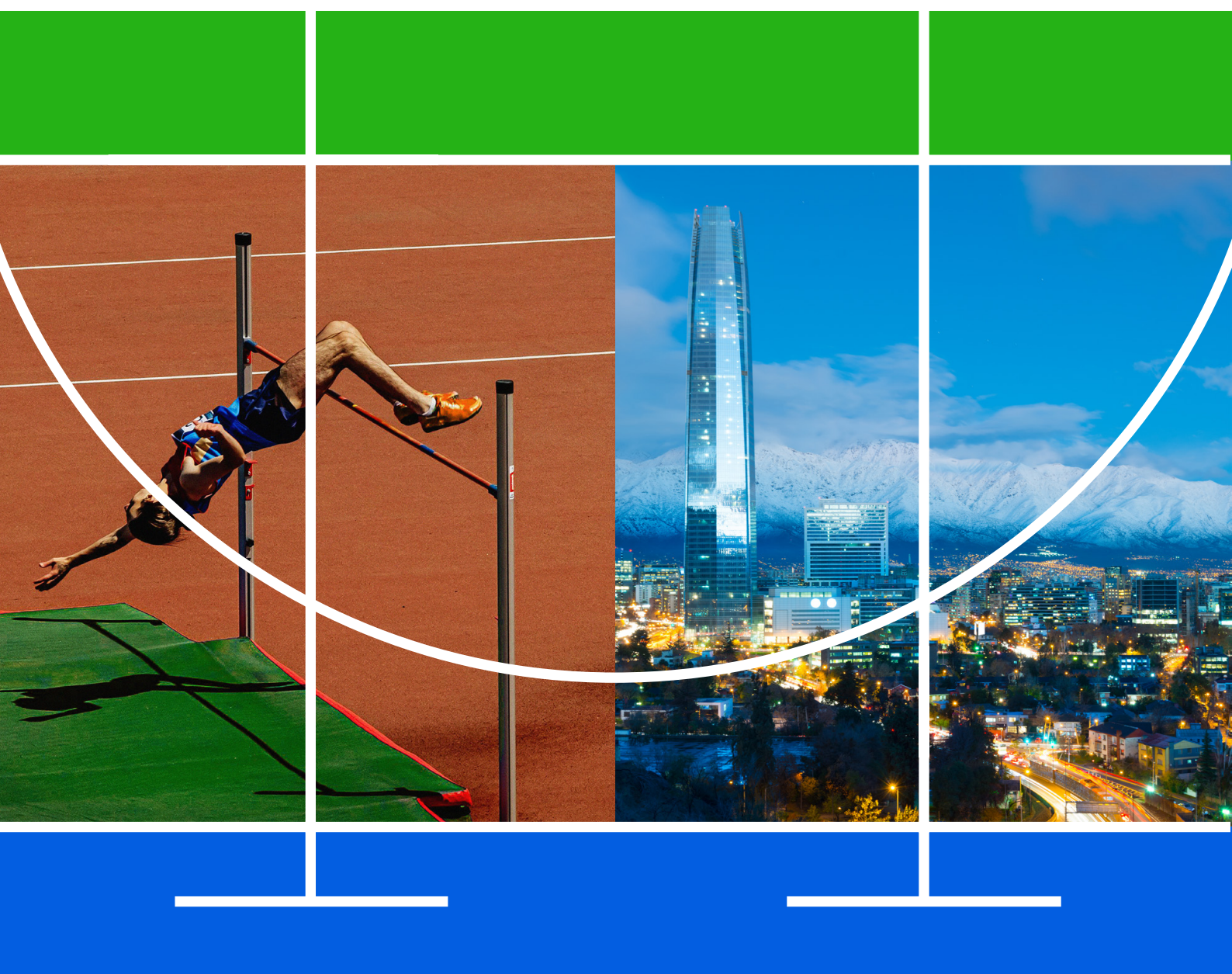


Report of the

# INDEPENDENT OBSERVERS

Pan American Games  
Santiago, Chile 2023



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## 1.0 Acronyms and Abbreviations

Full Name	Acronym/Abbreviation
ADAMS	Anti-Doping Administration and Management System
ADRV	Anti-Doping Rule Violation
BCO	Blood Collection Officer
CCQ	Code Compliance Questionnaire
CNCD	Comision Nacional de Control de Dopaje
CRC	Compliance Review Committee
DBS	Dried Blood Spot
DCC	Doping Control Coordinator
DCCC	Doping Control Coordination Centre
DCF	Doping Control Form
DCO	Doping Control Officer
DCS	Doping Control Station
ExCo	Executive Committee
IC	In-competition
IF	International Federation
IO	Independent Observer
ISCCS	International Standard for Code Compliance by Signatories
ISE	International Standard for Education
ISTI	International Standard for Testing and Investigations
ITA	International Testing Agency
LADF	Laboratoire AntiDopage Français
LOC	Local Organizing Committee
MEO	Major Event Organizer
NADO	National Anti-Doping Organization
NOC	National Olympic Committee
OOC	Out-of-competition
PAN RADO	Pan American Regional Anti-Doping Organization
PASO	Pan American Sports Organization
PASO AD Unit	PASO Anti-Doping Unit
PS	PASO
PSMC	PASO Medical Commission
RA	Risk Assessment
RMA	Results Management Authority
RTP	Registered Testing Pool
SCA	Sample Collection Authority
SCP	Sample Collection Personnel
TA	Testing Authority
TDP	Test Distribution Plan
TP	Testing Pool
TUE	Therapeutic Use Exemption
TUEC	Therapeutic Use Exemption Committee
UA	Unsuccessful Attempt
WADA	World Anti-Doping Agency
WADC	World Anti-Doping Code

## 2.0 Introduction and Acknowledgements

The Independent Observer (IO) Team, appointed by the World Anti-Doping Agency (WADA), upon the Pan American Sport Organization (Panam Sports or PASO) invitation, attended the XIX edition of the Pan-American Games 2023 in Santiago de Chile, Chile from 17 October to 7 November 2023.

The IO Team program was established by WADA to enhance athletes' and the public's confidence at major sporting events by monitoring and reporting on all phases of the doping control processes and education activities in an objective manner. The IO Team, through its observations, assesses whether procedures are in line with the World Anti-Doping Code (WADC) and relevant International Standards and provides onsite advice, guidance, and assistance in a collaborative manner to the body in charge of delivering the doping control program.

The IO Team wishes to thank the PASO, the Comision Nacional de Control de Dopaje (CNCD) from Chile and the Pan American Regional Anti-Doping Organization (PAN RADO) for their support and partnership throughout the Games.

We extend our appreciation to Dr. Bernardo Chernilo, President of the PASO Medical Commission (PSMC) to Dr. José Veloso, member of the PSMC and PASO Anti-Doping Unit (PASO AD Unit) appointed by PASO as the main point of contact for the IO Team, Roberto Enrique Dagnino Batarce, Executive Director of CNCD, Andres Gonzalez, Testing Manager of CNCD and Manuel Villalobos, Executive Director of PAN RADO and their hard-working staff, for their support of the IO Team during its mission and their consideration of the observations and recommendations provided by the IO Team.

## 3.0 WADA Independent Observer Team

The Independent Observer (IO) Team consisted of the following members:

- Juan Manuel Lauria (Argentina), Manager, WADA Regional Office, Latin America and Caribbean (Chair).
- Federico Perroni (Uruguay), Manager, WADA Regional Office, Latin America and Caribbean (Team Manager).
- Maria Fernanda Carraca Frias (Brazil), Testing Manager, National Anti-Doping Organization of Brazil.
- Clare Eagan (USA), ex-Olympic Athlete (Biathlon) and WADA Athlete Council Member.
- Natalia Chaparro (Colombia), Investigator, WADA Intelligence and Investigations.

