

MONITORING GROUP (T-DO)

ANTI-DOPING CONVENTION

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

Strasbourg, 1 June 2023

T-DO(2023)14

EVALUATION REPORT OF THE MONITORING GROUP (T-DO)

**EVALUATION VISIT TO THE REPUBLIC OF
IRELAND
5 – 7 OCTOBER 2022**

The Monitoring Group oversees the implementation and application of the Anti-Doping Convention. The Additional Protocol to the Anti-Doping Convention supplements the responsibilities of the Monitoring Group by requiring the Monitoring Group to '*supervise the application and implementation of the Convention*' by the Parties to the Convention.

This supervision is achieved through an integrated compliance approach. A significant component of this is the evaluation process, whereby a team of experts appointed by the Monitoring Group (**Evaluation Team**) examines the implementation of the Convention by a Party and provides a report (**Evaluation Report**) to the Monitoring Group. The Evaluation Team will typically undertake this examination by way of a visit to the Party being evaluated, this visit being referred to as an **Evaluation Visit**.

In October 2022, the Irish authorities invited an Evaluation Team to conduct an Evaluation Visit. Prior to the Evaluation Visit the Irish authorities submitted a **National Report** which provided detailed description of the measures adopted by the Irish authorities in relation to the Convention. This Evaluation Report records the outcome of that Evaluation Visit.

The National Report and the programme of the visit, including the participants, are included as Annexes to this Evaluation Report.

This Evaluation Report is divided into two Sections:

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| Section One | A summary of the conclusions reached by the Evaluation Team, identification of best practices that may be of use and benefit to other Parties, and recommendations made to the Irish authorities. |
| Section Two | A detailed set of observations and conclusions of the Evaluation Team. |

SECTION ONE

A. Executive Summary

The Evaluation Team considers that the Irish Government has given legal effect to its commitments under the Convention.

Sport Ireland is the statutory body established by legislation in 2015 with the following objectives: to develop strategies to increase participation in recreational sport; to promote and develop the achievement of excellence in sport; to develop and implement governance standards; to manage and operate sports facilities and sites; and to deliver educational activities.

Sport Ireland also acts as the National Anti-Doping Organisation (NADO) of Ireland. In this regard, it carries out all anti-doping activities as required by the Anti-Doping Convention, as well as the World Anti-Doping Code and related International Standards, and Technical Documents. The NADO is a separate unit of Sport Ireland, which is perceived as operationally independent. However, all employees of the NADO are also employees of Sport Ireland, all payments related to the anti-doping department work are managed by the financial unit of the Sport Ireland and the Head of the NADO is appointed by Sport Ireland.

In the Republic of Ireland, the ministry responsible of sport in Ireland – the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DTCAGSM) plays a central role in the anti-doping system. The Ministry coordinates the strategic anti-doping commitments at the governmental level, which are derived from the Convention.

Another key state actor is the Health Products Regulation Authority (HPRA), which is the medicines regulator under jurisdiction of the Health Ministry. It has powers of investigation, appeal, and representation in court. The HPRA exercises its powers in the criminal field and thus, complements the actions of Sport Ireland. Their relationship is formalised in a Memorandum of Understanding.

The landscape of sport organisations in Ireland is no different from other European countries. Sport is managed by national sport federations, i.e. national governing bodies (NGBs). NGBs are recognised by Sport Ireland, which entitles them to receive funding for their activities. A strict mechanism is in place to monitor the performance and compliance of NGBs, including anti-doping activities. If an NGB is deemed to be non-compliant, its funding could be reduced or withdrawn. On the other hand, the Olympic Federation of Ireland (NOC) and Paralympics Ireland (NPC) have a well-established cooperation with Sport Ireland, which include education programmes, preparations of major events, youth games and exchange of whereabouts. The NOC and NPC would withdraw funding (scholarships) if anti-doping rule violations (ADRVs) were confirmed.

Sport Ireland, in its capacity as NADO, is responsible for the collection of anti-doping samples. All collected samples are shipped the Doping Control laboratory of Cologne, Germany. In 2021, Sport Ireland collected 1554 urine and blood samples from 28 sport disciplines that are considered high performance: 1333 tests were conducted out of competition (420 blood and 713 urine samples) and 221 urine samples were collected in competition. The number of blood samples collected in competition or over the weekend are limited due to logistic constraints.

The Disciplinary Panel of Sport Ireland is established by Sport Ireland and its members are appointed by Sport Ireland Anti-Doping Committee, a distinct body from the Anti-Doping Unit of Sport Ireland (which manages operational activities). All NGBs have transferred results management functions to Sport Ireland. The Irish Anti-Doping Rules refer to the Court of Arbitration for Sport (CAS) as a means of appealing the decisions made by Sport Ireland or its Disciplinary Panel.

Sport Ireland performs a wide range of activities related to the education of athletes and athletes support personnel (ASP). One of the examples of education programmes is Zero Gains campaign of Sport Ireland.

The Sport Ireland Anti-Doping Unit's (NADO) education and information focuses on working both within and outside the sporting community. Outside the sporting community, the main messages aims at influencing public opinion, providing accurate information on the health risks of doping substances and providing information on nutritional supplements.

The NADO's research programme is implemented mainly through the implementation of European projects and the cooperation with the Cologne Laboratory. Sport Ireland allocates an annual budget to fund the anti-doping research. The Cologne laboratory acknowledges Sport Ireland as a contributor when research is published.

B. Best Practices

The Monitoring Group identifies the following best practices arising from the measures adopted by the Irish authorities:

- a) The synergies and cooperation between the NOC, the NGBs and the NADO result in a good and unified approach to fight against doping in the country.
- b) The Anti-Doping Officer of each NGB as the primary liaison person between the NGB and Sport Ireland on all anti-doping matters, is an effective mechanism to assist the NADO in reaching out to the athletes and ASP and ensuring that they are informed and educated about the anti-doping rules.
- c) The mechanism of financial penalties imposed in a situation of whereabouts failures committed by athletes is great relevance. In such situations, a financial penalty may be imposed on an athlete who has a Whereabouts Failure. This approach clearly reduced the number of filling failures as well as motivating athletes to fulfil their whereabouts obligations more carefully.
- d) The establishment by the NADO of the NGB tutors/educators pool is an excellent solution for increasing the outreach of anti-doping education.
- e) The experience gained after the completion of the pilot phase of including drugs and sport in the physical education curriculum could be shared with other countries.

C. Recommendations

The Evaluation Team makes the following recommendations arising from the measures adopted by the Irish authorities in connection with the Convention.

- i. Irish authorities are invited to strengthen the level of independence and the decision-making autonomy within the NADO - Sport Ireland Anti-Doping Unit. Having in mind the constant evolution of norms of the World Anti-Doping Programme and the latest trends of strengthening the operational independence and independence per se, it is worth to prepare and secure the structure for future developments.
- ii. Awareness and knowledge of the dangers of doping shall be strengthened particularly among health sector stakeholders and professionals.
- iii. The cooperation on anti-doping with other governmental departments involved in sports policy (education, research, etc.) shall be further enhanced, notably their involvement in anti-doping as well as other sports integrity issues.
- iv. While acknowledging that the membership-based application system and the obligation to incorporate anti-doping rules in order to receive funding fit the overall sports system, it is recommended to the Irish authorities to ensure the harmonised and mandatory application of the anti-doping rules across all sports and all athletes.
- v. In order to cover the scope of the Convention and to take into account the specificity of sport and of doping in sport, the Irish authorities are invited to consider criminalising further anti-doping rules violations, such as trafficking of certain prohibited substances or administration to an athlete.
- vi. It is recommended to the NADO to consider establishing partnerships to provide appropriate anti-doping education programmes to a wider range of sportsmen and sportswomen including participants of grassroots sport and recreational athletes.
- vii. The Irish authorities are invited to envisage the possibilities of unifying the procedures applied in all the disciplinary procedures, including by the NGBs not recognised by Sport Ireland, with the view of making the anti-doping system accessible to all athletes.
- viii. The Irish authorities are invited to consider establishing an institutionally separate appeal instance to hear cases relating to therapeutic use exemptions (TUE).
- ix. To further strengthen international commitments and cooperation, it is recommended to the Irish authorities to ratify the Additional Protocol to the Anti-Doping Convention (CETS 188) and to provide, in the respective legislation, that the fight against doping shall respect and be governed by the Council of Europe's Anti-Doping Convention (and its Additional Protocol).

SECTION TWO

Prior to the Evaluation Visit, Sport Ireland provided a National Report (Annex 2) detailing the various measures taken by the Irish authorities to implement the Convention.

This Section of the Evaluation Report has been prepared by the Evaluation Team and constitutes a detailed description of its findings by reference to the relevant sections of the National Report and the matters identified during the course of the Evaluation Visit (Annex 1).

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1. Legislation, Regulations and Administrative Provisions

- 1.1. Article 1 of the Convention requires State Parties to take measures to reduce and eliminate doping in sport, including legislation, and to commit themselves towards this responsibility. Article 2 provides definitions of “doping in sport”, “pharmacological classes of doping agents or doping methods” and “sportsmen and sportswomen” for the purpose of the convention. These definitions should be an umbrella for the national Anti-Doping system to be considered in line with the convention. Finally, Article 7 requires the Government to encourage its sports organizations to take all appropriate measures against doping in sport. These measures concern anti-doping regulation, list of banned doping agents and doping methods, doping control procedures, disciplinary procedures, penalties for officials, doctors, veterinary doctors, coaches, physiotherapists, procedure for mutual recognition of suspensions and other penalties imposed by sports organizations in the same country or other countries.
- 1.2. The Irish Government signed the Anti-Doping Convention on 25 June 1992 and ratified it on 1 March 2003. The Additional Protocol to the Anti-Doping Convention has not been signed or ratified. Ireland ratified the International Convention against doping in sport adopted by the UNESCO on 18 July 2018 (UNESCO Convention).

