

Report of the

INDEPENDENT OBSERVERS

XXIV Paralympic Winter Games
Beijing 2022

PLAY
TRUE
2022

公平
竞争



world
anti-doping
agency

Table of Content

1.0	Acknowledgments	5
2.0	Acronyms and Abbreviation.....	6
3.0	Executive Summary.....	8
	3.1 The Independent Observer Team’s Mission, its Scope, and Objectives	8
	3.2 Conclusion	9
4.0	WADA Independent Observer Program	9
	4.1 WADA Independent Observer Mission.....	10
	4.2 WADA Independent Observer Team	10
	4.3 Onsite Operations	10
	4.4 Methodology	11
5.0	IPC CONSTITUTION, BYLAWS, RULES, AND REGULATIONS.....	13
	5.1 IPC Anti-Doping Code and other Regulations.....	13
	5.2 Independent Observer Program.....	14
	5.3 Regulation of TUE Committee and Independent Anti-Doping Tribunal	14
6.0	PRE-GAMES TESTING	16
7.0	TEST DISTRIBUTION PLANNING	17
	7.1 Risk Assessment and Test Distribution Plan.....	17
	7.2 Games-Time Testing	18
	7.3 Out-of-Competition Testing	18
	7.4 In-Competition Testing	19
8.0	WHEREABOUTS COLLECTION.....	19
	8.1 Rooming Information.....	20
	8.2 Use of Applications	20
9.0	INTELLIGENCE.....	20
	9.1 Pre-Games Intelligence Related Activities	20
	9.2 During the Games.....	21
10.0	THERAPEUTIC USE EXEMPTION PROCEDURE	21
	10.1 General	21

10.2	Process	22
10.3	Mutual Recognition	22
10.4	Constitution of TUE Panel.....	22
10.5	Education of Athletes and Medical Staff	23
11.0	EDUCATION	23
12.0	ATHLETE PERSPECTIVES	24
13.0	SAMPLE COLLECTION PERSONNEL	25
13.1	Composition of Sample Collection Personnel	25
13.2	Training of Sample Collection Personnel	26
13.3	Recruitment and Training of Chaperones	27
14.0	NOTIFICATION AND CHAPERONING PROCESS.....	28
14.1	Notification and Chaperoning of Athletes.....	28
14.2	In-Competition Chaperoning	28
14.3	Out-of-Competition Chaperoning	29
15.0	SAMPLE COLLECTION PROCESS.....	29
15.1	Doping Control Stations	29
15.2	Sample Collection Session	30
15.3	Modifications for Athletes with Impairments.....	31
15.4	Declaration of Medication and Supplements.....	31
15.5	Storage of Samples	32
16.0	SAMPLE TRANSPORTATION	32
16.1	Storage of Samples and Preparation for Transport.....	32
16.2	Transportation of Samples and Chain of Custody.....	32
17.0	SAMPLE ANALYSIS	33
17.1	Athlete Biological Passport	33
17.2	Sample Retention and Further Analysis.....	34
17.3	Atypical Findings and Adverse Analytical Findings	34
18.0	RESULTS MANAGEMENT	34
18.1	General	34
18.2	Independent Anti-Doping Tribunal	34
18.3	Court of Arbitration for Sport's Anti-Doping Division	35
18.4	Provisional Suspensions.....	35
18.5	Hearings and Decisions	36

ANNEX I: LIST OF INDEPENDENT OBSERVERS' RECOMMENDATIONS AND EFFECTIVE PRACTICES	37
ANNEX II: COMPOSITION OF THE INDEPENDENT OBSERVER TEAM.....	40
ANNEX III: SAMPLE COLLECTION FIGURES.....	41
ANNEX IV: ADVERSE ANALYTICAL FINDINGS	42

1.0 ACKNOWLEDGMENTS

The World Anti-Doping Agency's (hereinafter referred to as 'WADA') Independent Observer Team (hereinafter referred to as 'IO Team'), in its successful operation and completion of the mission, would like to express sincere gratitude to all those staff members, employees, third party representatives and other persons who were involved in the development and implementation of the anti-doping program during the Beijing 2022 Winter Paralympic Games (hereinafter referred to as 'Games'). It is your tireless work, energy, and commitment that made the tremendous results that were achieved possible.

Noting the tremendous support of all the staff involved in anti-doping, the IO Team would like to express special thanks and gratitude to a few individuals, in particular, Mr. James Sclater, the International Paralympic Committee's (hereinafter referred to as 'IPC') Anti-Doping Director and the entire IPC Anti-Doping team for their constant support and efforts in collaboratively addressing all the inquiries, remarks, and recommendations of the IO Team.

In addition, the IO Team would also like to thank Ms. Ling Lin, Head of Doping Control, and Mr. Liu Xueqi, Venue Operations Manager, from the Beijing 2022 Organizing Committee for the Olympic and Paralympic Games (hereinafter referred to as 'Beijing 2022') for their dedication and assistance. Additionally, the IO Team would like to extend its deepest appreciation to the IPC and Beijing 2022 for accommodating all pertinent requests, and providing all the necessary information to the Team thus making the implementation of daily tasks and observations easily achievable, with special appreciation given to all the volunteers for their excellent work, enthusiasm, and commitment.

Furthermore, the IO Team is sincerely grateful to the Chairperson of the IPC Medical Committee, Dr. James Kissick, the Interim President of the IPC Independent Anti-Doping Tribunal, Ms. Janice Shardlow, and the IPC General Counsel, Ms. Elizabeth Riley for their valuable insights and assistance.

Lastly, the IO Team would like to particularly acknowledge the extraordinary and unprecedented measures taken in respect to the COVID-19 pandemic to ensure the safety and security of all participants before and during the Games. Despite the challenges of the pandemic and the necessary restrictions implemented, all the IPC and Beijing 2022 staff, particularly the sample collection personnel and volunteers, contributed considerably to a friendly, safe, successful, and healthy edition of the Games.

2.0 ACRONYMS AND ABBREVIATION

Acronym/Abbreviation	Full Name
AAF	Adverse Analytical Finding
ABP	Athlete Biological Passport
ADAMS	Anti-Doping Administration and Management System
ADEL	Anti-Doping Education and Learning platform
ADO	Anti-Doping Organization
ADRV	Anti-Doping Rule Violation
Agreement	Agreement between the IPC and WADA for the IO Mission
APMU	Athlete Passport Management Unit
ASP	Athlete Support Personnel
ATF	Atypical Finding
BCO	Blood Collection Officer
Beijing 2022	Beijing 2022 Organizing Committee for the Olympic and Paralympic Games
BSU	Beijing Sports University
CAS	Court of Arbitration for Sport
CoC	Chain of Custody
Code	World Anti-Doping Code
DBS	Dried Blood Spot
DCCC	Doping Control Command Center
DCO	Doping Control Officer
DCS	Doping Control Station
DCSM	Doping Control Station Manager
ESAs	Erythropoietin Stimulating Agents
Games	Beijing 2022 Winter Paralympic Games
GH	Growth Hormone
GHRFs	Growth Hormone Releasing Factors
GnRH	Gonadotropin-Releasing Hormone
IC	In-Competition
IDCO	International Doping Control Officer
IF	International Federation
IO	Independent Observer
IO Team	World Anti-Doping Agency's Independent Observer Team
IPC	International Paralympic Committee
ISTI	International Standard for Testing and Investigations
IRMS	Isotope Ratio Mass Spectrometry
ISE	International Standard for Education
ISL	International Standard for Laboratories
ISPPPI	International Standard for the Protection of Privacy and Personal Information
ISRM	International Standard for Results Management
ISTUE	International Standard for Therapeutic Use Exemptions
Laboratory	WADA-Accredited Laboratory
LOC	Local Organizing Committee
MEO	Major Event Organization
MLA	Minimum Level of Analysis
NADO	National Anti-Doping Organization
NPC	National Paralympic Committee
OOC	Out-of-Competition

PPE	Personal Protection Equipment
RA	Risk Assessment
SCP	Sample Collection Personnel
TDP	Test Distribution Plan
TDSSA	Technical Document for Sport Specific Analysis
Tribunal	Independent Anti-Doping Tribunal
Tribunal Rules	Rules of the Independent Anti-Doping Tribunal
TUE	Therapeutic Use Exemption
WADA	World Anti-Doping Agency

3.0 EXECUTIVE SUMMARY

This executive summary sets out the overall purpose of this report and highlights the key points and recommendations resulting from observations made by the IO Team during the 2022 Beijing Winter Paralympic Games.

Primarily, the IO Team would like to emphasize that these Games were surrounded by unprecedented challenges due to the COVID-19 pandemic, which necessitated the highest safety measures. These included a mechanism of ‘closed loops’, with defined travel/transit pathways for all participants, including the IO Team. Nevertheless, the spirit of the Games and the commitment to protecting the integrity of sport, as well as the health of athletes and participants, brought together the sporting and anti-doping community in the hosting capital of Beijing. Without the dedication of staff and volunteers, who had to compose with unique challenges related to the pandemic, including lengthy quarantine, the anti-doping program and the Games in general, would not have been possible. The commitment of all individuals involved paved the way for a successful Games.

3.1 The Independent Observer Team’s Mission, its Scope, and Objectives

WADA mandated the IO Team with the mission of observing the Games with the objective of assessing the development and implementation of the anti-doping program during the event, as well as during the pre-Games related preparations. The mission started three months before the Games, with the onsite component starting three days before the opening ceremony of the Games, which took place on 4 March 2022, until the closing ceremony on 13 March 2022. The scope of the mission included the following aspects of doping control¹: Test Distribution Plan (hereinafter referred to as ‘**TDP**’), and Risk Assessment (hereinafter referred to as ‘**RA**’), sample collection process, whereabouts information, sample transportation and analysis, and results management.

During the Games period, the IPC Anti-Doping Team was a regular point of contact for the IO Team. The IO Team met daily with the IPC and Beijing 2022 anti-doping teams, which ensured a collaborative, regular and fruitful exchange of information. For the period preceding the Games time, the IO Team worked closely with the IPC to ensure that it was sufficiently briefed on all anti-doping activities related to the Games. This allowed for an effective, productive, and collaborative working process onsite during the Games.

Overall, 680 samples were collected during the Games period, including dried blood spot (hereinafter referred to as **DBS**). Of the 680 samples, 241 were collected In-Competition (hereinafter referred to as **IC**) and 439 were collected Out-Of-Competition (hereinafter referred to as **OO**C). Overall, the IO Team observed a very well-established anti-doping workflow at different venues at three zones allocated for the purposes of the Games, including Beijing, Yanqing, and Zhangjiakou. In doing so, the IO Team noted the excellent teamwork, preparation, and organization of sample collection personnel during the Games. The focus of onsite observations of the IO Team was the notification and sample collection process of both IC and OOC testing. Doping control procedures were found to be effectively coordinated by the centralized command center, and the IPC Anti-Doping Team reacted quickly in making any necessary changes during the event.

¹ See details in Section 4.1

The IO Team would like to highlight the unique and challenging circumstances surrounding the IPC's anti-doping program before and during the Games:

1. Primarily, the preparation of the anti-doping program for these Games was completed in a reduced period in comparison to a typical Games event. This was a result of the impact of the COVID-19 pandemic on the Tokyo 2020 Summer Paralympic Games, which were postponed for one year. This led to the IPC Anti-Doping Team having only a few months at their disposal to address and finalize administrative issues stemming from the Summer Games' anti-doping program, and concurrently prepare and develop the anti-doping program for these Games.
2. Furthermore, the decision of the IPC's Governing Board, on the eve of the opening of the Games, to decline all athlete entries from the Russian Paralympic Committee and the National Paralympic Committee of Belarus, had an impact on the number of doping control tests that had been originally planned, as well as their distribution.
3. Lastly, Beijing 2022 was the first Winter Paralympic Games where the IPC was responsible to fully manage the anti-doping program on its own.