## 4.0 Games Overview

The Pan American Games is a major sporting event held every 4 years in the Americas featuring summer sports. The XIX Pan American Games, also known as Santiago 2023 Panam Games or Santiago 2023 included 419 sporting events in 60 sports disciplines with the participation of 6,680 athletes from 41 countries from North America, South America, Central America, and the Caribbean. A total of 1,379 medals were handed out in Santiago and 21 sports events served as qualification events for Paris 2024 Olympic Games.

The XIX Pan American Games were held in a total of 41 venues in and around Santiago. Regarding the anti-doping program implemented at the Games, the Test Distribution Plan (TDP) delivered a total of 1,838 samples (including 17 diluted samples), which represents an increase of 7.7% of samples compared to the original testing plan, which included 1,691 samples. This increase in the number of samples was due to a number of factors, including additional tests requested by the International Federations (IFs).

However, there has been a slight decrease of 9% in out-of-competition (OOC) testing in comparison to the TDP, while there has been an increase of 18.7% in in-competition (IC) testing. It would be beneficial to have more OOC samples collected before the start of the competitions (i.e. when the athletes arrive in the athletes' village).

The IO Team had the opportunity to visit 34 venues and observe doping control procedures for 37 sports and disciplines. In addition, the Chair and the Team Manager of the IO Team were able to attend the PASO AD Unit daily meetings, where they were able to share the observations of the IO Team and provide feedback. The IO Team is pleased to report that many of these recommendations for improvements were acted upon and implemented throughout the period of the Games.

The IO Team also attended the introductory meeting for the Chef de Mission and Team Physicians, as well as the initial meeting of the Doping Control Officers (DCOs). The IO Team was also able to attend one result management hearing and observe the processing of Therapeutic Use Exemptions (TUEs) while on site during the Games.

The feedback from athletes and Athlete Support Personnel (ASP) to the IO Team during the Games was, for the most part, positive. There was a general sense of confidence in the anti-doping program delivered and a willingness to support efforts made to fight for clean sport.

The in-Games phase of the anti-doping program was generally satisfactory, and the IO Team encourages the PASO AD Unit, CNCD, and PAN RADO to consider transferring the knowledge and experience gained from these Games to the next Games, to be held in Lima, Peru, in 2027. However, the pre-Games phase was substandard. Less than one month before the start of the Games, PASO was declared non-compliant with the World Anti-Doping Code (WADC) due to its failure to address critical non-conformities, as indicated in Section 5 of this report. These non-conformities pertained to the development of a Risk Assessment (RA) and the TDP. The IO Report for Lima 2019 included several recommendations to address these issues, but unfortunately, they were not fully followed. The sustained recommendations from the 2019 report are detailed in this report.

## **4.1 Key players and Organization**

### **4.2 Panam Sports Medical Commission and its Anti-Doping Unit**

PASO is the governing body for the Pan American Games, with the responsibility of developing and enforcing Code-compliant anti-doping rules.

The PASO Medical Commission (PSMC) is the committee with overall responsibility for the anti-doping program, including medical aspects, as well as for the development and delivery of doping control activities at the Games.

The PSMC is composed of 17 members. Similarly to the Lima 2019 Games, four members of the PSMC were selected by the PSMC to act as the PASO AD Unit. The PASO AD Unit was entrusted with the responsibility of overseeing the practical aspects of anti-doping in the lead-up to and during the Games. This included the development of a RA and TDP, an initial review of the result management process, and the recognition and/or granting of TUEs during the Games.

The IO Team observed that the planning and workload involved in implementing a robust anti-doping program for a major Games is significant and may present challenges for a Medical Commission that is also responsible for the planning and implementation of the medical aspects of a major event.

The IO Team would like to acknowledge the establishment of an Anti-Doping Unit. However, the IO Team strongly recommends that PASO consider sourcing regional experts in Anti-Doping to be part of the Anti-Doping unit for future Games. It is of the utmost importance that the members of the PASO AD Unit are experts who work full time in anti-doping. This will ensure that they are able to apply the requirements of international standards, thus maintaining PASO's compliance. Furthermore, it will guarantee that global best practices are implemented.

#### **4.2.1 Chilean National Anti-Doping Organization & Pan-American RADO**

The CNCD was appointed by PASO as the Sample Collection Authority (SCA), with the responsibility of implementing and delivering the anti-doping program of the Games. Furthermore, the CNCD and the PAN RADO entered into an agreement with the intention of working together to deliver the anti-doping program of the Games.

The delegation agreement between the PSMC and the CNCD was signed after the Games had already commenced.

The IO Team was most grateful for the welcoming and professional approach adopted by the CNCD and PAN RADO staff during the Games.

#### **4.2.2 Corporación XIX Juegos Panamericanos Santiago 2023**

The "Corporación XIX Juegos Panamericanos Santiago 2023" had the role of local organising committee (LOC) for the Panam Games 2023. It was responsible for the publication of the Doping Control Guidebook for the Panam Games 2023, the preparation and delivery of DCSs, the establishment and enforcement of a contract with the Paris Laboratory and the courier for sample delivery, and the transportation of athletes after doping control if necessary.

#### **4.2.3 Laboratoire Anti-dopage Français**

The WADA-accredited laboratory in Paris (LADF) was selected by the LOC to analyze samples collected during the Panam Games 2023.

### **5.0 Panam Sport Non-Compliance Declaration and Pre-Games Initiatives**

#### **5.1 Panam Sport Non-Compliance Declaration**

On November 24, 2022, PASO received the WADA's Code Compliance Questionnaire (CCQ). This questionnaire is a component of WADA's Compliance Monitoring Program for Major Event Organizations (MEOs) and is distributed approximately nine months before the commencement of the Games to ensure that the MEO is prepared to deliver a Code-compliant anti-doping program. Any corrective actions identified from the CCQ are documented in the Corrective Action Report (CAR), which is sent to the MEO with specific deadlines for addressing the issues before the Games.

PASO received nine corrective actions in the CAR. However, several of these corrective actions remained outstanding past the established deadlines. As per the procedures outlined in the International Standard for Code Compliance by Signatories (ISCCS), these non-conformities were reported to WADA's independent Compliance Review Committee (CRC). The CRC recommended to WADA's Executive Committee (ExCo) that PASO be declared non-compliant.

On September 22, 2023, WADA's ExCo alleged that PASO was non-compliant with the WADC due to its failure to implement critical corrective actions relating to its anti-doping program by the agreed deadlines as part of WADA's CCQ exercise<sup>1</sup>. The critical non-conformities concerned the failure to meet the minimum requirements to develop a RA and TDP in line with the requirements of the Code and the ISTI for the 2023 Pan American Games.

Under the ISCCS, PASO had 21 days following the date of receipt of the formal notice of non-compliance (i.e., until October 13, just seven days before the Opening Ceremony of the Games) to correct the non-conformities in full before the formal notice of non-compliance became a final decision with immediate effect. WADA worked closely with PASO representatives after the CAR was issued and throughout the non-compliance period. WADA recommended that PASO engage the CNCD and the PAN RADO to work collaboratively to address the non-conformities.

In the week leading up to the start of the Games, the CNCD and PAN RADO, along with WADA's Latin American and Caribbean Regional Office, cooperated to develop the RA and TDP. WADA's independent CRC then re-assessed PASO's compliance status and determined that the non-conformities were fully addressed. WADA's ExCo agreed with this recommendation and withdrew the notice of non-compliance.

## 5.2 Pre-Games Initiatives

Considering the aforementioned issues and the delays in developing the testing program, its implementation faced significant challenges both during the preparation phase and at the outset of the Games.

