

MONITORING GROUP (T-DO)

ANTI-DOPING CONVENTION



Strasbourg, 12 April 2013

T-DO (2013) 05

Anti-Doping Convention (T-DO)

Project on Compliance with Commitments

Respect by Bulgaria of the Anti-Doping Convention

**Auto-Evaluation Report by Bulgaria
Report by the evaluation team
Comments by Bulgaria**

FINAL

**Adopted at the 37th meeting of the Monitoring
Group of the Anti-doping Convention**

Table of Contents

A. Auto-evaluation report by Bulgaria	3
1. Preface.....	3
2. Introduction.....	3
3. Compliance with the Convention articles	4
3.1. Article 1: Aim of the Convention.....	4
3.2. Article 2: Definition and scope of the Convention.....	5
3.3. Article 3: Domestic co-ordination	6
3.4. Article 4: Measures to restrict the availability and use of banned doping agents and methods	7
3.5. Article 5: Laboratory	9
3.7. Article 7: Co-operation with sports organisations on measures to be taken by them	13
3.8. Article 8: International co-operation	15
Annex 1	17
B. Report of the evaluation team	19
Introduction.....	19
Article 1 – Aim of the Convention.....	19
Article 2 – Definition and scope of the Convention	20
Article 3 – Domestic co-ordination.....	22
Article 4 – Measures to restrict the availability and use of banned doping agents and methods	24
Article 5 – Laboratories	26
Article 6 – Education	28
Article 7 – Co-operation with sports organisations on measures to be taken by them.....	30
Article 8 – International co-operation	34
General conclusions and recommendations of the evaluation team	35
Acknowledgments.....	38
Composition of the evaluation team	38
Programme of the evaluation visit	39
C. Comments by Bulgaria	42

A. Auto-evaluation report by Bulgaria



REPUBLIC OF BULGARIA
Anti-Doping Centre



COMPLIANCE OF BULGARIA WITH THE ANTI-DOPING CONVENTION OF THE COUNCIL OF EUROPE

Auto-Evaluation Report by Bulgaria

1. Preface

The use of prohibited substances or methods by athletes is increasing, the main reason for doping-incidents being the strong wish of athletes and their coaches to quickly reach higher sports results. In this respect, there are some additional permanently acting factors for their enlarging use: easily accessible drugs or nutrition supplements containing banned substances in pharmacies and fitness-centres, or by on-line orders, as well as tradesmen unscrupulousness aimed at greater profit.

Besides being unfair action, doping use might be risky for athletes' health. This is an additional explanation why the fight against doping in sport is among the major priorities of the Council of Europe, UNESCO, the World Anti-Doping Agency (WADA), the International Olympic Committee and other institutions that are related to sport.

Two major approaches of fighting doping exist. The first is connected with funding. Subsidies should be granted only to those high-level sports unions and federations that comply with their obligations to prevent doping use. Besides, necessary funding should be provided to entities responsible for doping control and imposing the requirements of the internationally-accepted documents against doping in sport. Secondly, the state institutions should develop and adopt the essential legal norms (laws, decrees, regulations, etc.) for protection of the society against health-damaging doping substances.

2. Introduction

In the Republic of Bulgaria, 7 364 760 inhabitants live. Presently, in the country there are 79 sports federations with 71 846 licenced athletes, 172 of which are competing at high-level. This auto-evaluation report offers an overview of the present state of the fight against doping in sport and the implementation of the requirements of the Anti-Doping Convention of the Council of Europe.

On 22.04.1992, the Parliament of Republic of Bulgaria has ratified the Anti-Doping Convention of the Council of Europe. On 09.02.2005, the Parliament ratified the Additional Protocol to this Convention, making it effective in Bulgaria since 01.10.2005. On 13.12.2006, the Republic of Bulgaria ratified also the UNESCO International Convention against Doping in Sport, which is effective in Bulgaria since 01.03.2007. Besides, the Republic of Bulgaria has joined the Copenhagen Declaration on Anti-Doping in Sport, too.

3. Compliance with the Convention articles

3.1. Article 1: Aim of the Convention

The Parties, with a view to the reduction and eventual elimination of doping in sport, undertake, within the limits of their respective constitutional provisions, to take the steps necessary to apply the provisions of this Convention.

LEGAL BASIS OF ANTI-DOPING POLICY IN BULGARIA

The following legal documents underline the anti-doping activities in Bulgaria:

1. On 11.10.2010 by Decree № 232, the Bulgarian Council of Ministers established the Antidoping Centre (see Annex 1) and the internal rules about its structure and its activities were adopted. These internal rules were updated in 2011. According to Decree № 232, the Antidoping Centre is publically funded and has the mission to implement the state commitments undertaken as a Signatory of the Copenhagen Declaration, the International Convention against Doping in Sport (UNESCO) and the Convention against Doping of the Council of Europe and its additional protocol.
2. On 20.12.2010, the World Anti-Doping Code of WADA and its international standards (including the ISPPPI) were adopted by the Bulgarian Antidoping Centre. Concerning the banned pharmacological classes, the International Standard on Prohibited List as adopted by WADA every year is implemented without modification. This list of banned pharmacological classes and banned methods is enacted by a decree: Regulations on doping control in training and competition.
3. On 03.05.2011, Regulations on Doping Control in Training and Competition (RDCTC) were drafted by the Antidoping Centre and came into effect after approval by the Bulgarian Council of Ministers and by WADA. RDCTC run the application of the national anti-doping rules that are harmonized with those stipulated in the already mentioned international conventions and with the World Anti-Doping Code.
4. The overall activity of the Antidoping Centre is regulated by the two international conventions (of the Council of Europe and of UNESCO) for fighting doping use ratified by laws, and by the World Anti-Doping Code (the Code). Besides, all activities of the Antidoping Centre are organized and regulated as well according to the Law of Physical Education and Sports in Republic of Bulgaria (updated on 16.12.2011), the National Strategy for Development Physical Education and Sports in Republic of Bulgaria 2012-2022 (effective since 24.11.2011) and the Interior Regulations of the Centre.
5. Being a newly established executive entity and budget institution, in the Antidoping Centre (AC) a number of internal rules were established. The latter include: customer charter; rules for administrative services; code of ethics for AC employees; internal rules for salaries, for employment policy, for financial management, for management of human resources, as well as control rules for internal flow of electronic and paper documents, etc.

The Antidoping Centre coordinates its activities against doping use with a number of sports-related institutions: WADA, the Council of Europe, UNESCO, complying with their directions and requirements.

The Antidoping Centre strictly observes its responsibilities in relation with the Additional Protocol to the Anti-Doping Convention (Warsaw, 12.09.2002). On requests of other NADOs, the Centre performs doping testing of athletes from foreign countries, who train or compete on the territory of the Republic of Bulgaria.

3.2. Article 2: Definition and scope of the Convention

1. For the purposes of this Convention:

a. "doping in sport" means the administration to sportsmen or sportswomen, or the use by them, of pharmacological classes of doping agents or doping methods;

b. "pharmacological classes of doping agents or doping methods" means, subject to paragraph 2 below, those classes of doping agents or doping methods banned by the relevant international sports organisations and appearing in lists that have been approved by the Monitoring Group under the terms of Article 11.1.b;

c. "sportsmen and sportswomen" means those persons who participate regularly in organised sports activities.

2. Until such time as a list of banned pharmacological classes of doping agents and doping methods is approved by the Monitoring Group under the terms of Article 11.1.b, the reference list in the Appendix to this Convention shall apply.

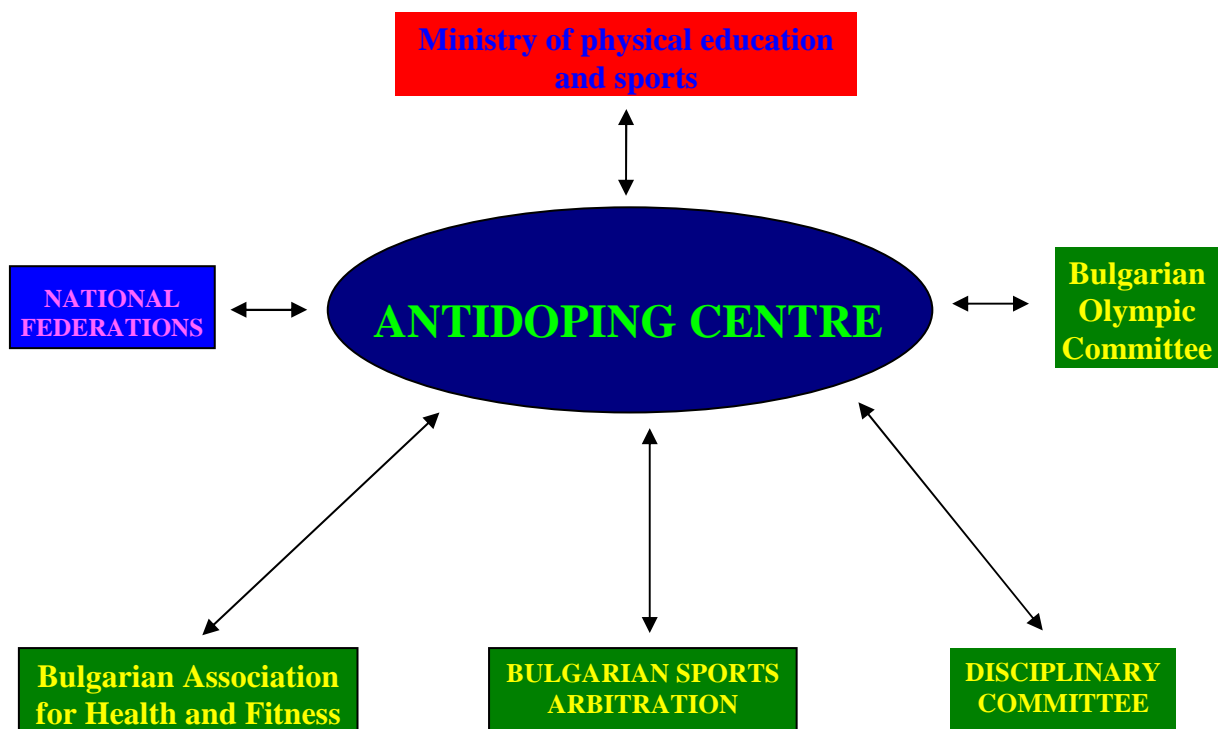
On 20.12.2010, the Bulgarian Antidoping Centre adopted the World Anti-Doping Code, including the International Standard on Prohibited List, which is implemented without modifications. The Prohibited List is translated in Bulgarian and its updates could be found at the website of the Antidoping Centre - <http://www.anti-doping.government.bg/>. Each year, the newly adopted by WADA Prohibited List is printed and delivered to athletes, sports medical and supporting personnel, students in sports-schools, as well as to all persons interested in the problems of doping.

Antidoping Centre initiated meetings with officials of Ministry of Physical Education and Sports, Ministry of Internal Affairs, Ministry of Justice, Ministry of Healthcare, and other institutions. The meetings are aimed at discussing the elaboration of jurisdictional basis for restriction and prevention of use and distribution of banned substances and methods.

