurate and complete. Athletes and teams in a TP shall file an update as soon as possible after they become aware of a change in circumstances that leads to inaccurate whereabouts. The consequences for Athletes and teams in a TP for not filing on time or for filing accurate whereabouts has further examples included (e.g., fines, Athlete's ineligibility for national teams or events, national federation funding) that could apply either to Athletes in an Individual TP or teams in a Team Sport TP and which would need to be included in the IF or NADOs anti-doping rules and procedures.

If the DCO's attempt to collect an OOC Sample from an Athlete or a team in a TP is unsuccessful, they shall file an UAR to the TA within five days of the attempt to test. The TA shall make available the UAR in ADAMS within 21 days from the day of the attempt.

- **Article 4.10.14 (Testing Athletes Not in a Whereabouts Pool)**

The General Pool section has been removed and ADOs are henceforth given the flexibility to conduct OOC Testing on Athletes who do not meet the criteria for entry into a Whereabouts Pool as determined by the ADO's Risk Assessment. The comment to this Article clarifies that if a TA wishes to test Athletes OOC, who do not meet the criteria for entry into a Whereabouts Pool, they shall obtain their whereabouts information via other means and not from the Athletes themselves, to enable such OOC Testing.

- **Article 4.10.17 (Whereabouts Responsibilities)**

  In line with revised language in Article 20 of the final draft of the 2027 Code, which prohibits ADOs from delegating Doping Control responsibilities to national sporting bodies, IFs and NADOs are no longer permitted to delegate their whereabouts responsibilities to a National Federation. However, an IF or a NADO may still request and/or require assistance from a National Federation in the collection and/or provision of whereabouts for Athletes who are under their jurisdiction and/or who may delegate the provision of their whereabouts to a third party such as their National Federation or a representative thereof, e.g., from a national team or non-national teams such as clubs that participate in a national competition.

x. Notification and Observation of selected Athletes (Article 5.2)

This Article now includes guidance to SCAs that plan to conduct Sample collection at an event that includes “open” or mixed gender sport categories and where the sport gender in which the Athlete competes is not specified under the applicable sports rules. In particular, SCAs shall appoint, at a minimum, a man and woman Sample Collection Personnel (SCP) to such events.

xi. Requirements Prior to Notification of Athletes (Article 5.3)

- **Article 5.3.2 (Phone calls to Athletes outside its current permitted use)**

  Whilst Article 5.3.1 highlights that No Advance Notice Testing of Athletes shall be the method for Sample collection save in exceptional and justifiable circumstances, Article 5.3.2 allows the use of phone calls to Athletes (outside its currently permitted use, i.e., in the last five minutes of a RTP Athlete’s sixty-minute time slot). However, it must be noted that this shall only be allowed on a very strict and limited basis, pursuant to a defined list of specific exceptional circumstances, and based on the conditions outlined below:

  - A DCO shall not call an Athlete outside of the sixty-minute time slot unless they have been instructed to do so by the TA and where the exceptional circumstances listed exist;
  - Following the phone call, if the attempt is successful and a Sample is collected, the test shall be recorded in ADAMS as advance notice and list the exceptional circumstances. The DCO shall also be required to record the time period from when the Athlete answered the call to when the in-person notification occurred.

  Three exceptional circumstances are listed, however, before a phone call can be made, the DCO shall first visit all locations that the Athlete may be located (as either indicated in their whereabouts filing for the day, as obtained by the DCO during the testing mission or via Anti-Doping Intelligence). It is also clarified that where circumstances make it logistically not possible for the DCO to visit all locations, the DCO shall visit those available and possible locations.

  The three exceptional circumstances are:

  - During an attempt to test an Athlete, the DCO obtains information, e.g., from a third party or other information source, where the Athlete can be located and is not a location provided in the Athlete’s whereabouts filing. If it is possible for the DCO to attend this location during the same test attempt, but the DCO is unable to access such location due to restrictions, e.g., no intercom, front desk, reception or security;

- APMU Target Test recommendation that is time sensitive; and
- Follow-up test to evaluate whether the Athlete is a carrier of the EPO variant gene.

Two exceptional circumstances are also listed, in circumstances where the requirement for the DCO to first visit all locations that the Athlete may be located is not applicable.
The two exceptional circumstances are:

- In the context of testing for the ABP where blood samples only are being collected during a SCS for blood profiling purposes or a large-scale screening strategy; and
- Validation of a national or world record based on the rules of the National or International Federation and where there is no sample collection taking place at the competition where the record was achieved.

– **Article 5.3.5 (Official Documentation for SCP)**

Article 5.3.5 confirms that the documentation from the TA evidencing the SCA's authority to collect a Sample from an Athlete does not need to contain the name(s) of the Athlete(s) being requested to provide a Sample.

– **Article 5.3.6 (Identification Requirements for Sample Collection Personnel Article)**

To harmonize the identification requirements for all Athletes regardless of where they may be tested, Article 5.3.3 clarifies the identification requirements for SCP. While conducting testing, all SCP are required to not only carry an identification card from the SCA which they represent, but also a complementary government issued identity document which includes their name and photograph (e.g., passport, driver's license, etc.) to confirm their identity to an Athlete during the SCS. Both the SCP accreditation badge and identification document can be presented in an electronic format. If the SCP appointed to work at an International Event is issued with an official event photo accreditation that contains the photo and name of the SCP, and such accreditation has been issued by the IF or the International Event organizer, this will suffice as an identity document.