- 1.3. The Irish Sports Council was established in 1999 and under its remit was to combat doping in sport, including testing. The Irish Sports Council was the Irish NADO and conducted testing, education, compliance and intelligence. Sport Ireland, established in 2015, and took over that remit. Sport Ireland was created by the Sport Ireland Act and tasked with the responsibility to develop sport in Ireland. This authority is placed under the jurisdiction of the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media. This Department and Sport Ireland signed an agreement that defines roles and responsibilities of both authorities and terms of their relationship. Pursuant to this agreement, the Minister has responsibility for the oversight of Sport Ireland, but “shall fully respect, defend and ensure the autonomy of Sport Ireland”.
- 1.4. In accordance with the 2015 Act, Sport Ireland is designated as the National Anti-Doping Organization as provided with in the Code and the UNESCO Convention. Its functions are, among others: “(d) to facilitate, through the promulgation of guidelines and codes of practice, standards of good conduct, fair play and the elimination of doping in sport; / (e) to take such action as Sport Ireland considers appropriate, including testing, to combat doping in sport; / (f) to plan, implement, evaluate and monitor education and information programmes for good conduct, fair play and the elimination of doping in sport; / (g) in its capacity as the national anti-doping organisation in the State, to direct the collection of samples, to manage the testing and test results of samples and attend hearings, as required; [...]”.
- 1.5. According to article 42 of the 2015 Act, Sport Ireland is responsible for adopting Anti-Doping Rules that shall apply throughout Ireland. These rules or arrangements must be related to:
- (a) application of rules;
 - (b) violations of rules;
 - (c) prohibited substances and methods;
 - (d) therapeutic use of substances and methods;
 - (e) testing of sportspersons;
 - (f) intelligence relating to doping in sport;
 - (g) disqualifications;
 - (h) disciplinary procedures;
 - (i) sanctions;
 - (j) implementation, reporting and publication of decisions.

The same article provides that Sport Ireland may amend the Irish Anti-Doping Rules.

- 1.6. The latest Anti-Doping Rules developed by Sport Ireland date 1 January 2021. In addition, binding document on disciplinary procedures complements the Anti-Doping Rules.

Concerning the definitions provided in the Convention,

- 1.7. First, Article 1 of the Irish Anti-Doping Rules defines the scope of application of these rules. Under this article, the funding given by Sport Ireland to National Governing Bodies (NGBs) is conditioned to the implementation of the Anti-Doping Rules. Consequently, NGBs shall transpose Irish Anti-Doping Rules directly or by reference into their internal norms.
- 1.8. The Irish Anti-Doping Rules refer to the athlete definition set by the Code as “Any Person who competes in sport at the international level (as defined by each

International Federation) or the national level (as defined by each National Anti-Doping Organisation).” In this respect, the Irish Anti-Doping Rules apply to all persons who:

- are members or license holders of an NGB or a member or affiliate organization;
- participate in such capacity in an Event, Competition or other activity organized, convened, authorized or recognized by an NGB or a member or affiliate organization;
- who are subject to the authority and/or jurisdiction of an NGB or a member or affiliate organization;
- who participate in any capacity in any activity organized, held, convened or authorized by the organizer of a National Event or of a national league that is not affiliated with an NGB;
- who do not fall within one of the foregoing provisions but who wish to be eligible to participate in International Events or National Events.

1.9. It is specified that the Irish Anti-Doping Rules also apply to Athlete Support Persons and Sport Ireland members.

1.10. Article 2 of the Irish Anti-Doping Rules defines “doping in sport” as an occurrence of one or more of the anti-doping rule violations set forth in the same article:

- The presence of a prohibited substance or its metabolites or markers in an athlete’s sample;
- Use or attempted use by an athlete of a prohibited substance or a prohibited method;
- Evading, refusing or failing to submit to sample collection by an athlete;
- Whereabouts failures by an athlete, tampering or attempted tampering with any part of doping control by an athlete or other person;
- Possession of a prohibited substance or a prohibited method by an athlete or athlete support person;
- Trafficking or attempted trafficking in any prohibited substance or prohibited method by an athlete or other person;
- Administration or attempted administration by an athlete or other person to any athlete in-competition of any prohibited substance or prohibited method, or administration or attempted administration to any athlete out-of-competition of any prohibited substance or any prohibited method that is prohibited out-of-competition;
- Complicity or attempted complicity by an athlete or other person;
- Prohibited association by an athlete or other person;
- Acts by an athlete or other person to discourage or retaliate against reporting to authorities.

1.11. Article 3 of the Irish Anti-Doping Rules provide that “these rules incorporate the Prohibited List which is published and revised by WADA” and which is defined as the list published as an International Standard by WADA identifying the prohibited substances and methods.

1.12. Regarding doping control procedures, Sport Ireland Anti-Doping Unit (NADO) specified to the Evaluation team that it employs and trains doping control officers to perform tests. A testing distribution plan is set by NADO with the assistance of NGBs.

- 1.13. The Irish Anti-Doping Rules provide that Sport Ireland can conduct In-Competition and Out-of-Competition testing. In particular, Sport Ireland Anti-Doping Unit (NADO) establishes a registered testing pool with the assistance of NGBs composed of high-level athletes
- 1.14. Concerning “results management”, Sport Ireland has jurisdiction to prosecute any violation of the Anti-Doping Rules listed above. When investigations of a case justify a sanction, the Director of Anti-Doping & Ethics, the Anti-Doping Unit (NADO) can sign, if the athlete agrees and accepts the sanction, a decision of acceptance of the sanction. If the athlete doesn’t accept and/or ask for an audience and a review of their affair, the case is sent to the disciplinary panel, that will decide on its consequences pursuant to Articles 8, 9 and 10 of the Irish Anti-Doping Rules. Sport Ireland also established the “Irish Sport Anti-Doping Disciplinary panel procedures” that provides detailed rules for disciplinary procedures.
- 1.15. Article 16 of the Irish Anti-Doping Rules provides requirements concerning mutual recognition of decisions taken by other Anti-Doping organisations. In this respect, Sport Ireland and NGBs shall recognize and implement a decision imposing a provisional suspension and/or a period of ineligibility, accepting an Anti-Doping rule violation or disqualifying results, taken by a signatory of the Code without any further action required. With regard to non-signatories of the Code, Sport Ireland shall implement their decision if it finds that the rules of that body are consistent with the Code.
- 1.16. In addition to the Anti-Doping Rules, the Irish authorities adopted two Acts relating to medicines and misuse of drugs. These acts are not specific to sport and concern general policies on drugs and medicines. Under the Irish Medicine Board Act, the Minister can regulate and ensure the control of the manufacture, production, preparation, importation, distribution, sale, supply, placing on the market, advertisement or promotion of medicines.

Recommendations

- 1.17. The Irish authorities should consider ratification of the Additional Protocol of the Anti-Doping Convention to strengthen the international commitments of monitoring implementation of the Convention.
- 1.18. The Irish authorities should provide, in the respective legislation, that the fight against doping in the country shall respect and be governed not only by the UNESCO International Convention against Doping in Sport, but also by the of the Council of Europe’s Anti-Doping Convention and its Additional Protocol.

2. National Anti-Doping Organisation (NADO) – Structure and Governance

- 2.1. As indicated above, the Irish Sport Council was the first NADO established in Ireland in 1999. Its successor, Sport Ireland is a non-commercial state body established in 2015 according to Sport Ireland Act, with the responsibilities, among several others, of developing strategies for increasing participation in recreational sports, promoting, and developing the achievement of excellence in sports, facilitating governance

standards, managing, and operating sports facilities and campuses, as well as developing and implementing educational activities.

- 2.2. Sport Ireland is 100% state owned and funded by the State budget. The State budget funding is granted by the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DTCAGSM) – the principal Government agency concerned with sport policy. There's no implication of the Department in the operational management of Sport Ireland. The demarcation between these two organizations is very clearly defined in the Sport Ireland Act 2015,
- 2.3. Sport Ireland is also designated as the national anti-doping organisation for the country and shall perform the functions and obligations of such an organisation referred to in the World Anti-Doping Code, the UNESCO Anti-Doping Convention and the Irish Anti-Doping Rules.
- 2.4. While Sport Ireland is an organisation that, among other things, “supports elite athletes in achieving excellence in sport”, it is also the home of a specifically designated unit – Sport Ireland Anti-Doping Unit, which acts as a National Anti-Doping Organisation of Ireland. In this respect, it carries out all anti-doping activities contemplated by the Anti-Doping Convention, as well as the Code, the International Standards, and Technical Documents, including controlling and, if relevant, punishing elite athletes and their support personnel. This stand-alone unit of Sport Ireland is perceived as operationally independent.
- 2.5. All NADO staff are employees of Sport Ireland. At the time of the Evaluation Visit, there were 7 employees working exclusively for the Anti-Doping Unit of Sport Ireland (NADO).
- 2.6. The Evaluation Team noted that under current leadership, the rules and procedures for the appointment of the Director of the Anti-Doping Unit (NADO) provide sufficient safeguards for the independence, but that there remains a theoretical risk of influence from Sport Ireland.
- 2.7. All payments relating to the work of the Anti-Doping Unit are administrated by the financial unit of Sport Ireland. The total budget allocated to anti-doping matters is approximately 1.9 million euros (2021 budget), which may be increased proportionally each year as the overall Sport Ireland budget increases.
- 2.8. The Evaluation Team understood that all administrative, financial, logistical and IT support for the NADO is provided by Sport Ireland.
- 2.9. The organisational structure provides clear division of roles and responsibilities between the Board of Sport Ireland, the Anti-Doping Committee of Sport Ireland as an advisory committee to the Board of Sport Ireland, the Chief Executive of Sport Ireland and the Director of Anti-Doping and Ethics.
- 2.10. In addition, Sport Ireland appoints two independent bodies – the Irish Sport Anti-Doping Disciplinary Panel and the Sport Ireland Therapeutic Use Exemption (TUE) Committee. Decisions regarding TUE and sanctions are subject to appeal only to CAS (Court of Arbitration for Sport).

- 2.11. The Evaluation Team had a discussion on the independence of the NADO with the DTCAGSM and Sport Ireland. Although the 2022 oversight agreement between the DTCAGSM and Sport Ireland states that “the Minister shall fully respect, defend and ensure the autonomy of Sport Ireland in accordance with clause 22.8 of the Code”, the Evaluation Team noted that the existing legal base may not provide an adequate framework for the operational independence of the NADO. Whilst there are currently no issues on this matter at a practical level, there is a potential for further discussion and improvement.
- 2.12. It should be noted that the National Sport Policy 2018 – 2027 includes a reference to the issue of the independence of the NADO: “Ireland sees an emerging requirement for the anti-doping system to be seen as independent of the system that supports and funds the achievement of excellence in sport. The trend internationally is for the establishment of an agency, separate to the sports development agency, to regulate anti-doping matters. We commit to a detailed consideration of this issue in the first two years of the policy”.