3.3. Article 3: Domestic co-ordination

1. *The Parties shall co-ordinate the policies and actions of their government departments and other public agencies concerned with combating doping in sport.*
2. *They shall ensure that there is practical application of this Convention, and in particular that the requirements under Article 7 are met, by entrusting, where appropriate, the implementation of some of the provisions of this Convention to a designated governmental or non-governmental sports authority or to a sports organisation.*

The Antidoping Centre keeps close contacts with the Ministry of Physical Education and Sports, sports federations, and other institutions in Bulgaria (including the Bulgarian Association for Health and Fitness), when implementing the commitments related to the Convention aims. The Antidoping Centre works in partnership especially with the Bulgarian Olympic Committee (established in 1923) and its two institutions: the Disciplinary Committee (founded in 1995 and reorganised in 2011) and the Bulgarian Sports Arbitration (established in 1999 and reorganised in 2006).



3.4. Article 4: Measures to restrict the availability and use of banned doping agents and methods

1. The Parties shall adopt, where appropriate, legislation, regulations or administrative measures to restrict the availability (including provisions to control movement, possession, importation, distribution and sale) as well as the use in sport of banned doping agents and doping methods and in particular anabolic steroids.

2. To this end, the Parties or, where appropriate, the relevant non-governmental organisations shall make it a criterion for the grant of public subsidies to sports organisations that they effectively apply anti-doping regulations.

3. Furthermore, the Parties shall:

a. assist their sports organisations to finance doping controls and analyses, either by direct subsidies or grants, or by recognising the costs of such controls and analyses when determining the overall subsidies or grants to be awarded to those organisations;

b. take appropriate steps to withhold the grant of subsidies from public funds, for training purposes, to individual sportsmen and sportswomen who have been suspended following a doping offence in sport, during the period of their suspension;

c. encourage and, where appropriate, facilitate the carrying out by their sports organisations of the doping controls required by the competent international sports organisations whether during or outside competitions; and

d. encourage and facilitate the negotiation by sports organisations of agreements permitting their members to be tested by duly authorised doping control teams in other countries.

4. Parties reserve the right to adopt anti-doping regulations and to organise doping controls on their own initiative and on their own responsibility, provided that they are compatible with the relevant principles of this Convention.

In the Republic of Bulgaria, there are restrictive measures for the use of narcotic substances and anabolic steroids. They may be bought only by special prescriptions on rigorous medical indications. In this respect, three laws are effective in Bulgaria: the Law for drugs and pharmacies in human medicine, the Law for children protection, and the Law for narcotic substances.

Experts from the Ministry of Health, the Customs Agency, and the Agency for Food Safety started working on legislative initiatives for prevention and restriction of possessing and trafficking of prohibited substances.

In 2011, the Antidoping Centre organised a seminar for representative of national sport federations (or supporting personnel) in order to inform them on the requirements of the Centre, complying with the documents of WADA, the Anti-Doping Convention of the Council of Europe, and the UNESCO International Convention against Doping in Sport. Due to the Antidoping Centre imperativeness, all Bulgarian sport organisations elaborated and adopted their own antidoping rules, according to the RDCTC and in compliance with the antidoping rules of the international federations. These rules are at disposal of the Antidoping Centre and their implementation is controlled by it.

Presently, a National Strategy against doping-use in sport is developed together with Ministry of Physical Education and Sports, Home Office, Ministry of Healthcare, Ministry of Justice, and Customs Agency. The Strategy would be finally adopted at the beginning of 2013 and will be valid until 2022. It will offer basis for elaboration of a long-term national plan for fighting the use of doping in sport.

As in many other countries, Bulgarian sports entities (unions and federations) are functionally autonomous and, as stated, they have elaborated anti-doping rules of their own. The first step to these federations, which do not observe their anti-doping obligations or do not impose sanctions corresponding to the found anti-doping violation, according to the RDCTC is to warn them on the matter. Since, the sports associations are funded by the state, the main way to penalize them for not fighting actively doping-use is to forfeit such associations. This possibility has been envisaged in the RDCTC and could be implemented by the Minister of Physical Education and Sports, after a motivated proposal by the Executive Director of the Antidoping Centre.

In Bulgaria, the sports federations and unions are funded by the state; hence, it is supposed that they should pay for the doping tests conducted at their request, especially in-competition testing. Sports entities pay also for the out-of-competition tests requested by them. Aiming at enlarged out-of-competition doping controls and paying special attention to the RTP-testing, in the budget of the Antidoping Centre, provided by the government, money for doping controls is also included. In 2011, the total state funding for the Antidoping Centre amounted to BGN 697 822 (\approx € 356 796).

Of course, in case of large sports events (e.g., World or European Championship), the organizers of these events have to pay for the required doping testing themselves, and state funding for these controls is not necessary.

Presently, the analysis of samples taken at doping tests is conducted by the WADA-accredited Doping-Control Laboratory in Athens, Greece. Currently, the Antidoping Centre arranges the equipment of the Anti-Doping Laboratory, looking for its impending accreditation.

In the process of running-up is the instruction for the preparation and management of the athletes' Registered Testing Pool (RTP).

3.5. Article 5: Laboratory

1. Each Party undertakes:

a. either to establish or facilitate the establishment on its territory of one or more doping control laboratories suitable for consideration for accreditation under the criteria adopted by the relevant international sports organisations and approved by the Monitoring Group under the terms of Article 11.1.b;

b. or to assist its sports organisations to gain access to such a laboratory on the territory of another Party.

2. These laboratories shall be encouraged to:

a. take appropriate action to employ and retain, train and retrain qualified staff;

b. undertake appropriate programmes of research and development into doping agents and methods used, or thought to be used, for the purposes of doping in sport and into analytical biochemistry and pharmacology with a view to obtaining a better understanding of the effects of various substances upon the human body and their consequences for athletic performance;

c. publish and circulate promptly new data from their research.

In 2011, the main task of Doping Control Laboratory at the Antidoping Centre was to prepare the documents for ISO/IEC:17025 accreditation and for the WADA International Standard for Laboratories; the next objective was to restore its analytical work and to speed up the start of the accreditation procedure.

According to the plan for work restoration prepared at the beginning of the year that was updated in July, activities related to a standard ISO/IEC17025 were undertaken.

In the National Centre for Metrology, the laboratory equipment for sample preparation was calibrated and calibration certificates for each device were obtained.

Servicing professionals performed inspection and cleaning of the gas chromatograph with a nitrogen/phosphorus detector for drug-analysis and of the gas chromatographs with mass-spectrometric detectors for analysis of anabolic steroids, beta-agonists, and diuretics. Records and files of the devices were prepared, too. The assessment of their suitability for screening analysis based on repeatability was at end and calibration certificates were prepared.

Monitoring of refrigerators and freezers was introduced, monthly reports of the data from the recording device being prepared.

Evaluation of the suitability of available enzyme agents for hydrolysis and derivatization reagents was made.

Based on the Quality Manual, the following documents were prepared:

- The archive of the results subjected to retention under the WADA International Standard for Laboratories was put in ordered and listed.
- New instructions for using utensils and apparatuses are prepared, and the old ones are updated, the operating instructions for sample preparation, additional lists of licensed software and business forms are prepared as required for forming the Quality Manual of ISO/IEC17025.
- The technical procedures of the Quality Manual have been prepared and their integration in daily operation, as well as of the Manual for management of laboratory processes is pending.
- In relation with the accreditation of the laboratory, the Centre has consulted experts from the Bulgarian Accreditation Service, the results of the audit being discussed with them.

Technical documentation for a public order for purchase of new analytical equipment for the needs of the Doping Control Laboratory was prepared.

The Joint Committee of the Ministry of Economics, Energetics and Tourism and the Drug Directorate of the Ministry of Health gave to the Laboratory a license for purchasing and using drug precursors, narcotics and stimulants. We expect to receive the first batch of orders and to organise the collection of certified reference materials required for accreditation.

New files are made and new inventories of consumables, reagents, tests, solvents, and biological samples, subjected to storage, have been prepared.

In the Bulgarian Accreditation Service, two laboratory employees are trained in metrology and accreditation; one employee was involved in modern-management training programs of the Institute of Public Administration and all the staff of the laboratory participated in a seminar of the TEAM-company for analytical devices.

During the 2011, intensive work has been done on fixed-term completion and putting into operation of the new building of the Antidoping Centre. The Executive Director and other officials of the Centre exercised daily control on the precise implementation of the assigned building project.

Representatives of the Antidoping Centre have always participated at the regular (weekly) or special meetings of the operative management of the building. Due to this control, certain project parameters were changed, since they did not comply with the technical characteristics of the devices and the working regimen in the laboratory.

3.6. Article 6: Education

1. The Parties undertake to devise and implement, where appropriate in co-operation with the sports organisations concerned and the mass media, educational programmes and information campaigns emphasising the dangers to health inherent in doping and its harm to the ethical values of sport. Such programmes and campaigns shall be directed at both young people in schools and sports clubs and their parents, and at adult sportsmen and sportswomen, sports officials, coaches and trainers. For those involved in medicine, such educational programmes will emphasise respect for medical ethics.

2. The Parties undertake to encourage and promote research, in co-operation with the regional, national and international sports organisations concerned, into ways and means of devising scientifically-based physiological and psychological training programmes that respect the integrity of the human person.

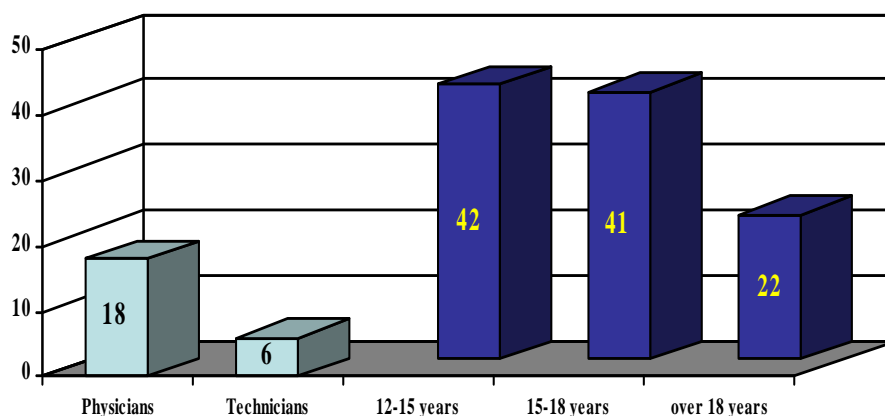
The Antidoping Centre is responsible for designing and implementing educational programmes, targeted to diverse audience: athletes (especially youths), students, supporting personal (physicians, officials, coaches, etc.). In its educative activity, the Antidoping Centre keeps to the "Model guidelines for core information/education programmes to prevent doping in sport" and uses varied types of educational/information materials: lectures, seminars, printed documents, posters, etc.

The educative programmes of the Antidoping Centre concern various topics related to the fight against doping. The courses present correct and actual information on the topics as:

- negative effects of doping on sports merits;
- consequences of doping use for athlete's health;
- rights and obligations of athletes and sport personnel during doping testing;
- requirements for issuing therapeutic use exemptions (TUE);
- effects of doping rules violation on athletes' sport career.

All educative programmes are prepared for multimedia presentations. The Prohibited List and WADA informational materials have been translated in Bulgarian and are delivered to participants in the education. On the figure below, the number of persons involved in anti-doping education in 2011 is presented.

In order to comply with the antidoping program for educational and informational activities, training of Doping Control Officer was organized and conducted by the Antidoping Centre, using the DCO training program of WADA. At the end of 2011, 32 Doping Control Officers were enrolled in



■ Sports Personnel

■ Student

the register of the Antidoping Centre, all of them independent of sports organisations.