– **Article 5.3.7 (Identification Requirements for Athletes Selected to Provide a Sample for Analysis)**

Article 5.3.7 lists the types of government-issued photo identity documents which an Athlete can provide to confirm their identity including the use of official electronic versions. If testing is conducted during an International Event, an Athlete's official event photo accreditation that contains the Athlete's photo and name and that has been issued by the IF or the International Event organizer, will suffice as an identity document. If the Athlete is unable to provide a government-issued photo identity document, this Article provides the alternative option for an OOC test, i.e., the DCO shall check the Athlete's photograph within ADAMS (if the Athlete is part of a RTP or an Individual TP). If a third party is available and can validate the identity of the Athlete, the details of the third party's name and role, and type of government-issued photo identity shall be documented by the DCO. Where a third party is located and can validate the identity of the Athlete but is unable to produce their own photo identification, or where a third party is unable to be located, the DCO shall document this and continue with the Sample collection. These changes will ensure greater harmonization among Athletes and ADOs.

xii. Requirements for Notification of Athletes (Article 5.4)

If the time of initial contact with an Athlete is different than the time of the Athlete's in-person notification (e.g., initial contact with the Athlete is made via a third party, intercom, video doorbell or phone call, etc.), then the time period between initial contact and in-person notification as well as the type of initial contact shall be recorded along with the manner in which the initial contact was made in accordance with Article 7.4.5 (a).

A comment has been included to this Article regarding the permitted activities for delayed reporting to, or the temporary departure from, the Doping Control Station (DCS). In particular, showers shall not be permitted or accepted as a reason for delay to, or temporary departure from, the DCS unless there is a health and safety concern or where a urine Sample is not being collected. It has also been clarified that ice baths are considered an activity as part of an Athlete's warm down and are therefore permitted.

xiii. Sample Collection Equipment – Blood Sample Collection (Article 6.3.4)

The criteria for Sample collection equipment are revised in this Article to ensure that the Sample collection equipment shall maintain its functionality for up to a minimum of ten years from when the Sample is sealed within the equipment.

With a view to the future collection of capillary blood, which will be collected in different types of blood collection tubes than the standard blood vacutainers, the volume requirements for plasma (3ml) and serum (5ml) have been removed from the final draft of the 2027 IST. These volumes will be referenced, however, in a guideline so as not to collect more blood from an Athlete than is necessary for the applicable analyses in plasma, serum, or whole blood.

xiv. Information recorded during a Sample Collection Session (Article 7.4.5)

Article 7.4.5 now includes the requirement to document the following additional information during a SCS:

- The time and type of initial contact with an Athlete and/or third party;
- The time of in-person notification with an Athlete;
- The signature of the notified Athlete; and
- The country where the test is taking place.

It also clarifies that the documented sport gender of an Athlete is the gender the Athlete competes in under the applicable rules. If the sport gender of the Athlete is not specified as either male or female under the applicable rules of the sport, and the Athlete is unaware of their sport gender, the DCO shall record the sport gender as unspecified on the Doping Control documentation, which shall be part of information provided to the Laboratory. The DCO shall also record the Athlete's preferred SCP gender declaration for witnessing the provision of their Sample for use in planning any future SCS, however, this information shall not be provided to the Laboratory.

xv. Requirements for Transport and Storage of Samples and Documentation (Article 9)

Following feedback from stakeholders and based on the knowledge and experience from WADA's compliance monitoring activities, this Article highlights specific timeframes for:

- The SCS documentation to be sent to the TA (no later than five days);

- The shipment of urine and DBS Samples to the Laboratory (no later than seven days - it is important to clarify that this timeframe refers to the time between the Sample collection and the time the Sample is shipped to a Laboratory rather than the time between the Sample collection and the time it is received by a Laboratory);
- The transportation of blood Samples (timeframes depend on the type of analysis requested) and the period of time by when Samples should arrive at a Laboratory from the moment they are collected, reflects the Sample collection to reception time rather than the Sample collection to analysis time by a Laboratory); and
- Doping Control Forms to be entered into ADAMS (five days for whole blood Samples for the Hematological Module of the ABP and twenty-one days for all other types of Samples except when collected in the period listed in Article 4.8.3).

In addition, instructions to TAs following a deviation of the transport temperature, have been moved from the Guidelines for Sample Collection to this Article for greater clarity and reference.

xvi. Ownership of Samples (Article 10) *New Article*

This Article includes a new objective sub-Article to confirm ownership of Samples collected from Athletes and clarifies that the ADO requesting the transfer of ownership of a Sample shall be responsible for any costs associated with that Sample from the time of said request.

Additional language has been added to this Article to clarify the transfer of ownership of a Sample to another ADO and related responsibilities associated with such transfer. These include:

- If the TA, which owns the Sample, plans to discard the Sample after the initial analysis, another ADO with jurisdiction may request the TA to transfer ownership of the Sample to store long-term.
- If a Sample is stored long-term, the transfer of ownership of the Sample is permitted upon request when another ADO with jurisdiction wishes to conduct Further Analysis on the Sample.
- The ADO requesting ownership of a Sample shall be responsible for any costs associated with that Sample from the time of the request, including any shipping costs to relocate the Sample to another Laboratory, long-term storage, Further Analysis and any Result Management. The transfer of ownership shall be communicated to the Laboratory where the Sample is located, by the TA transferring ownership of the Sample.

xvii. Enhancements to the Athlete Biological Passport (ABP) (Article 11) *New Article*

This is a new Article, whose objective is to ensure the optimal use of the ABP as a tool to identify suspicious Athletes and Samples for further follow-up, including additional analysis of existing Samples or the collection of additional Samples, and centralizes the mandatory requirements that are currently included in other sections of the 2023 ISTI or the ABP Operating Guidelines in a central location within the 2027 IST.