Recommendation

- 2.13. The Evaluation Team is of the opinion that it is worth considering what would be the most efficient model of anti-doping structure in Ireland. In this context, the Irish authorities should strengthen the level of independence and the decision-making autonomy within the NADO - Sport Ireland Anti-Doping Unit. Considering the constant evolution of the Code and its standards and the recent trend towards strengthening operational independence and independence per se, it is worthwhile to prepare and secure the structure for future developments.

3. Public Authorities

- 3.1. Each country has a number of agencies within its public administration that are involved in some aspect of the organisation, regulation, or administration of sport. The Convention anticipates that there will be a degree of ‘co-ordination’ between these agencies. Key aspects of this co-ordination are: the exchange of information that is potentially useful to the anti-doping authorities, and the withholding of funding from sports organisations and/or sports persons who do not comply with anti-doping standards.
- 3.2. The Convention requires the States or the relevant non-governmental organisations to make the effective application of anti-doping rules a criterion for granting public subsidies to sports organisations.
- 3.3. The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DTCAGSM) is the main Government department responsible for sport policy. The Minister responsible for sport is responsible for the oversight of Sport Ireland. Through the mechanism of an annual oversight agreement between the DTCAGSM and Sport Ireland, the terms of the relationship between the DTCAGSM and Sport Ireland are defined in accordance with the Sport Ireland Act (2015). The agreement reiterates the definitions of Sport Ireland’s functions in Irish sport, including in anti-doping (elimination of doping in sport and measures to combat doping in sport, anti-doping

education and doping control) as well as the designation of Sport Ireland as the NADO. Under to the Act, the Minister may give a direction in writing to Sport Ireland on any matter relating to a subsidiary and Sport Ireland shall comply or secure compliance with any such direction. Sport Ireland is 100% government funded through the DTCAGSM.

- 3.4. According to the Act, the Anti-Doping Committee of Sport Ireland is established to assist and advise Sport Ireland in relation to the performance of its functions. The Anti-Doping Committee of Sport Ireland is an advisory committee to the Board of Sport Ireland and its members provide specialist advice from their own areas of expertise to assist the Anti-Doping Unit of Sport Ireland. The Committee is composed of experts from the medical, academic, athletes and sporting organisations. Members of the Sport Ireland Board are also members of the Anti-Doping Committee.
- 3.5. The Sport Leadership Group, established in 2018, consists of 15 key stakeholders from both the private and public sectors, including the Departments of Education, and of Health and Department of Children and Youth Affairs. The Group was established to ensure the implementation of the overall Government's National Sport Policy 2018-2027, including anti-doping and other sport integrity issues. The Minister responsible for sport leads the Group. The Group adopted the action plan on the implementation of the Policy. One of the actions included in the National Sports Policy document is to explore the possibility of establishing an independent anti-doping agency. The Evaluation Team raised this issue with the representatives of the DTCAGSM, who were open for to any ideas on the matter, when the issue of independence was raised. According to the National Sport Policy document, a full mid-term review of the policy will be carried out in 2023.
- 3.6. During the discussions, the Evaluation Team learned that anti-doping has not yet been actively discussed in the Sport Leadership Group. A National Physical Activity Plan has been launched, involving various stakeholders and administrative areas. The Plan does not include anti-doping activities. It is clear, that the Covid-19 pandemic has influenced discussions and priority setting of in the sport policy in recent years.
- 3.7. The NADO does not have any direct projects or activities with the Department of Health. Concerns have been raised in discussions about the awareness and knowledge of the dangers of doping among health professionals.
- 3.8. The main collaborating partner of Sport Ireland in the health sector are the Health Product Regulatory Authority (HPRA) and the Monthly Index of Monthly Specialities (MIMS). Sport Ireland has active weekly contacts with the HRPA. Sport Ireland has assisted the HPRA with information on the campaign for recreational athletes Zero Gains (ZeroGains – What will you gain from steroid use?).
- 3.9. The Monthly Index of Monthly Specialities (MIMS) is the Irish drugs directory and a guide for all Irish General Practitioners (GPs). It lists all licensed products by the Health Product Regulatory Authority (HPRA). Since 2002, all products listed in MIMS have been flagged in relation to sport i.e. permitted, restricted and prohibited. In addition, athletes and athlete support personnel can check the status of medications in relation to sport at www.eirpharm.com.

- 3.10. The HPRA regulates health care products. Its regulatory functions include human and veterinary medicines, clinical trials, medical devices, controlled drugs, blood and blood components, tissues and cells, and cosmetics. The HPRA reports to the Medical Council on the violations of the legislation on medicines. The Medical Council regulates medical doctors in Ireland. One of its key responsibilities is to investigate complaints against medical practitioners. The HPRA also cooperates internationally (e.g. with Europol and Interpol) and it implements the Medicrime Convention in Ireland.
- 3.11. The national report provides information on cooperation and information sharing between Sport Ireland and law enforcement agencies; the Health Products Regulatory Authority (HPRA), An Garda Síochána (the Irish National Police Service), the National Customs Service and the Pharmaceutical Society of Ireland. Information will be shared, for example, on suspicious cases in accordance with the GDPR and national data protection legislation. Practical arrangements with these bodies have been formalised through Memoranda of Understanding. Additional data sharing agreements are being developed as a result of requirements arising from changes in the legislation. It should be noted that Sport Ireland has no role in the investigation and prosecution of criminal offences. Such cases are referred to the relevant law enforcement or regulatory authority. According to the 2021 draft annual report, Sport Ireland continues to cooperate closely with the HPRA, Customs and An Garda Síochána and the Pharmaceutical Society of Ireland from a monitoring and intelligence perspective.
- 3.12. Sport Ireland works with the Faculty of Sport and Exercise Medicine (FSEM) in relation to anti-doping education for sport medical personnel. Athlete Support Personnel are required to attend anti-doping education sessions for their sport/athlete/team. These education requirements are mandatory before the Olympic and the Paralympic Games.
- 3.13. Sport Ireland also works with universities and research institutions but is not directly involved with compulsory education institutions. However, there have been occasional joint activities, for example in relation to curriculum: anti-doping is included in the national secondary physical education curriculum. Some third level institutions also offer courses on anti-doping.
- 3.14. Sport Ireland is responsible for the funding of NGBs and direct funding to high performance and elite athletes under the Sport Ireland Act.
- 3.15. According to the national report and the discussions held during the visit the anti-doping criterion for public funding to organisations is a powerful tool for improving and committing to anti-doping work: in order to receive funding from Sport Ireland, all sport organisations must comply with the Irish Sport Anti-Doping Programme.
- 3.16. National Governing Bodies of Sport must complete and submit an anti-doping compliance report on an annual basis, and also on a mid-year basis. The Anti-Doping Unit evaluates the anti-doping programmes of the organisations. Sport Ireland will not release funding to any organisation without the receipt and verification of these compliance documents.

- 3.17. Similarly, athletes receiving funding must comply with the Irish Sport Anti-Doping Programme. A detailed Anti-Doping Programme clause forms part of the Terms and Conditions of Sport Ireland's Carding Scheme.
- 3.18. In 2021, a total of €13.3 million of core funding has been allocated to 59 sports organisations (National Governing Bodies of Sport) and direct athlete/ player support totalled of €2,959,000.
- 3.19. There are regular discussions with the sports organisations and Sport Ireland; the contractual system with organisations is comprehensive.
- 3.20. There is a strong commitment to anti-doping work and a shared anti-doping culture in Ireland, which was reflected in discussions with various stakeholders. Stakeholders involved in the anti-doping policy and work are motivated to promote clean sport. The strong anti-doping culture and other ethical/integrity issues could also be made more visible in sport policy (documents).
- 3.21. Cooperation and information-sharing between Sport Ireland and the law enforcement agencies works well, and the Evaluation Team considered that Ireland would have some good practices to offer to other Member states in this area: the monthly index of medical specialties and the model of cooperation between the NADO and the MIMS.
- 3.22. However, the Evaluation Team identified possible areas for future development. The DTCAGSM and Sport Ireland could strengthen their cooperation in anti-doping with other Government Departments, e.g., in the framework of the Sport Leadership Group. The closer cooperation is particularly important if Sport Ireland is to increase its focus on anti-doping work in recreational sport.

Recommendations

- 3.23. Awareness and knowledge of doping should be strengthened especially among health sector actors and professionals.
- 3.24. Cooperation on anti-doping with other government departments involved in sport policy (education, research, etc.) could be enhanced and the role of anti-doping as well as other issues of sport integrity be further emphasized in sport policy.

4. Sport Organisations

- 4.1. The Anti-Doping Convention contemplates the fact that several entities can be fully or partially involved in the anti-doping movement, i.e., ministries responsible for sports, sporting organisations, universities, or public agencies, such as health, law enforcement etc. These entities must work together constructively to achieve the best results. In addition, Article 3 requires States Parties to coordinate the efforts of all interested stakeholders and to designate a central body to ensure consistency across all sports at the national level.

