

Report of the

INDEPENDENT OBSERVERS

XXIV Olympic Winter Games

Beijing 2022

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1.0 Acknowledgments

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While the IO Team would like to acknowledge and thank all Beijing 2022 anti-doping staff, many which were seconded from the China Anti-Doping Agency (CHINADA), all the ITA staff on-site in Beijing (as well as those working from Lausanne) and all our IOC colleagues, we would like to extend our gratitude to a few individuals in particular. From Beijing 2022, Ms. Ling Lin, Head of Doping Control; Mr. Liu Xueqi, Venue Operations Manager; and Ms. Chen Yang, External Relations Coordinator; from the ITA, Mr. Gianluca Siracusano, Head of Regulatory Compliance; Mr. Matteo Vallini, Head of Testing; Ms. Vanessa Webb, Major Events Project Manager; Dr. Neil Robinson, Head of Science and Medical; and Ms. Dominique Leroux-Lacroix, Head of Legal Affairs; and from the IOC, Dr. Richard Budgett, Medical and Scientific Director; and Ms. Hannah Grossenbacher, Senior Anti-Doping Manager.

The IO Team would like to acknowledge the warm welcome that we received from all the sample collection personnel whenever members visited a doping control station. The IO Team also wants to thank all the Games volunteers and, in particular the volunteers who were assigned to the IO Team, whose enthusiasm and patience not only ensured that we were provided with the best experience possible but made our job so much easier.

The IO Team would also like to thank the National Anti-Doping Laboratory, Beijing Sports University staff, in particular the laboratory Director, Dr. Yinong Zhang and the laboratory Deputy Director, Dr. Lisi Zhang, for their dedication to preparing the laboratory for these Games, as well as their assistance and cooperation during the World Anti-Doping Agency (WADA) assessments and the IO mission.

Last, but not least, the IO Team would like to thank the athletes that competed in Beijing. They demonstrated that, despite the challenging circumstances presented by the COVID-19 pandemic, they could still perform at the highest level of competition.

To everyone, thank you!



2.0 Acronyms and Abbreviation

Full Name	Acronym/Abbreviation
Adverse Analytical Finding	AAF
Anti-Doping Administration & Management System	ADAMS
Anti-Doping Organization	ADO
Anti-Doping Rule Violation	ADRV
Athlete Biological Passport	ABP
Athlete Passport Management Unit	APMU
Atypical Finding	ATF
Beijing Organizing Committee for the 2022 Olympic and Paralympic Winter Games	Beijing 2022
Blood Collection Officer	BCO
Chain of Custody	CoC
Chief Medical Officer	CMO
China Anti-Doping Agency	CHINADA
Court of Arbitration for Sport's Ad Hoc Division	CAS Ad Hoc Division
Court of Arbitration for Sport's Anti-Doping Division	CAS ADD
Doping Control Command Center	DCCC
Doping Control Form	DCF
Doping Control Officer	DCO
Doping Control Station	DCS
Doping Control Station Manager	DCSM
Dried Blood Spot	DBS
Erythropoietin receptor agonists	EPOs
External Quality Assessment Scheme	EQAS
Gonadotrophin Releasing Hormone	GnRH
Growth Hormone Releasing Hormone	GHRH
Growth Hormone Releasing Peptides	GHRP
Growth Hormone Secretagogues	GHS
Haemoglobin-based Oxygen Carriers	HBOCs
Hypoxia-inducible factors	HIFs
Independent Observer Team	IO Team
Insulin-like Growth Factor-I	IGF-I
Intelligence and Investigations	I&I
Intelligence Collection Plan	ICP

Intelligence Task Force	ITF
International Doping Control Officer	IDCO
International Federation	IF
International Olympic Committee	IOC
International Standard for Education	ISE
International Standard for Laboratories	ISL
International Standard for Results Management	ISRM
International Standard for Testing and Investigations	ISTI
International Standard of TUEs	ISTUE
International Testing Agency	ITA
International Testing Agency's data management system	PASS
International Testing Agency's reporting platform	REVEAL
International Testing Agency's anti-doping communication platform	ADCOM
IOC Anti-Doping Rules applicable to the XXIV Olympic Winter Games	IOC ADR
Isotope Ratio Mass Spectrometry	ISRM
Laboratory Information Management System	LIMS
Local Organizing Committee	LOC
Major Events Organization	MEO
National Anti-Doping Laboratory, Beijing Sports University	Beijing Laboratory or Laboratory
National Anti-Doping Organization	NADO
National Olympic Committee	NOC
Olympic Broadcasting Services	OBS