Article 11 Summarizes the Key Principles Related to the Implementation and Administration of an ABP Program:

- An ADO's ABP shall be in accordance with the principles of the IST, the IST Technical Document for Sport Specific Analysis (IST TD SSA), the International Standard for Results Management (ISRM) and the applicable Technical Documents specific to the ABP;
- An ADO shall employ the service of a WADA-approved APMU; and

- To ensure an Athlete's passport includes all the relevant Samples of an Athlete, the passport custodian, APMU and WADA should collaborate to ensure each Athlete has only one ADAMS identification number (ADAMS ID).

Procedures for the collection, storage and transport of blood Samples for the ABP are outlined in IST Annex I ("Collection, Storage and Transport of Blood Samples for the ABP") that complements Article 11.

The Article also indicates that the passport custodian shall share relevant passport information, including APMU recommendations via ADAMS, with other ADOs who share testing jurisdiction over the Athlete to ensure proper coordination and effective use of resources. When an Athlete is included in both an IF's and NADO's RTP, and no agreement can be found on the passport custody of the Athlete, the passport custodianship shall be attributed to the IF. Passport custody is attributed to the TA that first tests the Athlete regardless of the Sample type, except:

- When the Athlete is first tested by a MEO, passport custody is attributed to the NADO, and
- When a NADO first tests an Athlete with a different sport nationality, passport custody is attributed to the NADO of that sport nationality.

An ADO shall ensure that recommendations received from the APMU (for further analysis, target testing or long-term storage) are implemented within the APMU issued timeframes. If the ADO does not implement such recommendations, it shall document its reasoning in ADAMS.

Article 11 also clarifies which ADO is responsible for the costs associated with an APMU recommendation for Target Testing, Further Analysis and/or long-term storage. The responsibility is based on the ADO who is the passport custodian and/or the Testing Authority.

xviii. Use of Intelligence to Support Testing Programs (Article 12)

Article 12 includes several sections from current 2023 ISTI Articles 11 and 12 which reflect the continued importance of establishing standards for the efficient and effective gathering, assessment, and processing of Anti-Doping Intelligence in order to support and to incorporate these aspects into testing programs. This Article also includes several references to the new ISII.

xix. Modifications for Athletes with Impairments (Annex A)

Annex A clarifies that for Athletes who use catheters, and who are unable to use gloves, they shall be permitted to wash their hands with soap and thoroughly rinse their hands with water prior to using the catheter to minimize the risk of possible infection. The DCO shall record this.

A new comment has been added in this Annex to highlight that for an Athlete with vision or intellectual impairments, the preferred venue for all OOC testing is a location where the presence of an Athlete representative is most likely to be available for the duration of the SCS. In addition, if the representative of an Athlete with vision or intellectual impairments is not able to be physically present at the location where the Athlete is tested, they have the option to connect virtually via the Athlete's phone (either video or audio) and participate in the SCS.

When an Athlete with vision or intellectual impairments declines to have a representative present, the DCO should nevertheless consider having a representative present during the SCS. This noted,

where an Athlete with vision or intellectual impairments declines to have a representative present or if a representative is unable to be located or contacted, this will not invalidate the test.

In the case of an Athlete with an intellectual impairment, the TA does not have to seek consent to testing from the Athlete's representative and as such has been removed from the comment. As outlined in the Code, anti-doping rules, like competition rules, are sport rules governing the conditions under which sport is played. Athletes accept these rules as a condition of participation or involvement in sport and shall be bound by these rules.

xx. Modifications for Athletes who are Minors (Annex B)

Annex B no longer includes the requirement for the TA to ensure, when possible, that the SCA or the DCO has information to confirm parental consent for testing when collecting Samples from Minors. The reasoning for the removal of this requirement stems from the fact that the participation of such Athletes in sport is governed by the rules of the sport and these competition rules include the obligation for such Athletes to accept anti-doping rules.

If the Athlete representative of a Minor Athlete is not able to be physically present at the location where the Minor Athlete is to be tested, the Athlete representative has the option to connect with virtually via the Athlete's phone (either video or audio) and participate in the SCS including the notification process. The representative and/or the Athlete are not permitted to record the Sample collection and sealing process.

xxi. Collection of Urine Samples (Annex C)

This Annex now includes clarifications on the process that shall be followed in "open" or mixed gender categories where the sport gender of an Athlete is not specified under the applicable sport rules. Upon arrival at the DCS, it is proposed that the Athlete shall declare their sport gender (if they are aware of it). If the Athlete is not aware of their sport gender, they will be asked to declare the preferred gender (man or woman) of the SCP who will witness the passing of their Sample. The Athlete's declaration of preferred gender of SCP shall be considered final and recorded by the DCO for use in planning any future SCS.

xxii. Collection of Blood Samples (Annex F) / (Annex D in the 2023 ISTI)

Annex F now includes the requirement for an Athlete to wait for sixty minutes before the Sample collection of a blood Sample. The DCO shall document whether the Athlete was engaged in any type of physical activity prior to Sample collection, and if so, record on the documentation that is sent to the Laboratory that the Athlete waited the required sixty minutes prior to Sample collection. Part of the sixty-minute wait includes the Athlete sitting in an upright stationary position with their feet on the floor for at least ten minutes. Athletes who use a wheelchair may remain in their chair in an upright and stationary seated position.9

Annex F now includes Articles on blood Sample storage and transportation that were previously included in Annex G, "Collection, Storage and Transport of Blood Samples for the ABP". It also clarifies that the temperature data logger measures the temperature within the storage and transport device and does not measure the actual temperature of the blood Sample within the

9 Please note that this requirement will be included in a revised 2026 ISTI that will be presented at the WADA Executive Committee on 2 December 2026 for approval, and upon approval will come into effect on 1 April 2026.

container(s) in which it is stored or transported. Therefore, it may be possible that a temperature logger records temperatures within the storage and transport device that are below zero without the blood Sample freezing.

xxiii. Collection, Storage and Transport of Blood Samples for the ABP (Annex G) / (Annex I in the 2023 ISTI)

This Annex has been revised to include requirements for all modules of the ABP (Hematological, blood Markers of the Steroidal, Endocrine) when a blood Sample is collected. Several Articles that refer to the collection, storage and transport of all types of blood Samples have been moved to Annex F, “Collection of Blood Samples”.