- 4.2. Sport Ireland has a specific role in relation to the funding of the National Governing Bodies (NGBs), which is combined with a regulatory function to ensure that these organisations comply with specific standards, including those relating to anti-doping. Hence, Sport Ireland currently recognises 65 NGBs. Sport Ireland is also responsible for directing funding to high performance/elite athletes.
- 4.3. The Olympic Federation of Ireland is the National Olympic Committee of Ireland. It has 43 members. The majority of them are recognised by Sport Ireland. Membership does not require compliance with the Irish Anti-Doping Rules. The Olympic Federation of Ireland does not fund the NGBs, but there are a few funding mechanisms for the athletes, which, in terms of anti-doping, require the withdrawal of funds in the event of an anti-doping rule violation.
- 4.4. Paralympics Ireland is the National Paralympic Committee of Ireland. It also acts as the National Governing Body for certain types of sports. It has one full-time anti-doping officer dedicated to anti-doping work. Both organisations have a significant role in the promotion and provision of anti-doping education to athletes. Sport Ireland collaborates closely with the Olympic Federation of Ireland and Paralympics Ireland, especially in the lead-up to major events such as the Olympic, Paralympic and World and European Youth Olympic Games. All participants in the Olympic and Paralympic Games are required to attend anti-doping education sessions and also complete the Sport Ireland e-learning course. Sport Ireland also provides anti-doping education sessions for the World and European Youth Olympic Games.
- 4.5. National Governing Bodies (NGBs) are autonomous bodies, acting as National Federations, which govern the sport within their jurisdiction, as a primary function. NGBs recognised by Sport Ireland are at the centre of Irish sport. They are key delivery agencies to achieve the strategic and operational goals of Sport Ireland. With their member clubs and affiliates, the NGBs organise and administer the majority of the organised sports in Ireland; train and provide coaches; organise representative-level sport, and provide sporting opportunities and pathways leading from local sport to national and international competition.
- 4.6. In order to receive funding from Sport Ireland, all NGBs must comply with the Irish Sport Anti-Doping Programme and must complete and return an anti-doping compliance report on both a mid-year basis and on an annual basis. No funding will be released by Sport Ireland to any NGB without the receipt and verification of these compliance documents. The NGBs, which are recognised by Sport Ireland, incorporate the Irish Anti-Doping Rules as a reference in their governance rules. In addition, the NGBs will also incorporate anti-doping clauses for competitions, for which they act as the ruling body.
- 4.7. The NGBs have established a well-functioning network of educators, who are assessed on a timely basis as part of the continuous professional development programme and hold annual educational workshops related to anti-doping. In addition, NGBs have anti-doping officers who carry out anti-doping activities under the jurisdiction of the NGBs and act as a liaison with Sport Ireland, International Federations, and other relevant stakeholders. They are also trained in medication issues, enabling them to effectively raise awareness of the list of prohibited substances and methods.

- 4.8. There is a network of 29 Local Sport Partnerships (LSPs) throughout Ireland. These LSPs undertake a wide range of activities aimed at increasing participation in sport and physical activity in their local communities. However, LSPs are not involved in anti-doping activities.
- 4.9. The Evaluation Team observed a very strong, and cultural commitment to the anti-doping work and good working coordination and collaboration mechanisms between stakeholders in this regard.
- 4.10. At the same time, the Evaluation Team was concerned that certain sports fall outside the remit of Sport Ireland as their respective NGBs are not recognised by Sport Ireland, and that a small number of NGBs, although members of the Olympic Federation of Ireland, are not recognised by Sport Ireland. The Evaluation Team was advised that those NGBs, which are outside the scope of Sport Ireland, govern sports that are not widely played in the country.
- 4.11. As indicated above, the Irish Anti-Doping Rules are adopted and incorporated into the governance of the NGBs as a condition of recognition and funding by Sport Ireland. Therefore, the Irish Anti-Doping Rules only apply directly to those sports and to those athletes who are subject to the recognition rules, and whose NGBs have effectively adopted the anti-doping rules. Therefore, the athletes' right to a clean sport, and the necessary harmonisation of anti-doping rules required by the Anti-Doping Convention, are not fully realised.
- 4.12. Overall, the establishment of a centralised organisation such as Sport Ireland and the close collaborative anti-doping work under its umbrella are consistent with the requirements of Article 3.1 of the Anti-Doping Convention.

Good practice

- 4.13. The Anti-Doping Officer of each NGB as the primary liaison person between the NGB and Sport Ireland on all anti-doping matters, is an effective mechanism to assist the NADO in reaching out to the athletes and ASP and ensuring that they are informed and educated about the anti-doping rules.

Recommendation

- 4.14. While acknowledging that the membership-based application system and the obligation to incorporate anti-doping rules in order to receive funding fit the overall sports system, the Irish authorities shall ensure the harmonised and mandatory application of the anti-doping rules across all athletes and all sports, including for those with limited number of practitioners.

5. Restricting the Availability of Doping Substances

- 5.1. Regarding restriction of availability of doping substances, Article 4.1 of the Convention provides that “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”.

- 5.2. As it is explained in the Explanatory report to the Convention, “Methods which may be appropriate for states to consider besides those mentioned in Article 4 paragraph 1 ("legislation, regulations or administrative measures") include: strict control of medical ethics and the pharmacists' code; collaboration between the police, customs, veterinary services and public health inspectors; control of private gymnasiums and fitness centers; co-operation between police and customs authorities and sports organizations; inspection of sports teams' luggage at border controls, etc.”.
- 5.3. The Evaluation Team was not able to assess in depth all the measures that are promoted in the explanatory report. However, it noted the following.
- 5.4. The Irish authorities has adopted two types of measures to limit the overall availability of prohibited substances in sport: sport-specific regulations that apply to sport and general measures that go beyond sport.
- 5.5. As mentioned in the first part of the present report, the Irish authorities, through the 2015 Sport Ireland Act, has delegated to Sport Ireland the responsibility for establishing Anti-Doping rules applicable to athletes and their entourage.
- 5.6. In this regard, Article 3 of the Irish Anti-Doping Rules gives effect to the latest version of the Prohibited List adopted by WADA, which is directly applicable in Ireland.
- 5.7. The presence of a prohibited substance in an athlete’s sample or the use of such a substance is therefore an anti-doping rule violation sanctioned of a period of ineligibility of two up to four years. Similarly, the trafficking or attempted trafficking of a prohibited substance or method by an athlete or another person is an anti-doping rules violation, which results to a period of ineligibility of four years. It should be noted that Sport Ireland gives to trafficking the same definition as WADA.
- 5.8. In addition to the Irish Anti-Doping Rules, general measures that are not specific to sport also help to restrict the availability of prohibited substances. For example, the Irish authorities has enacted two major Acts which regulate the production, movement, possession, importation, distribution and sale of medicines and drugs.
- 5.9. The Irish Medicine Board Act of 1995 establishes a Medicine Board whose functions include licensing the manufacture, preparation, importation, distribution and sale of medicines. Moreover, the Acts empowers the Minister to take measures such as the regulation (including the control) of the production, preparation, importation, distribution, sale, supply, placing on the market, advertising or promotion, the regulation or control of the packaging. The Act also provides that any violation to these regulations shall be punished by a fine and/or imprisonment of up to ten years.
- 5.10. Pursuant to the Medicine Board Act, more than one person may be appointed by a regulation for the purpose of such enforcement and execution as the Minister may consider appropriate. In this regard, officers of the Minister, officers of the Medicine Board, health boards and their officers, officers of Customs and Excise, officers of

the ministry for Enterprise and Employment, and officers of the Pharmaceutical Society of Ireland can detect an offence against the medicines regulations.

- 5.11. In addition to this Act, the Misuse of Drugs Act of 1977 prohibits the possession of all drugs listed in the Schedule of controlled drugs, which is wider than the Prohibited List referred to in Article 3 of the Irish Anti-Doping Rules. It also contains provisions relating to medical practitioners or pharmacists who have been convicted of an offence under that act or an offence under the Customs Act in relation to the importation or exportation of a controlled drug. It should be noted that the prohibition is not limited to the possession of controlled drugs, as the Act also prohibits the cultivation of opium and cannabis. The prohibitions provided by the Misuse of Drugs Act are all criminal offences for which the person convicted is liable to a fine and/or imprisonment.
- 5.12. Finally, the professional regulations applicable to practitioners also make them professionally liable to disciplinary action before of the Medical Council.
- 5.13. During the Evaluation Visit, the Team met with officials of the Health Products Regulation Authority (HPRA), which is the regulatory authority for medicines under jurisdiction of the ministry of Health. It has powers of investigation, appeal and representation in court.
- 5.14. The HPRA works with customs and law enforcement agencies, in particular to give effect to the Irish Medicines Board Act. In this regard, the HPRA can monitor the importation of controlled drugs. Its role is not specific to sport and, therefore the HPRA does not automatically refer to the Prohibited List mentioned in Article 3 of Irish Anti-Doping Rules. However, the Evaluation Team noted that if the HPRA is informed by Customs that medicines are being illegally imported into Ireland, it will investigate and inform Sport Ireland whenever a person subject to the Irish Anti-Doping Rules is involved, whether directly or not.
- 5.15. The HPRA exercises its powers in the criminal field and thus complements the actions of Sport Ireland. Their relationship is formalised in a Memorandum of Understanding and an investigator employed by Sport Ireland is the point of contact for the HPRA. This MoU organises the exchange of information between the two agencies. For example, when the HPRA has information about imported prohibited drugs or medicines, but also when a doping control officer discovers a certain amount of prohibited medicines or drugs.
- 5.16. The HPRA has no jurisdiction to control nutritional supplements. In fact, the Food Safety Authority is responsible for products that do not contain medicines. The HPRA is responsible for products that contain medicinal substances. However, imported nutritional supplements seized by the customs authorities are sent to a government laboratory for further analysis to determine their composition and to forward them to the appropriate authority.
- 5.17. According to the HPRA, the cooperation with the Customs is a good way to combat the importation of anabolic steroids. The HPRA acknowledged that importation is difficult to estimate due to its clandestine nature, particularly due to trade via the internet.

- 5.18. Finally, it should be noted that Ireland is also focusing on prevention to restrict the availability and use of prohibited substances. A book containing information on medicines is published and updated monthly. The Monthly Index of Medical Specialities Ireland (MIMS) is a prescribing guide for doctors and pharmacists and provides information on dosage, contraindications, interactions, special-warnings and side effects of medicines. The MIMS works closely with Sport Ireland to provide anti-doping information to doctors and the public at large.
- 5.19. Consequently, even though doping in sport is not criminalised, the Evaluation Team considers that the Irish Anti-Doping Rules and general measures relating to the manufacture and distribution of medicines and drugs contribute to restrict the availability of prohibited substances.
- 5.20. In particular, good cooperation between all the relevant stakeholders should be highlighted as a good practice leading to the control the distribution, supply, and use of prohibited substances.

Recommendation

- 5.21. In order to cover the scope of the Convention and to take into account the specificity of sport and of doping in sport, the Irish authorities are invited to consider criminalising further anti-doping rules violations, such as trafficking of certain prohibited substances or administration to an athlete.