Officers of the Antidoping Centre prepared and published three articles in the field of doping in sport: "Violations of anti-doping rules" in the journal "Sport and Science", "Therapeutic Use Exemptions as required by WADA" in the journal "Medicine and Sport" and "What should know the GPs when their patient is an athlete" in the journal "Health.bg".

The staff of the Centre participated with lectures, entitled "Issuance of Therapeutic Use Exemptions" and "Management of atypical analytical results", in the 4th International Conference on Medicine and Football, and in the National Conference of Sport Medicine held in Sofia.

Under the auspices of the Minister of Physical Education and Sports, a two-day seminar in Borovets on "Problems of doping control" was organized and held. Representatives of BOC, 13 licensed sport federations and sport physicians took part in the seminar. Officers of the Antidoping Centre presented reports concerning: doping control; management of doping-control results; TUE-issuing; sanctions, resulting from violations of anti-doping rules; explanations on ADAMS – system for administration and management of antidoping activities.

Officers of the Antidoping Centre participated in regular meetings with federations for coordination and cooperation in the implementation of the Regulations of doping control, development of antidoping rules, as well of other issues related to anti-doping activities. Two officers underwent training in IPA programs - introduction to public administration, and bases of administration management.

The Antidoping Centre developed, distributed and evaluated questionnaires for students in sport schools and sport classes in the countryside, aimed at revealing the level of knowledge of youths about doping in sport and anti-doping rules violations. Based on data from the questionnaires, educational programs for athletes and support personal were developed.

In its education activities, the officers of the Antidoping Centre specially inform the audience about the possible presence of banned substances in extensively used food supplements.

In 2012, the project "Anti-doping knowledge and training for young people up to 19 years in Bulgaria" was prepared and applied to WADA program for funding programs for social studies. The project was not approved for funding, there were certain remarks on it, which were commented by the Centre. Presently, a project for UNESCO is in preparation - "Anti-doping education against false self-assertion", aimed at young people in sport schools.

In future, it is intended to focus the education process on coaches, trainers, teachers, physicians, and parents, who could multiply its effectiveness.

3.7. Article 7: Co-operation with sports organisations on measures to be taken by them

1. The Parties undertake to encourage their sports organisations and through them the international sports organisations to formulate and apply all appropriate measures, falling within their competence, against doping in sport.

2. To this end, they shall encourage their sports organisations to clarify and harmonise their respective rights, obligations and duties, in particular by harmonising their:

a. anti-doping regulations on the basis of the regulations agreed by the relevant international sports organisations;

b. lists of banned pharmacological classes of doping agents and banned doping methods, on the basis of the lists agreed by the relevant international sports organisations;

c. doping control procedures;

d. disciplinary procedures, applying agreed international principles of natural justice and ensuring respect for the fundamental rights of suspected sportsmen and sportswomen; these principles will include:

(i) the reporting and disciplinary bodies to be distinct from one another;

(ii) the right of such persons to a fair hearing and to be assisted or represented;

(iii) clear and enforceable provisions for appealing against any judgement made;

e. procedures for the imposition of effective penalties for officials, doctors, veterinary doctors, coaches, physiotherapists and other officials or accessories associated with infringements of the anti-doping regulations by sportsmen and sportswomen;

f. procedures for the mutual recognition of suspensions and other penalties imposed by other sports organisations in the same or other countries.

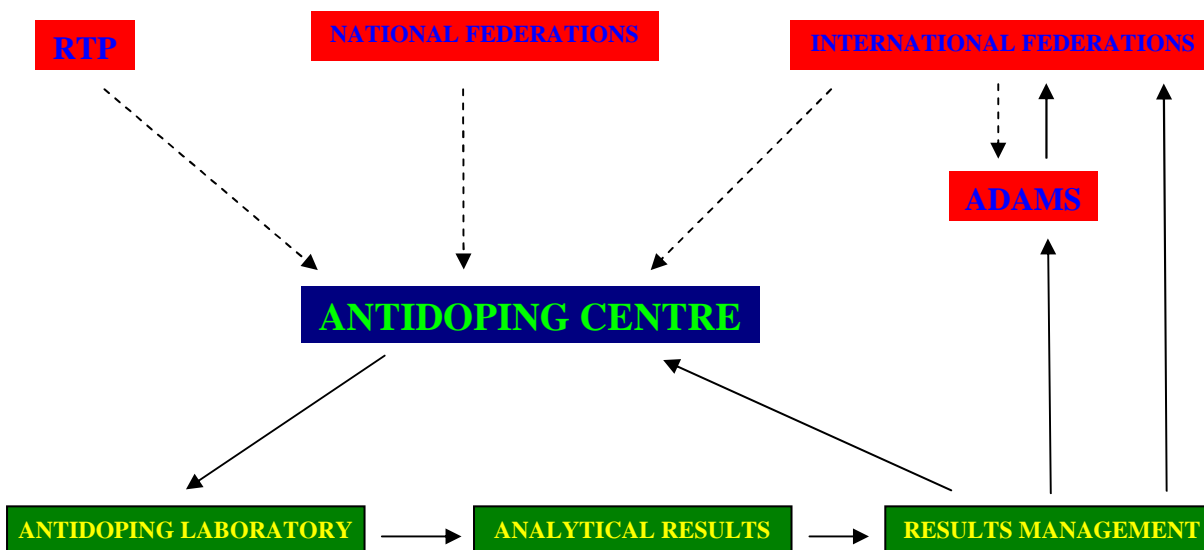
The Antidoping Centre conducts in-competition and out-of competition doping testing of Bulgarian athletes and athletes from foreign countries, training or competing on the territory of the Republic of Bulgaria, at the request of the international sports organizations.

Based on both random and targeted selection, in 2011 and up to October 2012 the Antidoping Centre performed 1082 doping tests; of them, 683 samples were taken according to the year plan (in-competition – 402, out-of-competition – 281). Approximately 20% of the tested persons were not "High-level athletes". Additionally, 399 samples totally were taken at request of international federations (in-competition – 357, out-of-competition - 42).

INDICATORS	JANUARY 2011 – SEPTEMBER 2012			
	RTP and Bulgarian federations		International federations	
Samples	in-competition	out-of-competition	in-competition	out-of-competition
		402	281	357
Doping violations, including:	adverse analytical findings		doping violations of sport personal	
	20		1	
Athletics	3			
Wrestling	5			
Boxing	2			
Football	4		1	
Swimming	2			
Basketball	1			
Water-Polo	1			
Volleyball	1			
Cycling	1			

Atypical results	before 01.11.2011	after 01.11.2011
	3	3
TUE	Applications	Issued
	16	8

The number of doping violations established in the same period is presented in the above table.



The Antidoping Centre sends the samples taken at doping testing to the WADA-accredited Doping-Control Laboratory in Athens (Greece) together with the necessary documents. After receiving the analytical results from the Laboratory, the results are managed by the Antidoping Centre according to the Regulations on doping control at training and competition activities, to the IST and ISTUE, and to all guidelines to the corresponding standards, including v. 2 of the “Guideline for report and management of elevated testosterone/epitestosterone ratio and endogenous steroids” (October 2011). Concerning results with elevated testosterone/epitestosterone ratio and endogenous steroids, the Antidoping Centre communicates with the accredited Doping-Control Laboratory in Athens asking for IRMS analysis of the corresponding sample.

In compliance with the RDCTC, each violation of the anti-doping rules, proved by the Antidoping Centre, is reported immediately to the athlete or the member of the support personnel, as well as to his/her national and international federations, to the Disciplinary Committee of the Bulgarian Olympic Committee. In case of adverse result of the B sample, a report is also send to the Minister of Physical Education and Sports. The athletes, who have committed anti-doping rules violation, are sanctioned by the Disciplinary Committee of the Bulgarian Olympic Committee, the penalty being put in force by the corresponding national federation. If a penalty is appealed, the final decision on the case is taken by the Bulgarian Sports Arbitrage.

3.8. Article 8: International co-operation

1. The Parties shall co-operate closely on the matters covered by this Convention and shall encourage similar co-operation amongst their sports organisations.

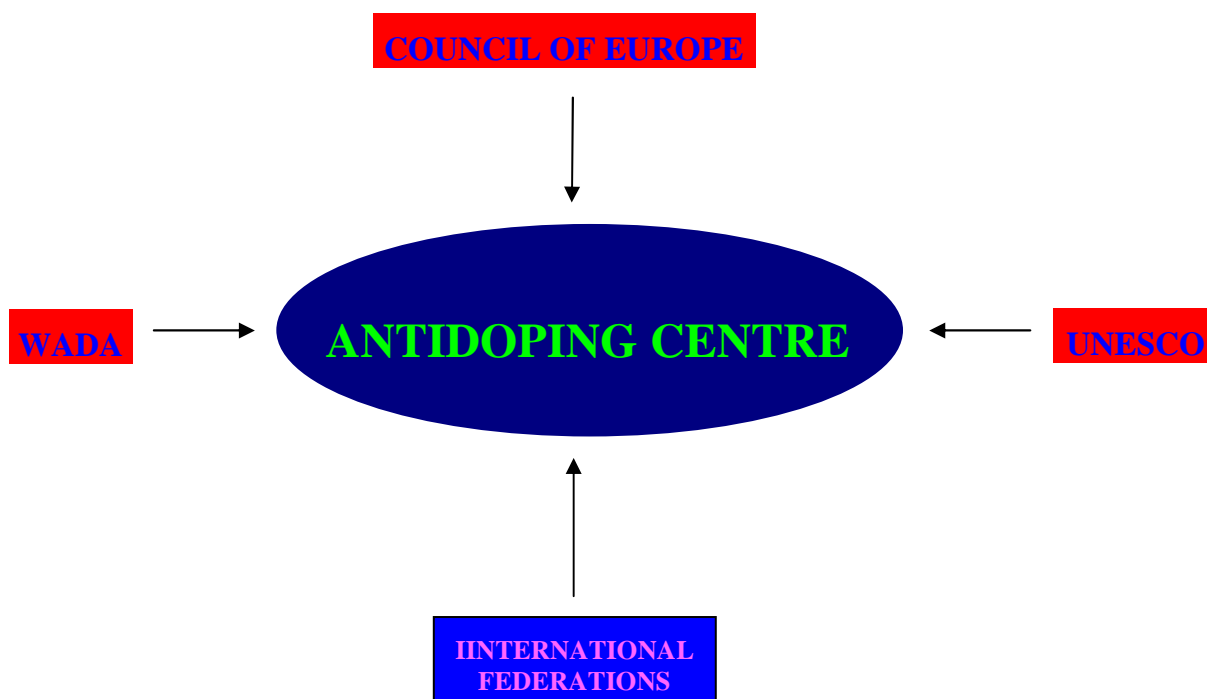
2. The Parties undertake:

a. to encourage their sports organisations to operate in a manner that promotes application of the provisions of this Convention within all the appropriate international sports organisations to which they are affiliated, including the refusal to ratify claims for world or regional records unless accompanied by an authenticated negative doping control report;

b. to promote co-operation between the staffs of their doping control laboratories established or operating in pursuance of Article 5;

c. to initiate bilateral and multilateral co-operation between their appropriate agencies, authorities and organisations in order to achieve, at the international level as well, the purposes set out in Article 4.1.