Instead of waiting two hours before the collection of a whole blood Sample for the Hematological Module of the ABP, Annex G specifies that Sample collection shall not occur within sixty minutes of the Athlete’s participation in competition or other similar physical activity for all blood Samples for the ABP (Hematological, Endocrine, Steroidal). A new Blood Collection Supplementary Report Form will now be required for all blood Samples for the ABP that will include the mandatory questions for the Hematological Module and the confirmation of the sixty-minute wait (if applicable) for all modules of the ABP.[10]

With regards to the mandatory questions an Athlete is asked when collecting a whole blood Sample for the Hematological Module of the ABP, these questions are relocated from Annex G to the IST Guideline - Operating an Athlete Biological Passport as well as the IST Template - Blood Collection Supplementary Report Form, which will be available on WADA’s website and in ADAMS to provide greater flexibility for any future changes. New text has also been added to Annex I to clarify that an ADO may obtain further information or clarify the Athlete’s answers to the mandatory questions of the Hematological Module of the ABP following the SCS.

xxiv. Collection, Storage and Transport of DBS Samples (Annex H) / (Annex J in the 2023 ISTI)

Annex H includes clarifications on the criteria ADOs shall consider when planning to collect DBS Samples. It must be emphasized that although DBS Samples are complementary to existing Sample collections, the collection of DBS Samples shall not replace the need for urine Sample collections as the latter remains an important element of an effective testing program.

DBS Samples, collected either with a blood Sample or in isolation, must be subject to analysis and cannot be collected for long-term storage or for later analysis. Where DBS Samples are collected with urine Samples during the same SCS, the TA may request in advance that the Laboratory place the DBS Samples directly in storage. TAs that decide to collect DBS Samples in isolation (i.e., not with either a urine or blood Sample) shall be able to demonstrate to WADA their rationale for doing so upon request. DBS Samples, if collected in isolation, on RTP or TP Athletes shall not be counted as part of the minimum number of OOC test requirements.

[10] Please note that this requirement along with some changes to the mandatory questions asked to an Athlete when providing a whole blood sample for the Hematological Module of the ABP will be included in a revised 2026 ISTI that will be presented at the WADA Executive Committee on 2 December 2026 for approval, and upon approval will come into effect on 1 April 2026.

xxv. Sample Collection Personnel Requirements (Annex I) / (Annex G in the 2023 ISTI)

Annex I now includes requirements that an ADO's SCP shall not include Athletes who are part of a Whereabouts Pool or who compete at the national or international level. Annex I also includes a requirement for SCP to have a level of flexibility in their schedules to be available to accept testing missions on a regular basis and/or at short notice and be able to achieve the minimum activity level as set out by the SCA. Finally, Annex I requires ADOs to monitor and document the conflicts of interest of its SCP and ensure that a SCP with a conflict of interest is not assigned or involved with conflicted testing missions.

DCOs

As it concerns the training of DCOs, trainee DCOs will now be permitted to observe the Athlete providing a urine Sample in the field. The DCO trainer will be required to observe the trainee DCO when they are witnessing the provision of the Sample, however, the DCO trainer will not directly witness the Sample provision. The DCO training also includes applicable training for the collection of DBS Samples.

BCOs

Enhanced training requirements for BCOs are included to ensure they possess the required qualifications, experience, and proficiency in conducting venipuncture in advance of their appointment by an ADO. The BCO training also includes applicable training for the collection of DBS Samples.

Chaperones

With regards to chaperone training, Annex I includes enhanced training requirements for chaperones and a section for volunteer chaperones. The training of chaperones consists of both theoretical and practical training that covers enhanced training requirements including the importance of the role of the chaperone and their code of conduct. Due to the importance of correctly witnessing the provision of an Athlete's Sample, if a chaperone's duties include witnessing the provision of an Athlete's Sample, Annex I requires that this be included in the on-site training of chaperones and the DCO trainer shall observe trainee chaperones witnessing the passing of the urine Sample but not observing the actual passing of the Sample.

With regards to volunteer chaperones, the Annex includes enhanced requirements for their use, identification, and accreditation. It is proposed that ADOs should avoid using volunteer chaperones or limit their use to events only. Annex I further clarifies that volunteer chaperones shall not witness the provision of an Athlete's Sample, rather, this shall be the responsibility of a DCO or a chaperone who has undergone training on witnessing a provision of a Sample and is fully accredited by the SCA.

xxvi. The order of Annexes has been revised to improve the flow of the text as follows:

2027 IST	2023 ISTI
Annex A: Modifications for Athletes with Impairments	Annex A
Annex B: Modifications for Athletes who are Minors	Annex B
Annex C: Collection of Urine Samples	Annex C
Annex D: Urine Samples - Insufficient Volume	Annex E
Annex E: Urine Samples that do not meet the Requirement for Suitable Specific Gravity for Analysis	Annex F
Annex F: Collection of Blood Samples	Annex D
Annex G: Collection, Storage and Transport of Blood Samples for the Athlete Biological Passport	Annex I
Annex H: Collection, Storage and Transport of Dried Blood Spot Samples	Annex J
Annex I: Sample Collection Personnel Requirements	Annex G
Annex J: Event Testing	Annex H
Annex K: Collection of Urine Samples in a Virtual Environment during a Pandemic and/or National Epidemic	Annex K

xxvii. Defined Terms (Appendix I)

As it concerns IST defined terms, the following terms are new or revised.