While developing and delivering an anti-doping program for a major Games is a challenge in itself, delivering it with these additional challenges is a testament to the IPC's ability to quickly pivot, adapt, and react in order to overcome the situation and successfully prepare and carry out an effective anti-doping program for the Games.

3.2 Conclusion

In summary, despite occasional challenges, the IO Team found that the anti-doping program of the Games was planned and delivered very effectively. The program was found to be in compliance with the World Anti-Doping Code, International Standards and Technical Documents, as well as the IPC Anti-Doping Code and all other applicable regulatory documents.

While details of the IO Team's assessment of the various aspects of the anti-doping program, including recommendations and effective practices observed, are provided in this report, overall, the IO Team was impressed by the anti-doping program implemented for the Games, and congratulates the IPC as well as all other stakeholders who contributed to its success and the protection of the integrity of the Games.

4.0 WADA INDEPENDENT OBSERVER PROGRAM

Ever since it was first launched at the 2000 Olympic Games in Sydney, the World Anti-Doping Agency's (hereinafter referred to as '**WADA**') Independent Observer (hereinafter referred to as '**IO**') program has helped enhance athlete and public confidence at major sport events by randomly monitoring and reporting on all phases of the doping control and results management processes. IO programs are conducted in an objective, unbiased manner, and in recent years have adopted an audit-style approach which has allowed the IO Teams to work alongside the Doping Control team and organizers every step of the way. Following the conclusion of an IO Mission, the team publishes a report covering all aspects of the anti-doping program and suggesting any possible areas for improvement. Following the success of the first program in Sydney, IO Teams have participated at more than 50 major events including IAAF World Championships, Mediterranean Games, Commonwealth Games, the Tour de France, and the Olympic and Paralympic Games².

² See at: <https://www.wada-ama.org/en/independent-observer-program>

In November 2021, WADA and the IPC concluded an Agreement for the 2022 Winter Paralympic Games, taking place in Beijing, China, from 4 March to 13 March 2022 (hereinafter referred to as '**Agreement**') for the purposes of the presence of an IO Team responsible for observing all stages of the doping control program during, and leading up to, the Paralympic Games. Pursuant to this Agreement, and in the spirit of Article 20.2.5 of the World Anti-Doping Code, WADA appointed an Independent Observer Team to be present onsite in Beijing during the Games.

4.1 WADA Independent Observer Mission

As described above, in accordance with WADA's IO Program and the Agreement signed between WADA and the IPC, the parties agreed to the presence of the IO Team, mandated by WADA, during all stages of the doping control program leading up to and at the Games. Therefore, the scope of the mandate of the IO Team was framed to the observation of all the aspects related to the doping control program including, in particular, test distribution planning; selection of athletes; provision of whereabouts information; training of sample collection personnel; implementation of the OOC testing program; Therapeutic Use Exemption procedure; athlete notification and sample collection procedures; transport and chain of custody of samples; sample analysis at the WADA-accredited Laboratory (hereinafter referred to as '**Laboratory**'); results management process including initial review and hearings; and any other relevant and related areas under the 2021 World Anti-Doping Code (hereinafter referred to as '**Code**'), International Standards or Technical Documents.

The main onsite observation period started three days prior to the date of the opening ceremony of the Games, on 4 March 2022, and ended on the day of the closing ceremony on 13 March 2022.

In accordance with the final competitions' schedule, the participating sports during the Games, all of which were observed by the IO Team, were as follows: Para Alpine Skiing, Para Biathlon, Para Cross Country Skiing, Para Ice Hockey, Para Snowboard and Wheelchair Curling.

4.2 WADA Independent Observer Team

For the past 21 years, WADA IO Teams have contributed to protect the integrity of the system at various major events around the world. The teams selected for the Games represent a range of anti-doping professionals and athletes, all driven by a sense of fair play and the desire to make sure the athletes can benefit from the best anti-doping program and experience at the relevant events. In what is a very effective mix of disciplines, the teams include experts in the fields of athlete representation, laboratories, medicine, science, testing, anti-doping policy, international relations and legal affairs³. The full composition of the IO Team is described in Annex II.

4.3 Onsite Operations

The IPC, as the Major Event Organizer (hereinafter referred to as '**MEO**'), was the ruling body for the Games, and thus responsible for all aspects of the anti-doping program, and served as the main point of contact for the IO Team. The IPC acted as the Testing Authority and Results Management Authority for the event, initiating and directing doping control tests and related processes.

³ The IO Team for the 2022 Beijing Paralympic Games was announced on 15 November 2021, See at: <https://www.wada-ama.org/en/news/wada-announces-independent-observer-teams-beijing-olympic-and-paralympic-games>

To effectively carry out and oversee the implementation of all aspects of the anti-doping program, the IPC had onsite 4 staff members and 2 external experts on testing, along with the TUE manager, Legal Counsel and the Interim President of the Anti-Doping Tribunal.

In the meantime, Beijing 2022, as the Local Organizing Committee (hereinafter referred to as '**LOC**'), acted as a Sample Collection Authority responsible for the recruitment, training and management of the Sample Collection Personnel, as well as conducting the sample collection process on behalf of the IPC, which delegated this function to it. In addition, Beijing 2022 was also responsible for arranging the transportation of samples to the WADA accredited Laboratory in Beijing.

The IO Team notes the impressive collaborative work by both the IPC and Beijing 2022 before and during the Games to ensure an effective and efficient anti-doping program.

4.4 Methodology

This Report (hereinafter referred to as the '**IO Report**') has been prepared following the mission, with the aim of providing a summary of the IO Team's observations, together with a number of recommendations. The IO Report is referenced against the World Anti-Doping Code and International Standards, as well as rules and regulations of the IPC related to the Games.

Furthermore, the IO Team wishes to highlight that this IO Report contains a summary of the relevant facts based on the observations of the IO Team, as well as evidence, documents, discussions, and feedback kindly provided by the IPC and Beijing 2022 during the mission. While the IO Team has considered all relevant observations, facts and evidence, this IO Report refers only to the items necessary to explain the substantiation and the outcomes of the mission.

As a general point, the IO Team followed an audit-style approach that has been adopted by WADA. Observations were mainly based on the requirements of the Code, applicable International Standards and Technical Documents, the IPC Anti-Doping Code, the IPC's Rules and Bylaws, the IPC's Doping Control Guide for Testing Athletes in Para Sports, the Beijing 2022 Doping Control Guide and Doping Control Technical Procedure, as well as other applicable and relevant regulations and guidelines.

Methodology used during the IO Mission and for the preparation of this IO Report was based on both qualitative and quantitative methods, consisting of the following data collection tools and techniques: document analysis, semi-structured and unstructured overt observations (onsite visits), semi-structured discussions with key figures, and statistical analysis.

4.4.1 Document Analysis

Document analysis as a qualitative method was used in the form of a systematic procedure to analyze the IPC anti-doping documentary evidence relevant and related to the Games for the purposes of the IO Team's mandate during the mission. In this regard, for the period starting three months before the opening of the Games, the IO Team worked with the IPC Anti-Doping Team to obtain and review all regulatory documents. Several online meetings were held for the purposes of reviewing respective anti-doping documents related to the Games in order to provide feedback and input.

4.4.2 Semi-Structured and Unstructured Overt Observations

Observation was the main assessment method used during the Games. It was conducted in the form of semi-structured (systematic observation with a pre-defined schedules and objectives with the option for certain flexibility) and unstructured (free and open with no-notice) visits.

Before the Games, the IO Team observed the training of Doping Control Officers⁴. For the period prior to the opening ceremony, from 28 February 2022 to 4 March 2022, while the IO Team continued reviewing the updated documents simultaneously, such as the TDP and the RA, the IO Team also visited different venues and witnessed OOC testing at different Paralympic Villages, as well as held several meetings with the IPC Anti-Doping Team and Beijing 2022 staff. The IO Team also participated in the meeting of the National Paralympic Committees' (hereinafter referred to as 'NPC') Chefs de Mission, as well as a training of Chaperones.

During the Games, the IO Team observed IC testing at all venues in the Beijing, Yanqing and Zhangjiakou zones. The Team also visited the National Anti-Doping Laboratory of the Beijing Sports University in order to observe the transportation process for the samples and held meetings with the Laboratory Director as well as key individuals. In addition, the IO Team held daily meetings with the IPC Anti-Doping Team and the Beijing 2022 staff to discuss emerging matters, report comments and observations from previous days, and provide recommendations for further follow-ups. These were promptly considered by the IPC and Beijing 2022.

The IO Team was kept abreast in a timely manner of all developments and correspondences related to results management processes that occurred in relation to and during the Games. The IO received continuous updates from the IPC Anti-Doping Team and was able to request clarifications and documentation in certain cases.

4.4.3 Semi-Structured Discussions

Semi-structured discussions were one of the methods used during the mission and were conducted via scheduled meetings with key individuals directly related to the operations and activities of the Games' anti-doping program. These included meetings with the Chairperson of the IPC Medical Committee, who also served as the Chair of the IPC TUE Committee, the Interim President of the IPC Independent Anti-Doping Tribunal, and the IPC General Counsel.

4.4.4 Statistics

For the purposes of this IO Report, the IO Team obtained statistical data from the IPC and consulted the Anti-Doping Administration and Management System (hereinafter referred to as 'ADAMS').

4.4.5 Assessment of Previous Recommendations

While the IO Team would usually take account of the implementation by the IPC and Beijing 2022 of recommendations from previous IO Reports to assess progress, due to the limited timeframe between publication of the IO Report on the Tokyo 2020 Paralympic Games, held on August 24, 2021 – September 5, 2021, and these Games, the IO Team believes that it would not have been reasonable to expect the

⁴ Online meeting, 24 February 2022

IPC to be able to implement all of the previous recommendations included in the previous report for this edition of the Games. Although it should be noted that the IPC made significant efforts to ensure that previous recommendations were implemented, such as for example, the inclusion of more visual material and practical sessions during the DCO training on testing in Para sports.

4.4.6 Structure of this IO Report

This IO Report contains different sections of the anti-doping program that were observed by the IO Team. At the beginning of every section, an overview of the topics is provided, and the relevant Code requirements and provisions of International Standards that were referred to and invoked are referenced. Following this overview, detailed descriptions of observations are provided in sub-sections in addition to recommendations and effective practices for the way forward.

5.0 IPC CONSTITUTION, BYLAWS, RULES, AND REGULATIONS

The IPC is an athlete-centered organization, founded on 22 September 1989 as an international non-profit organization with headquarters in Bonn, Germany, composed of an elected Governing Board, a management team, and various Standing Committees and Councils. The IPC's primary responsibilities are to support 200 plus members develop Para sport and advocate social inclusion and ensure the successful delivery and organization of the Paralympic Games⁵. The IPC also acts as an International Federation for 10 Para sports: Para Alpine Skiing, Para Athletics, Para Dance Sport, Para Ice Hockey, Para Nordic Skiing (including cross-country skiing and biathlon), Para Powerlifting, Shooting Para Sport, Para Snowboard and Para Swimming⁶.

The IPC is a Signatory⁷ to the World Anti-Doping Code and, therefore, bound by its requirements. Considering that the IPC acts both as the organizer of the Paralympic Summer and Winter Games, as well as the International Federation for 10 Para sports, it assumes the roles and responsibilities set out in Articles 20.2 and 20.3 of the Code respectively. However, the IO Team would like to note that for the purposes of this IO Report, and within its mandate defined by the Agreement, only Article 20.2 of the Code with its sub-articles were taken into consideration in this section, and subsequent sections, alongside the other requirements of the Code, as well as International Standards and other regulatory documents directly related to the Games.

Article 20.2 of the Code establishes a number of commitments on the part of the IPC aimed at ensuring that they take all the appropriate steps in order to implement effective anti-doping programs. The IPC complied with these commitments, that include matters specifically related to the Games, by adopting the IPC Anti-Doping Code and other regulatory documents described herein.