6. Testing and the Analysis of Biological Samples

- 6.1. Samples collected by Sport Ireland are analysed at the Doping Control Laboratory of Cologne, Germany. Sport Ireland currently uses the Nordic Athlete Biological Passport Management Unit (APMU) hosted by the Oslo Laboratory for the management of blood passports, and the Cologne Laboratory APMU for the management of steroid passports. The APMU advises and assists the NADO in the management and interpretation of the results of different modules of the Athlete's Biological Passport (ABP). The APMU evaluates and makes recommendations regarding sample validity, follow-up and target testing, additional analysis, coordination of expert review, and provides advice on priorities and strategies to optimise the efficiency of the ABP programme.
- 6.2. In 2021, doping controls were conducted in only 28 sports while in pre -Covid years, 32-34 sports would normally be tested. All athletes participating to the Olympic and Paralympic Games were tested.
- 6.3. Doping controls are conducted according to Sport Ireland Test Distribution Plan (TDP). In 2021, Sport Ireland collected 1354 urine and blood samples from 28 sports that were considered to be high performance. Out of these, 1133 were out of competition (420 blood and 713 urine samples) and 221 urine samples were collected in competition. The number of blood samples collected in competition or over the weekend were limited due to logistic constraints.

- 6.4. Sport Ireland conducts doping controls based on the calendar provided by NGBs and also on the request of international federations. The athlete selection criteria for the doping controls requested by the NGB were applied by the NADO and not by the requesting NGB.
- 6.5. The NADO focuses its testing activities on organised sport and does not conduct any tests in the area of recreational sport
- 6.6. As required by the Code and international standards, the specific analysis for the different sports (TDSSA) is applied to the doping controls in accordance with the plan (TDP) which is reviewed every 3 months. Based on the risk assessment, the NGBs are divided into 3 categories - high, medium and low.
- 6.7. Sport Ireland has a formal agreement with a service provider (IDTM) and with other NADOs to collect urine and blood samples from Irish athletes living or training abroad. Foreign athletes competing in Ireland are tested by Sport Ireland at the request of the event organiser. Even though some NGBs are classified as low risk, Sport Ireland has the jurisdiction over them and their athletes may be tested by the NADO.
- 6.8. In terms of funding, the athletes who failed to submit the whereabouts information may not receive any funding from the Sport Ireland Carding Scheme. In addition, if an athlete is sanctioned for an anti-doping rule violation, the funding will be withdrawn.
- 6.9. Doping Control Officers are directly employed by Sport Ireland with independent contracts signed by the Director of Anti-doping. Sport Ireland Anti-Doping (NADO) recruits and trains its own Sample Collection Personnel. It currently has 56 Sample Collection Personnel, comprising of 12 accredited Doping Control Officers and 44 accredited Chaperones. Their Sample Collection Personnel are located throughout the country. Every two years, all Sample Collection Personnel must undergo recertification, which includes both a practical and written assessment, in order to be recertified for the next two years.
- 6.10. The NADO has a contract with the phlebotomy company Biomed, for Blood Collection Officers, with whom it has worked for a number of years and has developed a good working relationship.
- 6.11. The Irish authorities operate a comprehensive anti-doping programme in terms of testing, which is in line with the Convention.
- 6.12. The Irish authorities could study the experience of other countries where testing programmes have been extended to the recreational sport, thus addressing issue of doping as a public health threat.

7. Education and Research

- 7.1. The analytical/scientific research programme is centred on the cooperation with the Cologne Laboratory with Sport Ireland providing an annually funding for anti-doping

research. The Cologne laboratory recognises Sport Ireland as a contributor when research is published. Some of the research findings are implemented in practice by the NADO, for example in updating the testing plan (TDP).

- 7.2. On the more social science research side, Sport Ireland is regularly involved in Erasmus+ projects. For example, Sport Ireland Anti-Doping is currently involved in an Erasmus+ project which aims to give a voice to athletes competing in parasports.
- 7.3. Sport Ireland has a Research Strategy for 2021-2027 by which states that “sport is about challenge, curiosity, belief and potential in life and competition and sports research condenses these stories into insights that support informed action in policy and practice”. The research strategy will identify how sport as a sector can generate, capture and share insights to better understand the key policy questions around sport and to develop better solutions to the challenges we seek to address. This Strategy has adopted the use of the Council of Europe’s definition of sport, where in sport means “all forms of physical activity which, through casual or organised participation, aim at expressing or improving physical fitness and mental well-being, forming social relationships or obtaining results in competition at all levels”.
- 7.4. The Sport Ireland Anti-Doping Education Plan means that the NGBs must develop and implement their own anti-doping education plans and submit them to the NADO for review. The NADO works with and support the NGBs in delivering and implementing of their anti-doping education plans. The overall purpose of the education programme is to preserve the spirit of sport and to contribute to a clean sporting environment in Ireland.
- 7.5. The NADO trains and maintains a pool of anti-doping tutors and educators. Candidates for these roles come through the NGBs. They receive an initial two-day training session conducted by the NADO and are supported by the NADO throughout their work for their respective NGBs. The primary role of tutors is to deliver accurate and up-to-date education to their NGB members and also to provide information on anti-doping related issues.
- 7.6. The NADO education and information activities focus on working both inside and outside the sports community. Outside the sports community, the main messages are based on influencing public opinion, providing accurate information on the health hazards of doping substances, and providing information on nutritional supplements. The NADO does not directly cooperate with the Department of Health, but has a number of educational initiatives, such as:
 - Monthly Index of Monthly Specialities (MIMS): MIMS Ireland is the Irish drugs directory and is a guide for Irish General Practitioners (GPs). This book is distributed to all GPs in Ireland. Since 2002, all products licensed by the Health Product Regulatory Authority (HPRA) have been tagged in relation to sport i.e. permitted, restricted, prohibited.
 - www.eirpharm.com: Since 2001, athletes and athlete support personnel can have been able to use this website to verify the status of medicines in relation to sport.
 - The Faculty of Sport and Exercise Medicine (FSEM): Sport Ireland works with the FSEM in the area of anti-doping training for sports medical staff. This collaboration also provides support to athletes in the areas of physiotherapy,

nutrition, medication and adapting the athlete's training programme based on their blood analysis and specific tests.

- Athlete Support Personnel (ASP): all ASP are requested to attend anti-doping education sessions for their sport/athlete/team. For both the Olympic and Paralympic Games, it is mandatory that all ASP complete their anti-doping e-learning course and/or attend a face to face/online session prior to the Games.
- Zero Gains Campaign (ZeroGains – What will you gain from steroid use?): This campaign is run by the HPRA for recreational athletes. Sport Ireland assisted the HPRA with information on this campaign.

7.7. With regard to the requirement of the Convention to provide alternative, doping-free training methods and to educate young people in schools, the NADO and Sport Ireland have taken a number of initiatives, such as:

- Physical Education (PE) in schools: drugs in sport is being piloted as part of the PE curriculum for the Leaving Certificate (i.e. the last exams before students leave for college). Sport Ireland has also delivered a series of workshops (online/in-person) to students in secondary education as part of the PE curriculum.
- The Women in Sport Policy which expresses Sport Ireland's commitment to women in sport. It builds on the significant work which has already been undertaken in this area within the sport sector and, recognising the opportunity to make a significant impact on the lives of women through their involvement in sport, it provides a blueprint for Sport Ireland's future work.
- Coaching: with the support of Sport Ireland Coaching, all level 1 coaches have completed an anti-doping module.
- Third Level Institutions: Sport Ireland liaises with a number of third level institutions and provides anti-doping for third level courses.
- www.i-parc.ie - Irish Physical Activity Research Collaboration which fosters insight, intelligence and innovation to enable more people to be more active, more often.
- The [National Physical Activity Plan](#) was a successful project, which, according to an independent review, has made a positive contribution to the society as a whole and will be updated and continued.

Good practices

7.8. The experience of the NADO with establishing a pool of NGB tutors/educators is a great solution to increasing the reach of anti-doping education.

7.9. The experience gained after the completion of the pilot phase of including drugs and sport in the physical education curriculum could be shared with other countries.

Recommendation

7.10. The NADO could consider establishing partnerships to deliver appropriate anti-doping education programmes not only to elite and high-level athletes in organised sport, but also to participants of grassroots sport and recreational athletes.

8. Disciplinary Measures

- 8.1. The Monitoring Group of the Anti-Doping Convention has adopted a recommendation on hearing panels and dispute resolution. Moreover, the Committee of Ministers of the Council of Europe adopted a Recommendation reinforcing the human rights principles that should govern anti-doping procedures in sport, which ensures that essential safeguards of Article 6 of the European Convention on Human Rights applies to anti-doping proceedings.
- 8.2. The Irish Anti-Doping Rules provide with specific provisions for the resolution of disputes arising from of anti-doping rule violations. For the overall process, Sport Ireland adopted the Irish Anti-Doping Disciplinary Panel procedures, which define the process of adjudication of anti-doping rule violations. The Irish Anti-Doping Rules, which are consistent with the Code, describe the process for investigating, prosecuting, and enforcing anti-doping rule violations.
- 8.3. The Disciplinary Panel of Sport Ireland is established by Sport Ireland, and its members are appointed by the Anti-Doping Committee of Sport Ireland, a distinct body from the NADO within the overall structure of Sport Ireland.
- 8.4. The Irish Anti-Doping Rules include provisions for the imposition of sanctions on athlete support personnel for anti-doping rule violations. This will ensure harmonisation that anti-doping sanctions are applied in a similar and proportionate manner to such offenders.
- 8.5. The Irish Anti-Doping Rules include a provision for the recognition of sanctions, that applies to the NGBs.
- 8.6. The Evaluation Team noted that the NGBs also have the right to provide a dispute-resolution mechanism for offenders, with the agreement of Sport Ireland. As a small number of sports fall outside of the scope of Sport Ireland, the Evaluation Team was not able to evaluate the disciplinary mechanism of the NGBs governing those sports. The Team considers that harmonised and centralised approach based on the model currently accepted by majority would work for the benefit of the system as a whole.
- 8.7. In terms of the appeals process, the Irish Anti-Doping Rules refer to the CAS as a means of appealing the decisions made by Sport Ireland or its Disciplinary Panel. The appeals related to the Therapeutic Use Exemptions (TUEs), are made exclusively to CAS.