- Passport Custodian (moved from ISRM and revised)
- Team Activities (revised)
- Unsuccessful Attempt Report (revised)
- Whereabouts Custodian (new)
- Whereabouts Pool (new)

The IST will now include acronyms for several defined terms that are widely used in the anti-doping community in an effort to reduce the size of the document:

From the Code:
Adverse Analytical Finding (AAF)
Anti-Doping Organization (ADO)
Athlete Biological Passport (ABP)
Atypical Finding (ATF)
In-Competition (IC)
Major Event Organizations (MEO)
National Anti-Doping Organization (NADO)
Out-of-Competition (OOC)
Registered Testing Pool (RTP)
Testing Pool (TP):

From the IST:
Doping Control Station (DCS)
Sample Collection Authority (SCA)
Sample Collection Personnel (SCP)
Sample Collection Session (SCS)
Test Distribution Plan (TDP)
Testing Authority (TA)

Unsuccessful Attempt Report (UAR)

From the ISRM:
Results Management Authority (RMA)

7. Summary of Substantive Changes between the 2023 ISTUE and proposed 2027 ISTUE

The purpose of the International Standard for Therapeutic Use Exemptions (ISTUE) is to establish a robust, transparent, and equitable framework governing the process by which Athletes, Anti-Doping Organizations (ADOs), physicians, and Athlete Support Personnel (ASP) address situations in which, due to a diagnosed illness or medical condition, an Athlete may require the Use, Possession and/or Administration of a substance or method included on the World Anti-Doping Agency's (WADA) Prohibited List (the List).

i. Clarification of Advance and Retroactive Applications (Article 4.1)

Previously included in the introduction to Article 4 of the 2023 International Standard for Therapeutic Use Exemptions (ISTUE), Article 4.1 clarifies that Athletes shall obtain a Therapeutic Use Exemption (TUE) prior to using or possessing a prohibited substance or method, unless eligible for a retroactive TUE under Article 4.3 or another justification under 2027 Code Article 2.6. This ensures alignment with Code principles, procedural clarity, and consistency across Anti-Doping Organizations (ADOs). It aims to reflect clinical realities while reinforcing responsibility.

A new comment to Article 4.1 has been added to reference 2027 Code Article 10.2.4, which outlines a revised sanctioning framework introduced to the second draft of the 2027 Code. This addition is intended to guide stakeholders to the applicable provision in cases where an Athlete has failed to satisfy any of the criteria for the retroactive approval of a TUE.

ii. Reorganization and Refinement of TUE Criteria (Article 4.2)

Article 4.2 has been restructured to present the TUE criteria in a clearer, more logical sequence and to align with medical and procedural expectations:

- **Article 4.2(a)** now focuses exclusively on the requirement for a diagnosed medical condition supported by clinical evidence.
- **Article 4.2(b)** corresponds to the 2023 ISTUE Article 4.2 (c).
    - The revised comment specifies that treatments should be evaluated using evidence-based guidelines, side-effect profiles, accessibility, and medical justification. Athletes are not always required to attempt and fail alternative therapies. These amendments enhance clarity and medical rigor while maintaining the balance between therapeutic necessity and fairness in sport.
- **Article 4.2 (c)** corresponds to the previous Article 4.2 (b).

iii. Reorganization of Retroactive TUE Provisions (Article 4.3)

Formerly 2023 ISTUE Article 4.1, this Article ensures clarity, maintaining existing eligibility criteria while emphasizing the primacy of the Article 4.2 criteria.

- **Article 4.3 (b)** has been amended to be less restrictive, with the aim to be more Athlete centered, by broadening the exceptional circumstances that may allow an Athlete to apply retroactively for a TUE.

iv. Exceptional Circumstances and WADA Oversight (Article 4.4)

Formerly 2023 ISTUE Article 4.3, Article 4.4 preserves the framework for granting retroactive TUEs in exceptional cases when it would be unfair not to, while improving clarity and streamlining the applicable procedural provisions. WADA's prior approval remains mandatory for International- and National-Level Athletes, while non-elite Athletes may apply without pre-approval. Reporting and evaluation elements have been relocated to later Articles for consistency with the overall restructuring.

v. Designation of Assessment Responsibilities (Article 4.5) *New Article*

Newly introduced Article 4.5 delineates who is responsible for assessing each TUE criterion, ensuring accountability and expert oversight. This structural addition promotes fairness, transparency, and procedural consistency.

vi. Establishment of Standardized TUE Processes (Article 5.1)

Article 5.1 replaces earlier quotations from the Code with a clear mandate for each ADO to implement a standardized TUE application process in compliance with the ISTUE. The accompanying comment now refers to Annex A flowcharts that summarize TUE procedures, recognition pathways, and appeal rights, thereby improving accessibility and compliance clarity.

vii. Publication and Transparency Requirements (Article 5.2) *New Article*

Article 5.2 consolidates all ADO publishing obligations, requiring that key TUE information be publicly available and easily accessible. ADOs shall post:

- TUE procedures and application methods e.g., forms based on the WADA template;
- Definitions of National- and International-Level Athletes;
- Prioritization policies affecting TUE eligibility; and
- International Federation (IFs) /Major Event Organization (MEO) recognition information.