5.1 IPC Anti-Doping Code and other Regulations

The IPC Anti-Doping Code has been drafted in accordance with the principles of the World Anti-Doping Code, and was declared compliant with the Code by WADA. It is adopted and implemented in accordance with the IPC's responsibility under the World Anti-Doping Code, and is subject to compliance oversight by WADA.

⁵ See at: <https://www.paralympic.org/ipc/who-we-are>

⁶ See at: <https://www.paralympic.org/antidoping-tue>

⁷ See at: <https://www.wada-ama.org/en/what-we-do/world-anti-doping-code/code-signatories>

Article 20.2.1 of the Code requires from the IPC “to adopt and implement anti-doping policies and rules for the Paralympic Games, which conform with the Code and the International Standards”. The IPC Anti-Doping Code consists of four parts, the second of which is dedicated to the IPC Games Rules. Hence, the IPC Anti-Doping Code applies to the Paralympic Games, as well as all other events and competitions under the jurisdiction of the IPC.

Furthermore, Article 20.2.6 of the Code requires from the IPC “to require all athletes preparing for or participating in the Paralympic Games, and all Athlete Support Personnel (hereinafter referred to as ‘ASP’) associated with such athletes, to agree to and be bound by anti-doping rules in conformity with the Code as a condition of such participation or involvement”. In this regard, for these Games, the IPC established a framework within which all participants agree to be bound the IPC Anti-Doping Code as a condition of participation in the Games by signing a specific agreement⁸.

5.2 Independent Observer Program

As defined in Section 4.1 of this IO Report, the IPC concluded an Agreement with WADA to authorize and facilitate the presence of a Team of Independent Observers mandated by WADA during all stages of the anti-doping program, leading up to and during the Games.

5.3 Regulation of TUE Committee and Independent Anti-Doping Tribunal

5.3.1 TUE Committee

In accordance with the IPC Anti-Doping Code and the published TUE process, a pool of experts is available to examine all TUE applications submitted. Currently, the IPC Medical Committee assumes the role of the TUE Committee⁹. It is composed of eight members, including a Chairperson. The Committee acts in accordance with the IPC Anti-Doping Code and Medical Committee bylaws¹⁰.

In this regard, the TUE Committee has the role of advising the IPC Governing Board on all policy matters related to TUEs under the Code and the IPC Anti-Doping Code, reviewing all TUE applications submitted under the IPC Anti-Doping Code, and assisting the IPC Medical & Scientific Director with the TUE program¹¹.

5.3.2 Independent Anti-Doping Tribunal

The IPC established the Independent Anti-Doping Tribunal (hereinafter referred to as ‘**Tribunal**’) as an operationally independent body in accordance with Annex A of the IPC Anti-Doping Code, Rules of the Independent Anti-Doping Tribunal (hereinafter referred to as ‘**Tribunal Rules**’). According to the Tribunal Rules, it has jurisdiction to hear and determine the matters arising from and related to the determination of Anti-Doping Rule Violations (hereinafter referred to as ‘**ADRV**’), applicable Consequences, and costs, as well as application of Provisional Suspensions¹² and determination of violations and applicable

⁸ Clause 2, “IPC Conditions of Participation Agreement Beijing 2022 Paralympic Winter Games”

⁹ Further references to the TUE Committee mean the Medical Committee acting as a TUE Committee

¹⁰ Section 1, Chapter 2.4.10 of the IPC Handbook

¹¹ Article 2, Medical Committee bylaws, Section 1, Chapter 2.4.10 of the IPC Handbook

¹² Within the meaning described in the Code

consequences to the sporting bodies over which IPC has authority¹³.

The Tribunal consists of an independent lawyer, appointed by the IPC, acting as interim President, as well as ten additional members with different fields of expertise that are identified and appointed by the Tribunal President. On a special and distinctive note, the IO Team would like to commend the endeavour of the IPC on the achievement of greater participation of females within the members of the Tribunal, which is an effective prerequisite for fostering gender equality¹⁴. All members of the Tribunal sign a written declaration on a case-by-case basis, disclosing any potential conflict of interest and confirming their independence¹⁵.

While the IO Team was not in a position to fully assess the appointment procedure of the interim President of the Tribunal, it was advised that the IPC intends to establish an independent nominations' committee, which will be responsible for recruiting, assessing, vetting, interviewing, and recommending candidates for the position of Tribunal President. Hence, the IO Team would like to compliment this approach as a significant step in strengthening the impartiality and independence of the appointment procedures, and thus the Tribunal itself.

However, while the IPC Anti-Doping Code applies to all members, directors, officers, and employees, as well as those of appointed delegated third parties, involved in any aspect of doping control as a general requirement, the IO Team noted that the members of the Tribunal do not explicitly agree to be bound by the IPC Anti-Doping Code as a condition of their position or involvement in anti-doping proceedings by way of a declaration, agreement or any other applicable form.

5.3.3 Doping Control Team

For the sample collection purposes during the Games, all Doping Control Officers (hereinafter referred to as 'DCOs') and Chaperones signed a written declaration¹⁶, which obliged them to agree to be bound by the Code, including the related International Standards and the IPC Anti-Doping Code applicable to the Games. Moreover, by declaration, they were required to disclose any existing or potential conflict of interest.

Recommendation No. 1

Disciplinary procedures and internal mechanisms are in place with respect to the deterring and sanctioning of direct and intentional misconduct in order to ensure compliance with the IPC Anti-Doping Code by any person (board members, directors, officers, delegated third parties, committee members and others) who are involved in the anti-doping program. However, the IO Team recommends that the IPC ensures that the abovementioned persons are bound by the IPC Anti-Doping Code when it next revises its regulatory documents.

Effective Practice No. 1

The IO Team applauds the endeavours of the IPC on the achievement of greater participation of females within its Tribunal members as an effective prerequisite for fostering gender equality.

¹³ Tribunal Rules, Article 1.1

¹⁴ Seven out of a total of 11 members are females.

¹⁵ Disclosure of potential conflicts and statement of independence.

¹⁶ DCO (Chaperone) Appointment Undertaking

Effective Practice No. 2

The IO Team would also like to specifically commend the intention of the IPC to provide the nominations committee with responsibility for vetting and approving candidates for positions within the IPC Anti-Doping Tribunal. The IO Team would encourage all stakeholders to use such an approach in strengthening their respective appointment processes and procedures.

6.0 PRE-GAMES TESTING

This Section provides a summary of observations made by the IO Team regarding the testing activities of the IPC prior to the Games, as well as outlines recommendations resulting from the respective observations. In the assessment of pre-Games testing activities, the IO Team referred to applicable requirements of the Code and the International Standard for Testing and Investigations (hereinafter referred to as 'ISTI'), as well as other regulatory documents where relevant.

Firstly, for the overall pre-Games testing activities, it should be noted that the IPC is both the organizer of the Paralympic Games and the International Federation for many Para sports, including all winter Para sports except Curling. The IO Team was advised that prior to the Games, 421 urine samples, 69 blood samples, 311 blood passport and 20 dried blood spots were collected both IC and OOC.

Table 1: Pre-Games testing

	OOC	IC	Total
Urine	298	123	421
Blood	69	0	69
Blood Passport	301	10	311
DBS	20	0	20

Table 2 - Pre-Games RTP testing

	OOC	IC	Total
Urine	128	20	148
Blood	7	0	7
Blood Passport	119	4	123
DBS	2	0	2

This model allows the IPC to centrally coordinate pre-Games testing. While it was not the IO Team's mandate to assess the work of the IPC regarding its responsibilities as an International Federation, the IO Team believes that, for the purposes of the Games, it would be beneficial for the IPC to liaise more closely with National Anti-Doping Organizations (hereinafter referred to as 'NADOs') pre-Games to ensure that they have co-ordinated Pre-Games programs and reduce any potential testing gaps and overlaps.

Recommendation No. 2

The IO Team recommends that the IPC develops a specific pre-Games testing program, potentially through a taskforce model for future games and events, and closely communicates with relevant NADOs in order to provide specific testing recommendations, as well as to share intelligence and information in order to ensure that an appropriate level of OOC testing has been carried out in the period leading up to the Games. In this regard, such testing is preferably conducted jointly in collaboration with the NADO to avoid repeated tests and to ensure that high risk athletes are tested effectively prior to their participation

at major events. Where possible, such an OOC testing program shall ensure that high risk athletes have been sufficiently tested within six months prior to the Games. The IO Team further recommends that, with a view of a comprehensive pre-Games program, this recommendation should be implemented together with the recommendations No. 7 and No. 8.

Recommendation No. 3

The IO Team recommends that the IPC collaborates with and encourages all relevant NADOs to combine their efforts, possibly by creating a pre-Games Taskforce. This could be used for intelligence and information sharing, as well as test planning, collection and analysis.

7.0 TEST DISTRIBUTION PLANNING

This Section provides an overview of the observations and conclusions made by the IO Team during the mission related to the planning of doping control tests by the IPC in advance of and during the Games. In its assessment, the IO Team referred to the applicable and specific requirements of the ISTI. For the planning of the doping control tests at the Games, the IPC developed a TDP based on a detailed and specific risk assessment, developed and reviewed in advance of the Games. Overall, the IO Team commends the IPC for its comprehensive and detailed approach related to testing and the tremendous amount of work dedicated to developing and elaborating the RA and TDP.

7.1 Risk Assessment and Test Distribution Plan

The TDP for the Games was developed and based on a Risk Assessment that included a comprehensive breakdown of doping risks and incorporated the requirements of the Technical Document for Sport Specific Analysis (hereinafter referred to as 'TDSSA').

The IPC's Risk Assessment is the combination of various qualitative and quantitative datasets and information. Hence, the IPC has developed and documented a comprehensive and unique quantitative RA which is evidence-based as it assigns numerical values to risks, based on quantifiable data, such as: (a) country risk based on a political and economic corruption index, (b) testing quality risks assigned to the IPC, NADOs and IFs, (c) number of samples collected from athlete by different testing authorities, (d) previous ADRVs, (e) athletes' individual parameters such as performance and testing history, (f) laboratory and Athlete Passport Management Unit (hereinafter referred to as 'APMU') recommendations, (g) various rankings and (h) other quantifiable data. Similarly, the IPC's qualitative Risk Assessment is based on the IPC's experience and expertise around the physiological and physical requirements specific to the sport and discipline. Despite being in-use for several years, as highlighted in previous Paralympic Games' IO Reports, the IPC risk assessment remains a living document, and is reviewed and enhanced on a regular basis. It provides a foundation for the calculation of planned testing figures per sport in advance of the Games and is updated as the Games events progress.

Recommendation No. 4

While acknowledging the specificities of developing a Risk Assessment for Para sports, the IO Team recommends that the IPC includes, to the extent possible, qualitative parameters such as physiological and physical requirements, information received or intelligence developed, as well as research on doping trends. It is acknowledged by the IO Team that the IPC takes into account all of these criteria and implements them in practice, however, it would still be useful to include them in the Risk Assessment.

Recommendation No. 5

The IO Team appreciates that the IPC Anti-Doping Team shared relevant documents prior to the Games, but recommends that, for future Games, the Risk Assessment, as well as its explanatory note and user guidelines, are shared with the IO Team well ahead of the Games so that a detailed review can be conducted, and any potential recommendations can be shared.

7.2 Games-Time Testing

In total, 564 athletes took part in the Games. During the Games, a total of 680 samples were collected and analyzed, of which 390 constituted urine samples, 60 blood samples, 206 Athlete Biological Passport (hereinafter referred to as 'ABP') blood samples, and 24 DBS samples. It was noted by the IO Team that among those participating, 350 athletes were tested in total, with 177 medallists tested. Out of those medallists, 59 were tested IC, while among the other 118 medallists, who were tested OOC only, 32 athletes were tested once, 25 athletes were tested twice, 20 athletes were tested three times, 39 were tested four or more times and two athletes were not tested at all. Among the 59 medallists who were tested IC at least once, 51 were tested both IC and OOC, while eight were not tested OOC.