Olympic Winter Games Beijing 2022	Beijing Games
Personal Protection Equipment	PPE
Professional Worldwide Controls	PWC
Professional Worldwide Controls' paperless system	MODOC
Registered Testing Pool	RTP
Results Management Authority	RMA
Russian Anti-Doping Agency	RUSADA
Sport Specific Protocol	SSP
Test Distribution Plan	TDP
Testing Pool	TP
Therapeutic Use Exemption	TUE
Therapeutic Use Exemption Committee	TUEC
Word Anti-Doping Code	Code
World Anti-Doping Agency	WADA

3.0 Executive Summary

At the invitation of the International Olympic Committee (IOC), WADA appointed an IO Team to attend the Olympic Winter Games Beijing 2022 (the Beijing Games). The Games period for doping control ran from 27 January 2022 to the final day of competition on 20 February 2022. While a small number of IO Team members were on-site from the start of the Games period, active observations of the doping control procedures commenced on 3 February 2022 while laboratory monitoring began on 27 January 2022. During that time, in addition to being present at the laboratory on almost a daily basis, the IO Team visited all 12 competition venues as well as the doping control stations located at the three Olympic Villages and observed one results management hearing process.

3.1 The Key Players and the Game Plan

The IOC is the governing body of the Olympic Games and, as a signatory to the World Anti-Doping Code (the Code), adopted the Rules that were in force during the Beijing Games. While the IOC, as the signatory to the Code, remained responsible from a Code compliance perspective for all aspects of doping control conducted at the Games, the IOC had agreed to delegate the management of its anti-doping program to the ITA. In Beijing, the ITA had overall responsibility for the development, implementation, and management of the anti-doping program. In turn, the ITA, as was permitted in the IOC Anti-Doping Rules (ADR), sub-delegated some aspects of doping control to the Beijing Organizing Committee for the 2022 Olympic and Paralympic Winter Games (Beijing 2022). Beijing 2022 was tasked with organizing and delivering on several operational aspects of the doping control program, such as the recruitment and training of sample collection personnel, the sample collection procedures, as well as the transport of samples collected during the Games period to the WADA-accredited laboratory, the National Anti-Doping Laboratory, Beijing Sports University (the Beijing Laboratory or Laboratory).

When reporting on the operational approach implemented at major events, previous IO reports have often raised concerns related to the lack of independence when sporting organizations are responsible for the development and implementation of anti-doping programs, as well as the lack of clarity when different organizations are involved in the delivery of anti-doping programs at major games. None of these concerns are raised in relation to these Games. On the contrary, what the IO Team observed was a team of experienced individuals from the IOC, the ITA and Beijing 2022, who came together and collectively developed and delivered an impressive anti-doping program.

3.2 Challenging Times

Like most Olympic Games, the Beijing Games presented some unique challenges. The COVID-19 pandemic and the restrictions implemented to mitigate its impact created an unusually demanding environment for the Beijing 2022 anti-doping team and the Beijing Laboratory to prepare for, and operate, during the Games. The testing program and the Laboratory operated within a strict “Closed Loop”, which meant that movements were extremely limited and that any anti-doping staff or volunteers from China had to arrive approximately one week before the opening of the villages (i.e., enter the “Closed Loop”) and had to quarantine for approximately 21 days once their work was completed at the end of the Games. For these individuals, it meant being away from home, their families and loved ones for more than 50 days. Without the commitment and dedication of all these individuals, the anti-doping program, and the Games in general, would not have been possible. The IO Team cannot express its gratitude enough to all of them.

In addition to the “Closed Loop” system, the strict sanitary conditions also challenged every aspect of the doping control and Laboratory operations. Beijing 2022, sample collection personnel and Laboratory staff had to contend with numerous COVID-19 countermeasures (e.g., sanitization procedures, personal protective equipment, etc.) as well as restrictions when developing and implementing certain procedures, such as sample transport. The IO Team highlights these circumstances, the extent of which are outlined in the Playbooks¹ developed for the Beijing Games, to note that these Games operated within a unique and specific set of circumstances that posed challenges for all involved and limited some of the IO Team’s observations. Despite all this, we are thankful that these measures were in place, which ensured that participants and the people of China stayed safe and healthy during the Games.