This addition standardizes transparency across ADOs and ensures that Athletes are fully informed of their responsibilities.

viii. Clarification of Therapeutic Use Exemption Committee Composition and Function (Article 5.3)

Article 5.3 has been streamlined and reorganized. It establishes clear standards for how ADOs shall form and operate their Therapeutic Use Exemption Committees. Each ADO should have a qualified, impartial committee, composed of at least three physicians experienced in sports medicine, one with condition-specific expertise when needed, to evaluate TUE applications under Article 4.2.

The provisions provide a standardized, transparent framework that ensures TUE decisions are clinically sound, ethically independent, and aligned with the Code.

ix. Timelines for TUE Decisions (Article 5.4)

Formerly ISTUE Article 6.9, this provision has now been relocated to improve structural flow. It formalizes that ADOs or Therapeutic Use Exemption Committees shall issue decisions within twenty-one days of receiving a complete application or recognition request, reinforcing timeliness and predictability.

x. Clarification of Effective Dates (Article 5.5) ***New Article***

Article 5.5 provides clear guidance on determining the effective date of a prospective TUE and expressly limits the temporal scope of retroactive TUEs, confirming that any TUE granted retroactively shall not apply to future periods. It also allows prospective TUEs to be future-dated, for example, in cases involving the renewal of an existing authorization. The accompanying comment clarifies that ADOs are not required to evaluate prospective and retroactive applications separately but should recognize the procedural distinction between them.

This clarification promotes global harmonization by aligning practices across ADOs, many of which have previously applied differing approaches to the effective dating of TUEs.

xi. Duration and Validity of TUEs (Article 5.6)

Article 5.6 stipulates that TUE duration should generally correspond to treatment length and introduces a maximum duration of ten years. This ensures medical appropriateness while eliminating indefinite authorizations.

xii. Notification of TUE Decisions (Article 5.7)

This Article now clarifies the responsibilities of ADOs in notifying Athletes of TUE denials, thereby ensuring consistent and harmonized communication.

xiii. International Federation Notification Obligations (Article 5.8) ***New Article***

This new Article formalizes notification requirements when an IF grants or refuses to recognize a TUE, aligning with 2027 Code Articles 4.4.3.1 and 4.4.3.2. The related comment on application forms has been relocated to Article 5.2 for logical consistency.

xiv. TUE Monitoring Responsibilities (Article 5.10) ***New Article***

Introduced to clarify monitoring responsibilities, this Article establishes that the ADO which granted the TUE retains responsibility for follow-up and compliance with any conditions, unless another arrangement is mutually agreed upon. This approach promotes efficiency and ensures that oversight remains with the body most familiar with the Athlete's case.

xv. Appeals of TUE Decisions (Article 5.12) *New Article*

Newly introduced to fill an informational gap, Article 5.12 aligns with 2027 Code Articles 4.4.2, 4.4.4.3, 4.4.7, 4.4.8, and 13.4. It provides explicit guidance on available appeal routes and corresponds to Annex A flowcharts, thereby ensuring greater transparency and procedural certainty.

xvi. Clarification of Anti-Doping Organization Jurisdiction (Article 6.1 - 6.4) *New Articles*

Articles 6.1 - 6.4 have been restructured to clarify where Athletes shall apply depending on their competitive status (National, International, or Major Event). Articles 6.3 and 6.4, both new Articles, derive from 2027 Code Articles 4.4.3 and 4.4.4, respectively, and enhance procedural flow and jurisdictional clarity.

xvii. Incomplete or Withdrawn Applications (Article 6.6)

Article 6.6 clarifies that if an Athlete fails to respond to a request for additional information within a reasonable timeframe, the ADO may cancel the TUE application. This ensures process efficiency and accountability.

xviii. Removal of Ambiguous Wording (Article 6.10)

The word “materially” has been removed to eliminate subjectivity. The accompanying comment now recognizes that dosage fluctuations may occur in legitimate clinical contexts and should be addressed in the TUE decision through dosage ranges or upper limits, consistent with the ISTUE “Medical Information for TUEs” documents (previously the TUE Physician Guidelines).

xix. Withdrawal of TUEs (Article 6.12)

This revised Article clarifies that ADOs, through their Therapeutic Use Exemption Committees, may withdraw a TUE when criteria are no longer met, such as when treatment ceases. WADA’s authority for TUE reviews remains covered by 2027 Code Article 4.4.6 and 2027 ISTUE Article 8.

xx. Multiple TUEs (Article 6.13)

This Article has been further refined to clarify that an Athlete may hold multiple TUEs concurrently, provided each pertains to a distinct medical condition or treatment. However, Athletes are expressly prohibited from submitting multiple TUE applications to different ADOs for the same substance or method to treat the same condition. This provision reinforces procedural integrity, prevents duplicative or conflicting decisions, and ensures consistency in the administration of TUEs across the anti-doping system.

xxi. Referral of International Federation Decisions to WADA (Article 6.18) *New Article*

Derived from 2027 Code Article 4.4.3.2, Article 6.18 gives National Anti-Doping Organizations (NADOs) twenty-one days to refer an IF-granted TUE to WADA for review. The TUE remains valid for International-Level and Out-of-Competition testing during the review period, enhancing procedural transparency and fairness.

xxii. Automatic Recognition of TUEs (Article 7.2 (a))

Under the proposed 2027 ISTUE Article 7.1 (a), the default position shifts to automatic TUE recognition unless WADA grants an exception to an IF or MEO. The new wording to this Article ensures all properly reported TUEs (under 2027 ISTUE Article 5.9) are automatically accepted. Additionally, the new wording clarifies that once a TUE has been granted and automatically recognized, it cannot be reviewed further by the ADO. It is important to emphasize that IFs or MEO still have the ability to evaluate and decide whether or not to recognize TUE decisions if they opt out of automatic recognition by requesting an exemption from WADA. However, the objective of these proposed amendments is to decrease administrative burdens for Athletes and promote greater consistency and fairness in anti-doping procedures.