Table 3 - Games-Time Testing

Sport/Discipline	Urine			Blood			Blood Passport			Dried Blood Spot			Grand Total
	IC	OOC	Total	IC	OOC	Total	IC	OOC	Total	IC	OOC	Total	
Curling	15		15										15
Para-Alpine Skiing	62	21	83		4	4					1	1	88
Para-Biathlon	1		1										1
Para-Ice Hockey	32	41	73		8	8					1	1	82
Para-Nordic Skiing	101	83	184		44	44	4	202	206	2	20	22	456
Para-Cross Country Skiing Middle/Long Distance	10		10					1	1				11
Para-Cross Country Skiing Sprint/Short Distance	1		1					1	1				2
Para-Nordic Skiing	90	83	173		44	44	4	200	204	2	20	22	443
Para-Snowboard	24	10	34		4	4							38

7.3 Out-of-Competition Testing

OOC testing was conducted at all three zones where athletes were located. These were Beijing, Yanqing, and Zhangjiakou, each of the three cities hosted a Paralympic Village, as well as other accommodation facilities. For the processing of OOC testing, the IPC issued mission orders for the period beginning before the start of the Games, from 26 February, when athletes could access the Paralympic Villages, and ending on 4 March. The mission orders included athletes' details, and the type of tests to be performed.

During this period, each DCCC was instructed by the IPC to conduct target tests within their zones before and during the Games, based on APMU and intelligence recommendations, which were constantly reviewed by the IPC.

Although it was initially planned by the IPC that OOC testing would be concluded before 4 March, the IO Team noted that the IPC continued to carry out OOC target tests based on received APMU and laboratory recommendations after that date, which the IO Team considers a good initiative. The IO Team would like to commend the IPC for a very impressive intelligence-based, effective and extensive OOC testing program.

Overall, the IPC collected 439 samples OOC in six sports, in accordance with the allocation made in its TDP. Out of those samples, 155 were urine, 60 blood, 202 ABP and 22 DBS (see Table 3).

7.4 In-Competition Testing

The IPC's number of IC tests per sport and discipline was based on the outcomes of the Risk Assessment, with a greater number of tests being allocated during the finals in higher risk sport/disciplines. Furthermore, the IPC focused on "real-time" selection of athletes for testing during the event, which was based on results, as well as the IPC's Risk Assessment and rankings. This was found to be effectively used by IPC anti-doping staff during the Games.

The IPC also developed a comprehensive mechanism, which prioritized the potential selection of athletes during competitions based on available intelligence criteria and information. This mechanism was used by the IPC staff, as well as the international experts appointed by the IPC, to make the target selection for certain IC tests. The IO Team commends the IPC on such effective use of the outcomes of the Risk Assessment to prioritize target selection for IC testing.

In total, the IPC collected 241 IC samples in six sports in accordance with the allocation made in the TDP. Out of those samples, 235 were urine, none were blood, four were for the ABP program and two were DBS (see Table 3).

Recommendation No. 6

While the IO Team acknowledges the development of an intelligence-based IC testing program with a satisfactory number of samples collected, it is the Team's opinion that some blood samples should be collected IC for future Games. This will ensure that sports with a higher risk to Prohibited Substances are well tested, and allow for greater unpredictability for the IPC's testing program.

8.0 WHEREABOUTS COLLECTION

This Section provides information about observations made by the IO Team regarding the collection of whereabouts information and related activities. In general, whereabouts information for OOC testing were collected from three different sources. These include; the list of rooming information received by the IPC from all participating NPCs, as well as two applications used by the DCCC for the purposes of locating and notifying athletes. The IO Team wants to commend the IPC for its use of technological tools during the Games, which ensured that they had up-to-date information that contributed to the smooth running of the efficient operations related to the identification of athletes.

8.1 Rooming Information

The IO Team acknowledges that the IPC and Beijing 2022 were able to locate athletes during the Games for the purpose of OOC testing. The IO Team was advised that all information regarding rooming and location of the athletes had been collected by the IPC, and subsequently transferred to the DCCC for their daily operations. The IPC requested from all NPCs to provide all rooming information, including their athletes' name, building and room numbers, as well as arrival and departure times. Moreover, all NPCs were required by the IPC to update information in a timely manner where relevant. A mechanism was established under which, whenever required, the DCCC informed the IPC of potential misinformation, and the IPC could subsequently impose a fine on the relevant NPC for any inaccurate or late submission of whereabouts information¹⁷.

8.2 Use of Applications

With respect to the other sources of information, the IO Team observed technological solutions used by the DCCC for the purposes of identification of the athletes through two mobile applications ("MyInfo" and "Games App"). One of the applications contained information about athletes' names, dates of birth, photographic images, as well as the schedule of their respective competitions, while the other app was used to determine the arrival and departure dates of the athletes.

Effective practice No. 3

The IO Team notes that the use of technological applications, subject to the requirements of the relevant data protection regulations, adds value, simplifies the process of locating athletes, and increases the accuracy of their identification. The IO Team encourages organizers of future Games to use similar platforms whenever possible.

9.0 INTELLIGENCE

This Section provides a summary of observations by the IO Team with respect to intelligence gathering before and during the Games, as well as recommendations made by the IO Team in this regard. For the purposes of this Section, respective Code and International Standards' provisions, and in particular the relevant provisions of the ISTI, were taken into consideration.

9.1 Pre-Games Intelligence Related Activities

The IO Team believes that one of the main aspects of anti-doping intelligence is a well-established information sharing mechanism between Anti-Doping Organizations (hereinafter referred to as 'ADOs'). This allows for an effective exchange of intelligence and contributes to the efficient planning of doping control tests. As such, one of the key partners for the IPC would be NADOs, and to a certain extent NPCs.

Thus, cooperation and mutual efforts in the spirit of the collaboration required by the Code would provide an impetus in increasing the level of intelligence gathering, sharing, and further processing, as per Article 20.2.11 of the Code that requires from the IPC *'to cooperate with relevant national organisations and agencies and other Anti-Doping Organisations.'*

¹⁷ Article 12.1.3, the IPC Anti-Doping Code, Part One, 1 January 2021

Before the Games, the IO Team was advised that the IPC would use different intelligence sources during the Games (as described in subsequent paragraphs). While the IPC did reach out to all relevant NADOs ahead of the Games, inviting them to share any information or intelligence, none were received.

Recommendation No. 7

For future Games, and since the IPC reached out to NADOs with little success, the IPC should consider putting in place a pre-Games Taskforce involving the LOC, the appointed Sample Collection Authority, as well as some relevant NADOs. It is highly recommended that the IPC initiates the operations of this Taskforce 12 months before the start of the Games to benefit from its work.

9.2 During the Games

The IO Team noted that during the Games, the IPC collected and utilised different intelligence from multiple sources, including recommendations from laboratory experts and sample collection personnel for the purposes of conducting IC and target testing. Furthermore, to facilitate the collection of whistle-blower information, the IPC promoted the use of WADA's "Speak Up" platform, including with prominent exposure in doping control stations.

The IO Team would like to specifically highlight that the IPC used information gathered from the APMU, which enabled them to carry out intelligence-based target testing during the Games.

While the IO Team notes that during the Tokyo 2020 Paralympic Games, the IPC had an agreement with the Japanese authorities for exchange of intelligence, the IO Team was advised that during these Games, there was no such agreement with the Chinese authorities.

Recommendation No. 8

The IO Team recommends that, for future Games, the IPC establishes a policy for intelligence gathering prior to the Games. This would include a close exchange of information, preferably via a pre-Games Taskforce, with the relevant NPCs, NADOs and IFs, as well as collaboration with the governmental and customs authorities of the hosting country. If possible, specific agreements should be in place for these engagements well ahead of the Games.

10.0 THERAPEUTIC USE EXEMPTION PROCEDURE

This Section provides an overview and summary of the observations, as well as recommendations, made by the IO Team related to the activities of the IPC TUE Committee (hereinafter referred to as 'TUEC'), its composition, and all related Therapeutic Use Exemption (hereinafter referred to as 'TUE') processes that occurred before and during the Games, in light of their compliance with the Code, and the related International Standard for Therapeutic Use Exemptions (hereinafter referred to as 'ISTUE') provisions.

10.1 General

The IO Team notes that the IPC had a compliant and effective TUE process in place at the Games. Twelve TUEs were approved by the IPC just prior to or during the Games period, and eight TUEs granted by other ADOs and were recognised as valid for the Games.

No TUE applications or applications for recognition were rejected, and two emergency TUEs were

approved during the Games period. In total, TUEs or applications for recognition were received from ten participating countries, with one country accounting for one-third of the total recognitions/applications.

10.2 Process

Deadlines for pre-Games TUE applications and requests for recognition were indicated in the anti-doping section of the IPC website. New TUE applications were submitted by the athlete, or doctor, to the IPC TUEC e-mail address. The IPC TUE Manager was responsible for receiving and processing all TUE applications received during the Games, including entry of details into ADAMS for review by the TUE Committee members, and communication with the athlete or doctor.

10.3 Mutual Recognition

The process for TUE recognition was completed via ADAMS. The IPC ensured prior to the Games that their TUE staff received access to review TUEs issued by the World Curling Federation, as the International Federation for wheelchair curling. The IO Team considered this to be a good initiative as part of the pre-Games planning process.

While the IPC Anti-Doping Code is explicitly clear with regards to the process for recognition of TUEs awarded by other ADOs, in that TUEs are recognized where they meet ISTUE requirements as stated in Section 4.4.3.1 of the IPC Anti-Doping Code, the IO Team noted that there was the potential for some confusion to be created by the fact that the IPC website also lists the ADOs from whom TUEs will be automatically recognized.

Recommendation No. 9

While the IPC Anti-Doping Code is clear, some clarification may be needed to the wording in the anti-doping section of the IPC website to remove any possibility of confusion for athletes with regards to how the recognition applies depending on their country, and/or, ADO. The IO Team recommends that the IPC clarifies that their policy is either to (i) automatically recognize all TUEs that meet ISTUE requirements, or (ii) automatically recognize all TUEs that meet ISTUE requirements when issued by the countries/ADOs listed on their website.

10.4 Constitution of TUE Panel

The IPC TUE panel was constituted by three members of the IPC TUE Committee who were onsite at the Games, and one remote member who was available to review applications remotely when required¹⁸. All members had previous experience reviewing applications from Paralympic athletes, which was essential. As mentioned, the administration of the TUE process was managed at the Games by the IPC TUE Manager, who was also onsite. Procedures for approving new TUEs at the Games, and for recognition of TUEs issued by other Signatories¹⁹ of the Code in advance of the Games, were evaluated as appropriate to ensure a fair and effective process for athletes and their medical staff.

The IPC Appeals Committee was the body designated to hear any appeals related to TUE decisions. No TUE appeals were initiated in relation to the Games.

Conflict of interest forms were signed by the TUE Committee Members. The administration of this process

¹⁸ All were members of the IPC Medical Committee

¹⁹ Within the meaning defined in the Code

was also conducted by the TUE Manager.

10.5 Education of Athletes and Medical Staff

The IPC TUEC Chair provided communication to NPC medical staff in advance of the Games on the applicable TUE rules and procedures, and also provided a copy of the WADA List of Prohibited Substances and Methods (hereinafter referred to as '**The Prohibited List**'). This was followed-up by an in-person session with the Chefs de Mission during the Games, where team medical officers and physicians were sensitized on these areas.

The IPC required for medical officials from participating NPCs to complete the WADA anti-doping eLearning platform (hereinafter referred to as '**ADEL**') physicians' module prior to the Games. The completion of the module was monitored by the LOC. The IO Team notes that this was an excellent initiative, which may have been rendered less effective though as a result of the requirement not being monitored and enforced accordingly. The IO Team was advised that at least 50 chief and deputy physicians completed the course as part of their medical personnel registration application and undertaking to be accredited for the Games.