The agreement with the LADF was not finalized and received the Games TDP on the eve of the Games. Consequently, there was insufficient time for the LADF to prepare the plan for the analyses of the samples. Additionally, there was inadequate time to assess potential customs delays for shipments to the laboratory.

The CNCD also lacked adequate time to assess and coordinate the implementation of the Test Distribution Plan (TDP) (e.g., signing the delegation agreement, accessing ADAMS, allocating sample collection personnel (SCP) in accordance with the TDP, among other tasks). Additionally, the delegation agreement between the PASO AD Unit and CNCD was finalized only on the eve of the Games, and an ADAMS account for CNCD was set up late with limited access to information in ADAMS. These and related challenges are further detailed in the respective sections of this report.

Further, only 12 OOC samples were collected from the time the village opened on 15 October 2023 until the start of the first competition. Despite this, the CNCD was still able to establish a list of athletes for possible OOC target testing on arrival and during the Games, based on the "short list" received on the eve of the event. By way of comparison, for Lima 2019, 29 OOC samples were collected in Pre-Games period.

As recommended in the Independent Observer Report for Lima 2019, the quality of the testing program could have been enhanced by establishing a pre-Games Taskforce consisting of National Anti-Doping Organization (NADO) regional anti-doping experts. The pre-Games Taskforce would have made testing

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<sup>1</sup> Refer to the "Compliance with the World Anti-Doping Code" section at the following link: <https://www.wada-ama.org/en/news/wada-executive-committee-approves-2024-prohibited-list>



recommendations to participating countries, ensuring adequate testing of athletes who were not subject to robust testing programs in the lead-up to the Games.

**The following recommendations provided in IO Report for Lima 2019 are sustained:**

- For future Games, it is strongly recommended that PASO moves away from the current traditional approach of managing anti-doping activities through its Medical Commission. Instead, PASO is encouraged to establish an operationally independent Anti-Doping Unit, integrated with members that work daily in anti-doping operations with expertise to strategically plan and deliver a comprehensive anti-doping program compliant with the mandatory requirements of the WADC and the International Standards and in collaboration with the NADO of the country hosting the Games.
- For future Games, the PASO AD Unit should consider setting up a pre-Games Taskforce involving the LOC, the appointed SCA, and key experts from relevant IFs and NADOs. It is highly recommended that the PASO AD Unit starts the Taskforce 9-12 months in advance of the Games to benefit from its work and ensure that a greater level of testing occurs in the months leading up to the Games. This process will also help in developing a prioritized list of athletes that can be incorporated into the Games' TDP.
- Given that the period prior to the athletes' arrival at the Games is considered high-risk for doping, efforts should be made to target test athletes in high-risk sports, such as athletics and cycling, based on intelligence. To facilitate this process, the IO Team recommends this be incorporated into the next Games' TDP and that testing agreements with relevant IFs and NADOs be put in place to enable such testing outside of the Athlete Village(s) and competition venues.
- It is recommended that the PASO AD Unit liaise with WADA in advance of the next Games to receive guidance on how to develop such a Taskforce.
- It is also strongly recommended that the PASO AD Unit starts operating at least 12 months before the Games period to ensure that all the mandatory requirements of an anti-doping program, including the rules, technical and logistical procedures, and relevant services including the agreements with the appointed WADA Accredited Lab and the LOC and SCA are reviewed, completed, and formalized before the start of the Games.

**Additional recommendations:**

- The PASO AD Unit shall be composed of members who are not part of the PSMC and who are not a physician from a participating country's NOC at the Games.
- It is strongly recommended that, upon receipt of a CCQ, PASO completes all corrective actions in a timely manner, avoiding compliance consequences, and ensuring they are prepared to deliver a Code-compliant anti-doping program.

**6.0 Pre-Games Testing Program and Cooperation with International Federations and National Anti-Doping Organizations**

It should be noted that, as previously mentioned, a pre-Games testing program was not in place in the lead-up to Santiago 2023. Considering this, IFs were requested via a general circular letter in the lead-up to Santiago 2023 by PASO AD Unit to ensure that athletes who had qualified were subject to testing ahead of the Games.

### **Recommendation for PASO:**

IO Team recommends that for future Panam Games, PASO contacts applicable IFs and NADOs well in advance of the Games to remind them of the importance of testing athletes before the event.

## **7.0 Athlete's Anti-Doping Education**

While some educational material was made available in a number of the DCS (e.g. pictograms on the procedures related to urine and blood sample collection procedures), it would have been beneficial to have had access to further educational resources during the Games.

Code article 20.6.8 suggests that, among other roles and responsibilities of the MEOs, should plan, implement, evaluate and promote anti-doping education in line with the requirements of the International Standard for Education (ISE). Furthermore, article 7.4 (i) of the ISE suggests that MEOs should consider ensuring the provision of Education activities at Events that fall under their authority, in alignment with Code Article 20.6.8. Event-based education has the potential to reach and positively impact wider audiences, including the public and the media.

Despite the aforementioned challenges, in a joint effort between WADA and PASO, WADA's Athlete Engagement team went to Santiago 2023, where they had the opportunity to engage with athletes and deliver activities with the support of the CNCD.

### **Recommendation for PASO:**

For future Panam Games, PASO could consider organising more event-based and pre-Games educational activities. This could help to enhance the quality of the education program and reach a wider audience, including the public and the media. This would ensure that the requirements of the Code and ISE are fully met.

## **8.0 Whereabouts**

The PASO AD Unit provided an Excel template for NOCs, via their Chefs de Mission, to submit their athlete's whereabouts information (e.g., rooming list, arrival and departure date, accommodation, and training activities, inter alia) to PASO via email to allow for an effective OOC testing program, as used in Lima 2019. While that was the case, there were no consequences applied to the NOCs if whereabouts information was not provided or if the information provided was not accurate. PASO AD Unit proactively acted on this matter by sending reminders to Chefs de Mission, stressing the need to provide accurate training activities for the duration of the Games, but not all NOCs were compliant with the requirements.

The IO Team is aware that obtaining athlete whereabouts during Games time has posed a challenge for many years across major Games. However, the IO Team considers, as indicated in the Lima 2019 IO Report, that a more robust system can be put in place for future Pan American Games. This includes enabling anti-doping personnel to access the accreditation database to verify when athletes arrive and depart the country. This can be done only if each athlete is required to activate their accreditation individually via the Chefs de Mission.

### **The following recommendations provided in IO Report for Lima 2019 are sustained:**

- It is highly recommended that the PASO AD Unit ensure that all delegations provide accurate arrival and departure details for their athletes, as well as precise rooming lists, via their NOCs. This can be

also facilitated by having an accreditation scanning system in place that shows when athletes are entering and exiting the Athlete Village, training and competition venues.

- It is recommended that the PASO AD Unit develop a whereabouts system in which clear requirements for the NOCs are set, including deadlines to provide accurate and comprehensive whereabouts information, training activities, etc. Clear consequences should be applied in the case of non-compliance and incorporated into the anti-doping rules.

## 9.0 Test Distribution Plan

### 9.1 Risk Assessment and Test Distribution Planning

The RA considered the 39 sports featured in the Games, their related disciplines and events, the 41 participating nations, and the nine mandatory elements required by the ISTI. In addition, the outcomes of previous Panam Games' TDP cycles (i.e., Toronto 2015 and Lima 2019) were also considered. Based on the outcomes of the RA, a Code compliant TDP was finalized at the same time. The TDP originally aimed for 1,691 samples to be collected with a 60/40 distribution between IC and OOC testing, which was impressive on paper, and very ambitious given the limited time remaining for preparing its implementation. By way of comparison, the TDP for Lima 2019 originally aimed for 1,500 samples to be collected with a 50/50 split between IC and OOC testing.