Another challenge encountered was the case of a figure skating athlete embroiled in a doping controversy. While this story garnered a significant amount of attention during the Beijing Games, the sample at the center of the controversy was not collected during the Games, nor was it a sample that was part of the Beijing Games anti-doping program. As such, it *was not* collected under the authority of the IOC, *nor* was it analyzed at the Beijing Laboratory. Rather, this sample was collected several weeks before the start of the Games under the testing authority of the athlete’s National Anti-Doping Organization and for several reasons, the results had not been reported before the Beijing Games started. The IO Team mentions this unfortunate circumstance to clarify that while some results management procedures took place during the period of the Games and while the IO Team was kept informed, these procedures were outside the scope of the IO Team’s mandate and observations under the applicable rules in place for the Beijing Games.

3.3 Education First and Intelligence-Led Anti-Doping Program

The IO Team is of the view that the IOC, the ITA and Beijing 2022 developed and delivered several excellent initiatives to protect every athlete’s right to compete on a level playing field and to preserve the integrity of the Games.

In its International Standard for Education (ISE), WADA highlights that an athlete’s first experience with anti-doping should be through education rather than through the doping control process. The ITA and the IOC took this principle to heart. Several initiatives were developed and implemented ahead of the Games as well as during the Games to ensure that everyone was well informed. While several educational initiatives were implemented ahead of the Games, the level of education displayed by athletes and athlete support personnel was no doubt also a result of the education programs implemented by the seven winter International Federations (IFs) and National Anti-Doping Organizations (NADOs) of the 91 nations that competed.

From a Therapeutic Use Exemptions (TUEs) perspective, the focus on ensuring the ease of the process for athletes and their physicians as well as the availability of information regarding this aspect, was seen as an example for future Games to follow. It was also clear that the ITA and the IOC had reflected on their experience from previous Games and had adjusted their operations based on those learnings and the specific requirements of a Winter Games.

In the area of intelligence and investigations, the IO Team would like to commend the ITA for the resources invested and for fostering the exchange and receipt of information via several initiatives, such as the establishment of a multi-stakeholder [Intelligence Task Force \(ITF\)](#) ahead of the Games to promote

¹ For additional information regarding the [Playbooks](#).

the exchange of intelligence on athletes, athlete support personnel, delegations, sports, etc., that may require specific focus in the lead up to, or during, the Beijing Games; the signing of a [collaboration agreement](#) with governmental agencies in China to facilitate the exchange of information connected to potential doping in the lead up to, and during, the Beijing Games; and the implementation of several channels, such as the ITA's confidential reporting platform '[REVEAL](#)' and its internal communication system 'ADCOM', for the secure sharing of information. Additional information is provided in section 8 of this report ('Intelligence'), but the work done in the area of intelligence and investigations should serve as an example for future Games.

This intelligence-led approach was also evident in the testing program implemented for the Games. The ITA established a Pre-Games Expert Group ahead of the Beijing Games and this group conducted an extensive risk assessment which led to over 5,000 testing recommendations issued to winter IFs and relevant NADOs. The recommendations' implementation rate of 80 percent certainly highlighted the winter IFs' and NADOs' joint commitment to ensuring that their athletes were subject to a robust and intelligent testing program ahead of the Games. To further support the work of IFs and NADOs in the lead up to the Games, it should be noted that, in addition to leading the Pre-Games Expert Group, the ITA, on behalf of the IOC, coordinated testing on 79 athletes (representing 110 samples) between 27 November 2021 and 26 January 2022 (i.e., the IOC's extended testing jurisdiction period prior to the Games). These tests focused on prospective Games athletes that had limited or no testing conducted on them.