Additionally, the Games' Polyclinic staff were advised prior to the event by Beijing 2022 to ensure that any medical care given to athletes which might involve the use of prohibited substances was managed within the demands of the treatment, and in line with TUE requirements.

TUE reminder posters were displayed prominently in the Games' doping control stations, which was considered by the IO Team to be a good initiative to remind athletes and support staff of their obligations.

Recommendation No. 10

The IO Team recommends that for future Games, the IPC should ensure that NPCs adequately inform their athletes of TUE requirements so that they are more well versed and aware of TUE processes regardless of their levels. This makes it important for athletes, and their medical staff, to be aware that their national level TUEs will need recognition by the IPC.

Recommendation No. 11

The IO Team recommends that the anti-doping landing page of the IPC website is updated, to the extent possible, to better signpost all available content (as stated on the 'IPC' dropdown menu) at [Anti-Doping Home Page \(paralympic.org\)](#). In addition, the link to the IPC TUE application form contained in the IPC Anti-Doping Code at section 4.4.3.3 takes the user to the main IPC landing page, not a TUE section. This should be corrected. A clear link to the anti-doping section should be visible somewhere on the IPC main landing page to enable easier access for athletes and ASP.

11.0 EDUCATION

This Section describes the educational activities that were carried out by the IPC during the Games, and observed by the IO Team, and provides information regarding recommendations made in this regard. The Section consists of three parts, and is focused on the awareness raising and information provision at doping control stations, interaction with athletes by sample collection personnel, and engagement of athletes during the Games.

In assessing the educational activities, the IO Team has taken into consideration Article 20.2.9 of the Code, which requires from the IPC *‘to plan, implement, evaluate, and promote anti-doping Education in line with the requirements of the International Standard for Education’* and applicable requirements of the International Standard for Education (hereinafter referred to as **‘ISE’**).

As indicated in the ISE, an athlete’s first experience of anti-doping should be education and not a doping control test. In this regard, the IPC shared important educational resources on the anti-doping page of its website for athletes and ASP to consult. In addition, the IPC, jointly with WADA, offered a very good initiative in the lead up to the Games, in the form of a specific e-learning course for athletes participating in the Beijing 2022 Games on ADEL. The aim of this course was to educate Para-athletes, and their entourages, as well as all NPCs, on the different processes and requirements of the anti-doping rules. Through this course, athletes were able to acquaint themselves with the relevant rules and regulations for TUEs, whereabouts information, rights and responsibilities during sample collection process, and matters related to the Prohibited List. To facilitate the process, before the Games, the IPC communicated with and advised all NPCs to encourage their athletes, and their ASP, to complete the course.

As such, 66 out of 558 athletes taking part at the Games, and 112 out of 1095 ASP completed the course.

During the Games, the IO Team observed a very interesting and impressive set of educational materials that were located and accessible at each Doping Control Station (hereinafter referred to as **‘DCS’**) including a variety of information, both visual and printed, concerning topics related to the World Anti-Doping Code, the sample collection process, and various other types of information that were found to be useful to athletes. Visual information in the form of a detailed video outlining the steps in the process of the collection of urine and blood samples was available for all athletes, and their ASP, as they entered the DCS, and was intermittently broadcasted on the television monitors, which the IO Team found to be a good initiative.

Although outreach activities were not allowed due to the measures in-place to curb the effects of the COVID-19 pandemic, the printed materials, banners, flyers, pamphlets and videos ensured that athletes and ASP were sensitized during the Games. The IO Team would like to commend the work of sample collection personnel, who regularly directed the athletes’ attention to those resources, thereby facilitating sample collection process and promoting anti-doping education. This was particularly useful where the DCO and the athlete did not share a common language.

Overall, the IO Team would like to commend the IPC for its work related to implementation of awareness activities, including the location of visual materials and their visibility for athletes.

Recommendation No. 12

The IO Team encourages the IPC to make the e-learning course for athletes and ASP mandatory for future Games, which will enable the IPC to assess the pass mark for entry eligibility.

12.0 ATHLETE PERSPECTIVES

This Section provides an overview of athletes’ perspectives about doping control during the Games. The IO Team greatly welcomed the inclusion of an athlete representative within the team, as it brought an immense value to the mission through the evaluation of the anti-doping program from an athlete’s perspective.

During the mission, the IO Team had an opportunity to communicate with athletes and observe the work of different DCOs, both local and international. Primarily, the IO Team would like to commend all DCOs for their very friendly behaviour, as well as their clear methods of communication and engagement, e.g., introducing themselves, showing the posters containing information about the sample collection process, carefully and clearly explaining each step, taking the necessary time to fill out certain forms and, in general, making sure that the athletes felt as comfortable as possible throughout the process.

English was the main language that was used mostly during doping control. While for many DCOs English was not their first language, and a language barrier was observed, they were still able to communicate quite well with the athletes, and athlete representatives, either by using a device for translation, or with the assistance of visual materials.

Occasionally, the IO Team had an opportunity to communicate with athletes after the completion of their sample collection process, and it should be noted that most athletes were very satisfied with the process, which was adequately personalized to all request and needs. Furthermore, the IO Team often inquired from athletes on issues related to their rights and education activities. Most of the comments received were positive, and the athletes were satisfied with the work conducted. Almost all of the athletes had one, or several, previous sample collections experiences, which indicated that their feedback was well informed.

During the conversations with athletes, the IO Team also attempted to dive deeper into the subject of anti-doping education before the Games in the athletes' home countries. All athletes with whom the IO Team spoke confirmed receiving a course either from their NADO or their NPC, although very few were aware of the ADEL platform. In terms of their rights, many athletes were familiar with the more obvious ones, such as the right to education, the rights in the data collection process, analysis of the B sample and whistleblowing. On the other hand, it is important to mention that some athletes were confused about the roles and responsibilities of each stakeholder, which might be considered in the future and added to the set of education materials offered to them.

13.0 SAMPLE COLLECTION PERSONNEL

While previous editions of the Paralympic Games might have experienced certain issues with regards to the recruitment, training, and overall capacities of Sample Collection Personnel (hereinafter referred to as 'SCP'), it was evident to the IO Team that these matters were extremely well managed and planned for by Beijing 2022, in cooperation with the IPC. This can be seen in the meticulous manner through which SCP were recruited, the informative and interactive way through which they were trained prior to and during the Games, as well as the capacitating and support that they received throughout their mandate.

Overall, the IO Team wishes to commend the IPC and Beijing 2022 for the recruitment and training strategy developed and implemented for these Games, as it allowed the SCP to perform their roles excellently.

13.1 Composition of Sample Collection Personnel

Overall, the organigram for the anti-doping team at the Games was well structured and detailed, with clear tasks and responsibilities assigned to each party. As the Testing and Results Management Authority for the event, the IPC Anti-Doping Team acted as the ultimate reference point for all questions and concerns. However, Beijing 2022 managed to operate with full autonomy and confidence on all matters within its

jurisdiction, and it is the IO Team's opinion that Beijing 2022 did so with an extremely high level of competence and efficiency.

In terms of anti-doping, Beijing 2022 was composed of several internal authorities and structures, starting with the Beijing DCCC at the helm. The Beijing DCCC, located at the Beijing Athletes' Village, was the focal point for all major decisions and instructions, as well as the housing facility for all the essential documentation. The Beijing DCCC was located on the same floor as the IPC Anti-Doping Team's office, which was helpful during times where urgent feedback and advice were needed.

Two additional DCCCs were located at the two other zones that were used for the Games, *i.e.* Zhangjiakou and Yanqing. Both DCCCs remained in close contact with the Beijing DCCC and were able to provide timely and relevant guidance and support onsite for their respective teams.

Each DCS was staffed with its own Doping Control Station Manager (hereinafter referred to as '**DCSM**'), Chaperone Coordinator, Venue Coordinator, Doping Control Officers (hereinafter referred to as '**DCOs**'), Blood Control Officers (hereinafter referred to as '**BCOs**') and Chaperones. Overall, the same SCP were maintained at the same venues throughout the event, which was a recommendation from previous IO Reports and helped create a stronger and more efficient team spirit within the staff. The doping control team was complemented by a courier service that was able to transport all samples in a timely manner from the different locations to the WADA accredited Laboratory located in Beijing.

Overall, the doping control team was composed of 309 individuals. The three DCCCs were staffed with 28 individuals. The combined venue staff was a total of 208 individuals split into 10 teams, and the courier team was composed of 6 individuals. The total number of Chaperones that participated in the Games was 130. Unlike previous editions of the Paralympic Games, at no point did the IO Team feel that the venues and Doping Control Stations were understaffed. On the contrary, the venues and DCSs regularly benefited from extra personnel that were able to assist when required.

Among the doping control team were four International DCOs (hereinafter referred to as '**IDCOs**') that were recruited to participate. All IDCOs were located for the duration of the Games at the Zhangjiakou venue. Overall, the IO Team observed that the IDCOs were engaged, cooperative and efficient, as they were able to both easily integrate with their local colleagues, as well as provide added value in communications with individuals from different countries and cultures.

13.2 Training of Sample Collection Personnel

All the SCP that participated in the Games had already worked at the Winter Olympic Games. Accordingly, all of them benefited from the comprehensive and efficient training program that Beijing 2022 offered, prior to and throughout the event, to ensure that all members of the SCP were prepared and able to fulfil their mandate during the Games. In addition to the training program that was offered for the Olympic Games' SCP, additional emphasis was placed for the Paralympic Games' SCP on amendments related to Paraspports and modifications for athletes with impairment.

For DCOs, the recruitment and training process started in July 2020, 18 months prior to the event, and was restricted to individuals with a minimum experience of six testing missions prior to the event. The candidates underwent extensive training modules to ensure that they possessed the required level of knowledge and capacity to fulfil their roles, as well as the necessary linguistic skills to communicate with athletes and other individuals. The training was divided into four main areas: (1) general training on testing

and anti-doping, (2) training on sport specific information for Winter Sports, (3) training on testing for Para-sports and modifications for athletes with impairments, and (4) training on the collection of intelligence during doping control missions.

Several resources were utilized during training, including documents developed by the IPC, courses designed by WADA and the ITA, and documents prepared by Beijing 2022. The results of the pre-Games training were very encouraging, with selected DCOs obtaining an average grade of 91%. This was later reflected in the highly competent performance of the DCOs.

While the SCP pre-Games training program was already robust, it was further complemented by the ongoing guidance and information provided during the event through the “Working Tips”. The Working Tips were prepared by the Beijing DCCC based on the compiled feedback received from several stakeholders, including DCSMs, DCOs, athletes, the IPC, and the IO Team.

In total, five working tips were shared during the Games, with the DCCC taking the time to translate them into English and forward them to the IO Team for consultation. Overall, the IO Team believes this practice was very useful, educative, and supportive of the SCP, as it highlighted best practices and provided a way forward without singling out particular individuals for blame, which was very positive for the work environment. In several cases, the Working Tips had a direct and instantaneous positive impact, as it was observed that the best practices and recommendations included in them were acted upon immediately.

Effective practice No. 4

The IO Team would like to note the practice of the IPC and Beijing 2022 of circulation of Working Tips during the Games to all sample collection personnel as a form of prompt reaction to emerging issues and instructions on further processes. Such practice appeared to be very effective, efficient, and easy to comprehend.

13.3 Recruitment and Training of Chaperones

As an integral part of the Doping Control Team, the Chaperones at the Games were recruited taking several important factors into consideration and benefited from an efficient training program.

From the beginning, Beijing 2022 identified the need for Chaperones to be fluent in other languages, mainly English, as a critical element to overcome the difficulties of recruiting a larger number of IDCs or international Chaperones due to the COVID-19 pandemic and its impact on the entry requirements into China.