xxiii. Exemption from Automatic Recognition (Article 7.2 (b))

If an IF or MEO opts out of automatic recognition, it must publish which TUEs are automatically recognized, and which require Athlete submission. This increases transparency and accountability.

xxiv. Retroactive Recognition (Article 7.4) *New Article*

Allows an IF or MEO that has obtained a WADA exception to grant retroactive recognition of a TUE, provided the Athlete demonstrates compliance with 2027 ISTUE Article 4.2. This provision balances procedural flexibility with medical rigor.

xxv. Referral to WADA for Non-Recognition (Article 7.6) *New Article*

Derived from 2027 Code Article 4.4.3.1, this Article introduces a twenty-one-day timeframe for NADOs or Athletes to refer non-recognition decisions to WADA. During this period, TUEs remain valid nationally but not internationally.

xxvi. Clarification of WADA Review Powers (Article 8.1 - 8.2)

Articles 8.1 and 8.2, derived from 2027 Code Article 4.4.6, expand on WADA's authority to review TUEs. Article 8.1 sets out WADA's mandatory and discretionary review powers, while Article 8.2 specifies that certain reviews must involve consultation with members of the WADA Therapeutic Use Exemption Committee or external experts, ensuring medical and procedural integrity.

xxvii. WADA Review Costs (Articles 8.9 - 8.10)

Clarifies that WADA may require the ADO to bear reasonable costs associated with reviews if the ADO's original decision is overturned.

xxviii. Enhanced Data Protection and Transparency (Article 9)

Article 9.1 now explicitly requires compliance with the 2027 International Standard for Data Protection (ISDP), including adherence to data retention timelines specified in its Annex. Article 9.5 broadens the scope to emphasize the importance of TUE data in supporting education, policy refinement, and the early detection of misuse patterns. These changes reinforce transparency, fairness, and the evidence-based management of the TUE process.

VII. Summary of key requirements in the new International Standard for Intelligence and Investigations

The purpose of the International Standard for Intelligence and Investigations is to set out the core responsibilities of Anti-Doping Organizations (ADOs) regarding collecting, receiving, storing, and assessing raw information, using Anti-Doping Intelligence, and conducting investigations into possible anti-doping rule violations, non-compliance of Signatories and WADA-accredited laboratories, and other activities that may facilitate doping.

This section will provide a summary of the key requirements in the new International Standard for Intelligence and Investigations[11].

i. Collection and Use of Raw Information and Intelligence (Article 4.1)

ADOs must be capable of collecting, receiving, storing, assessing and using Raw Information and Anti-Doping Intelligence to inform and guide their anti-doping activities.

ii. Sharing of Anti-Doping Intelligence (Article 4.2.2)

ADOs shall share Anti-Doping Intelligence in a secure manner when it would allow the receiving Anti-Doping Organization to fulfill its obligations under the Code and International Standards.

iii. Security and Confidentiality Protocols (Article 4.2.3)

ADOs shall have policies and procedures to manage information securely, confidentially and in accordance with the International Standard for Data Protection.

iv. Confidential Human Source Management (Article 4.2.4)

If managing Confidential Human Sources, ADOs shall have policies and procedures for their handling, ensuring protection and proper management.

v. Use of Intelligence to Guide Anti-Doping Activities (Article 4.3.2)

ADOs shall use Raw Information and/or Anti-Doping Intelligence to guide and inform their anti-doping activities.

vi. Initiation of Investigations where Justified (Article 5.3.1)

ADOs shall conduct investigations when there is reasonable cause to believe a violation of the Code or an International Standard has occurred.

vii. Impartial and Objective Investigations (Article 5.3.3)

Investigations shall be impartial, objective, and open-minded, seeking evidence for or against a potential violation.

[11] Terms that are capitalized in this section refer to defined terms in the 2027 Code and International Standards.

viii. Special Handling of Protected Persons and Minors (Article 5.3.4)

ADOs shall have policies for investigations involving Protected Persons and Minors which reflect the different treatment these groups receive under the Code.

ix. Investigation Confidentiality (Article 5.3.8)

ADOs shall treat all information obtained in an investigation confidentially and only share it on a need-to-know basis.

x. Documenting Investigations (Article 5.3.9)

ADOs shall document all key steps of an investigation, from the initiation to the conclusion, including outcomes of the investigation.

xi. Cooperation with Investigations (Article 5.4.1 and Art 5.4.2)

Code Signatories, Athletes, and Athlete Support Personnel are required to cooperate with investigations conducted by an ADO. Procedural safeguards such as the right not to self-incriminate and the right to be represented by counsel at the person's own expense must be respected.

VIII. Code Compliance: Practical steps for Code Signatories following the adoption of the 2027 Code

The following aspects of Code Compliance should be specifically considered by Signatories as it concerns the practical steps which should be taken following the adoption of the 2027 Code and International Standards:

- Code Signatories **do not** need to sign a new Code acceptance form.

- Following the December 2025 World Conference on Doping in Sport (World Conference), the first step for all Signatories is to incorporate the 2027 Code into their policies, statutes, legislation, or anti-doping rules (where applicable). To avoid any compliance interventions, Signatories shall ensure that they have Code compliant anti-doping rules (or legislation if required) reviewed by WADA as in line with the Code and adopted into their legal system by 1 January 2027.