### 9.2 Test Distribution Plan Delivery

The TDP delivered during the Games included a total of 1,821 samples suitable for analyses, in addition, 17 samples did not meet the specific gravity requirements. This was an increase of 7.7% compared to the original testing plan. The increase in the number of samples was due to additional tests requested by IFs.

Of the 1,821 valid samples collected during the Games:

- a total of 1,439 athletes were tested (around 22% of participating athletes);
- 659 were samples collected OOC, representing 36% of the overall testing;
- 1,162 were sample collected IC;
- of the 1,821 valid samples collected, 169 were blood samples (142 collected IC and 27 collected OOC); and
- no ABP or DBS samples were collected.

Overall, the number of tests conducted is worthy of commendation. In general, the TDP was delivered in line with the outcomes of the RA. With regards to OOC tests, the 9% decrease against the TDP was not a significant issue. However, it is worth noting that the testing in the athlete village was unfortunately quite limited. It would be fair to question the effectiveness and unpredictability of the OOC testing conducted outside the IC period once the Games had commenced, particularly in instances of large-scale testing. For example, on the day prior to the start of the events, 13 urine tests were conducted in rowing and rugby.

The implementation of blood tests did not fully align with the OOC testing TDP (-63%), with a proportion of the samples being collected IC instead (+140%). This did not reflect a clear strategy regarding the optimal time for collecting blood samples, considering the inherent risks of the various sports and disciplines, as well as the subsequent analysis required for these samples.

The delivery of the TDP for some sports/disciplines did not fully comply with the MLAs of the TDSSA. While this is not an issue in lower risk sports/disciplines where only one analysis is missing, the IO Team

highlighted the importance of adhering to the TDSSA MLAs, particularly for high and medium risk sports/disciplines involving Erythropoiesis Stimulating Agents (ESAs) above 30%. Ultimately, it was found that seven high-risk and medium-high sports disciplines were not fully aligned with the MLAs required. The IO Team recommended that the PASO AD Unit consider conducting a retroactive analysis to address this gap, but unfortunately this did not occur.

### TDSSA missing analysis (as of 31 December 2023):

Sports / disciplines	ERAs	GHRFs
Aquatics - Artistic Swimming	1	
Aquatics - Swimming Long Distance 800m or greater	2	
Aquatics - Swimming Middle Distance 200-400m	1	
Athletics - Long Distance 3000m or greater	6	1
Athletics - Sprint 400m or less		1
Boxing - Boxing	2	1
Canoe - Middle Distance 500m	3	1
Canoe - Sprint 200m		1
Cycling - Mountain Bike Endurance	3	1
Cycling Road	2	1
Cycling - Track Endurance	3	
Cycling - Track Sprint		2
Football		1
Judo - Judo	1	1
Rowing		1
Sport Climbing - Combined	1	
Surfing - Stand Up Paddle	1	
Triathlon - Triathlon	3	3
Total	29	15

At Last, the IO team observed that, during the Games, no ABP blood samples were collected since the relevant IFs or NADOs did not request such samples given they are the passport custodians.

### Recommendations:

- For future Games, it is recommended that the PASO AD Unit conducts OOC testing as soon as possible after the athlete arrives in the village, particularly in high- and medium-risk sports, with the number of tests distributed based on the risk factors identified through the RA.
- It is recommended that the PASO AD Unit ensures the TDSSA MLAs are met for all sports/disciplines particularly those identified as high-risk sport disciplines.
- It is recommended that for future Games, the PASO AD Unit contact the relevant IFs and NADOs in advance of the Games to ensure the sharing of relevant passport-related information with PASO to plan ABP tests at the Games, in accordance with the guidance set out in article 2.4.1 of the Athlete Biological Passport (ABP) Operating Guidelines.

## 9.3 Out-of-Competition Testing

As previously mentioned, the OOC testing program at the Games accounted for 36% of the overall testing program.

Considering the findings of the RA and the athletes who were identified as being on the "short list", CNCD put together a list of over 6909 athletes who were considered to be of particular importance and who were therefore selected for target testing out of competition. The RA by athletes was developed with the

aim of identifying potential areas of concern. Initially, high-risk sports were classified, and then countries and athletes deemed to be at risk were identified. The specific athletes included in the OOC priority list were determined by a careful assessment of the country risk profile and a review of the athlete ranking.

As mentioned in Section 5 of this report, and as recommended in the IO Report for Lima 2019, the PASO AD Unit might benefit from establishing a pre-Games Taskforce. This Taskforce could review intelligence to create a list of athletes who should be subject to testing, or increased testing, in the lead-up to and during the Games. The work of such a Taskforce could further strengthen the OOC priority list while also informing athlete selection for IC testing.

While the majority of the OOC testing was carried out at the Athlete Village, some OOC testing was also conducted at training venues and hotels where athletes were residing.

Given the previously described challenges in collecting athletes' whereabouts information, there were a number of difficulties encountered when attempting to locate the athletes for OOC testing. This was the case for the majority of OOC tests conducted on athletes residing outside the Athlete Village.

The IO Team observed that the DCOs displayed a high level of experience and a pragmatic approach in instructing the Chaperones to locate the selected athletes. However, it should be noted that for many of the chaperones, this was their first experience of working in anti-doping, and therefore they had limited experience of locating athletes for OOC testing. This proved to be a challenge, particularly at the outset of the Games, and in the absence of a system to ascertain whether the athletes had arrived in Santiago.

It would seem that the implementation of OOC testing based on country RA reflected the initial TDP.

## 9.4 In-Competition Testing

The IC testing program was developed in line with the findings of the RA and, in light of the recommendations set forth in the Lima 2019 Report, primarily focused on evaluating the performance of gold, silver and bronze medalists (the podium finishers) and incorporated supplementary testing based on a target selection strategy for both individual and team sports. The IO team noted that for athletics competitions, a team based at the stadium was monitoring and processing athletes' sports records for target testing.

The IO Team was generally pleased with the distribution of the IC testing across the different sports and disciplines. It was observed that the recommendations provided in the Lima 2019 Report were followed. As suggested in the Lima 2019 Report, preparing an intelligence-based priority list of athletes for IC testing could have optimized the selection process. However, the IO Team acknowledges that this was not feasible due to the challenges faced during the pre-Games phase, as described previously.

The IO team observed that the instructions provided to the lead DCOs within most testing orders for IC testing were comprehensive and provided sufficient details to conduct the tests efficiently. It is worth noting that the recommendation provided for the Lima 2019 Report was followed.

### Recommendations:

- The IO Team recommends that a TDP is developed well in advance of the Games to establish an intelligence-based priority list of athletes for IC testing.

## 9.5 International Federation Protocols

It was observed that as in Lima 2019, PASO did not seek IFs testing protocols<sup>2</sup> in advance of the Games. As a result, the implementation of the IC testing process relied on the Lead DCOs, who in many cases had expertise in testing of the sport.

On a few occasions, the IO Team observed that team representatives were aware of the athletes selected for doping control well before the completion of the match, particularly in team sports. This situation arose because a random draw was conducted at halftime, allowing team representatives to view the numbers selected. This practice constitutes a clear breach of ISTI Article 5.3.1, as it may provide advance notice to the athletes. To address this issue, it is essential that PASO establish clear and sport-specific protocols that ensure no advance notice is given. Such protocols should be implemented before the Games to ensure that all IF protocols comply with the requirements of the ISTI.