3. The Parties with laboratories established or operating in pursuance of Article 5 undertake to assist other Parties to enable them to acquire the experience, skills and techniques necessary to establish their own laboratories.



The policy of the Antidoping Centre is to participate willingly in the activities of diverse national, European, or other international anti-doping working groups and entities. Officials of the Centre took part in the discussions on revising of the WADA Code and the international standards, as well as in the work of the Advisory Group on Compliance of the Council of Europe.

On the invitation of the Secretariat of the Monitoring Group of the Anti-Doping Convention of the Council of Europe, the staff of the Centre participated in the advisory groups in Paris (France), reviewing the 2009 WADA Code and proposing revisions in it.

Representatives of the Antidoping Centre attended a meeting of the Advisory Group on the scientific issues of Monitoring Group on Anti-Doping Convention of the Council of Europe in Strasbourg (France), and in the WADA Symposium for anti-doping organisations on "New perspectives and paths of development in the fight against doping."

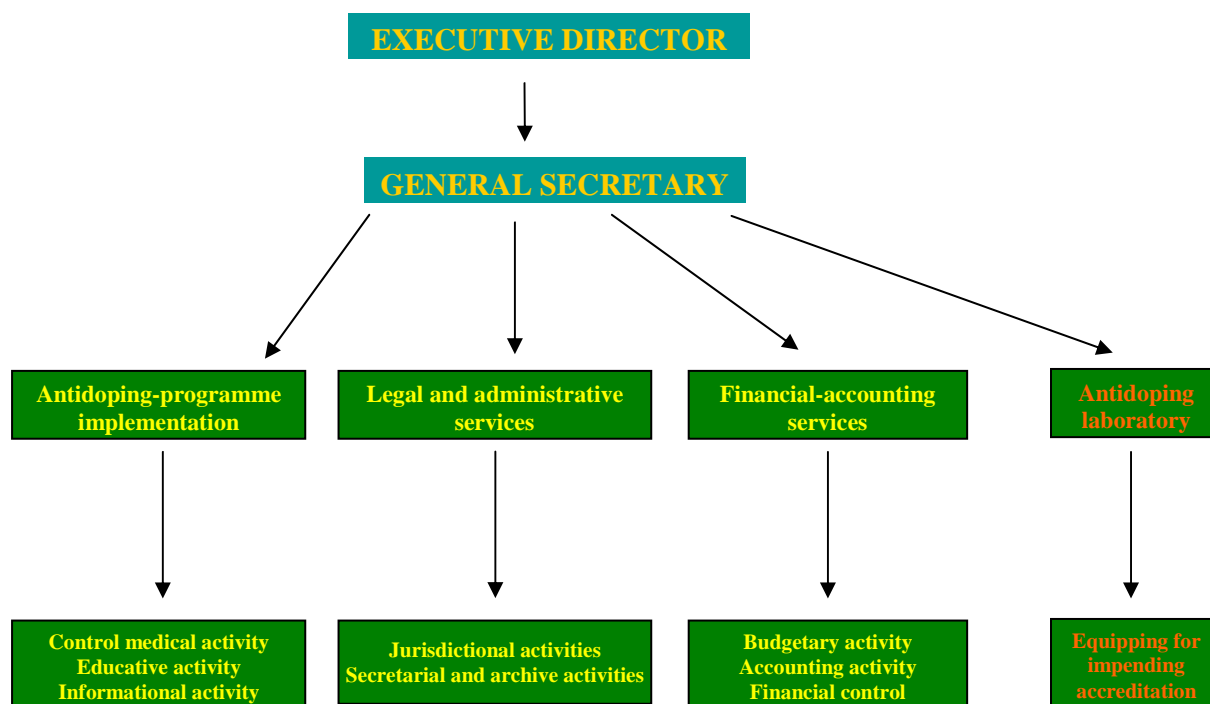
Together with Minister of Physical Education and Sports Mr. S. Neykov, the Executive Director of the Antidoping Centre participated in the 33rd meeting of the Monitoring Group of the Anti-Doping Convention of the Council of Europe, in the meetings with the Director General of Education, Youth,

Culture, and Sport of the Council of Europe, as well as with the Director of "Harmonisation and Standards Directorate" in WADA.

Annual report on the work of the Centre was presented to the Antidoping Commission of the Council of Europe. Employees of the Antidoping Centre made comments and suggestions on the amendments to the World Anti-Doping Code, proposed by the European Union.

Annex 1

STRUCTURE OF THE ANTIDOPING CENTRE



The Executive Director of the Antidoping Centre organizes and controls its overall activities. The General Secretary organizes, coordinates and controls the administrative activity of the Antidoping Centre.

Department “Antidoping-programme implementation” performs medical control, educative and informational activities, accomplishes international collaboration, as well as public relations with mass-media. This Department includes three professionally experienced physicians and an expert on information services.

Department “Legal and administrative services” renders jurisdictional services, represents the Antidoping Centre in courts and juries. It also organizes and maintains secretarial and archive system, as well as the correspondence. In this Department, two experts are employed.

Department “Financial-accounting attendance of the Centre activities” (in which one expert works) is responsible for implementation of the year budget and the financial report of the Antidoping Centre.

The doping-control Laboratory comprises ten employees (including the Head of the Lab).

MISSION OF THE ANTIDOPING CENTRE

Complying with its obligations according to the Copenhagen Declaration, the International Convention against Doping in Sport of UNESCO, as well as to the Convention against Doping of the Council of Europe and its Additional Protocol, the Antidoping Centre develops the National Strategy for doping-use prevention by enlarging the knowledge of the society on the matter.

OBJECTIVES:

- To create equal conditions at competitions, to protect athlete’s health and reputation;
- To develop a long-term programme for prevention of the use of prohibited substances and methods.

FUNCTIONS:

- Prepares year plan for doping control of Bulgarian athletes;
- Organises and conducts doping control on the territory of the Republic of Bulgaria;
- Elaborates and maintains the Registered Testing Pool of the Bulgarian athletes;
- Manages the doping-control results, according to the International Standards;
- Develops and realises appropriate educative programmes for athletes, medical and support personnel;
- Distributes the WADA Prohibited List and other informational materials.

INTENTIONS:

- Intensification of the testing programme (both in-competition and out-of competition);
- Enhancing the education process (targeted mainly to young athletes and students);
- Enlarging the public information on the problems of doping use;
- Strengthening of the international co-operation.

B. Report of the evaluation team

Introduction

The visit of the Evaluation Team was carefully organised by the Anti-Doping Centre (ADC) in Bulgaria. The Compliance with Commitments report covered the articles 1 to 8 of the Convention and the Additional Protocol to the Convention, which are the ones that are up for evaluation. The report had several authors and the visit started with an internal meeting to discuss the prepared report. Questions had been sent before the visit and were duly answered. During the visit, the team had the opportunity to meet representatives from the Customs and from the Educational establishments, such as the National Academy of Sports and to visit a Sports School. The team also met with representatives from the Disciplinary Committee and from the Bulgarian Sports Arbitrage, as well as from the Bulgarian Olympic Committee and different sports organisations. The team also had the opportunity to talk with Mr Svilen Neykov, Minister of Physical Education and Sports, and members of the Parliamentary Commission of Education, Science and the Problems of Children, Youths and Sports. Meetings with athletes, from Olympic and Paralympics sports, coaches and officials and one journalist were also organized. Not so common in evaluation visits, the team also met with a Lawyer, who had represented athletes in different doping cases and with the chair of the Bulgarian Association for Health and Fitness. During the meetings, the team was accompanied by relevant staff from the Anti-Doping Centre. The team received excellent translations into English when needed.

Article 1 – Aim of the Convention

The Parties, with a view to the reduction and eventual elimination of doping in sport, undertake, within the limits of their respective constitutional provisions, to take the steps necessary to apply the provisions of this Convention.

The Anti-Doping Convention has entered in to force in Bulgaria 1/8/1992. Bulgaria is also a Party to the Additional Protocol, which entered into force 1/10/2005. After a consultative visit in Bulgaria in 2002 the anti-doping work has developed and has been reorganized from 2010.

Today the implementation of the Convention is carried out according to the Law on Physical Education and Sports. With amendments that came into force, shortly before the evaluation visit, on 2 November 2012 the anti-doping organization has developed even more. According to the new Article 41 of the Law, a national body – Anti-Doping Centre – is established under the Minister of Physical Education and Sports and is the National Anti-Doping Organisation for Bulgaria. The Centre is subsidised by the Ministry of Physical Education and Sports. The same amendments to the law define rights and responsibilities of different parties involved in the fight against doping.

The Evaluation Team found that the reorganising of anti-doping activities has been successful and there is evidence of continuous improving.

The Evaluation Team congratulates the Bulgarian authorities on their impressive and successful work in reorganising Ant-Doping activities in such a short period of time and found that the political commitment expected in Art. 1 is fulfilled.

Article 2 – Definition and scope of the Convention

1 For the purposes of this Convention:

a “doping in sport” means the administration to sportsmen or sportswomen, or the use by them, of pharmacological classes of doping agents or doping methods;

b “pharmacological classes of doping agents or doping methods” means, subject to paragraph 2 below, those classes of doping agents or doping methods banned by the relevant international sports organisations and appearing in lists that have been approved by the monitoring group under the terms of Article 11.1.b;

c “sportsmen and sportswomen” means those persons who participate regularly in organised sports activities.

2 Until such time as a list of banned pharmacological classes of doping agents and doping methods is approved by the monitoring group under the terms of Article 11.1.b, the reference list in the appendix to this Convention shall apply.

1 b) “*pharmacological classes of doping agents or doping methods*”

The definition in the Convention on forbidden classes of doping agents and of doping methods refers to those banned by sport and approved by the Monitoring Group. As far as the Evaluation Team was informed - there is no specific procedure for approval of the list of banned Pharmacological classes of doping agents and doping methods after its adoption by the Monitoring Group.

Section (1) of Article 14 of the Regulations on doping control in training and competition activities (RDCTCA) refers to the WADA Prohibited List and respective annex of the International Convention against doping in sport (UNESCO Convention).

If the Monitoring Group would decide on a list that is not in accordance with the WADA Prohibited List International Standard, which is fairly improbable, the problem would have international complications and affect all signatories to the Convention and would have to be dealt with in some way.

1 c) “*sportsmen and sportswomen*”

The Law on Physical Education and Sports in its new Article 67 as of 2 November 2012 defines the anti-doping rule violations in the same wording as they are outlined in the Article 2 of the 2009 World Anti-Doping Code.

The definition of athlete is determined by the Article 35 of the Law on Physical Education and Sports, which describes the process of licensing the athletes. Target for anti-doping measures are licensed sports organizations, their members, athletes, all other persons taking part in sports training and competition activities. The national federations get their license from the Minister of Physical Education and Sports when they have reached certain criteria.

The Evaluation Team has experienced that education extends to athletes that are not licensed. Whether it reaches all sportswomen and sportsmen who participate in organised sport is unclear. But doping controls are only carried out on those athletes who belong to a licensed sports federation and who have been issued with a competition license, and not to those who participate in sports for all activities or belong to an unlicensed sports federation. For example the Bulgarian Weightlifting team is unlicensed. This provision is more described in the Section (1) of Article 1 of the RDCTCA.

The Convention defines sportswomen and sportsmen as athletes who participate regularly in organized sports. Even if the Convention does not explicitly say that all athletes – as defined – shall be subject to the possibility of a doping control it must be the meaning of the Convention.