The Games-time Test Distribution Plan (TDP) was designed following a thorough and well-considered risk assessment, which was developed in collaboration with several external experts. The decisions on how and why to allocate tests by sport, by discipline, by country and by athlete were informed and underpinned by a strong rationale. The TDP called for 2,200 tests to be conducted (with an additional 100 tests as a contingency). What is most impressive, especially for the Beijing Games, is that almost 50 percent of those tests were allocated to out-of-competition testing, and almost all of the tests implemented during these Games, whether in-competition or out-of-competition, were target tests. These target tests were possible due to: a) the seamless transition between the work of Pre-Games Expert Group and the Games-time group; b) the close collaboration between the ITA and the several Athlete Passport Management Units (APMUs), who were providing timely recommendations; c) the feedback received from NADOs and IFs which were reviewed by the ITA; and d) the ability of the ITA to review all this information and provide daily targeted athlete selections.

3.4 Innovation and Commitment to Improvement

The ITA's ability to process a large amount of information to implement a high level of target tests for these Games was by and large due to the experience and dedication of the staff on-site but also due to the technological tools implemented. To ensure that information was shared in a secure and confidential manner and to continue to optimize the ITA's operations, several innovative technological tools were utilized during the Beijing Games, most of which the ITA developed and others, like the paperless system, made possible with its partnership with Professional Worldwide Controls GmbH (PWC). The level of interconnectedness between the different systems was impressive, as were the improvements implemented between the Tokyo and Beijing Games. The IO Team commends the ITA for the investment made in these tools and its commitment to continual improvement, which meant that information was shared safely and securely contributing to extremely efficient operations.

For the first time, Dried Blood Spot (DBS) samples were collected as capillary blood via finger-prick. The collection of DBS samples was included as part of the TDP for the Games, sample collection personnel

were trained on the sample collection procedures and the analysis was applied as a routine method at the Games for the analysis of testosterone esters in blood, which gives unequivocal proof of the administration of exogenous testosterone. The implementation of DBS testing during the Games was the result of a successful collaboration between the IOC, ITA, CHINADA, Beijing 2022, the Beijing Laboratory and WADA, with the support of the [DBS Steering Committee](#). This test has the potential to become an increasingly important tool in the fight against doping and, as such, its expanded implementation in future Games as well as in routine testing programs is encouraged.

3.5 Sample Collection Team and Sample Collection Procedures

The success of any operation cannot rely solely on technology. The people often make it or break it. The doping control team in place at the Beijing 2022 Games was excellent, and the IO Team was impressed by the recruitment and training plan developed and implemented by Beijing 2022, with the support of the ITA and PWC. While previous IO reports have raised several concerns in the area of sample collection personnel, none are raised here, which is no small feat and a testament to all involved.

Given that previous IO reports have noted, on several occasions, how the importance of the Chaperone's role is often underestimated, and that language skills in particular are somewhat overlooked, the IO Team would like to commend Beijing 2022 for the emphasis placed on communications skills. In particular, we would like to highlight everyone's proficiency in English, in particular the Chaperones, which was made possible due to a partnership with several Chinese universities.

Regarding the Doping Control Stations (DCSs), while the IO Team noted that they were appropriately staffed, very well managed and that most were fit for purpose, some could have benefited from larger waiting rooms and additional processing rooms as outlined later in this report.

Overall, and in large part due to the sample collection personnel recruited and trained by Beijing 2022, the sample collection process implemented during the Games was excellent. Any minor issues that were identified by the IO Team and raised during daily meetings with the IOC, ITA and Beijing 2022 were promptly addressed and corrected. The IO Team is of the view that urine, blood, and DBS sample collection procedures were implemented in accordance with the International Standard for Testing and Investigations (ISTI).

3.6 Laboratory Operations

Laboratory operations were conducted in accordance with the International Standard for Laboratories (ISL), by the Beijing Laboratory, located in Beijing. The Laboratory operated 24 hours a day, 7 days a week, to analyze athlete samples and safeguard the integrity of the Games.

Despite the COVID-19 pandemic challenges faced, from the Pre-Games preparation stages to the end of Games testing, the Beijing Laboratory made an outstanding effort to ensure it was properly equipped and staffed to analyze all samples in a timely manner. National volunteers from local universities and international experts from other WADA-accredited laboratories were recruited and trained to increase the laboratory capabilities for the rigors of the Olympic Games testing regiment.

WADA conducted three laboratory assessments, including one remote and two on-site, in the lead up to the Games to ensure that the preparations of the laboratory were fit-for-purpose even in the challenging environment of the COVID-19 restrictions. Just before the Games, satisfactory implementation of all WADA major event requirements was achieved, including quickly adjusting procedures to incorporate

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