Recommendation

- 8.8. The Irish authorities are invited to envisage the possibilities of unifying the procedures applied in all the disciplinary procedures, including by the GNBs not recognised by Sport Ireland, with the view of making the anti-doping system accessible to all athletes.

9. International Co-operation and Provision of Information

- 9.1. During the discussions with the Evaluation Team, the Irish authorities recognised the importance and relevance of the work of the Council of Europe in the area of sports integrity and governance. The Convention is one of the instruments that supports the Irish Sport policy. Gender equality in sport, child safeguarding in sport, counterfeiting of medical products (Medicrime Convention) are among the issues that Ireland follows in the relevant Council of Europe bodies.
- 9.2. Sport Ireland Anti-Doping, in conjunction with the HPRA, works with Europol and this has yielded fruitful results such as *Operation Shield*.
- 9.3. The national report provides an extensive description of the involvement of Sport Ireland and Sport Ireland Anti-Doping in international anti-doping networks.
- 9.4. The Irish authorities provide the Council of Europe with an annual report on the implementation of the Convention by completing the online questionnaire and sharing relevant documents. This information is made publicly available on the Council of Europe website.
- 9.5. As also mentioned in the Part One, the Sport Ireland Act does not refer to the commitments outlined in the Anti-Doping Convention, while it refers to the UNESCO International Convention against Doping in Sport. Ireland did not sign or ratify the Additional Protocol to the Anti-Doping Convention, which strengthens the monitoring mechanisms of the States Parties.

Recommendation

- 9.6. To further strengthen international cooperation, the Irish authorities could consider ratifying the Additional Protocol and indicate, in the relevant legislation, that the fight against doping in the country shall respect and be governed by the Council of Europe's Anti-Doping Convention (and its Additional Protocol).

Annex 1 – Programme of the visit and Participants

PROGRAMME OF THE VISIT

Wednesday, 5 October 2022

Meeting venue: Sport Ireland Offices, The Courtyard, Sport Ireland Campus, Snugborough Road, Blanchardstown, Dublin 15 D15 PN0N

- | | |
|---------|--|
| 9.30am | Introductions <ul style="list-style-type: none"> - Evaluation Team - Anti-Doping Unit, Sport Ireland and Dr Úna May, CEO Sport Ireland |
| 10.30am | Officials from the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media |
| 12pm | Officials from Health Product Regulatory Authority (HPRA) – Law Enforcement |
| 2pm | Sport Ireland Officials (Sports Policy) |
| 3.30pm | Facility of Sports and Exercise Medicine |
| 4.30pm | Chair of Irish Sport Anti-Doping Disciplinary Panel / Michael Collins |

Thursday, 6 October 2022

- | | |
|---------|--|
| 9.30am | Representatives from Olympic Federation of Ireland (OFI) and Paralympics Ireland |
| 10.45am | Representatives from National Governing Bodies of Sport |
| 12.15pm | Athlete Representatives |
| 2.15pm | Sport Ireland's Anti-Doping Unit |

Friday, 7 October 2022

- | | |
|--------|--|
| 9.30am | Feedback from Evaluation Team to Sport Ireland and Officials from the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media |
|--------|--|

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Annex 2 – National report



SPÓRT
ÉIREANN
FRITHDHÓPÁIL

SPORT
IRELAND
ANTI-DOPING

Sport Ireland's National Report for the Council of Europe's T-DO
Monitoring Group of the Anti-Doping Convention's Evaluation
Visit on October 5th-7th 2022

September 2022



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Introduction

Sport Ireland is delighted to welcome the Evaluation Team from the T-DO Monitoring Group of the Anti-Doping Convention on October 5th-7th 2022 to Dublin, Ireland

This National Report was written to provide assistance and background information to the Evaluation Team on Ireland's activities to implement the Anti-Doping Convention. The report will follow the Template National Report Format and Content, provided to us by the Council of Europe.

We look forward to meeting the Evaluation Team and discussing our anti-doping activities in relation to the Council of Europe's Anti-Doping Convention.

Part One: Legislation, Regulations and Administrative Provisions

Sport Ireland is responsible for the implementation of the Irish Anti-Doping Programme in Ireland. Sport Ireland was formerly known as the Irish Sports Council, which was established in 1999 and was responsible for the Irish Anti-Doping Programme. On October 1st 2015, Sport Ireland was established under the Sport Ireland Act and took over responsibility of the Irish Anti-Doping Programme. The Act can be found here: [Sport Ireland Act 2015 \(irishstatutebook.ie\)](http://irishstatutebook.ie).

Under the Sport Ireland Act (2015), Sport Ireland's functions in relation to Anti-Doping include:

- to facilitate, through the promulgation of guidelines and codes of practice, standards of good conduct, fair play and the elimination of doping in sport;
- to take such action as Sport Ireland considers appropriate, including testing, to combat doping in sport;
- to plan, implement, evaluate and monitor education and information programmes for good conduct, fair play and the elimination of doping in sport;
- in its capacity as the national anti-doping organisation in the State, to direct the collection of samples, to manage the testing and test results of samples and attend hearings, as required;

Under Article 41, Sport Ireland has been clearly designated as the National Anti-Doping Organisation in Ireland and in Article 42 Irish Anti-Doping Rules have also been enshrined in this legislation, including the following:

- (a) application of rules;
- (b) violations of rules;

- (c) prohibited substances and methods;
- (d) therapeutic use of substances and methods;
- (e) testing of sportspersons;
- (f) intelligence relating to doping in sport;
- (g) disqualifications;
- (h) disciplinary procedures;
- (i) sanctions;
- (j) implementation, reporting and publication of decisions.

The Irish Anti-Doping Rules can be found here: <https://www.sportireland.ie/anti-doping-rules>.

The Prohibited List is given effect through Article 3 The Prohibited List of the Irish Anti-Doping Rules.

Data sharing powers have been enhanced between key state regulatory authorities and other appropriate Anti-Doping Organisations. Ireland has also ratified the UNESCO Convention Against Doping in Sport, which effectively binds the government to the implementation of a fully functioning National Anti-Doping Programme, which complies with all of the relevant articles of the World Anti-Doping Code.

The World Anti-Doping Code continues to be the cornerstone of the worldwide fight against doping in sport. In Ireland, this code is reflected in, and consequently implemented through the Irish Anti-Doping Rules.

Sport Ireland require all National Governing Bodies in Ireland to adopt the Irish Anti-Doping Rules, and these are adopted in their constitution or memorandum of association. This gives Sport Ireland jurisdiction to conduct anti-doping testing.

The Irish Government signed the Anti-Doping Convention in 1992 and on March 1st 2003 formally ratified the Convention.

Part Two: National Anti-Doping Organisation

Under Article 41 of the Sport Ireland Act 2015, Sport Ireland is the designated National Anti-Doping Organisation in Ireland. There is significant priority given to anti-doping work by Sport Ireland and this is recognised through a full section, Section 4, of the Act dedicated to strengthening the anti-doping programme. The Act can be found: [Sport Ireland Act 2015 \(irishstatutebook.ie\)](http://irishstatutebook.ie)

Sport Ireland is 100% government funded and our parent department is the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DTCAGSM). An Oversight agreement is signed between Sport Ireland and DTCAGSM. The Oversight Agreement is a written statement between the relevant Minister/Parent Department and a State body (in this case Sport Ireland) which clearly defines the terms of the relevant Minister's/Parent Department's relationship with the State body.

Oversight Agreements reflect the legal framework of the State body; the environment in which it operates; the purpose and responsibilities of the State body; the State body level of compliance with the Code of Practice for the Governance of State Bodies; details of the Performance Delivery Agreement; and arrangements for oversight, monitoring and reporting.

Under Section Three Operational Environment of the Oversight Agreement between Sport Ireland and DTCAGSM it states the following:

“Sport Ireland is designated as the National Anti-Doping Organisation. Clause 22.8 of the World Anti-Doping Code states that "Each government should respect the autonomy of a National Anti-Doping Organization in its country or a Regional Anti-Doping Organization to which its country belongs and any WADA-accredited or approved laboratory in its country and not interfere in their operational decisions and activities”.

Notwithstanding that the Minister has responsibility for the oversight of Sport Ireland, the Minister shall fully respect, defend and ensure the autonomy of Sport Ireland in accordance with clause 22.8 of the World Anti-Doping Code.”

Sport Ireland can give access to the signed Oversight Agreement to the Evaluation team during their visit.

Part Three: Public Authorities and Other Organisations

Sport Ireland is also responsible for funding of National Governing Bodies of Sport and direct funding to High Performance/Elite Athletes. The following functions are contained in Article 8.) of the Sport Ireland Act:

- to encourage the promotion, development and co-ordination of, and the achievement of excellence in, competitive sport;
- to support elite athletes in achieving excellence in sport;

Sport Ireland operates a dedicated Intelligence and Investigations capability which has responsibility for the secure exchange of information with relevant strategic partners and the maintenance of appropriate channels to facilitate this process. These partners include the:

- Health Products Regulatory Authority
- An Garda Síochána (The Irish National Police Service)
- The National Customs Service
- The Pharmaceutical Society of Ireland

Data sharing arrangements between relevant bodies have to date been governed by GDPR and local data protection legislation. Practical arrangements have been formalised through Memoranda of Understanding, which facilitate operational relationships. Recent legislation regarding data sharing and Governance between public bodies now requires additional data sharing agreements to be put in place, this is an ongoing process.

Sport Ireland has no role in investigating and prosecuting criminal offences, this is the function of the relevant law enforcement and regulatory authorities. If it becomes apparent to Sport Ireland that an Anti-Doping Rule Violation which is under investigation may also constitute a criminal offence then the case will be referred to the relevant law enforcement or regulatory authority.

Part Four: Sport Organisations

Sport Ireland collaborates with funded National Governing Bodies of Sport (NGBs) in relation to the implementation of the anti-doping programme. Sport Ireland works closely with NGBs to deliver testing and education anti-doping programmes.

In order to receive funding from Sport Ireland, all NGBs must be compliant with the Irish Sport Anti-Doping Programme and must complete and return an anti-doping compliance report on an annual basis, and also on a mid-year basis. Funding is not released to any NGB by Sport Ireland without receipt and verification of these compliance documents.