The Evaluation Team finds that the definition in the Regulations on doping control in training and competition activities is too narrow. In the other aspects of the Article, the Evaluation Team finds that the scope of the Convention and the definitions applied are taken into account in a satisfactory manner.

Recommendations

- **that the definition of sportsman/ sportswoman in the Law on Physical Education and Sports and in the Regulations on Doping Control in Training and Competition Activities is harmonized with the one in the Convention.**

Article 3 – Domestic co-ordination

1 The Parties shall co-ordinate the policies and actions of their government departments and other public agencies concerned with combating doping in sport.

2 They shall ensure that there is practical application of this Convention, and in particular that the requirements under Article 7 are met, by entrusting, where appropriate, the implementation of some of the provisions of this Convention to a designated governmental or non-governmental sports authority or to a sports organisation.

At the meeting with the Minister of Physical Health and Sports, the evaluation team experienced that the Minister is strongly committed to anti-doping work. He is strongly working to proceed with the financing of the laboratory, with the aim of obtaining both ISO- and WADA-accreditation. The Minister decides on the yearly budget and on the doping control plan. He has strong support from the parliamentary Commission on Education, Science and the problems of Children, Youths and Sports.

Currently the Anti-Doping Centre (ADC) in cooperation with governmental and non-governmental partners drafts a “National Strategy against doping use in sports”. This Strategy will identify aims and objectives for the period 2013-2022, and it will be completed with a short term (annual) action plan. The aims are preliminarily:

1. Enhancing institutional commitment for coordinated fight against doping use in sport;
2. Reducing traffic for doping substances;
3. Prevention of doping (education of athletes and recreational sportsmen);
4. Broad public awareness about problems with doping use;
5. Enlarged participation in national and international projects to combat doping.

The Strategy is elaborated through the process of involving many stakeholders, such as Ministries of Physical Education and Sports, of Education, Youth and Science, of Healthcare, of Interior and of Justice, Bulgarian Agency of Food Safety, Customs Agency, Bulgarian Association for Health and Fitness and the Bulgarian Olympic Committee, as well as licensed sport federations. It has a political support from all parties in the Parliament. It is planned to be adopted in the first part of 2013.

As is pointed out later under Article 5, police and customs authorities are engaged in the work to reduce illegal handling with doping substances.

At a practical level, the anti-doping work in Bulgaria is undertaken by the ADC, which works very closely with the Ministry of Physical Education and Sports. Several decisions are taken by the Minister. For example, the Minister shall approve the Annual Test Distribution Plan.

The organic structure of the ADC seems adequate, if the operational, technical and scientific independence of the Anti-Doping Laboratory will be preserved. The Executive Director and all the members of staff are very committed to the anti-doping work, which was very well appreciated by the Evaluation Team.

The Therapeutic Use Exemption Committee (TUEC) of ADC is composed by members of its Medical Control Commission which didn't fulfil the independency of the majority of its members from the anti-doping organization required by the International Standard for TUE.

It was also mentioned in the report that there is close contact between the Centre and the Bulgarian Olympic Committee and the 79 licensed national sports federations, which was evidenced by the representatives of the Bulgarian Olympic Committee and some sports federations.

All the National Federations must have Anti-Doping Regulations in compliance with the provisions of the Law on Physical Education and Sports and with the Regulations on doping control in training and competition activities.

The evaluation team found that the provisions in article 3 are well met by Bulgaria but has the following recommendation.

Recommendation:

- that the Anti-Doping Centre – to ensure the independence of testing - is entrusted to adopt and sign off the Annual Test Distribution Plan after the Minister has adopted the dedicated budget;
- that the Anti-Doping Centre, in order to optimize its work, implements an ISO 9001 Quality System in compliance with the recommendation defined in the article 1.2 of the Additional Protocol to the Anti-doping Convention;
- that the Therapeutic Use Exemption Committee includes some physicians from outside the Anti-Doping Centre in order to fulfil its independency.

Article 4 – Measures to restrict the availability and use of banned doping agents and methods

4.1 The Parties shall adopt where appropriate legislation, regulations or administrative measures to restrict the availability (including provisions to control movement, possession, importation, distribution and sale) as well as the use in sport of banned doping agents and doping methods and in particular anabolic steroids.

4.2 To this end, the Parties or, where appropriate, the relevant non-governmental organisations shall make it a criterion for the grant of public subsidies to sports organisations that they effectively apply anti-doping regulations.

4.3 Furthermore, the Parties shall:

a assist their sports organisations to finance doping controls and analyses, either by direct subsidies or grants, or by recognising the costs of such controls and analyses when determining the overall subsidies or grants to be awarded to those organisations;

b take appropriate steps to withhold the grant of subsidies from public funds, for training purposes, to individual sportsmen and sportswomen who have been suspended following a doping offence in sport, during the period of their suspension;

c encourage and, where appropriate, facilitate the carrying out by their sports organisations of the doping controls required by the competent international sports organisations whether during or outside competitions; and

d encourage and facilitate the negotiation by sports organisations of agreements permitting their members to be tested by duly authorised doping control teams in other countries.

.4 Parties reserve the right to adopt anti-doping regulations and to organise doping controls on their own initiative and on their own responsibility, provided that they are compatible with the relevant principles of this Convention.

1. The Evaluation Team met representatives of the Customs National Agency, sector of the Narcotics, Precursors and Arms. They informed the Evaluation Team that it needs special permits to import restricted substances. Current legal instruments allow seizing substances like Anabolic Androgenic Steroids (AAS) or Human Growth Hormone. Usually, it is identified as an administrative offence when illicit goods are taken into the country. When a substance is identified as a medicine, then cooperation with the Bulgarian Drug Agency is initiated. If the substance is a food supplement – the case is dealt in conjunction with Food Safety Agency. For trafficking of Narcotics, Stimulants and Precursors, the legal instruments are well established.

The legislation against trafficking cannot be applied on AAS and some other doping substances. The Customs has for a long time promoted an amendment to the Narcotics law, criminalising trafficking and other ways of handling AAS and other doping substances. With the work on the “National Strategy against doping use in sports” in mind, there will hopefully be a specific legislation on certain doping substances, which would facilitate the work of customs and police. During the visit to the Parliament, the Commission on Education, Science and the problems of Children, Youths and Sports confirmed to the Evaluation Team the elaboration of a legislative initiative, in short term, in order to solve this problem.

Currently there is a good cooperation between Customs and the Director of Organised Crime Unite of the Police especially regarding narcotics, but such cooperation could be extended also to the doping substances. But the resources to act against small seizures of illicit drugs are too restricted as it is today.

Information to and from the Anti-Doping Centre is possible and is exchanged but by a procedure not formally established. Another angle, from which to work against doping on low level basis, is the cooperation with the Bulgarian Association for Health and Fitness. The Evaluation Team met the chair of the Association on the premises of a gym run by him. According to him, the Association is against the use of AAS in the gym centres and tries to check manufacturers of supplements, sold in

the gyms. There are no means to make doping controls in gyms as the use of AAS is not forbidden. There is no regulation on licensing gyms or fitness clubs. Wishes expressed were a law against the use of AAS, education and the responsibility for National Governmental Organizations to give youth attractive alternatives to the use for lower level athletes/youths, and licensing for instructors and gym owners.

The Evaluation Team finds that there is a need for a legal possibility to restrict availability of some banned doping substances. The team also suggests activities to improve anti-doping work on gyms and fitness centres by regulating licensing of such centres, to assess the existing experience of other States Parties (e.g. Denmark) in organising clean gym campaigns and to follow activities of the ad-hoc Group of Experts on Doping in Recreational Sport of the EU Expert Group on Anti-Doping.

2-3. The report describes the structure of Bulgarian sport with autonomous sports federations. It also describes the responsibility to act according to the Regulations on doping control in training and competition activities and the possibility for the Minister to forfeit funding or give the federation a fine when not acting according to the regulations.

The evaluation team finds that the Bulgarian system on these points fulfils the Convention.

4. The World Anti Doping Code is implemented into the Bulgarian system, much into the Regulations on doping control in training and competition activities.

The evaluation team could not find any matter that was not compatible with the Convention except that the possibility to conduct doping controls is restricted to licensed athletes.

Recommendations

- **that the Bulgarian Authorities develop legislation regarding restricting the availability of doping substances;**
- **that the representatives of the National Agency of Customs and police forces would be involved in the elaboration of the legislation regarding restricting the availability of doping substances, also regarding procedural issues;**
- **that a legislation regarding the establishment of fitness clubs (e.g. special licence) and the competence of gym instructors (education and licensing) would be considered;**
- **that the existing experience of other States Parties in organising clean gym campaigns could be assessed;**
- **that the activities of the ad-hoc Group of Experts on Doping in Recreational Sport of the EU Expert Group on Anti-Doping could be followed.**

Article 5 – Laboratories

1 Each Party undertakes:

a either to establish or facilitate the establishment on its territory of one or more doping control laboratories suitable for consideration for accreditation under the criteria adopted by the relevant international sports organisations and approved by the monitoring group under the terms of Article 11.1.b; or

b to assist its sports organisations to gain access to such a laboratory on the territory of another Party.

2 These laboratories shall be encouraged to:

a take appropriate action to employ and retain, train and retrain qualified staff;

b undertake appropriate programmes of research and development into doping agents and methods used, or thought to be used, for the purposes of doping in sport and into analytical biochemistry and pharmacology with a view to obtaining a better understanding of the effects of various substances upon the human body and their consequences for athletic performance;

c publish and circulate promptly new data from their research.

1. and 2a. For the time being, the Bulgarian analyses are conducted mostly by the WADA-accredited Doping-Control Laboratory in Athens. There is no long term contract with the laboratory. Article 38 in the Regulations declares that samples shall be sent to a WADA-accredited laboratory.

The evaluation team finds that with the agreement with Athens – although not a fixed term contract – the demands in Article 5 are fulfilled for the time being.

However, in the report are described efforts made to create an ISO- and WADA accredited laboratory. The laboratory is being established in the same building as the Anti-Doping Centre. The Evaluation Team visited the premises. In article 36.1 in the Regulations on Doping Control in Training and Competition Activities (RDCTCA) is stated the following: “The Executive Director of the Anti-Doping Centre shall, following a proposal submitted by the Director of the Doping Control Laboratory, approve internal rules governing the laboratory’s internal chain of custody procedures in accordance with the International Standard for Laboratories and its Technical Documents”.

The Evaluation Team finds that it is crucial to preserve an operational, scientific and technical independency of the laboratory from the ADC to guarantee the anonymity of the samples. It is also very important that the access to the laboratory is controlled by a secure and traceable system (e.g. digital control access to authorized persons). It should be impossible for the staff from other departments of the ADC to enter into the facilities of the laboratory, except in exceptional and justifiable circumstances, and only after receiving a special authorization from the Head of the laboratory. Also, unwished entrance from outdoors into the laboratory facilities must be secured.

The Minister of Physical Education and Sports expressed to the evaluation team his intent to fund the laboratory in a way that the laboratory could be ISO- and WADA-accredited.

The evaluation team is comfortable with the fact that the Bulgarian Authorities will provide and guarantee the necessary analytical facilities and instrumentation, and a sufficient annual financial support for a minimum of 3 years to the Anti-Doping Laboratory. Nevertheless, a lot of work must be done in order to guarantee that, within 2 years of obtaining accreditation, a minimum of 3000 samples from Code-compliant clients (as determined by WADA) will be provided annually to the Anti-Doping Laboratory for a period of 3 years.