### The following recommendations provided in IO Report for Lima 2019 are sustained:

- For future Games it is highly recommended that PASO AD Unit develops IF protocols well in advance of the Games. This would help to ensure, in particular, that the selection procedures are compliant with the ISTI and that athletes are not given advance notice.
- The IO Team recommends that the PASO AD Unit develops a template IF protocol that can be adapted for each IF. This template should include a broad description in terms of test type, number and timing (instead of committing to specific numbers); who the IF technical delegate will be (name and contact information) and his/her responsibilities during the Games; specific information on any random or targeted random draw requirements and materials (if applicable); procedures regarding testing athletes who achieve record performances; any sport-specific anti-doping procedures; and an agreed procedure for how information and intelligence held by the IF can be shared with PASO AD Unit and the host NADO as well as how the IF can request target tests during the Games (i.e., contact name, contact method – phone or secure email, etc.).

## 9.6 Analysis of Samples at a WADA Accredited Laboratory

After a bidding process, the WADA-accredited in Paris (LADF) was selected to be responsible for the analysis of samples collected during the Games.

Unfortunately, and as previously mentioned in Section 5 of this report, the LOC was unable to sign an agreement with the LADF prior to the start of the Games which as explained by the PASO AD Unit and LOC, there was a lack of resources which prevented the Lab to address the terms of the agreement after having received the Games TDP with such a short notice.

As a result, there were significant delays in the turnaround times for sample analyses at the beginning of the Games, which impacted the timely prosecution of adverse analytical findings (AAFs) and atypical findings (ATFs)<sup>3</sup>. The draft agreement with LADF set out reporting times of 48hrs for samples and 120hrs

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<sup>2</sup> IFs testing protocols are specific rules and/or procedures established by the respective IF for conducting for conducting doping tests. These include guidelines for selecting athletes for testing, managing notifications without advance warning, and ensuring proper collection, storage, and transportation of samples, inter alias.

<sup>3</sup> It should be noted that for AAFs and ATFs turnaround time set in the draft agreement was 72 hours after the reception of the sample.

for samples requiring the analysis of ESAs and GHRFs.

After the initial stage of the Games, despite being some distance from Chile, the shipment time for samples was acceptable. On average, blood samples took three days and urine samples four days to arrive at the LADF. The time from the reception of the samples at the LADF to the time of reporting the results of analysis was on average 5.6 days with the average for blood samples being 3.8 days and urine 5.8 days.

The IO team noted that, despite the conclusion of the Games, the agreement had not yet been signed with the LADF.

### **Recommendations:**

- The IO Team highly recommends that the PASO AD Unit provides the laboratory with the TDP well in advance of the Games. This will enable the laboratory to prepare in time to meet the demands that come with a major event.
- It also recommended that the agreement is signed with the laboratory at least six months before the start of the Games.

## **10.0 Long-term Storage of Samples**

Considering the recommendations set forth in the IO Report for Lima 2019, the PASO AD Unit has developed a written strategy for the retention and re-analysis of samples in alignment with the requirements set forth in ISTI article 4.7.3. However, it has not been possible for the IO Team to confirm whether the strategy has been implemented.

## **11.0 Therapeutic Use Exemption Procedures**

Athletes requiring the use of a prohibited substance or method as part of a legitimate medical treatment, may apply for and be granted a Therapeutic Use Exemption (TUE), only if the conditions set out in the International Standard for Therapeutic Use Exemptions (ISTUE) are satisfied. This exemption, if granted, will preclude the athlete to an Anti-Doping Rule Violation (ADRV) and applicable sanction for the use of the medication within the prescribed and agreed limits. The purpose of the ISTUE is to ensure that the process of granting TUEs is harmonized across sports and countries.

As was done at previous Major Events, the IO Team reviewed the processes and procedures for the handling of TUEs at the Games but did not review the content of the medical files or the rationale for the decisions made by the Therapeutic Use Exemption Committee (TUEC) to recognize, grant or refuse a TUE. This is the role of WADA's Medical Department, which has the right to review and appeal in these matters.

Prior to the Games, following various correspondences with WADA, the TUE process was updated on the Panam website. However, the process requires further improvement as it can be confusing for Athletes to follow. The IO recommends that for the next Games, PASO use the WADA website template available on the WADA website. The IO Team observed that PASO reminded NOCs and NOC physicians of the process in place at the Games via email reminders. The procedures were further highlighted during on-site meetings with physicians' and NOCs' during the Games.

Under PASO' Anti-Doping Rules, athletes with existing TUEs granted by their IFs would be automatically recognized. Athletes with existing TUEs granted by their NADOs or RADOs, would be recognized, subject to review, and satisfaction of the ISTUE conditions.

During the Games, athletes were required to submit any new TUE requests to the PASO' TUEC via email due to the strict medical confidentiality contained within a TUE application. The IO Team recommends that PASO display information sheets in the polyclinic to signpost athletes and their physicians where/how to submit TUE applications in future editions of the Games.

PASO appointed a TUEC consisting of four physicians to consider applications for TUEs permitting the use of prohibited substances or methods during the Games. In total, the TUEC registered in ADAMS 14 approved TUEs and 3 rejected TUEs. A total of 56 TUEs from 24 ADOs were recognized by the PASO.

A total of 69 athletes had a valid TUE(s) during the Panam Games. The percentage of athletes who held a TUE during the Games was 1%. The three TUEs denied by the Panam TUEC were due to lack of medical information and the athletes did not re-submit the additional information nor appeal the decision. The IO Team observed that the TUE appeal panel was not established until after the Games had started.

The number of TUE recognitions between the Santiago Games and the previous edition in Lima increased 800%, the IO Team commends the TUEC Chair for this improvement. However, none of these TUEs were recognized until after the Games had begun which places unnecessary concern on the athletes.

The IO Team observed that the TUEC Chair was the sole person conducting the initial screening of TUE applications. It was noted that a large portion of the applications were either not complete or not necessary and this increased the workload on the TUEC Chair. The IO Team recommends that the Panam TUEC Chair have an assistant with knowledge and experience in ADAMS to assist them at the next Games. Given the time sensitivity associated with the evaluating and reporting of TUEs at major events.

It was noted that the two Adverse Analytical Findings did not proceed to an Anti-Doping Rule Violation because of approved TUEs.

Regarding the entering of granted TUEs by the TUEC in ADAMS. Delays were observed in registering the TUEs in ADAMS and in updating ADAMS once the TUE was granted or denied. This situation prevented WADA's timely evaluation of the TUEs, and denied the PASO AD Unit the extra layer of transparency and accountability that WADA's review on the TUE application process is intended to provide.

#### **Recommendations:**

- The IO team recommends that in future the Panam TUEC Chair send all NOCs and Chief Medical Officers (CMOs) an email reminding them to check the use of medications among their athletes so that new or expired TUEs for athletes were not missed and recognition of TUEs is completed.
- The PASO AD Unit should promptly report (in English or in French) all decisions of its TUEC granting or denying TUEs, and all decisions to recognize or refusing to recognize other ADOs' TUEs, through ADAMS.



- The PASO AD Unit should ensure that all TUEC and Appeal Panel members sign a conflict-of-interest declaration and a confidentiality agreement before having access to any athlete's TUE. The TUEC should be established well before the Games.
- The PASO AD Unit should ensure to consult the TUE section of WADA's website ahead of the Games for the latest documentation and templates and consult WADA's Medical Department for any assistance. <https://www.wada-ama.org/en/athletes-support-personnel/therapeutic-use-exemptions-tues>

## 12.0 Gathering and Sharing of Information and Intelligence

PASO was the entity responsible for collecting intelligence, and the intelligence and information received was then shared with the PASO AD Unit to decide what actions needed to be implemented.

Like in Lima 2019, the IO Team observed that a documented process was not in place to gather and process intelligence and information received, however, the IO Team observed that a few IFs did request some target testing based on intelligence.