The Sport Ireland International Carding Scheme provides financial support to athletes for their training and competition programmes. The primary purpose of this funding is to support Irish athletes in reaching finals and achieving medals at European, World, Olympic and Paralympic level.

Similarly, to funding to NGB funding, athletes must be compliant with the Irish Sport Anti-Doping Programme. The following clause is part of the Terms and Conditions of Sport Irelands Carding Scheme in relation to the Anti-Doping Programme:

- Comply with and be bound by the Irish Anti-Doping Rules;
- Know the substances and methods which have been included in the Prohibited List (as may be amended from time to time) and to take responsibility to make sure that any substance ingested by the Athlete does not violate the Irish Anti-Doping Rules;
- Participate in the National Sports Anti-Doping Programme and undertake, as required, anti-doping testing, including the taking of a blood or urine sample, in competition and/or out of competition;
- Understand that a refusal by the athlete to submit to a test will have the same consequence as if the athlete had tested positive;
- Provide Sport Ireland, by the specified dates, an accurate and complete whereabouts filing in the format and detail required by Sport Ireland on a quarterly basis throughout the year;
- Supply accurate contact details to Sport Ireland. Addresses supplied via the application form will be made available to the Anti-Doping Unit for the purposes of implementing the anti-doping programme, and Sport Ireland Institute in relation to their various athlete programmes.
- Update their whereabouts filing as required so that it is up to date and accurate at all times.
- Comply with the contents of their whereabouts filing;
- Agree to complete Sport Irelands anti-doping eLearning course <https://elearning.sportireland.ie/login/index.php>.

Sport Ireland can provide all documents in relation to funding during the visit if requested.

Sport Ireland collaborates closely with the Olympic Federation of Ireland and Paralympics Ireland especially in the lead up to major Games such the Olympics, Paralympics and World and European Youth Olympics. It is mandatory that all participants at the Olympics and Paralympics Games attend an anti-doping education sessions and also completes the Sport Ireland e-learning course. Sport Ireland also provides anti-doping education sessions for the World and European Youth Olympics.

Part Five: Restricting the Availability of Doping Substances

Sport Ireland is not a law enforcement or regulatory authority and accordingly, has no legal role in restricting the availability of banned substances and methods and, in particular, anabolic steroids, as well as the use in sport of banned doping agents and doping methods. However, the trafficking, of banned substances and methods and, in particular, anabolic steroids, as well as the use in sport of banned doping agents and doping methods is prohibited by the Irish Anti-Doping Rules and may constitute an Anti-Doping Rule Violation.

There is however broader national legislation which restricts the use, sale or supply of prohibited drugs, medications or other substances. Regarding the regulation of Medicinal Products including their use, sale and supply the main national legislation is contained in the Irish Medicines Board Act, 1995/2006. The use, sale and supply of illegal recreational drugs is governed by the Misuse of Drugs Act, 1977/1984.

These legislations are operated by the Health Products Regulatory Authority (HPRA), An Garda Síochána (The Irish National Police Service) and the National Customs Service.

Depending on their constituent ingredients, Nutritional Substances may be governed by the Irish Medicines Board Act, 1995/2006 or the Misuse of Drugs Act, 1977/1984.

In addition, in the context of organised sport the sale, supply and/or use of nutritional supplements which contain any substance on the WADA prohibited list and included in the Irish Anti-Doping Rules may constitute an Anti-Doping Rule Violation.

Part Six: Testing and Analysis of Biological Samples

Sport Ireland require all funded National Governing Bodies in Ireland to adopt the Irish Anti-Doping Rules and these are adopted in their constitution or memorandum of association. This gives Sport Ireland jurisdiction to implement the Irish Anti-Doping Programme.

Test Distribution Plan (TDP)

Sport Ireland will strive to complete a minimum of 1390 blood and urine tests in the National Programme in 2022. In 2021, Sport Ireland completed 1,354 blood and urine tests. Sport Ireland have 124 athletes currently on our Registered Testing Pool.

The following figures are the initial intended targets for 2022:

Testing Pool	Number of Tests	
	Blood	Urine
Registered Testing Pool (RTP)	316	401
National Testing Pool (NTP)	88	265
In Competition	0	320
Totals	404	986

The process of developing the Test Distribution Plan follows two main steps:

- i. The **Risk Analysis** of the National Governing Bodies (NGBs) and subsequent placing of each sport into categories according to pre-established criteria.
- ii. The **Allocation** of testing numbers for each NGB according to the risk analysis of the sport and each athlete within that sport.

The Test Distribution Plan ensures the implementation of intelligent testing which is effective in detecting and deterring doping practices.

Categorisation and test distribution will be reviewed annually in preparation for the forthcoming year. Based on previous Test Distribution Plans it is clear that deviation from this plan will be required at various times throughout the year where unpredictable situations arise.

The emphasis of the Test Distribution Plan for 2022 is to; continue to introduce new athletes to the testing process who are likely to be striving towards a place at the Olympic Games in Paris 2024; continue to develop the Athlete Biological Passports of a number of athletes across a range of sports; increase in-competition testing to pre pandemic levels; increase squad testing for a number of the individual sports; maintain the increased levels of squad testing in team sports and apply a more intelligent testing strategy which effectively detects and deters doping and doping practices in a cost effective manner.

The Test Distribution Plan is reviewed on a quarterly basis and may be modified at the mid year review.

Risk Analysis Process

Each NGB is assessed and categorised according to a set of pre-established criteria, which evaluate the sport as a whole, irrespective of the sport’s size, popularity or strength in Ireland. The pre-established criteria will then be used as evidence in deciding whether that sport is to be regarded as a high, medium or low risk sport.

The sports will be rated as one of the following:

- **High Risk:** those sports in which both In-Competition (IC) and Out Of Competition (OOC) testing will take place. Generally speaking, the emphasis will be on OOC testing and the relevant NGBs and athletes will be required to produce accurate whereabouts information at all times.
- **Medium Risk:** those sports in which testing will occur but will be conducted, for the main part, IC. In many cases, OOC testing will occur but this will be targeted at the training sessions of the national squads and or medium risk athletes in the RTP. In some cases, testing may be completed in alternative years.
- **Low Risk:** testing will likely not be conducted in these sports.

Risk Number	Risk Category	Description
5	High	Testing including ABP etc.
4	Medium	IC, Squad, small number of RTP athletes
3	Medium	IC Testing – Urine Only
2	Low	No Testing Required – Continue to monitor
1	Low	No Testing Required

Pre-established Criteria

Sport Ireland will consider the following criteria when categorising each sport:

- The physical, mental and other demands of the relevant sport(s)/sport discipline considering the physiological and psychological requirements of the sport(s)/sport discipline;

*Possible performance enhancing effects that doping may elicit in such sport(s)/sport discipline.

- The history of doping in that sport(s)/sport discipline;
- International level of the sport in Ireland;
- The rewards at the different levels of the sport/sport discipline;
- Information/Intelligence developed on possible doping practices in that sport and the outcomes of previous TDP cycles;
- Available research on doping trends;
- Cultural link to Irish identity;
- Point during an Athletes career in the sport/discipline an athlete would be most likely to benefit from Prohibited Substances and/or Prohibited Methods;
- At what time during the year/cycle an Athlete would be most likely to benefit from Prohibited Substances and/or Prohibited Methods.

Allocating Tests

Once categorisation has been decided, the 1390 tests scheduled to be completed in 2022 by Sport Ireland will be divided between each of the sports. This will be done by looking at the needs of each sport, in particular the question of whether OOC as well as IC testing is to be conducted. However, the final number of tests will be decided on a sport-by-sport basis, taking into account the following factors:

- The number of elite athletes within the sport;
- The degree of success/competitiveness of the Irish athletes on the world stage;
- The number of athletes in the registered testing pool (RTP) and any detailed testing plan for high risk athletes;
- The sport's categorisation as a high, medium or low risk sport;
- Whether testing should be concentrated on in or OOC testing;
- Testing statistics from previous years

As with the categorisation process, these factors will be balanced between all NGBs in which testing will occur. The allocation of tests may change during the year when information (such as Atypical Passport Findings or intelligence reports) is received, and a more intelligent & targeted testing plan may need to be implemented for that sport or athlete.

Overseas Athletes

Sport Ireland recognises that athletes who compete for Ireland will attend training camps abroad or reside in another location other than Ireland. As such, Sport Ireland has a contract in place with International Doping Tests and Management to complete urine and blood testing of Irish athletes overseas on their behalf. Sport Ireland would also work with other National Anti-Doping Organisations who would assist in the completion of anti-doping tests overseas.

Major Events

Sport Ireland complete detailed athlete plans for each athlete on Sport Ireland's Registered Testing Pool annually. The Science Officer would review the Athletes Whereabouts information to assess the major games/competitions an athlete is aiming for and details a targeted testing plan for urine and/or blood tests around those fixtures.

Sport Ireland engages with International Federations, National Governing Bodies and the Athlete Passport Management Unit (APMU) to continuously review and monitor each athlete's progress in the lead up to major events. Any recommendations from our APMU in relation to additional analysis or follow up anti-doping tests are acted upon swiftly.

Sport Ireland prepares the Irish Anti-Doping Rules for adoption by the National Governing Bodies in Ireland. The latest revision is the 2021 Irish Anti-Doping Rules. Sport Ireland requires Irish Anti-Doping Rules each National Governing Body to adopt the Irish Anti-Doping Rules and incorporate these Rules either directly or by reference into its governing documents, constitution and/or rules as part of the rules governing the rights and obligations of the Athletes or other Persons in the sport of that National Governing Body.

By its adoption of these Rules, each National Governing Body specifically recognises the authority and responsibility of Sport Ireland for administering the Irish Sport Anti-Doping Programme (including conducting Testing of Athletes) in respect of all of the Persons to whom these Rules apply and authorises Sport Ireland to carry out Doping Control.

By its adoption of these Rules, each National Governing Body shall be deemed to have agreed to be bound by and to comply strictly with these Rules and to recognise, abide by and give effect to the decisions made pursuant to these Rules, including the decisions of Sport Ireland, the Irish Sport Anti-Doping Disciplinary Panel and CAS, as applicable.