As such, Beijing 2022 signed a cooperation agreement with seven of China’s leading universities to receive recommendations for recruitment of Chaperones who were fluent in English. Beijing 2022 then used the specific module for Chaperones to conduct the general training, which was followed by further sport-specific training as well as training for modifications for athletes with an impairment. The training was concluded with in-person sessions that took place on the days prior to the start of the competitions. The IO Team managed to attend some of the sessions and noted the positive atmosphere and engaged participation of the Chaperones.

Similarly to the DCOs, the Chaperones that participated in the Games had already worked at the Winter Olympic Games, which allowed them to have a solid understanding of their role, as well as significant knowledge and experience related to the sports and the venues

14.0 NOTIFICATION AND CHAPERONING PROCESS

This Section describes the observations made by the IO Team regarding the notification and chaperoning process during the Games period.

14.1 Notification and Chaperoning of Athletes

The number of chaperones available for the notification and chaperoning requirements of the doping control process was more than sufficient for the needs of the testing program. Chaperones at the competitions were identified by a green “DOP” armband which was observed to function well as a clear indicator to athletes when notified. For OOC testing, “DOP” armbands were removed so that the Chaperones were not identified by athletes and their entourage prior to the notification process.

14.1.1 Training and Organisation

Chaperones were diligent, well-prepared and trained, and all demonstrated an excellent understanding of the requirements of their role. Chaperones were routinely observed at venues to be in position in advance of their notification responsibilities, and all managed to select good positions to observe their athletes. At most venues, where necessary for coordination of high-volume tests, Chaperone co-ordinators oversaw notification from a nearby observation point. Radios were used extremely well by Chaperones and Chaperone coordinators to liaise with the DCS, or DCSM, when required.

14.1.2 Identification and Notification

The quality of athlete notification and chaperoning was observed to be extremely high. No issues were noted with the identification, and, in many cases, DCOs/Chaperones prepared for missions by printing official images of the athletes prior to commencing the notification process. This was an effective practice, which ensured that mix-ups with athlete identification were avoided, as noted by the IO Team.

All chaperones were observed to react well to unexpected changes or variances in athletes leaving the field of play, using changing rooms post-competition and moving through the mixed zone. Chaperones were typically observed to show good consideration of an appropriate time to notify the athlete, and no misunderstandings due to language were observed during the notification process, which is to be commended given the various languages and cultures in play.

In some instances, Chaperones utilized portable translation devices to facilitate communications with athletes. These were found to be efficient in ensuring a clear understanding of the notification process by everyone involved.

14.2 In-Competition Chaperoning

In-competition chaperoning was observed to be effective and consistent at all venues, with athletes notified between the end of competition as they left the field of play, and arrival at the mixed zone.

On one or two occasions, the timing of the notification was delayed, and/or occurred later than expected for no obvious reason, which was promptly noted by the Chaperones and addressed accordingly. However, these were exceptions to a very consistent and impressive standardization, which resulted in

no compromised procedures, as athletes remained under observation at all times.

Chaperones were seen to manage the two-hour waiting time for Athlete Biological Passport blood testing extremely efficiently, though ABP testing was only observed IC due to the TDP.

14.3 Out-of-Competition Chaperoning

Due to short notice changes that were often made to the TDP, and the timing of tests which affected planned observation missions, the IO Team was only able to observe limited OOC testing missions. Consequently, the following observations are based solely around these missions.

While notification and chaperoning procedures were observed to be generally in line with International Standards, it was observed that, on one occasion, the Chaperone team voluntarily waited in the team block lobby on the request of a member of the NPC team, who was waiting for the team doctor to assist the Chaperones, instead of proceeding directly to the athlete's room to commence the notification process. Although there was no indication that any advanced notice was provided to the athlete, and the delay was no longer than 5-10 minutes, this could nevertheless have provided the team or the athlete with an opportunity to attempt to subvert the doping control process.

Aside from this issue, the Chaperones performed very well. They were not identifiable, no armband, refused to provide the name of the selected athlete to another athlete answering the door of the room, and kept the athlete under observation during a planned treatment session.

Recommendation No. 13

All NPCs should be educated and reminded at the start of the event that (i) access to athletes should not be impeded or delayed in any way, and (ii) rooming lists provided to the IPC, as explained in sub-section 8.1 of this IO Report, should be accurate and updated at all times to avoid Chaperones having to knock on incorrect room doors.

15.0 SAMPLE COLLECTION PROCESS

This Section describes observations made by the IO Team regarding sample collection process. References were made to respective provisions of the Code and the International Standards for Testing and Investigations, as well as other regulatory documents.

15.1 Doping Control Stations

Doping Control Stations were located at each venue where competitions were held, as well as at the Paralympic Villages of the Beijing, Yanqing, and Zhangjiakou zones. The size and the number of processing rooms were more than sufficient for carrying out sample collection processes effectively. The security of the stations with guards stationed at each entrance managing access contributed to the secure verification of all personnel entering the station.

15.1.1 Arrival at the Doping Control Station

The IO Team observed that the athletes were greeted at the DCS by friendly front desk staff on arrival, and entry/exit was managed extremely efficiently. DCSs were typically bright, welcoming environments, and athletes were often given local gifts on departure. This was a particularly well-managed part of the

sample collection process.

15.1.2 Coordination in the Doping Control Station

On arrival into the DCS, athletes were directed to the waiting area and asked whether they were ready to produce their sample, in the case of urine. Athletes who were not ready to produce on arrival typically remained in the waiting area and, on very few occasions, athletes were observed to request temporary departure from the DCS. On the occasions that this took place, the assigned Chaperone left with their athlete in line with procedure.

Chaperones usually did not continue direct observation of their athlete once the athlete had been signed into the DCS waiting area. Instead, one or more doping control officials, such as the DCSM or chaperone coordinator, would take the role of observing athletes and monitoring behaviour, including intake of liquids, and would step in to resolve issues and/or advise athletes when required. Though this was generally observed to be successful, presented no apparent issues, and helped to keep the waiting area uncluttered, this could have posed a problem in a busy waiting area due to the need for the nominated observer to keep accurate track of all athletes and support staff in the waiting area at the same time. While Article 4.3 of the Doping Control Technical Procedure mentions observing athletes and their liquid intakes, the IO Team notes that it would be beneficial to have a clear allocation of the roles and responsibilities within the DCS to have an accurate and constant observation of the athletes.

The DCSMs were all well trained, spoke good English and ran organized doping control stations. All staff were connected by radios, which were observed to be used effectively, particularly by Chaperones, as a means to allow the DCS/DCSM to monitor the operations in the field, and advise the Chaperones as needed. This ensured a coordinated testing operation at all venues.

15.2 Sample Collection Session

15.2.1 Collection of Urine Samples

Urine samples were observed to be collected in accordance with required procedures. Two DCOs were present for all sample processing. One DCO typically completed the sample collection form, as the other managed sample provision and processing. This was observed to work efficiently between both local DCOs and IDCs, and administrative tasks were switched effectively between both DCOs if/when needed.

DCOs demonstrated a very good understanding of process and sample collection, and processing was conducted consistently across all sites at the event.

The dilute sample policy is documented in the IPC Doping Control Guidelines, and appears to have been followed during the event. However, the IO Team was not in a position to observe directly the implementation of the guidelines, as no test missions observed by the IO Team resulted in dilute samples.

Having said that, data available in ADAMS shows that three dilute samples were provided during the Games, and additional samples were collected as required.

15.2.2 Collection of Blood Samples

The IO Team was able to observe blood collection (blood and/or ABP) only on a small number of occasions during the Games. This was due to (i) most OOC blood tests had been completed in advance of the arrival of the IO Team, in accordance with the TDP (ii) the absence of scheduled IC blood tests until the penultimate day of the Games, and (iii) the fact that the IO Team found difficulty to identify with any accuracy when OOC blood testing was to take place during the day, as this was often left to the DCSM to decide based on the events of the day when the OOC testing was scheduled.

Nevertheless, where observed, the blood collection process was conducted very professionally, and in line with stated procedures, by well-trained staff. Samples were handled and stored appropriately on conclusion of the test mission to the point at which they were prepared for onward transport to the Laboratory.

15.2.3 Collection of DBS Samples

DBS processing was observed during the mission and was found to be efficient and conducted correctly. Clear instruction on the process was provided to the athlete.

15.3 Modifications for Athletes with Impairments

Athlete impairments which necessitated modification to the doping control process were well managed by the SCP team, including ensuring that clear instructions were provided to visually impaired athletes. On one occasion, language issues provided some communication challenges between athlete and DCO, but DCOs mostly had sufficient levels of English to explain the procedures, which was often rendered more difficult by the two levels of PPE equipment that DCOs were required to wear.

All observed DCOs were calm, patient, and clear in their instructions to athletes, always ensuring that messages were fully understood. While some feedback on 'best practice' was provided during the event by the IO Team, no major non-conformities by DCOs were observed.

15.4 Declaration of Medication and Supplements

Paper Doping Control Forms (hereinafter referred to as '**DCF**s') were used at the event, and in addition to one DCF, and one notification Form, a single A5 sheet of paper was provided to athletes upon notification to collect personal information and medication/supplement information, which would later be transferred onto the DCF when the athlete commenced the processing of their sample. This allowed the DCOs to confirm accurate spelling with the athlete.

While this improved the accuracy of the process, on occasions, it was observed to delay the processing somewhat as a result of the language and alphabet differences, which required DCOs to take extra time to ensure that they had recorded all details correctly. This also meant that any time that may have been saved by asking athletes to complete medications and supplements while sitting in the waiting room was offset against the additional time taken for information to be transferred to the DCF before or during sample processing.

However, this was still considered to be a secure and effective method, and given the alphabet and language differences between Chinese and English, this can be considered a good initiative.

15.5 Storage of Samples

Samples were stored appropriately at each Doping Control Station. Collected urine samples were stored in lockable refrigerators in the doping control office until the completion of a testing mission, after which they were transported to the DCCC, prior to onward transfer to the Laboratory.

Blood samples were stored in a temperature-controlled cool bag with data loggers to record temperature and a numbered Q-tag for security. Where samples were taken from athletes late in the evening at remote venues, these were transferred from the DCS to the DCCC, where they were stored in a locked storage room until collection for delivery to the Laboratory the following morning.

No deviations from procedures were noted on the occasions that this process was observed.

16.0 SAMPLE TRANSPORTATION

This Section provides an overview of the observations of the IO Team with respect to the transportation of the samples to the Laboratory for analysis.

16.1 Storage of Samples and Preparation for Transport

The IO Team observed the processes related to the sample storage and preparation for transportation upon the completion of the sample collection process. It was observed that after the athlete left the processing room, the DCO was responsible for taking the sample immediately to the DCSM, and the latter stored it securely in a dedicated refrigerator for urine, or in the dedicated transport bag for blood or DBS. A temperature data logger was used when blood was transported. The security of all samples was maintained, as the samples were always under lock with only the DCSM having access.

Additionally, the IO Team was advised and observed that the DCSMs were responsible for the process of the preparation of the samples for transfer to the specifically authorized courier company, which subsequently was responsible to take the samples directly to the Laboratory. The responsibility of the DCSM included a meticulous checking of all DCFs against the relative samples, creating the Chain of Custody (hereinafter referred to as '**CoC**'), carefully ensuring that all sample code numbers were included in the CoC, including any relevant information for the Laboratory's consideration, and checking the courier waybill number as well as the transport bag seal numbers. The DCSM was also responsible for signing off once completed.

All documentation and the bag containing the samples were then sprayed with sanitizing products before all items were delivered to the dedicated courier.

16.2 Transportation of Samples and Chain of Custody

The IO Team noted that although its composition did not include a Laboratory expert, the operations of the Beijing WADA-accredited Laboratory (hereinafter referred to as '**Laboratory**') were closely scrutinized during the Olympic Games by the IO Team's laboratory experts, as well as during the pre-Games period, by WADA with a number of expert visits performed in the months leading up to the Games.

The observations of the IO Team during the Games focused on the CoC process without assessing the analytical aspect or internal processes of the Laboratory, which was outside the scope of its mission.