It was also observed that the PASO AD Unit did not have a reporting line nor a secured platform to receive intelligence during the Games and there was no instruction or guidance for athletes and their support personnel on how and to whom to report doping and/or suspicious activities. As such, during the daily meetings with PASO AD Unit, the IO Team recommended to have a reporting line or a secured platform available at PASO's website to report doping activities. The recommendation was received and noted; however, it was not addressed since it was too late to put a line/platform available to be used during the Games.

Finally, like Lima 2019, during the Games, a no-needle policy was put in place.

### Recommendations:

- It is recommended that the PASO AD Unit develops a documented process to gather, assess and process intelligence and information received.
- It is recommended for future Games to set up a secure reporting platform allowing a confidential way to report doping violations and/or suspicious activities before and during the Games for athletes, ASP and members of the public.
- It is recommended for future Games that the reporting line/platform be published in a prominent place on the Games website and promoted before and during the Games to maximize the valuable use of such initiative. Alternatively, should the PASO AD Unit prove unsuccessful in establishing their own reporting platform, it is recommended they contact WADA's Intelligence Unit to apply for Speak Up Use permission at least 6 months prior to the Games.
- It is also recommended that the PASO AD Unit invites relevant IFs, NADOs, Regional Anti-Doping Organizations (RADOs) and NOCs to provide any intelligence that might be relevant in the lead up to the Games (3-6 months prior) by providing awareness on where and how they can share relevant information on suspicious athletes or ASP, incidents, or substances and methods employed during the Games with the relevant anti-doping organization.

- As a best practice, it is recommended that PASO AD Unit assign one primary person to manage incoming reports and outgoing intelligence disclosures based on the established information processing procedure. In addition, that all information be stored in a secure location (digital or physical) and that access to that information be limited on a need-to-know basis.

### **13.0 Use of the Anti-Doping Administration and Management Systems**

In October, on the eve of the Games, WADA was approached by the PASO AD Unit with a request to upload the “short list” of athletes into the Anti-Doping Administration and Management Systems (ADAMS). WADA uploaded the list at such short notice.

Due to the challenges faced at the pre-Games phase, as previously described in Section 5 of this report, the delegation agreement between the PASO AD Unit and CNCD was finalized only on the eve of the Games, and an ADAMS account for CNCD was set up late with limited access to information in ADAMS. The CNCD had an account in ADAMS as a SCA with limited access to information, such as whereabouts from RTP athletes, ABP profile, testing history of the athletes, TDSSA monitoring and monitor DCF entry in ADAMS. This issue was raised by the IO Team during the daily meetings with the PASO AD Unit; however, it remained unresolved.

Despite the aforementioned issues, during the Games time all the required information was duly entered into ADAMS. Doping control forms were entered into ADAMS on a daily basis by CNCD staff and any issues identified by the IO Team in relation to ADAMS data were addressed promptly and effectively. The IO Team would like to commend the CNCD for their timely entry of information into ADAMS.

The IO Team observed that the WADA paperless platform, DCO Central, was not used at the Games for the sample collection process.

#### **The following recommendations provided in IO Report for Lima 2019 are sustained:**

- It is recommended that the PASO AD Unit ensures that the SCA for future Games has full access to athletes’ accounts in ADAMS. This would enable access to all information available in ADAMS, which would in turn facilitate the delivery of an effective testing program. In order for PASO to grant access to this information in ADAMS, it is necessary for PASO to authorize it to the SCA.
- It is recommended that the PASO AD Unit submits a request to the ADAMS Team with at least three months’ notice of the date they wish to have the list of participating athletes uploaded into ADAMS.
- It may be beneficial for PASO and the SCA to consider using the WADA paperless platform for future Games.

### **14.0 Sample Collection Personnel and Training**

The IO Team would like to acknowledge that the sample collection procedures were harmonized and conducted in a professional manner, as well as in accordance with the ISTI. Any minor issues that were identified by the IO Team were shared with the PASO AD Unit and CNCD during the daily meetings and, where addressed and corrected promptly. The IO Team was generally satisfied with the performance of the DCOs. In a similar vein to Lima 2019, the presence of experienced DCOs to support those with less experience was highly beneficial, ensuring the sample collection process was conducted in accordance with the standard protocols whilst providing invaluable capacity building opportunities to those less experienced DCOs, which can benefit the region from a legacy perspective.

As in Lima 2019, DCOs with the most experience and expertise were responsible for the management of the DCS.

A total of 52 local DCOs/Blood Collection Officers (BCOs), 31 international DCOs and 280 chaperones were involved in the anti-doping program at the Games.

The SCP were recruited, trained and certified by CNCD in advance of the Games, while the international DCOs were recruited upon the PSMC recommendation. There was a significant variation in the level of experience among the personnel involved. While the majority had considerable experience, others had less.

The IO Team commends CNCD for the 9 online training and 11 onsite courses conducted for SCP in the pre-Games phase. It is recommended that this level of training be maintained for future Games.

The LOC was responsible for recruiting chaperones, who were responsible with the task of providing notification and supervision during both OOC and IC. The LOC assigned chaperones to specific venues, which at the initial phase of the Games unfortunately led to an inadequate distribution of chaperones for most of the testing missions. In some instances, the number of chaperones was greater than needed, while in other cases, it was insufficient. As such, to ensure an adequate number of chaperones, volunteers with no training or knowledge in anti-doping from other areas of the Games were recruited. For instance, there were more chaperones than necessary for the marathon, swimming, badminton, and OOC tests in canoe slalom. The IO team provided recommendations on this matter, which the PASO AD Unit subsequently acted upon.

## 15.0 Notification Process

Regarding the notification process, the IO Team had the opportunity to observe the lead DCOs in some DCS debriefing the chaperones and observed chaperones when they were notifying athletes IC and OOC.

As described in the previous section, volunteers from other areas of the Games were recruited as chaperones when the number was insufficient, particularly during the first days of the Games. As such the IO Team observed that the majority of the chaperones had limited experience, as there was not sufficient time to train them to the level of the other chaperones that were recruited in the lead up to the Games. This unfortunately led to some instances of advance notification (notably in the volleyball and OOC tests conducted in hotels). In addition, it was also observed that numerous chaperones could not effectively communicate in English, which certainly led to breaches of the requirements for notification of athletes under ISTI article 5.4.1, particularly in the context of events such as BMX, volleyball and equestrian. The IO team provided recommendations on this matter, which the PASO AD Unit subsequently acted upon.

### Recommendations:

- The IO Team suggests that for future Games, the allocation of chaperones should be managed not on a venue-based basis, but rather by the SCA who is delivering the TDP.
- It is also recommended that the PASO AD Unit ensures Chaperones are familiar with their roles and responsibilities prior to notifying athletes. One possible method for achieving this could be to hold a briefing for chaperones on Day 1 of the Games, which could include a role play to allow for a revision of the training received weeks or months before. If circumstances allow, it might be beneficial to allow additional time for this revision to be conducted on site.

## **16.0 Sample Collection**

### **16.1 Doping Control Command Center**

The IO Team visited the Doping Control Command Center (DCCC) situated in the Estadio Nacional, which served as the competition venue for a wide range of sports disciplines.

All anti-doping operations were coordinated and supervised in the DCCC. The operations managed in the DCCC included, the development of testing strategies, the planning of tests, the administration of ADAMS, the gathering and analysis of intelligence, the scheduling and management of staff, the coordination of logistics, the organization of transportation of equipment and personnel, the delivery of samples from all testing venues, and the shipping of samples to the WADA-accredited LADF.

The DCCC was led by Andres Gonzalez with support from CNCD's full-time staff and PAN RADO representative, Manuel Villalobos.

The staff of the DCCC coordinated the testing orders for each testing session, and the IO Team was given access to those testing orders in advance. This proved to be a valuable exercise, not only for reviewing the test planning, but also for the IO Team in planning its daily observations.