    - To facilitate this task, WADA will provide Signatories with Model Rules based on the 2027 Code that will be published shortly after the World Conference for National Anti-Doping Organizations (NADO), International Federations (IF), Major Event Organizations (MEO) and National Olympic Committees (NOC). Red-lined comparisons between the Model Rules based upon the 2021 Code and the Model Rules based upon the 2027 Code will also be provided to help Signatories identify the provisions to be edited. However, to simplify the process, Signatories may elect to draft *ex novo* rules based on the 2027 Model Rules rather than editing their current rules based on the 2021 Code.

    - WADA must review all Signatories anti-doping rules, regulations, legislation, etc., and ensure that they are in line with the Code. However, it is the Signatories responsibility to conduct an assessment on their own legal system and submit any relevant documents to WADA's

Compliance Unit (compliance@wada-ama.org) in order for WADA to conduct its review. WADA will provide Signatories with any specific, individualized assistance and guidance that might be needed in this process.

- To avoid any potential Compliance consequences, Signatories are strongly encouraged to begin taking the appropriate steps without delay to amend their policies, statutes, legislation or rules (where applicable) to ensure that all revised documents enter into force on 1 January 2027. Experience has shown that adoption procedures can take some time; therefore, it is strongly recommended that Signatories finalize drafts in line with the Code in the first part of 2026 and dedicate the second part of the year to the adoption procedure.

– The next step to be taken by all Signatories is the implementation of an anti-doping program based on the new regulations each Signatory will draft and formally adopt, as per above.

  - Signatories should devote sufficient resources to implement such programs.

  - To assist Signatories in this second step of the compliance process, and as part of the upcoming CISP (see **Section XI**), WADA will provide guidelines based on the 2027 Code and International Standards.

IX. General Considerations on Code Compliance

To ensure efficiency in the harmonized fight against doping in sport and fairness for athletes, compliance with the Code and International Standards are mandatory for all Code Signatories. As the international independent agency tasked with coordinating, monitoring and promoting the fight against doping in sport, one of WADA's core activities is to monitor the compliance with the Code of its Signatories. While WADA is the governing body for the implementation of the Code, it is the Code Signatories who are responsible for the implementation of applicable Code provisions through policies, statutes, rules, regulations and programs according to their authority and jurisdiction. Signatories have a number of Code Compliance obligations under WADA's Code Compliance Monitoring Program.

In 2015, WADA shifted its focus from mainly ensuring that Signatories have rules in place to also monitoring that Signatories have quality anti-doping programs in place; and, in keeping with strong demand from stakeholders, that their compliance is monitored rigorously. To do so, in 2016, WADA initiated development of an ISO9001:2015 certified Code Compliance Monitoring Program which has continued to evolve over time and includes Code Compliance Questionnaires (CCQ), audits and program area monitoring. The purpose of the Program aims to reinforce athlete and public confidence in the quality of Signatories anti-doping programs.

On 1 April 2018, the ISCCS entered into force, which further reinforced WADA's Code Compliance Monitoring Program by creating a clear framework for WADA's compliance activities and outlining the responsibilities and consequences applicable to Signatories, as well as the procedure to be followed by WADA and the Signatories in case non-conformities are identified. The ISCCS has been updated in 2024 and again as part of the 2027 Code and International Standards Update process so that it remains fit for purpose.

Please consult the Compliance Monitoring Program section of WADA's website for more information.

X. 2027 Code Implementation Support Program

To assist Signatories in their adjustment to, and implementation of, the 2027 Code and International Standards, WADA will prioritize the development and publication of additional resources as part of its educational Code Implementation Support Program (CISP) to help explain the relevant changes and, importantly, to underline what Signatories and the wider anti-doping community must do in order to meet the new requirements. In addition, and in collaboration with internal and external technical experts, the Guidelines that support the implementation of each Standard will be revised and updated. Furthermore, as part of CISP, WADA shall provide Signatories with the relevant templates, proformas and resources which are referenced in the International Standards.

The overarching aim of CISP is to provide simplified guidance for Signatories on what is required by 1 January 2027 when the 2027 Code and International Standards come into effect. Therefore, CISP will focus on the following activities, phased in over the implementation year:

- Publication of a suite of resources that focus on explaining what has changed and what needs to be done to implement such changes;
- Revision and publication of the Guidelines that support each of the International Standards;
- Creation of new resources referenced in the International Standards or Guidelines to be made available for Signatories in meeting the requirements;
- Identification of, and updates to, existing CISP resources relevant for the 2027 cycle;
- Communicating changes to those under the jurisdiction of anti-doping rules/Code through the provision of “cascade” materials that Signatories can use to inform athletes of the changes (as one example); and
- Delivering webinars for the anti-doping community to support their understanding of the new requirements.

To complement CISP, and to provide Signatories with further guidance on the implementation of the 2027 Code and International Standards, opportunities will be taken at the following different WADA Regional Symposia to promote CISP within each region:

  - Europe: Baku, Azerbaijan on 18-19 March 2026
  - Africa: Cairo, Egypt on 28-29 April 2026
  - Asia and Oceania: Beijing, China on 2-3 June 2026
  - Americas: Lima, Peru on 1-2 July 2026

Recognizing that Signatories will equally need to communicate Code changes to their own stakeholders, WADA highlights now that Signatories should develop and implement a Code implementation plan for their respective organizations to make best use of the implementation year (2026). This should include dedicated activities to update staff and Committee members (e.g., TUE Committees, frontline workers such as Educators and Doping Control personnel and most importantly those impacted by the changes to the regulations including athletes and athlete support personnel).

WADA will communicate more regarding CISP in early 2026.

XI. Contact information

For more information, please contact code@wada-ama.org.