2. b and c

The Evaluation Team was not aware of any research and development being done in the Anti-Doping Laboratory into doping agents and methods used, or thought to be used, for the purposes of doping in sport and into analytical biochemistry and pharmacology with a view to obtaining a better understanding of the effects of various substances upon the human body and their consequences for athletic performance, as defined in the Anti-Doping Convention.

With the following recommendations taken in mind, the evaluation team finds that the Article 5 will be fulfilled with a new ISO- and WADA-accredited laboratory.

Recommendations

- that the Regulations and all the provisions concerning the structure and documentation system of the Anti-Doping Centre and of the Anti-Doping Laboratory be revised and amended in order to preserve the absence of any conflict of interest and the operational independency of the Laboratory in compliance with the International Standard for Laboratories.
- that the Anti-Doping Laboratory, in order to facilitate the long process in order to obtain WADA Accreditation, be in constant contact with WADA in order to fulfil all the requirements described in the International Standard for Laboratories, namely in its article 4.1 (Applying for a WADA Laboratory Accreditation).
- that the Anti-Doping Laboratory shall be established and remain operationally independent from Anti-Doping Centre to ensure full confidence in its competence, impartiality, judgment or operational integrity, in compliance with section 4.1.5d of ISO/IEC17025, as defined in the article 4.1.8 of International Standard for Laboratories.
- that the Anti-Doping Centre, as the responsible National Anti-Doping Organization provides, a letter of support to the Anti-Doping Laboratory to WADA and containing as a minimum:
 - o Guarantee of sufficient annual financial support for a minimum of 3 years;
 - o Guarantee that, within 2 years of obtaining accreditation, a minimum of 3000 Samples from Code-compliant clients (as determined by WADA) will be provided annually to the Anti-Doping Laboratory for 3 years;
 - o Guarantee that the necessary analytical facilities and instrumentation will be provided.
- that to preserve the operational independence of the Anti-Doping Laboratory and its security, the access to the Laboratory must be controlled by a secure and traceable system (e.g. digital control access to authorized persons) both from indoors and outdoors.
- that the Anti-Doping Centre establishes contact with other Parties of the Anti-Doping Convention in order to use the provision 8.3 of the Convention to assist the Anti-Doping Laboratory in the training and retraining of its staff, gaining for their experience and skills, crucial to the establishment of a WADA Accredited Laboratory.
- that the Anti-Doping Laboratory undertakes appropriate programmes of research in cooperation with other national institutions developing research programs (e.g. universities, forensic, medical and pharmaceutical laboratories) and/or with other anti-doping laboratories, namely located in countries that are Parties to the Anti-Doping Convention.
- that the Anti-Doping Laboratory publishes and circulates promptly new data from its research.

Article 6 – Education

1 The Parties undertake to devise and implement, where appropriate in co-operation with the sports organisations concerned and the mass media, educational programmes and information campaigns emphasising the dangers to health inherent in doping and its harm to the ethical values of sport. Such programmes and campaigns shall be directed at both young people in schools and sports clubs and their parents and at adult sportsmen and sportswomen, sports officials, coaches and trainers. For those involved in medicine, such educational programmes will emphasise respect for medical ethics.

2 The Parties undertake to encourage and promote research, in co-operation with the regional, national and international sports organisations concerned, into ways and means of devising scientifically based physiological and psychological training programmes that respect the integrity of the human person.

1. The report well describes the education activities undertaken by the Anti-Doping Centre. The impression of an ambitious program was strengthened during the visits to the National Academy of Sports and to the Sports School «Gen.VL. Stoychev».

It was noticeable that education has a large role in the Centre when discussing on anti-doping work in general with the staff of ADC. The importance of prevention was well recognized in the fight against doping. It is mainly the staff that gives lectures and arranges education conferences and workshops.

ADC has a regular system to train and retrain DCOs. Olympic and Paralympic teams and officials received an Education session before their departure to London.

The National Academy of Sports provides education for Physical Education Teachers, Coaches and Physiotherapists at all levels of university education (bachelor, masters, PhD). Normal curriculum in sports medicine includes series of lectures devoted to the anti-doping issues. National Academy of Sports also carries out research work aimed at improving training methods.

In the National Academy of Sports the lectures concern the prohibited list, effects of doping, testing procedures and the responsibilities of athletes. Also, key elements of the World Anti Doping Code are a topic. In biochemistry classes, the students were also lectured on adverse effects of doping and licit ways to enhance performance.

The education program in Sport Schools (Public schools dedicated to young sport men or sport women that want to follow a career in sport) is well established and reaches many young athletes at the early phases on their sporting career. The ADC participates in education of young athletes as to the risks and consequences of doping in sport. This activity comprises a cycle of lectures held in Sports Schools, engaging all pupils of these schools aged between 15 and 19 years. There are 23 Sport Schools all over the country and future elite athletes attend these schools. The lectures focus on anti-doping rules, doping control procedures and anti-doping rule violations, as well as providing information on nutritional supplements and the effects of using anabolic steroids and narcotics. The lectures were developed by the ADC and are delivered in the presence of the class teachers of respective class through dialogue and active participation. The anti-doping issues are integrated also in other subjects of curricula. Pupils have to respond anti-doping related questions during their final exam at the sports theory course.

The focus was mainly on health effects and the list of prohibited substances, especially on anabolic agents.

In Bulgaria, there are a few number of sport medicine degree doctors engaged in sport, that is due to the existence of only one Medical University in Bulgaria that offers specialization in Sport Medicine with four years of duration, where anti-doping is taught. The Sport Medicine is recognized as a

specialization by the Bulgarian Medical Association. One of the main challenges of ADC is the education of the team physicians that have no anti-doping training.

Outside the National Academy and Sport Schools, it is mostly the ADC that has the responsibility concerning education and information. With the work together with national sport federations, it would be easier to deliver information for those athletes who are not in Sport Schools and also for the coaches. A discussion with people in charge of coaching and coach education from different sport federations on how to ensure that these people have enough information on this topic could be fruitful for building a program where federations will be responsible for organizing anti-doping education.

Strong cooperation with sport federations is essential also when it concerns athletes already on top level. These athletes have to be in scope of anti-doping education as well. For this group, lectures can be more tailor made where the topics can be more sport specific and also include information on whereabouts and therapeutic use exemptions for example.

A good example is the Annual Symposium organized by the Bulgarian Football Association attended by physicians and physiotherapists of teams, and medical staff of other national federations, where ADC is responsible by three anti-doping lectures.

2. The National Academy carries out research work aimed at improving training methods. A list of publications is attached to this report.

The evaluation team finds that the obligations in Article 6 are mostly fulfilled and have some recommendations.

Recommendations

- *that the Anti-Doping Centre takes initiative where other sport organizations would share the responsibility on educating athletes and coaches and see the ADC as a place where they can seek for expertise and help to train educators of other institutions (e.g. Sport Schools, Olympic and Paralympic Committees and National Federations).*
- *that anti-doping education would cover the topics as followed:*
 - o *Commitment to anti-doping codes, the agreements and the consequences of anti-doping rule violations;*
 - o *Prohibited substances and methods in sports and athlete's therapeutic use exemptions;*
 - o *Risk of nutritional supplements;*
 - o *Doping control and athlete's rights and responsibilities;*
 - o *Responsibilities of stakeholders in anti-doping activities.*
- *that the education programs would include ethical and moral discussions around doping;*
- *that the impact of the education program be assessed to change the attitudes of young athletes and to optimize the programs;*
- *that the results of research be disseminated more broadly (e.g. through the Council Europe's annual questionnaire on anti-doping policies).*

Article 7 – Co-operation with sports organisations on measures to be taken by them

- 1. The Parties undertake to encourage their sports organisations and through them the international sports organisations to formulate and apply all appropriate measures, falling within their competence, against doping in sport.*
- 2. To this end, they shall encourage their sports organisations to clarify and harmonise their respective rights, obligations and duties, in particular by harmonising their:*
 - a. anti-doping regulations on the basis of the regulations agreed by the relevant international sports organisations;*
 - b. list of banned pharmacological classes of doping agents and banned doping methods, on the basis of the lists agreed by the relevant international sports organisations;*
 - c. doping control procedures;*
 - d. disciplinary procedures, applying agreed international principles of natural justice and ensuring respect for the fundamental rights of suspected sportsmen and sportswomen; these principles will include:*
 - the reporting and disciplinary bodies to be distinct from one another;*
 - the right of such persons to a fair hearing and to be assisted or represented;*
 - clear and enforceable provisions for appealing against any judgement made;*
 - procedures for the imposition of effective penalties for officials, doctors, veterinary doctors, coaches, physiotherapists and other officials or accessories associated with infringements of the anti-doping regulations by sportsmen and sportswomen;*
 - procedures for the mutual recognition of suspensions and other penalties imposed by other sports organisations in the same or other countries.*
- 3. Moreover, the Parties shall encourage their sports organisations:*
 - to introduce, on an effective scale, doping controls not only at, but also without advance warning, at any appropriate time outside, competitions, such controls to be conducted in away which is equitable for all sportsmen and sportswomen and which include testing and retesting of persons selected, where appropriate, on a random basis;*
 - to negotiate agreements with sports organisations of other countries permitting a sportsman or sportswoman training in another country to be tested by a duly authorised doping control team by that country;*
 - to clarify and harmonise regulations on eligibility to take part in sports events which will include anti-doping criteria;*
 - to promote active participation by sportsmen and sportswomen themselves in the anti-doping work of international sports organisations;*
 - to make full and efficient use of the facilities available for doping analysis at the laboratories provided for by Article 5, both during and outside sports competitions;*
 - to study scientific training methods and to devise guidelines to protect sportsmen and sportswomen of all ages appropriate for each sport.*

The Evaluation Team met representatives from sports, Mrs St. Eneva, an athlete with two silver Paralympic medals, and Mr Kr. Dunev, a former silver medal gymnast and now general secretary and coach in the Gymnastics National Federation. They both expressed their satisfaction with the information on doping controls and other anti-doping matters from their sports federation and from the Anti-Doping Centre (ADC).

The Evaluation Team also met with the president of BOC Mrs Stefka Kostadinova and Secretary General Mr Belcho Goranov, and heard their sincere commitment to the anti-doping work.

1. and 2.a and b.

In the report is described that all Bulgarian sports organisations elaborated and adopted their own anti-doping rules according to the Regulations on Doping Control in Training and Competition Activities (RDCTCA) and in compliance with the anti-doping rules of their respective international federations. For a federation to have in place their own rules is a criterion to get a license and get funding from the Ministry. The RDCTCA provides in article 81 sanctions for the licensed sports federations, which are found guilty for anti-doping rules violations.

The Evaluation Team met with several representatives from the Bulgarian licensed sports federations – athletes, doctors, administrators – and found that these persons were aware of the existing rules and the way of their application. The work of ADC was greatly appreciated by the persons the evaluation team interviewed.

The list of banned pharmacological classes of doping agents and banned doping methods is the list decided upon by WADA.

2 c.