The IO Team was generally satisfied with the operations of the DCCC. We would like to commend the CNCD and its staff for their commitment and dedication throughout the Games.

### **16.2 Doping Control Stations**

The Games were held across 41 competition venues, and in each venue a Doping Control Station (DCS) was made available. A spacious and well-equipped DCS was set up for OOC testing in the Athlete Village. For the athletes residing in hotels in Santiago, an area within the athletes' residence was secured for OOC testing purposes. Unfortunately, the IO Team did not have the opportunity to visit the DCS outside the city of Santiago due to time constraints, as they were quite far from the city.

For these Games, the CNCD proactively took the initiative of establishing a new division within its team aiming to ensure, in advance of the competition event, that the DCS complied with the ISTI requirements for sample collection.

While the setup of the DCS was appropriate, there was some inconsistencies in the standard of the facilities across all venues. Some venues were very spacious, warm and comfortable, while others were very basic temporary spaces that could perhaps have been more welcoming, and in some instances were not conveniently located close to the competition area.

As was the case in Lima in 2019, the signage for the DCSs presented a challenge in all venues throughout the course of the Games. The IO Team observed that the DCS were not clearly identified within the competition venues. This lack of proper signage resulted in challenges for doping control personnel, athlete representatives, volunteers, and the IO Team in locating the DCSs.

Regarding the processes at various DCS, the IO Team was generally impressed with the efficient, effective, and professional conduct of the doping control staff, particularly the lead DCOs. However, the IO Team noted several instances of inappropriate behavior by chaperones at the DCSs. This issue was addressed following the IO Team's observations, which were shared and discussed during the daily meetings.

**The following recommendations provided in IO Report for Lima 2019 are sustained:**

- It is recommended for future Games that DCSs be well identified, and that directional signage be available within competition venues.
- It is also recommended that athletes be provided with a pleasant and consistent doping control experience by having a more standardized setup and ‘look and feel’ across all DCSs.

### **16.3 Sample Collection Sessions**

The PASO AD Unit developed a Sample Collection Guide for the 2023 Panam Games (the Guide) with the aim of standardizing collection procedures and ensuring athletes were familiar with the doping control process.

Prior to the Games, WADA provided feedback regarding the specific gravity procedure outlined in the Guide, noting that it did not comply with the ISTI. WADA requested a revision to align the process with ISTI requirements<sup>4</sup>. Additionally, during the Games, the IO Team suggested that the PASO AD Unit revise the definition of “in competition” to ensure compliance with the Code and PASO AD Rules<sup>5</sup>. Both recommendations were addressed, though unfortunately, this occurred only after the Games had commenced which caused some confusion for two NOCs who raised concerns directly to WADA.

#### **16.3.4 Dilute Samples**

In reviewing ADAMS data, the IO Team observed that 13 athletes provided dilute samples during the Games, totaling 17 dilute samples. Of these athletes, only 10 provided a second or third sample that met the specific gravity requirement. All subsequent samples were recorded as collected at the same time as the initial sample. Three athletes did not provide any additional samples. The only target test conducted in relation to dilute samples was initiated based on a request from the IO Team.

All 17 dilute samples collected during the Games were analyzed.

#### **Recommendations:**

- To avoid collecting multiple samples from the same athlete—an approach that is neither ideal for the athletes nor cost-effective for the SCA—it is highly recommended that Chaperones or DCOs advise athletes and their ASP against excessive hydration. Excessive hydration may delay the production of a suitable sample. Additionally, DCOs should be reminded to ensure that athletes do not hydrate further after providing an initial dilute sample, as specified in Annex G of the ISTI.
- The IO Team also recommends that for future Games, PASO AD Unit considers additional follow-up target testing in the coming days for athletes who provided only dilute samples during the same sample collection session.

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<sup>4</sup> This matter was part of the corrective actions submitted in the compliance procedure mentioned in the “Pre-Games Initiatives” section.

<sup>5</sup> The term “In Competition” was originally defined in the Guides as the period from the Pan American Village opening until the Closing Ceremony of the Santiago 2023 Games.

### **16.3.5 Partial Samples**

The IO team observed that a few DCOs were not experienced and did not know how to process a partial sample. After providing recommendations to CNCD on how to correctly process partial samples, CNCD informed the IO team that during the training sessions prior to the Games, DCOs had been practicing the collection process using a different brand of equipment from the one used at the Games, where the partial sample process is slightly different. The recommendation was quickly addressed, and both the PASO AD Unit and CNCD are to be commended for providing additional guidance to the DCOs and ensuring that the partial sample procedure was conducted in a satisfactory manner.

#### **Recommendation:**

As a best practice, the IO Team recommends PASO AD Unit to consider conducting training on testing procedures with the same equipment that will be used at the next Games.

## **16.4 Storage and Transport of Samples**

### **16.4.1 Storage**

The IO Team noted that DCOs were directed to bring all sealed samples to the DCCC once the doping control process was concluded for each testing session. An IO Team member was able to observe the transfer of samples from a DCS to the DCCC.

At the DCCC, a dedicated individual from CNCD was responsible for verifying each sample code number against the Chain of Custody forms and the DCFs, ensuring accuracy and precision. A member of the CNCD team was then tasked with ensuring the samples were packed correctly and stored securely in a refrigerated room.

The IO Team observed that the chain of custody process was overall efficient and effective. In line with the recommendation made in the Lima 2019 Report, the cooler containers had secure seals, which added a secondary layer of security for the containers that the samples were stored and transported in.

### **16.4.2 Transport**

Regarding the transportation of the samples, the recommendations set out in the Lima 2019 IO Report were followed. The LOC was able to use the same sample transport procedures as in Lima 2019, which ensured that all samples arrived safely to the LADF.

The LOC entered into an agreement with the global courier company DHL to collect samples from the DCCC and transport them to the LADF throughout the duration of the Games. DHL employees were required to sign the Chain of Custody Form, and a separate DHL document was signed to acknowledge custody of the samples. The LOC provided the IO Team with the signed agreement with DHL, which appeared to be comprehensive. The IO Team was satisfied that the requirements outlined in the agreement with DHL were consistent with the International Standard for Laboratories (ISL).

The IO Team did not observe the process once the samples arrived at the airport but was informed that airport and courier employees were responsible for ensuring the samples were transported to the LADF.

### **16.4.3 Shipping to the Laboratory**

Despite the precautions taken in advance of the Games, a few blood samples sent to the LADF arrived with blood tubes frozen. Unfortunately, this meant that the samples could not be analyzed since the blood

samples spent a few days at temperatures of less than 0°C, as recorded by the temperature data logger that travelled with the samples. Following this unfortunate incident, the LADF recommended that the blood tubes be packed in a cardboard box and placed inside the one containing the ice packs, in order to prevent direct contact with the tubes. Following this recommendation, the IO Team noted that the packaging of blood samples was in accordance with the instructions provided by the LADF, therefore, no other blood samples arrived frozen at the LADF.

The IO Team did not have the opportunity to visit the LADF, as this was not within the scope of its observations. However, it did monitor the reporting of the results in ADAMS and all reporting by the LADF was submitted in a timely fashion as described in the above sections.

## 17.0 Results Management

The Doping Review Panel (DRP) appointed by the Chair of the PSMC was in charge of conducting the initial review related to potential Anti-Doping Rule Violations (ADRVs) that arose during the Games. When applicable, cases were referred to a Hearing Panel of four experts appointed by the President of PASO for adjudication.

The IO Team did not have the opportunity to observe the processing of the initial review of the reported atypical findings<sup>6</sup> (ATF) and adverse analytical findings (AAF). The IO team only had access to the notifications sent to the athletes and the opportunity to observe one hearing during the Games. All potential ADRVs that were reported during the Games were analytical cases.

