

CCES Submission to International Standards Second Review Phase: International Standard for Testing and Investigations (ISTI)

In response to WADA's request for comments as part of Phase 2 of the International Standards review process, the CCES submitted the following comments with respect to the **International Standard for Testing and Investigations (ISTI)**.

3.0 Definitions and interpretation

3.1 Defined terms from the 2021 Code used in the International Standard for Testing and Investigations (ISTI)

CCES supports the definition of In-Competition.

3.3 Defined terms specific to the International Standard for Testing and Investigations

CCES supports definition of Suitable Specific Gravity for Analysis.

4.0 Planning Effective Testing

4.3 Defining International and National-Level Athletes

In Article 4.3.2.b, CCES is concerned by the use of the term "all." As it reads, the definition of a National-Level Athlete would have to include "all those who compete at the highest levels of national Competition." In some sports, having "all" athletes who compete at a national level creates quite a large pool of athletes, diluting the pool of resources available to conduct "meaningful and effective" testing, as per the Code. NADOs should have the flexibility to identify the appropriate number of athletes from those sports where there is a large pool competing at national competitions. As such, we recommend removing "all" from the sentence, to ensure NADOs don't have the onerous obligation to include all of the athletes who compete at a national competition: "the definition shall at a minimum encompass those who compete at the highest levels of national Competition in the sport in question."

4.6 Prioritizing between different types of Testing

In Section 4.6.1.a.ii, CCES recommends removing the requirement to apply to WADA to seek an exemption from out-of-competition testing in situations where risk of doping is minimal during out-of-competition periods. In sports where testing resources are limited and the risk of doping is in-competition, we believe ADOs should have the flexibility to choose how those resources are being applied.

4.8 Collecting whereabouts information

In Section 4.8.9.2, remove "through ADAMS" from the sentence. CCES believes ADOs should have the flexibility to share the information by email or other means if ADAMS is not their primary test planning tool.

8.0 Security/post-test administration

8.3 Requirements for security/post-test administration

In Section 8.3.3, CCES suggests removing item “j” from list, as the laboratory doesn’t need the names of the athlete’s doctor and coach.

Annex G – Urine Samples that do not meet the requirement for Suitable Specific Gravity for Analysis

G.4 Requirements

In Annex G.4.6, CCES recommends using the term “should” instead of “shall”: “The DCO should continue to collect additional Samples...”

Annex K – Collection, Storage and Transport of Blood ABP Samples

K.2 Requirements

In Annex K.2.9.a), consider alternate wording for “with their feet on the floor” to take into consideration athletes who may have impairments (i.e. amputation of lower limbs). Such athletes may still have been in a seated position for the required 10 minutes which would satisfy this requirement.