The International Standard for Laboratories (hereinafter referred to as 'ISL') suggests that MEOs consider transporting samples to the existing facilities of a WADA-accredited Laboratory. During the Games, the Laboratory facilities, the National Anti-Doping Laboratory at the Beijing Sports University (hereinafter referred to as 'BSU'), located in Beijing, were utilized for the purposes of Games analytical testing services. The Laboratory was located on the National Olympic Sports Center campus, in close proximity to many of the Games venues in Beijing.

During the Games, the Laboratory was in operation 24/7 for the duration of the event. The Laboratory staff worked tirelessly to ensure a remarkably fast turnaround of analysis results. The samples collected at the various venues, IC and OOC, were delivered to the Laboratory day and night, and Laboratory staff were always in a position to receive the samples. A sample delivery system was put in place to transfer the samples from the doping control stations to the Laboratory in respect of the "Closed Loop" system which was implemented to mitigate the impact of the COVID-19 pandemic.

The process was as follows:

1. The DCSM took charge of handing over the samples, packaged in sealed transport boxes, to an authorized courier just outside the venue.
2. Subsequently, the courier transported the samples in their fleet vehicles to the Laboratory.
3. Once arrived, the courier stopped just outside the "Closed Loop" of the Laboratory where the samples were then handed over to the waiting dedicated sample delivery personnel.
4. Then, the person who was responsible for the delivery and authorized to enter the Laboratory's zone located outside the "Closed Loop" was required, as a condition of entry, to fully dress in sanitary Personal Protection Equipment (hereinafter referred to as 'PPE').
5. Sample delivery personnel subsequently brought the sample boxes into the specific building entrance of the Laboratory, where authorized guards checked the delivery and gave permission for it to proceed.
6. The samples were taken through a dedicated and secure sample delivery entrance to enter the Laboratory through a pass-through window.
7. The Laboratory sample reception staff were ready to receive the samples at the other side of the window, and would immediately start the opening of the boxes and processing of the samples. The sample transport boxes were sprayed with disinfectant at each transfer stage, from sample collection personnel to courier, and from the courier to the delivery personnel.

17.0 SAMPLE ANALYSIS

During the Games, a total of 680 samples were collected and analyzed, out of which 390 were urine samples, 60 blood samples, 206 ABP blood samples, and 24 DBS. Detailed information and statistical testing figures and tables for the Games are available in Annex III.

17.1 Athlete Biological Passport

The IPC utilizes the APMU of the WADA-accredited Laboratory of Ghent in Belgium for both its steroidal and hematological ABP program. The IO Team notes that as the IPC is the IF for all Para-athletes participating in the Games except Curling, it acted as Passport Custodian for most of the athletes in its ABP program.

The APMU reviewed passport profiles daily and reported back to the IPC with comprehensive testing recommendations for the IPC to act on. The IO Team noted that the constant communication between the APMU and the IPC was effective, and the recommendations made by the APMU were used and promptly

followed by the IPC.

17.2 Sample Retention and Further Analysis

The IO Team notes that, just before the Games started, the IPC was in the process of moving all the samples stored in different laboratories worldwide to a centralized location in the Ghent laboratory, thus limiting the time available before the Games to further analyze samples. All the Beijing samples will be sent to the IPC storage facility at the Ghent laboratory accordingly.

17.3 Atypical Findings and Adverse Analytical Findings

During the period of the Games, the Laboratory reported a total of eight Adverse Analytical Findings (hereinafter referred to as 'AAFs') and one Atypical Finding (hereinafter referred to as 'ATF'). A detailed table of the AAFs reported during the Games is available in Annex IV.

As at the date of this IO Report, out of those eight AAFs reported, three cases were closed due to the ingestion of a Prohibited Substance through a permitted route, one had a valid TUE, two cases' results management process were ongoing, and two cases were identified as resulting from the WADA Double-Blind External Quality Assessment Scheme for laboratories.

18.0 RESULTS MANAGEMENT

Results management remains a particular area for all IPC events, as the IPC is in the specific situation of acting both as an International Federation (hereinafter referred to as 'IF') for several Para-sports, in this case all sports except for Curling, while at the same time acting as an MEO for the Paralympic Games. Having said that, it is the IO Team's view that the IPC managed to operate in both capacities efficiently, while maintaining the operational and institutional independence of their hearing and appeal panels respectively. While some important recommendations can be taken into consideration for future events, it is the view of the IO Team that the results management process overall went smoothly and in line with the International Standard for Results Management (hereinafter referred to as 'ISRM').

18.1 General

As outlined previously, the IPC adopted both anti-doping rules as an IF, as well as an MEO, in its Anti-Doping Code. The IPC Anti-Doping Code is detailed, provides the pertinent information for each specific case, and can easily be retrieved from the IPC's website. However, for athletes, and others who are not familiar with the IPC's dual role, it could have been useful to produce a summary document outlining the relevant articles and processes solely for the Games. A similar initiative was undertaken by the IOC, in cooperation with the International Testing Agency, for the Olympic Games, and, according to the feedback received, it facilitated the consultation for stakeholders overall. The IO Team would recommend that the IPC produces such a document going forward and communicates it to the participating NPCs and delegations as part of its efforts to raise awareness and to simplify processes

18.2 Independent Anti-Doping Tribunal

Following the entry into force of the 2021 World Anti-Doping Code, the IPC has taken significant and important steps in order to ensure that its results management process was amended in accordance with the Code. As such, an Independent Anti-Doping Tribunal was established, which was a recommendation

of previous IO Teams, in order to solidify the operational independence of the first instance decisions.

Furthermore, Tribunal Rules were adopted to specify composition, responsibilities, and operations of the Tribunal. The Tribunal Rules contain valuable information that is indispensable to understand the operations of the IPC's results management system. While the IO Team has noted that the IPC ensures that it is sent to all athletes, and others, once a results management process is initiated, it should be noted that the document is not easily found on the IPC's website and is not included among the documents available on the Resources page within the Anti-Doping section.

While the IO Team has noted that the identity of the President is communicated to athletes and relevant individuals once a hearing is requested, it should be noted that the identity of the President, the composition of the Tribunal, the number of panellists, their identity, as well as the decision nominating them are not referred to on the IPC's website. It would be important to clearly highlight those elements, so that the structure of the Tribunal is well established, and its members are well identified. This would also allow the relevant stakeholders to have a minimum level of visibility regarding who could potentially look into cases regarding their situations.

Recommendation No. 14

The IO Team recommends that the IPC makes Appendix A to the IPC Anti-Doping Code more visible, including publishing it in the Resources page of the Anti-Doping section of the IPC website. This would assist in getting stakeholders to understand the role and composition of the IPC Independent Anti-Doping Tribunal.

Recommendation No. 15

For future Games, it is recommended that the IPC publishes all details regarding the Independent Anti-Doping Tribunal on its website, including the identity of the President, the number, and identities of the panellists, as well as the mechanisms through which they were nominated.

18.3 Court of Arbitration for Sport's Anti-Doping Division

According to the IPC Anti-Doping Code²⁰, all decisions related to the Games could be appealed exclusively to the Court of Arbitration for Sport (hereinafter referred to as 'CAS'). While there were no appeals for the decisions rendered during the course of the Games, it should be noted that, unlike for the Olympic Games, CAS did not have an ad-hoc chamber onsite during the Games.

18.4 Provisional Suspensions

From the several AAFs reported during the Games, which can be found in the table in Annex IV, one case involved a non-specified substance, triggering a mandatory Provisional Suspension from the IPC.

Prior to imposing the Provisional Suspension, the IPC sent a notification to the athlete's NPC, providing them with all the pertinent information, and requesting to receive the athlete's explanation in case the athlete wished to contest the imposition of the Provisional Suspension, within a deadline of two days. The athlete, through their NPC, provided an explanation on the same day, claiming that the AAF came from a contaminated substance, and that, due to the short deadline, they would not be able to get the contaminated substance analyzed in time. The athlete, therefore, requested that the Provisional

²⁰ Article 13.2.1 of the IPC Anti-Doping Code

Suspension be lifted pending the conclusion of the case, so that they may compete in a competition that was taking place on the following day. The IPC turned down the request and decided to proceed with sending the athlete and official notice of charge and imposing a Provisional Suspension.

Throughout these exchanges, the IO Team noted that the athlete was not present during the meeting where the NPC was informed of the AAF, nor was the athlete copied on the email exchanges between the IPC and the NPC. While the IPC Anti-Doping Code does allow for the notification to take place through the pertinent NPC²¹, the IO Team recommends that athletes be involved and made aware of developments, in particular when there are very short notice periods involved, in order to make sure that they are aware of the developments and outcomes.

Recommendation No. 16

While not explicitly required according to the IPC Anti-Doping Code, the IO Team recommends that athletes be copied, at least, on all exchanges related to any potential Anti-Doping Rule Violation related to them. This would allow for easier communication and further transparency, in particular for cases where a short timeline is provided for responses and preparation for any hearings.

18.5 Hearings and Decisions

With regards to the aforementioned case, after confirming the Provisional Suspension, the case was transferred to the Independent Anti-Doping Tribunal to decide upon the lifting of the Provisional Suspension. The President of the Tribunal decided to sit on the case as a sole arbitrator with written submissions and no hearing, after providing both parties with an additional deadline to provide further documents and explanations. Following consultation of the additional documents, the President decided not to lift the Provisional Suspension, and the athlete was thus not able to participate in the following competitions.

While the decision of the Tribunal was issued in a relatively expedited manner, four days after the notification letter was sent, the athlete had already been prevented from competing at a full competition day by then, which would have impacted their participation at the Games regardless of the decision made by the Tribunal. The IPC Games' Anti-Doping Rules²² do refer to an athlete's right to an expedited hearing, however they do not provide a specific timeline during which the hearing should take place, which can lead to the athlete having unrealistic expectations.

Additionally, there were three cases that were closed due to ingestion through permitted routes, and one case closed for the existence of a valid TUE. For all these cases, the IPC efficiently and proactively conducted the initial review, contacting the relevant individuals to obtain the pertinent documents in a timely manner, which led to the outcomes being delivered without disrupting the course of the Games.