The IO team reviewed the notification of an ATF for clenbuterol and noted that the investigation required by ISRM article 5.2.1 was not conducted, and the athlete was wrongly charged for an AAF. The IO Team brought this matter to the attention of the DRP and recommended this process be revised to ensure it was in line with the ISRM and WADA Technical Letter<sup>7</sup>. The recommendation was quickly followed and acted upon.

The IO Team also observed the notification and hearing for an AAF for the substance “dorzolamide”<sup>8</sup>. Following the reporting of an adverse analytical finding by the Lab, the athlete was charged for presence of a prohibited specified substance and the case was adjudicated before the hearing panel. The Disciplinary Panel decided, based in concentration of the substance found in the sample and the athlete’s allegations, that there was no anti-doping rule violation due to a permitted route of administration.

## 18.0 Procedural rules, Confidentiality Agreements and Conflict-of Interest Declarations

The IO Team observed that there was no system or “step-by-step” process in force to conduct the result management for ATFs and AAFs and noted that interaction with the TUEC was not efficient. The IO Team recommended the PSMC to have a system or “step-by-step” process in place. The recommendation was quickly followed and acted upon.

Despite several requests by the IO Team, the confidentiality, and conflict-of-interest declarations of the DPR and Hearing Panel members, were provided to the IO Team after conducting the initial review and adjudication of the cases.

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<sup>6</sup> Four (4) ATFs for Clenbuterol were reported during the Games.

<sup>7</sup> Technical Letter “TL23 Minimum reporting level for certain substances known to be potential meat contaminants”.

<sup>8</sup> Substance included as exceptionally permitted use under the 2023 Prohibited List S5 “Diuretic and masker” prohibited at all times.

## Recommendations:

- PASO AD Unit should ensure to conduct the initial review for ATFs and AAFs in line with the ISRM and WADA's technical letters. In particular, where the initial review involves a prohibited substance with a permitted route of administration.
- PASO AD Unit should ensure to have the confidentiality agreements and conflict-of interest declarations signed in advance of the Games.
- As a best practice, It may be beneficial for future editions of the Games for the PASO AD Unit to consider implementing a process by which athletes can be assisted with pro bono legal services at the Games, should they require it. For these purposes, it may be beneficial for the PASO AD Unit to contact the WADA Legal Department for guidance on how to implement this process.

## 19.0 Summary of AAFs

### WADA is monitoring the outcomes of all cases

Sample Collection Date	Sport	Substance(s) Found	Athlete Gender	Test Type	Sample Type	Case Statuses
18 Oct. 2023	Boxing	Dorzolamide	M	OOB	Urine	Closed - authorized route
21 Oct. 2023	Weightlifting	dorzolamide	F	IC	Urine	Closed - authorized route
24 Oct. 2023	Field Hockey	Furosemide	M	OOB	Urine	Closed - case to be dealt with by the IF
24 Oct. 2023	Cycling (Track Sprint)	SARMS LGD-4033 (ligandrol)	M	IC	Urine	Pending
25 Oct. 2023	Badminton	Dorzolamide	F	IC	Urine	Closed - authorized route
26 Oct. 2023	Equestrian (Eventing)	Canrenone	F	OOB	Urine	Closed - TUE
27 Oct. 2023	Boxing	Amphetamine	F	IC	Urine	Closed – TUE
28 Oct. 2023	Baseball	Carboxy-THC greater than the Decision Limit	M	IC	Urine	Pending
28 Oct. 2023	Baseball	Carboxy-THC greater than the Decision Limit	M	IC	Urine	Pending
4 Nov. 2023	Basketball	Clomifene	M	IC	Urine	Pending
4 Nov. 2023	Canoe	5-methylhexan-2-amine (1,4-dimethylpentylamine); 4-methylhexan-2-amine (methylhexaneamine)	M	IC	Urine	Closed - case to be dealt with by the IF

## 20.0 Summary of ATFs

Sample Collection Date	Sport	Substance(s) Found	Athlete Gender	Test Type	Sample Type	Case Statuses
19 Oct. 2023	Racquetball	Clembuterol	F	OOB	Urine	Closed – meat contamination
20 Oct. 2023	Volleyball	Clembuterol	F	OOB	Urine	Closed – meat contamination
26 Oct. 2023	Sailing	Clembuterol	M	OOB	Urine	Closed – meat contamination
26 Oct. 2023	Fencing	Clembuterol	F	OOB	Urine	Closed – meat contamination



## 21.0 Annex A – Game Statistics

### 21.1 Testing Overview

Testing Overview	
Total samples	1821
In-Competition samples	1162
Out-of-Competition samples	659
Urine samples	1652
Blood samples	169
Athletes tested	1439
ERAs analysis	257
GH analysis	151
GHRF analysis	177
Adverse Analytical Findings	11
Atypical Findings	4

## 21.2 Testing by Sport

Sport	Urine		Blood		Total Samples
	IC	OOB	IC	OOB	
Aquatics	117	79	8	5	209
Archery	10	5	-	-	15
Athletics	151	80	40	6	277
Badminton	8	3	-	-	11
Baseball	12	10	-	2	24
Basketball	36	14	4	2	56
Basque Pelota	9	3	1	-	13
Bowling	6	2	-	-	8
Boxing	30	10	2	2	44
Canoe/Kayak	53	31	6		90
Cycling	77	51	19	2	149
Dance Sport	12	12	-	-	24
Equestrian	16	16	-	-	32
Fencing	18	17	-		35
Field Hockey	12	12	2	-	26
Football	17	16	2		35
Golf	8	3	-	-	11
Gymnastics	30	18	2	-	50
Handball	16	13	3	-	32
Judo	24	8	2	-	34
Karate	24	8	3		35
Modern Pentathlon	7	2	-	-	9
Racquetball	7	6	-	-	13
Roller Sports	21	17	3	-	41
Rowing	25	24	10		59
Rugby Union	16	36	4	2	58
Sailing	15	10		-	25
Shooting	25		-	-	25
Softball	12	9		2	23
Squash	9	3	-	-	12
Surfing	14	10	1	-	25
Table Tennis	11	6	1	-	18
Taekwondo	26	15	3	-	44
Tennis	12	7		-	19
Triathlon	13	16	2	-	31
Volleyball	34	10	3	-	47
Waterskiing	6	-	-	-	6
Weightlifting	36	22	19		77
Wrestling	35	15	2	4	56
<b>Total</b>	<b>1020</b>	<b>632</b>	<b>142</b>	<b>27</b>	<b>1821</b>

### 21.3 Samples Collected Per Day

Date	Urine		Blood		Total Samples
	IC	OOB	IC	OOB	
16-Oct	-	1	-	-	1
17-Oct	-	9	-	2	11
18-Oct	1	23	-	2	26
19-Oct	-	74	-	7	81
20-Oct	0	48	-	0	48
21-Oct	75	26	-	-	101
22-Oct	71	10	25	-	106
23-Oct	70	30	5	-	105
24-Oct	50	17	8	-	75
25-Oct	44	8	11	-	63
26-Oct	30	61	2	2	95
27-Oct	49	39	4	2	94
28-Oct	22	36	-	-	58
29-Oct	67	71	9	3	150
30-Oct	47	21	6	3	77
31-Oct	28	62	9	6	105
01-Nov	39	37	5	-	81
02-Nov	68	33	8	-	109
03-Nov	101	26	7	-	134
04-Nov	212	-	37	-	249
05-Nov	45	-	6	-	51
<b>Total</b>	<b>1020</b>	<b>632</b>	<b>142</b>	<b>27</b>	<b>1821</b>

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