Doping Control tests are conducted by the Anti-Doping Centre on the basis of the Test Distribution Plan and are paid for from the Centre's budget. Sample collection, sealing, storage, transport and transfer of samples for analysis at the laboratory, is carried out by Anti-Doping Teams. Anti-Doping Teams comprise of individuals who have responsibilities similar to a Doping Control Officer ("DCO") and are trained to undertake the requirements of sample collection in accordance with the International Standards for Testing ("IST"). For each mission, the members of the Anti-Doping Team are appointed by the Executive Director of the ADC. The Anti-Doping Teams consist of at least two members, one of which is a Chair and take on the senior role of the assigned mission. As would be expected, members of the Anti-Doping Teams are granted access to all competitions, events across all sports in Bulgaria. As is required under the IST, each member is given an identification card which is issued by the ADC Executive Director. As part of their requirements, when recruiting members to the Anti-Doping Teams the Anti-Doping Centre ensures that there is no conflict in regards to the sample collection process and sport.

The responsibilities provided to the Anti-Doping Teams compliments the move towards non-analytical rule violations. As well as being able to collect samples, the Anti-Doping Team members have been given the authority to collect information and discover facts with the purpose of establishing anti-doping rule violations in the activities of athletes and officials, and other persons.

All Adverse Analytical Findings are reviewed by the Medical Control Commission within the Anti-Doping Centre. The responsibilities of the Medical Control Commission are clearly laid down within the RDCTCA and rightly do not include any rights to convene a hearing. The Commission has responsibility for contacting the athlete and the licensed sport organization to report their decision. Communication with athletes goes via the President of the licensed sport organization or their designated member of staff.

The persons involved in doping control related activities may on no occasion whatsoever disclose, and must keep confidential, any information that may have come to their knowledge in connection with, or in the process of, their work, except as provided in the RDCTCA.

According to the regulations, when enough information or facts providing grounds for an anti-doping rule violation is established, the Executive Director of the ADC shall forward to the Disciplinary Commission the entire documentation concerning the case.

2 d.

Hearings in relation to Anti-Doping Rule Violations are dealt with by the Disciplinary Commission. The Disciplinary Commission and the Bulgarian Sports Arbitration were established by the Bulgarian Olympic Committee in May 2011. Even if established by the Olympic Committee, they handle cases concerning athletes also from sports federations outside Olympic sports. The Disciplinary Commission primarily determines the length of the sanction. If a penalty is appealed, the decision on the case is taken by the Bulgarian Sports Arbitrage - if it not concerns an international level athlete or the case arises from an international event. Such cases must be appealed directly to the Court of Arbitration for Sports in Lausanne, Switzerland (CAS). The representatives of the Bulgarian Sports Arbitration would not oppose if also such cases could be appealed to the Bulgarian arbitration, which is significantly cheaper than the Court of Arbitration for Sport in Lausanne. The decision of the Bulgarian Sports Arbitrage can also be appealed by a national level athlete to CAS.

All hearings are funded via the Bulgarian Olympic Committee and from a fee per hearing from the parties involved. So far, this has been sufficient in Bulgaria based on the number of hearings. The Disciplinary Commission is supportive of the RDCTCA, but is of the opinion that they are a 'mechanical transfer of rules from the Code'. The Evaluation Team found the RDCTC to be comprehensive.

As part of the Evaluation, the team visited the Bulgarian Olympic Committee to meet members of the Disciplinary Committee, Bulgarian Sports Arbitration and the President of the Bulgarian Olympic Committee. It was clear that the process that had been established to deal with athlete and athlete support personnel anti-doping rule violations was robust and 'fit for purpose'. It was good to see that the disciplinary process was not undertaken by the licensed sport organizations, where there is a conflict of interest in supporting an athlete's performance and prosecuting for an anti-doping rule violation. The Bulgarian Olympic Committee is committed to ensuring the system in place is efficient and reflects the requirements of the Anti-Doping Convention. The Bulgarian Olympic Committee opinion is that decisions of the Disciplinary Commission and Sport Arbitrage are good and they fully support them.

There is very good co-operation between the ADC, Bulgarian Olympic Committee, Disciplinary Committee and the Bulgarian Sports Arbitration. A lot of the effective communication appears to be as a result of the expertise and commitment of Mrs. Violeta Zarkova, Executive Director, and her team at the ADC who are highly thought of by all parties within the Disciplinary Process. The disciplinary procedures in place uphold an athlete's right to a fair hearing.

We were informed, and as written in the RDCTCA, that the panel of the Disciplinary Commission comprises of 9 persons: a Chair and two Vice-Chairs, each of whom are legal practitioners of no less than five years standing; and six other members, three of whom shall be medical practitioners of no less than five years standing, and three additional members each of whom shall be of no less than five years standing in the field of physical education and/or sport. The Chair of the Disciplinary Commission, or in his/her absence, a Vice-Chair, shall appoint three members from the panel of the Disciplinary Commission to hear and determine each case. Each hearing panel shall comprise the Chair or a Vice-Chair as chair of the hearing panel, one medical practitioner member and one sport expert member.

In principal, the panel composition is good, regulations are strict, and rules in place and in the main should not pose a significant risk to the efficiency of the disciplinary process. The evaluation team has some concern that the Commission does not have enough legal practitioners, which could pose a risk to a panel should there be a complex case that requires a lot of legal expertise. The Commission advised that in Bulgaria there is not an abundance of sport lawyers and this was partly why there were only three legal practitioners to date. The Commission also advised that there had not been any problem that a panel was unable to deal with within a reasonable timeframe in regards to the

complexities of rules, regulations and athlete mitigation. However, the Commission understood the concerns of the Evaluation Team.

Members for the Disciplinary Commission panel are appointed by the Executive Bureau of the Bulgarian Olympic Committee, following a proposal submitted by the President of the Bulgarian Olympic Committee and consultation with the Minister of Physical Education and Sport. Each member of the Disciplinary Commission Panel is appointed for a term of four years and is reappointed only once. The Disciplinary Commission is without any influence from the ADC.

In order to be able to exercise its powers to determine matters in which any special knowledge or skill beyond the capacity of the members of the Disciplinary Commission is required, the Disciplinary Commission shall be entitled to appointing external experts in the relevant area.

The default is for hearings to be held in public, unless any of the parties has requested that the matter be reviewed behind closed doors. The Evaluation Team finds that it would be better if the default were for all hearings to be held behind closed doors, unless either party requested that the matter be dealt with in the public. This would better support the athlete's right to confidentiality.

3.

As said before doping controls are carried out by the ADC according to a yearly approved doping control plan. Subjects for doping controls are athletes listed in the RDCTCA. In this report has earlier been pointed out that athletes on low level or not belonging to a licensed sports federation can not be selected for doping controls.

The doping controls seem to be conducted in a good way. Nevertheless, the Evaluation team thinks that the percentage of blood samples and the amount of urine samples for EPO detection must be increased and the ADC should take the necessary steps to launch a National Athlete Biological Passport Program, taking in consideration the relevance of some endurance sports in Bulgaria. The Article 28.2 of RDCTCA must be revised in order to fulfil the non advance notice principle defined in the IST.

The RDCTC gives room for testing athletes, visiting Bulgaria on occasions and from state parties who have signed the Additional Protocol to the Anti-Doping Convention of the Council of Europe.

Under article 6 is accounted for the education, including training methods, targeted to all sports people.

The evaluation team finds that the obligations Article 7 are fulfilled.

Recommendations

- **that the sections 1 and 5 of the Article 57 of the Regulations on Doping Control in Training and Competition Activities are reviewed with the objective to secure legal expertise in the Disciplinary Commission and making it the default for all hearings to be held behind closed doors unless either party requested that the matter be dealt with in public;**
- **that also international level athletes could appeal a decision from the Disciplinary Commission to the Bulgarian Sports Arbitration for Sports before taking the matter to CAS;**
- **that athletes on lower level and/or not belonging to a licensed sports federation can be subject to doping control;**
- **that in the National Anti-Doping Program is increased the percentage of blood doping controls and launched a National Athlete Biological Passport Program.**

Article 8 – International co-operation

1 The Parties shall co-operate closely on the matters covered by this Convention and shall encourage similar co-operation amongst their sports organisations.

2 The Parties undertake:

a to encourage their sports organisations to operate in a manner that promotes application of the provisions of this Convention within all the appropriate international sports organisations to which they are affiliated, including the refusal to ratify claims for world or regional records unless accompanied by an authenticated negative doping control report;

b to promote co-operation between the staffs of their doping control laboratories established or operating in pursuance of Article 5; and

c to initiate bilateral and multilateral co-operation between their appropriate agencies, authorities and organisations in order to achieve, at the international level as well, the purposes set out in Article 4.1.

3 The Parties with laboratories established or operating in pursuance of Article 5 undertake to assist other Parties to enable them to acquire the experience, skills and techniques necessary to establish their own laboratories.

Bulgaria actively participates in different activities under auspices of international organisations - Council of Europe, UNESCO, World Anti-Doping Agency, and European Union.

Since 2009, the Bulgarian delegation always took part in the meetings of the Monitoring Group of the Anti-Doping Convention, participated in the work of the Advisory Groups on Legal and Science issues, and completed the annual questionnaires on anti-doping policies. It should also be reminded that Bulgaria hosted a consultative visit in the framework of the Compliance with Commitments project in 2002 and provided a follow-up report in 2004.

The World Anti-Doping Agency declared Bulgaria's anti-doping rules and program compliant with the World Anti-Doping Code in November 2011. Bulgarian Anti-Doping Centre successfully uses the templates of WADA education and information materials to support national anti-doping program.

Bulgaria ratified the International Convention against Doping in Sport (UNESCO Convention) in 12 January 2007 and takes part in the biannual Conferences of Parties, as well as uses the resources available through the Fund for the Elimination of Doping in Sport for a project "Anti-doping education versus false self-affirmation".

Bulgaria takes part in the regional customs network for all the Balkan countries with a centre in Bucharest (Romania) and has concluded Memoranda of Understanding with all neighbouring countries regarding customs cooperation.

Bulgarian authorities raised during the visit the issue of duplication of doping controls and outlined this issue as one that needs better international cooperation.

The Bulgarian Anti-Doping Centre is considering the possibility to join the newly established Institute of the National Anti-Doping Organisations (iNADO), which has replaced the ANADO.

The evaluation team finds that the obligations in Article 8 are fulfilled when taken into account that the doping laboratory is under implementation.

Recommendations

- *that Bulgaria decides to join the iNADO in order to be able to address and solve problems that are common for all national anti-doping organisations;*
- *that the Anti-Doping Centre considers signing data sharing agreements with the most relevant international sports federations regarding exchange of information on test planning and on results management*

General conclusions and recommendations of the evaluation team

The Bulgarian anti-doping work fulfils in general the commitments under the Council of Europe's Anti-Doping Convention in a good way. The Evaluation Team though thinks that the recommendations given by the team could even improve the Bulgarian anti-doping work. No prioritising could be made between the recommendations as mentioned under article 5. The Evaluation Team finds that with the agreement with Athens – although not a fixed term contract – the demands in Article 5 is fulfilled for the time being. The recommendations concerning this article refer to the Bulgarian intention to establish an ISO- and WADA-accredited laboratory.