²¹ Article 14.1.1 of the IPC Games Rules, Article 3.5 of Part One of the IPC Anti-Doping Code

²² Article 7.5.3.1 and 8.1.3 of the IPC Games Rules

ANNEX I: LIST OF INDEPENDENT OBSERVERS' RECOMMENDATIONS AND EFFECTIVE PRACTICES

<p>Recommendation No. 1</p>	<p>The IO Team strongly believes that disciplinary procedures and internal mechanism are in place with respect to the deterring and sanctioning of direct and intentional misconduct in order to ensure compliance with the IPC Anti-Doping Code by any person (board members, directors, officers, delegated third parties, committee members and others) who are involved in the anti-doping program. However, the IO Team recommends that the IPC ensures that the abovementioned persons are expressly bound by the IPC Anti-Doping Code when it next revises its regulatory documents.</p>
<p>Recommendation No. 2</p>	<p>The IO Team recommends that the IPC develops a specific pre-Games testing program, potentially through a taskforce model for future games and events, and closely communicates with relevant NADOs in order to provide specific testing recommendations, as well as to share intelligence and information in order to ensure that an appropriate level of OOC testing has been carried out in the period leading up to the Games. In this regard, such testing is preferably conducted jointly in collaboration with the NADO to avoid repeated tests and to ensure that high risk athletes are tested effectively prior to their participation at major events. Where possible, such an OOC testing program shall ensure that high risk athletes have been sufficiently tested within six months prior to the Games. The IO Team further recommends that, with a view of a comprehensive pre-Games program, this recommendation should be implemented together with the recommendations No. 7 and No. 8.</p>
<p>Recommendation No. 3</p>	<p>The IO Team recommends that the IPC collaborates with and encourages all relevant NADOs to combine their efforts, possibly by creating a pre-Games Taskforce. This could be used for intelligence and information sharing, as well as test planning, collection and analysis.</p>
<p>Recommendation No. 4</p>	<p>While acknowledging the specificities of developing a Risk Assessment for Para sports, the IO Team recommends that the IPC includes, to the extent possible, qualitative parameters such as physiological and physical requirements, information received or intelligence developed, as well as research on doping trends. It is acknowledged by the IO Team that the IPC takes into account all of these criteria and implements them in practice, however, it would still be useful to include them in the Risk Assessment.</p>
<p>Recommendation No. 5</p>	<p>The IO Team appreciates that the IPC Anti-Doping Team shared relevant documents prior to the Games, but recommends that, for future Games, the Risk Assessment, as well as its explanatory note and user guidelines, are shared with the IO Team well ahead of the Games so that a detailed review can be conducted, and any potential recommendations can be shared.</p>
<p>Recommendation No. 6</p>	<p>While the IO Team acknowledges the development of an intelligence-based IC testing program with a satisfactory number of samples collected, it is the Team's opinion that some blood samples should be</p>

	collected IC for future Games. This will ensure that sports with a higher risk to Prohibited Substances are well tested, and allow for greater unpredictability for the IPC's testing program.
Recommendation No. 7	For future Games, and since the IPC reached out to NADOs with little success, the IPC should consider putting in place a pre-Games Taskforce involving the LOC, the appointed Sample Collection Authority, as well as some relevant NADOs. It is highly recommended that the IPC initiates the operations of this Taskforce 12 months before the start of the Games to benefit from its work.
Recommendation No. 8	The IO Team recommends that, for future Games, the IPC establishes a policy for intelligence gathering prior to the Games. This would include a close exchange of information, preferably via a pre-Games Taskforce, with the relevant NPCs, NADOs and IFs, as well as collaboration with the governmental and customs authorities of the hosting country. If possible, specific agreements should be in place for these engagements well ahead of the Games.
Recommendation No. 9	While the IPC Anti-Doping Code is clear, some clarification may be needed to the wording in the anti-doping section of the IPC website to remove any possibility of confusion for athletes with regards to how the recognition applies depending on their country, and/or, ADO. The IO Team recommends that the IPC clarifies that their policy is either to (i) automatically recognize all TUEs that meet ISTUE requirements, or (ii) automatically recognize all TUEs that meet ISTUE requirements when issued by the countries/ADOs listed on their website.
Recommendation No. 10	The IO Team recommends that for future Games, the IPC should ensure that NPCs adequately inform their athletes of TUE requirements so that they are more well versed and aware of TUE processes regardless of their levels. This makes it important for athletes, and their medical staff, to be aware that their national level TUEs will need recognition by the IPC.
Recommendation No. 11	The IO Team recommends that the anti-doping landing page of the IPC website is updated, to the extent possible, to better signpost all available content (as stated on the 'IPC' dropdown menu) at Anti-Doping Home Page (paralympic.org). In addition, the link to the IPC TUE application form contained in the IPC Anti-Doping Code at section 4.4.3.3 takes the user to the main IPC landing page, not a TUE section. This should be corrected. A clear link to the anti-doping section should be visible somewhere on the IPC main landing page to enable easier access for athletes and ASP.
Recommendation No. 12	The IO Team encourages the IPC to make the e-learning course for athletes and ASP mandatory for future Games, which will enable the IPC to assess the pass mark for entry eligibility.
Recommendation No. 13	Recommendation No. 13 All NPCs should be educated and reminded at the start of the event that (i) access to athletes should not be impeded or delayed in any way, and (ii) rooming lists provided to the IPC, as explained in sub-section 8.1 of this IO Report, should be accurate and updated at all times to avoid Chaperones having to knock on incorrect room doors.

Recommendation No. 14	<p>The IO Team recommends that the IPC makes Appendix A to the IPC Anti-Doping Code more visible, including publishing it in the Resources page of the Anti-Doping section of the IPC website. This would assist in getting stakeholders to understand the role and composition of the IPC Independent Anti-Doping Tribunal.</p>
Recommendation No. 15	<p>For future Games, it is recommended that the IPC publishes all details regarding the Independent Anti-Doping Tribunal on its website, including the identity of the President, the number, and identities of the panellists, as well as the mechanisms through which they were nominated.</p>
Recommendation No. 16	<p>While not explicitly required according to the IPC Anti-Doping Code, the IO Team recommends that athletes be copied, at least, on all exchanges related to any potential Anti-Doping Rule Violation related to them. This would allow for easier communication and further transparency, in particular for cases where a short timeline is provided for responses and preparation for any hearings.</p>

Effective Practice No. 1	<p>The IO Team applauds the endeavours of the IPC on the achievement of greater participation of females within its Tribunal members as an effective prerequisite for mainstreaming gender equality.</p>
Effective Practice No. 2	<p>The IO Team would also like to specifically commend the intention of the IPC to provide the nominations committee with responsibility for vetting and approving candidates for positions within the IPC Anti-Doping Tribunal. The IO Team would encourage all stakeholders to use such an approach in strengthening their respective appointment processes and procedures.</p>
Effective Practice No. 3	<p>The IO Team notes that the use of technological applications, subject to the requirements of the relevant data protection regulations, adds value, simplifies the process of locating athletes, and increases the accuracy of their identification. The IO Team encourages organizers of future Games to use similar platforms whenever possible.</p>
Effective Practice No. 4	<p>The IO Team would like to note the practice of the IPC and Beijing 2022 of circulation of Working Tips during the Games to all sample collection personnel as a form of prompt reaction to emerging issues and instructions on further processes. Such practice appeared to be very effective, efficient, and easy to comprehend.</p>
Effective Practice No. 5	<p>The IO Team would like to emphasize that it is remarkable that in a few cases, the Ghent APMU flagged profiles of athletes with apparent normal profiles and asked the IPC to conduct follow up testing of these athletes. This shows that detailed reviews were conducted on all athletes' profiles regardless of whether they were flagged to be suspicious or not by the ADAMS system.</p>

ANNEX II: COMPOSITION OF THE INDEPENDENT OBSERVER TEAM

Chair: Ms. Shafag Huseynli (Azerbaijan)

Chief Executive Officer
Azerbaijan National Anti-Doping Agency

Vice Chair: Ms. Ilaria Baudo (Italy)

Senior Manager, Testing
World Anti-Doping Agency

Manager: Mr. Sameh Elray (Egypt)

Manager, Africa Office
World Anti-Doping Agency

Expert: Mr. Michael Earl (United Kingdom)

Director, Anti-Doping
World Rugby

Athlete: Ms. Adriana Escobar (El Salvador)

Member
Athlete Commission, Pan American Sports Organization
Athlete Committee, World Anti-Doping Agency

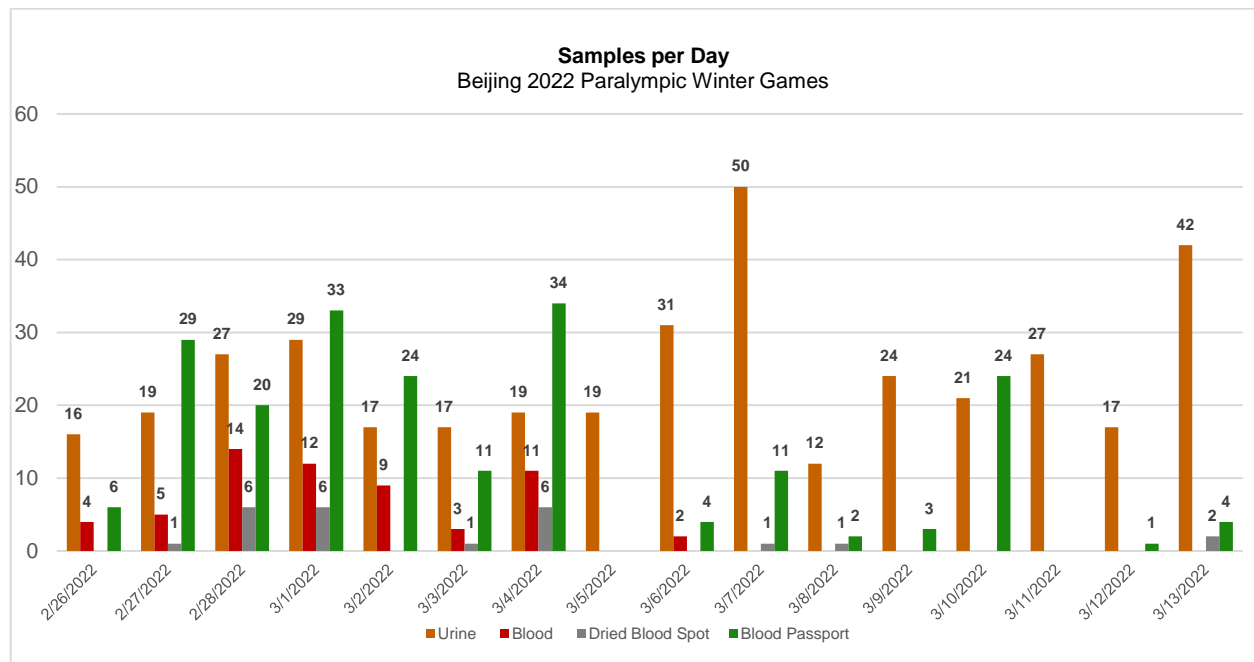


ANNEX III: SAMPLE COLLECTION FIGURES

Table 3: Games-Time Testing

Sport/Discipline	Urine			Blood			Blood Passport			Dried Blood Spot		Grand Total	
	IC	OOC	Total	IC	OOC	Total	IC	OOC	Total	IC	OOC		Total
Curling	15		15										15
Para-Alpine Skiing	62	21	83		4	4					1	1	88
Para-Biathlon	1		1										1
Para-Ice Hockey	32	41	73		8	8					1	1	82
Para-Nordic Skiing	10 1	83	184		44	44	4	202	206	2	20	22	456
Para-Cross Country Skiing Middle/Long Distance	10		10					1	1				11
Para-Cross Country Skiing Sprint/Short Distance	1		1					1	1				2
Para-Nordic Skiing	90	83	173		44	44	4	200	204	2	20	22	443
Para-Snowboard	24	10	34		4	4							38

Graph 1: Number of daily tests conducted in Urine, Serum, ABP Blood Passport and DBS Samples



The number of urine and blood (EDTA/ABP, DBS or serum) samples received for analysis per day are the following: **387** Urine Samples, **60** Blood Samples, **24** Dried Blood Spot Samples, **206** Blood Passport Samples.

Table 4: Number of Samples with Additional Analysis

TESTS	URINE SAMPLES	BLOOD SAMPLES	ABP	DRIED BLOOD SPOT (DBS)
ERAs	116	5	5	
GHRF (GHS/GHRP)	107			
GC/IRMS	26			
GnRH	78			
IGF-1 analogues	0			
Insulins	0			
GHRF (GHRH)	0			
GH Biomarkers		0		
GH Isoforms		39		
Gene Doping Test		0		
Blood Transfusion		16		
Steroid Esters in DBS				24
Blood Passport			206	
HBOCs		0		

ANNEX IV: ADVERSE ANALYTICAL FINDINGS

Table 5: Adverse Analytical Findings

Substance Class	Substance
S5. Diuretics and Masking Agents	brinzolamide
S1.2. Other Anabolic Agents	SARMS enobosarm (ostarine)
S5. Diuretics and Masking Agents	brinzolamide
S5. Diuretics and Masking Agents	brinzolamide
S7. Narcotics	total morphine greater than the Decision Limit and ratio of total morphine to total codeine equal or higher than 2.0 and total codeine not higher than 5 ug/mL
S2. Peptide Hormones, Growth Factors, Related Substances and Mimetics	human Chorionic Gonadotrophin (hCG) greater than the Decision Limit for immunoassays
S9. Glucocorticoids	methylprednisolone
S7. Narcotics	fentanyl and its derivatives