Article	Recommendations	Actor concerned
2	That the definition of sportsman/ sportswoman in the Law on Physical Education and Sports and in the Regulations on doping control in training and competition activities is harmonized with the one in the Convention.	Government
3	That the Anti-Doping Centre – to ensure the independence of testing – is entrusted to adopt and sign off the Annual Test Distribution Plan after the Minister has adopted the dedicated budget.	Government
3	That the Anti-Doping Centre, in order to optimize its work, implements an ISO 9001 Quality System in compliance with the recommendation defined in the article 1.2 of the Additional Protocol to the Convention.	Anti-Doping Centre
3	That in the Therapeutic Use Exemption Committee is included some physicians from outside the Anti-Doping Centre in order to fulfil its independency.	Anti-Doping Centre
4	That the Bulgarian Authorities develop legislation regarding restricting the availability of doping substances.	Government
4	That the representatives of the National Agency of Customs and police forces would be involved in the elaboration of the legislation regarding restricting the availability of doping substances, also regarding procedural issues.	Government
4	That a legislation regarding the establishment of fitness clubs (e.g. special licence) and the competence of gym instructors (education and licensing) would be considered.	Government
4	That the existing experience of other States Parties in organising clean gym campaigns could be assessed.	Government
4	That the activities of the ad-hoc Group of Experts on Doping in Recreational Sport of the EU Expert Group on Anti-Doping could be followed.	Government
5	That the Regulations on Doping Control in Training and Competition Activities and all the provisions concerning the structure and documentation system of the Anti-Doping Centre and of the Anti-Doping Laboratory be revised and amended in	Government

	order to preserve the absence of any conflict of interest and the operational independency of the Laboratory in compliance with the International Standard for Laboratories.	
5	That the Anti-Doping Laboratory, in order to facilitate the long process to obtain WADA Accreditation, be in constant contact with WADA in order to fulfil all the requirements described in the International Standard for Laboratories, namely in its article 4.1 (Applying for a WADA Laboratory Accreditation).	Anti-Doping Laboratory
5	That the Anti-Doping Laboratory shall be established and remain operationally independent from Anti-Doping Centre to ensure full confidence in its competence, impartiality, judgment or operational integrity, in compliance with section 4.1.5d of ISO/IEC17025, as defined in the article 4.1.8 of International Standard for Laboratories.	Anti-Doping Centre and Anti-Doping Laboratory
5	That the Anti-Doping Centre as the responsible National Anti-Doping Organization provides a letter of support to the Anti-Doping Laboratory to WADA and containing as a minimum: <ul style="list-style-type: none"> ○ Guarantee of sufficient annual financial support for a minimum of 3 years; ○ Guarantee that, within 2 years of obtaining accreditation, a minimum of 3000 Samples from Code-compliant clients (as determined by WADA) will be provided annually to the Anti-Doping Laboratory for 3 years; ○ Guarantee that the necessary analytical facilities and instrumentation will be provided. 	Anti-Doping Centre
5	That to preserve the operational independence of the Anti-Doping Laboratory and its security, the access to the Laboratory must be controlled by a secure and traceable system (e.g. digital control access to authorized persons) both from indoors and outdoors.	Anti-Doping Centre
5	That the anti-Doping Centre establishes contact with other Parties of the Anti-Doping Convention in order to use the provision 8.3 of the Convention to assist the anti-Doping Laboratory in the training and retraining of its staff, gaining for their experience and skills, crucial to the establishment of a WADA Accredited Laboratory.	Anti-Doping Centre
5	That the Anti-Doping Laboratory undertakes appropriate programmes of research in cooperation with other national institutions, developing research programs (e.g. universities, forensic, medical and pharmaceutical laboratories) and/or with other anti-doping laboratories, namely located in countries that are Parties to the Convention.	Anti-Doping Laboratory
5	That the Anti-Doping Laboratory publishes and circulates promptly new data from its research.	Anti-Doping Laboratory
6	That the Anti-Doping Centre takes initiative where other sports organizations would share the responsibility on education	Anti-Doping Centre

	athletes and coaches and see the ADC as a place where they can seek for expertise and help to train educators of other institutions (e.g. Sport Schools, Olympic and Paralympic Committees and National Federations).	
6	That anti-doping education would cover the topics as followed: <ul style="list-style-type: none"> o Commitment to anti-doping codes, the agreements and the consequences of anti-doping rule violations; o Prohibited substances and methods in sports and athlete's therapeutic use exemptions; o Risk of nutritional supplements; o Doping control and athlete's rights and responsibilities; o Responsibilities of stakeholders in anti-doping activities. 	Anti-Doping Centre
6	That the education programs would include ethical and moral discussions around doping.	Anti-Doping Centre
6	That the impact of the education program be assessed to change the attitudes of young athletes and to optimize the programs.	Anti-Doping Centre
6	That the results of research be disseminated more broadly (e.g. through the Council of Europe's annual questionnaire on anti-doping policies).	Anti-Doping Centre
7	That the sections 1 and 5 of the Article 57 of Regulations on Doping Control in Training and Competition Activities are reviewed with the objective to secure legal expertise in the Disciplinary Commission and making it the default for all hearings to be held behind closed doors unless either party requested that the matter be dealt with in public.	Government and Anti-Doping Centre
7	That also international level athletes could appeal a decision from the Disciplinary Commission to the Bulgarian Sports Arbitration for Sports before taking the matter to Court of Arbitration for Sport.	Government and Anti-Doping Centre
7	That athletes on lower level and/or not belonging to a licensed sports federation can be subject to doping control.	
7	That in the National Anti-Doping Program is increased the percentage of blood doping controls and launched a National Athlete Biological Passport Program.	Government and Anti-Doping Centre
8	That Bulgaria decides to join the INADO in order to be able to address and solve problems that are common for all national anti-doping organisations.	Government and Anti-Doping Centre
8	That the Anti-Doping Centre considers signing data sharing agreements with the most relevant international sports federations regarding exchange of information on test planning and on results management.	Anti-Doping Centre

Acknowledgments

The preparations for the meeting in Bulgaria were very good. Questions asked before the visit has been kindly and promptly answered. The team would like to thank the organisers of the visit and all the participants in the meetings, who gave good information and interesting discussions.

All the oral presentations and discussions were held in English or translated to English.

Composition of the evaluation team

Prof. Dr Luis Horta (Portugal), head of the team

Mr Samuli Rasila (Finland)

Mr Tony Josiah (United Kingdom)

Ms Liene Kozlovska (Council of Europe)

Ms Kristina Olinder (Sweden), rapporteur

Programme of the evaluation visit

November 18, 2012

19:00 – *EVALUATION-GROUP MEETING AT HOTEL “VEGA”*

November 19, 2012

09:00 – *SESSION I*

MEETING WITH THE AUTHORS OF THE NATIONAL REPORT ON THE COMPLIANCE OF BULGARIA WITH THE ANTI-DOPING CONVENTION OF THE COUNCIL OF EUROPE

Mrs. VIOLETA ZARKOVA, MD

Executive Director of the Antidoping Centre

Mr. VASSIL POPOV, MD

General Secretary of the Antidoping Centre

Mrs. MARGARITA GANCHEVA, PHD

Interim Head of the Antidoping Laboratory

Mrs. HRISTINA IVANCHEVA, MD Head of the Control Medical Commission of the Antidoping Centre

Debates on the National Report about implementation of the Anti-Doping Convention in Bulgaria

11:00 - *COFFEE BREAK*

11:30 – *SESSION II*

VISIT OF THE EVALUATION TEAM WITH THE BULGARIAN ANTIDOPING CENTRE

VISIT OF THE EVALUATION TEAM TO THE ANTIDOPING LABORATORY

MEETING OF THE EVALUATION TEAM WITH THE CONTROL MEDICAL COMMISSION OF THE ANTIDOPING CENTRE

13:00 - *LUNCH*

14:30 – *SESSION III*

VISIT OF THE EVALUATION TEAM TO NATIONAL ACADEMY OF SPORTS

Meeting with the Executive Team of the Academy: 15 min

Discussion with Assoc. Prof. D. Dimitrova, MD (Sport-Medicine Department): 45 min

16:00 - *COFFEE BREAK*

16:30 – *SESSION IV*

MEETING OF THE EVALUATION TEAM WITH MR. B. KOLEV (lawyer)

MEETING OF THE EVALUATION TEAM WITH Mrs. S. MITEVA (Gymnastics)

MEETING OF THE EVALUATION TEAM WITH MR. ST. STRUGAROV, MD (Olympic team)

MEETING OF THE EVALUATION TEAM WITH MR. V. YORDANOV (BF Wrestling)

18:30 - *DINNER*

November 20, 2012

09:00 – *SESSION V*

VISITS TO THE BULGARIAN OLYMPIC COMMITTEE

Discussion at the Bulgarian Sports Arbitrage with Mrs. M. Zlatareva (Chair) and Mr. Ts. Atanassov (Member): 30 min

T-DO (2013) 05

*Discussion at the Disciplinary Committee with Mr. N. Marinov (Chair) and Mr. K. Plochev (Member):
30 min*

10:30 - *COFFEE BREAK*

Discussion at the Bulgarian Olympic Committee with Mrs. St. Kostadinova (President) and Mr. B. Goranov (General Secretary): 30 min

11:15 - *SIGHT-SEEING TOUR*

13:30 - *LUNCH*

14:30 – SESSION VI

MEETING WITH MR. SVILEN NEYKOV, MINISTER OF PHYSICAL EDUCATION AND SPORTS: BULGARIAN-GOVERNMENT OBLIGATIONS IN IMPLEMENTATION OF THE ANTI-DOPING CONVENTION OF THE COUNCIL OF EUROPE

15:30 - *COFFEE BREAK*

16:00 – SESSION VII

VISIT TO THE PARLIAMENTARY COMMISSION OF EDUCATION, SCIENCE AND THE PROBLEMS OF CHILDREN, YOUTHS AND SPORTS

Discussion with Members of the Commission

17:30 – SESSION VIII

VISIT OF THE EVALUATION TEAM TO THE BULGARIAN ASSOCIATION FOR HEALTH AND FITNESS

Discussion with Mr. P. Angelov (Chair)

18:30 – *DINNER*

November 21, 2012

09:00 - WORKING SESSION IX

VISIT OF THE EVALUATION TEAM TO SPORTS SCHOOL “GEN. VL. STOYCHEV”

Discussion with Mr. V. Vutev (Director), sports teachers and students

10:30 - *COFFEE BREAK*

MEETING OF THE EVALUATION TEAM WITH REPRESENTATIVES OF THE CUSTOMS NATIONAL AGENCY

11:00 - WORKING SESSION X

MEETING OF THE EVALUATION TEAM WITH mrs. ST. ENEVA (athlete)

MEETING OF THE EVALUATION TEAM WITH MR. KR. DUNEV (Coach, Gymnastics)

MEETING OF THE EVALUATION TEAM WITH mrs. B. TONCHEVA (journalist)

MEETING OF THE EVALUATION TEAM WITH THE STAFF OF THE ANTIDOPING CENTRE

13:30 - *LUNCH*

END OF THE VISIT

- *Venue places:*

Working sessions I and II - Antidoping Centre (new building)

Working session III - National Academy of Sports

Working session IV - Antidoping Centre (new building)

Working sessions V - Bulgarian Olympic Committee

Working sessions VI - Ministry of Physical Education and Sports

Working sessions VII - Bulgarian Parliament

Working session VIII - Bulgarian Association for health and fitness;

Working session IX - Sports School "Gen. Vl. Stoychev"

Working session X - Antidoping Centre (new building)

- *There was simultaneous English-Bulgarian and Bulgarian-English translation*

C. Comments by Bulgaria