Sport Ireland monitors the adoption of the Rules by annually asking each National Governing Body to provide the extract of their Constitution/Memorandum of Association highlighting that they have adopted the Irish Anti-Doping Rules, as amended by time to time.

Laboratories and Analysis

There is no WADA accredited laboratory within the island of Ireland. Sport Ireland utilises the WADA accredited laboratory in Cologne, Germany, Institute of Biochemistry - German Sport University Cologne, for all athlete's urine and blood samples. Sport Ireland has used this laboratory for many years for sample analysis and has built up a great working relationship during this time. Sport Ireland contributes annually a proportion of funds for anti-doping research to the laboratory in Cologne, a laboratory known for its research programme, who recognise Sport Ireland as a contributor when this research is published. Sport Ireland must follow EU Procurement guidelines when selecting a WADA accredited laboratory.

In regard to the APMU for Sport Ireland, the laboratory in Cologne is the steroidal APMU for urine samples and the Nordic Athlete Passport Management Unit is the haematological APMU for athlete biological passport samples.

Long Term Storage

In accordance with the sample retention criteria outlined in The International Standard for Testing and Investigations, Sport Ireland have established a strategy for the retention and reanalysis of samples collected by them. Sport Ireland established a review group, comprising of three members; Anti-Doping Science Officer, Anti-Doping Testing & Quality Manager, and Director of Anti-Doping & Ethics.

Sport Ireland review meetings are held every three months in order to allow a full review of all samples analysed in the previous quarter prior to the mandatory disposal of the sample(s).

Sport Ireland uses the following criteria to decide on the type of samples to retain.

- 1) *Athlete Performance* – Success in major competitions, sustained periods of success and unusual patterns/fluctuations in results/performance.
- 2) *Intelligence Information* – Intelligence received via Report Doping platforms (Report Doping online submission, email, telephone call, sample collection personnel Activity Report, Sport Ireland Activity Report, and substantial assistance).
- 3) *Suspicious Whereabouts Behaviour* – Including suspicious or late filing patterns (e.g. last minute updates/changes), providing inaccurate, misleading or incomplete information, unsuccessful attempts, and residing and/or training in a remote location.

- 4) *Athlete Biological Passport Data* – Storing of samples based on atypical passport results, suspicious data points and suspicious trends in passport data.
- 5) *Laboratory Recommendations* – such as results whereby a sample is deemed suspicious or a substance is present despite not meeting adverse
- 6) *Scientific Input* – recommendations made on new analytical methods being developed and analytical methods previously used which will be further enhanced in the future e.g. extended detection window for a specified substance.
- 7) *In-Competition samples collected* – Samples collected at major national events or target qualification events for international selection.
- 8) *Substances Not Screened For* – Substances of concern that the sample was not initially screened for due to unforeseen circumstances such as laboratory capacity etc.

Sport Ireland may select samples for reanalysis where:

- 1) Athlete Biological Passport data shows potential doping.
- 2) New intelligence information is received in relation to an athlete, team or a sport in general.
- 3) New analytical methods are developed enabling the detection of a substance for the first time.
- 4) New analytical methods are developed extending the detection window of substances previously screened for.
- 5) A sample was not previously subjected to a particular type of analysis when initially collected.
- 6) The maximum 10-year storage period for a sample is imminent.

Sample Collection Personnel

Sport Ireland recruit and train their own Sample Collection Personnel. Currently, we have 56 Sample Collection Personnel, which consists of 12 accredited Doping Control Officers and 44 accredited Chaperones. Our Sample Collection Personnel are based across the island of Ireland to ensure we have adequate resources to complete testing within Ireland. Every two years all Sample Collection Personnel (DCOs and chaperones) must go through recertification, which involves both a practical and written assessment to be recertified for the proceeding two years.

Sport Ireland have a contract in place with the phlebotomy company Biomed, for Blood Collection Officers, who we have worked with for a number of years and have built up a great working relationship.

Part Seven: Education and Research

Development of Sport Ireland Education Plan

One of the fundamental principles of the Anti-Doping programme worldwide is that an *‘athlete’s first experience of Anti-Doping should be education rather than doping control’*.

As part of the new WADA Code (2021), WADA introduced a new International Standard for Education (ISE). Although WADA recognised that education had been taking place under the previous code, the new ISE mandated that all signatories increase their focus on anti-doping education. It also mandated that signatories develop an Anti-Doping Education plan for their organisation. Sport Ireland has developed an Anti-Doping Education Plan based on the criteria mandated in the ISE.

Sport Ireland Anti-Doping Education Plan

The broad aim of the Sport Ireland Anti-Doping Education Plan is to further develop the work that has been undertaken over the last number of years, in anti-doping education in Ireland, to foster a sustainable long-term clean sport environment. The example below outlines the Sport Ireland Anti-Education Plan, including education priorities, the education process and risk assessment to establish our Education Pool:

Sport Ireland Anti-Doping Education Priorities 2021/22

Completed Priorities for Anti-Doping (AD) Education 2021

Priority	Details
1. Implementation of ISE	<ul style="list-style-type: none">• Development of Sport Ireland AD Education Plan.• Development of AD Education Template and Guidance document for circulation to NGBs.• Engagement with Anti-Doping Officers (ADOs) to facilitate the development of education plans and implementation of the ISE
2. Tokyo 2020 Education	<ul style="list-style-type: none">• Delivery of AD e-Learning and Face to Face (F2F) (online) education sessions for athletes and Athlete Support Personnel (ASP) attending Olympics and Paralympics in Tokyo.

	<ul style="list-style-type: none"> • Collaboration with Olympics Federation of Ireland and Paralympics Ireland.
3. Tutor Training	<ul style="list-style-type: none"> • Survey of all NGBs to ascertain the number of active tutors delivering education. • Delivery of Tutor Training Course (2-day) (COVID restrictions dependent). • Q4- Online Tutor Training CPD.
4. 2022 Prohibited List Update	<ul style="list-style-type: none"> • Awareness campaign for updates to the Prohibited List for 2022: <ul style="list-style-type: none"> ○ Glucocorticoids (GC) and Beta-2 Agonists. • Education session delivery for medical professionals based on the Prohibited List 2022: <ul style="list-style-type: none"> ○ GC Washout Periods and TUE Application Process (RTP versus Non-RTP athletes).

Priorities for AD Education 2022

Priority	Details
1. Implementation of ISE	<ul style="list-style-type: none"> • Continued Engagement with NGB Anti-Doping Officers to facilitate delivery of AD Education in their organisations; • Review of Anti-Doping Education Plans (in-line with ISE and guidelines); • Engagement with International partners on Anti-Doping Education Procedures (e.g. Council of Europe Drafting Group); • Attendance at the Global Education Conference 2022.
2. Tutor Training	<ul style="list-style-type: none"> • Q1 Delivery of Tutor Training Course for new Tutors; • Movement to online Learning Management System for Tutor Training Course; • Q4- Online Tutor Training CPD.
3. Monitoring and Evaluation	<ul style="list-style-type: none"> • Development of a Monitoring and Evaluation strategy for the Anti-Doping Education Plan (based on ISE Guidelines);

	<ul style="list-style-type: none"> • Engagement with Stakeholders on Monitoring and Evaluation strategies they employ.
4. 2023 Prohibited List Update	<ul style="list-style-type: none"> • Awareness campaign for updates to the Prohibited List for 2023 <ul style="list-style-type: none"> ○ Information Provision (Website); ○ Social Media Campaign; ○ Email circulation to all NGBs. • Q4 - Education session delivered for medical professionals based on the Prohibited List 2022

Legislative Measures

There are no direct legislative requirements for anti-doping education. The National Anti-Doping Programme and Irish Anti-Doping Rules, however, have statutory underpinning under the Sport Ireland Act (2015).

As part of the Sport Ireland Anti-Doping programme, we link anti-doping education requirements to the core funding for our NGBs and Carded athletes. Funding will not be released for any NGB unless they are compliant with all aspects of our anti-doping programme.

Sport Ireland Anti-Doping Compliance

Sport Ireland anti-doping compliance requirements reflect the increasing emphasis on strengthening the National Anti-Doping Programme through the input of NGBs. Sport Ireland helps to facilitate the role out of this programme by working very closely with NGBs. Each NGB is responsible for its own anti-doping programme.

As part of the compliance process, to become eligible for funding, there a minimum set of criteria that NGBs must meet. Below is a list of anti-doping education requirements expected of NGBs as part of the Sport Ireland Core Grant:

1. For every new Anti-Doping Officer working with an NGB, he/she must complete the Sport Ireland e-Learning programme within 3 months of taking the post;
2. NGBs are required to submit an education plan to the Anti-Doping Education and Values Manager. In the Mid-Year Review, NGBs are required to provide updates regarding seminars and outreach events. Education Plan requirements are determined on priority/risk and relative size of the organisation (See Education Pool Below).

Sport Ireland Education Pool

Based on the Sport Ireland TDP, we have divided our education pool into four subcategories.

All NGBs, regardless of their education pool, must fully complete the anti-doping compliance report at the end of each year and must provide an update on their anti-doping education activities at the mid-year review.

Education Pool Categories

Priority/Risk Category	ISE Content
<p>Pool 1:</p> <ul style="list-style-type: none"> • RTP Athletes • Athletes Returning from Sanction • Olympic Sports 	<p>NGBs in this pool are encouraged to provide the following (facilitated by Sport Ireland where necessary):</p> <ul style="list-style-type: none"> ✓ Information Provision (e.g. up-to-date website); ✓ Awareness Raising – anti-doping wallet cards are circulated to all NGBs annually; ✓ Anti-Doping Education (e.g. e-Learning and F2F education seminars/workshops); ✓ Values-based education as early as possible in athlete pathway; ✓ New members on the RTP receive a letter from Sport Ireland outlining their rights and responsibilities as an RTP athlete (provided by Sport Ireland ADU); ✓ On membership of the RTP, all athletes receive education on ADAMS and updating Whereabouts for each Quarter (provided by Sport Ireland ADU); ✓ All ASP working with RTPs are encouraged to complete e-Learning and attend in-person education session(s).
<p>Pool 2:</p>	<p>NGBs in this pool are encouraged to provide the following (facilitated by Sport Ireland where necessary):</p>

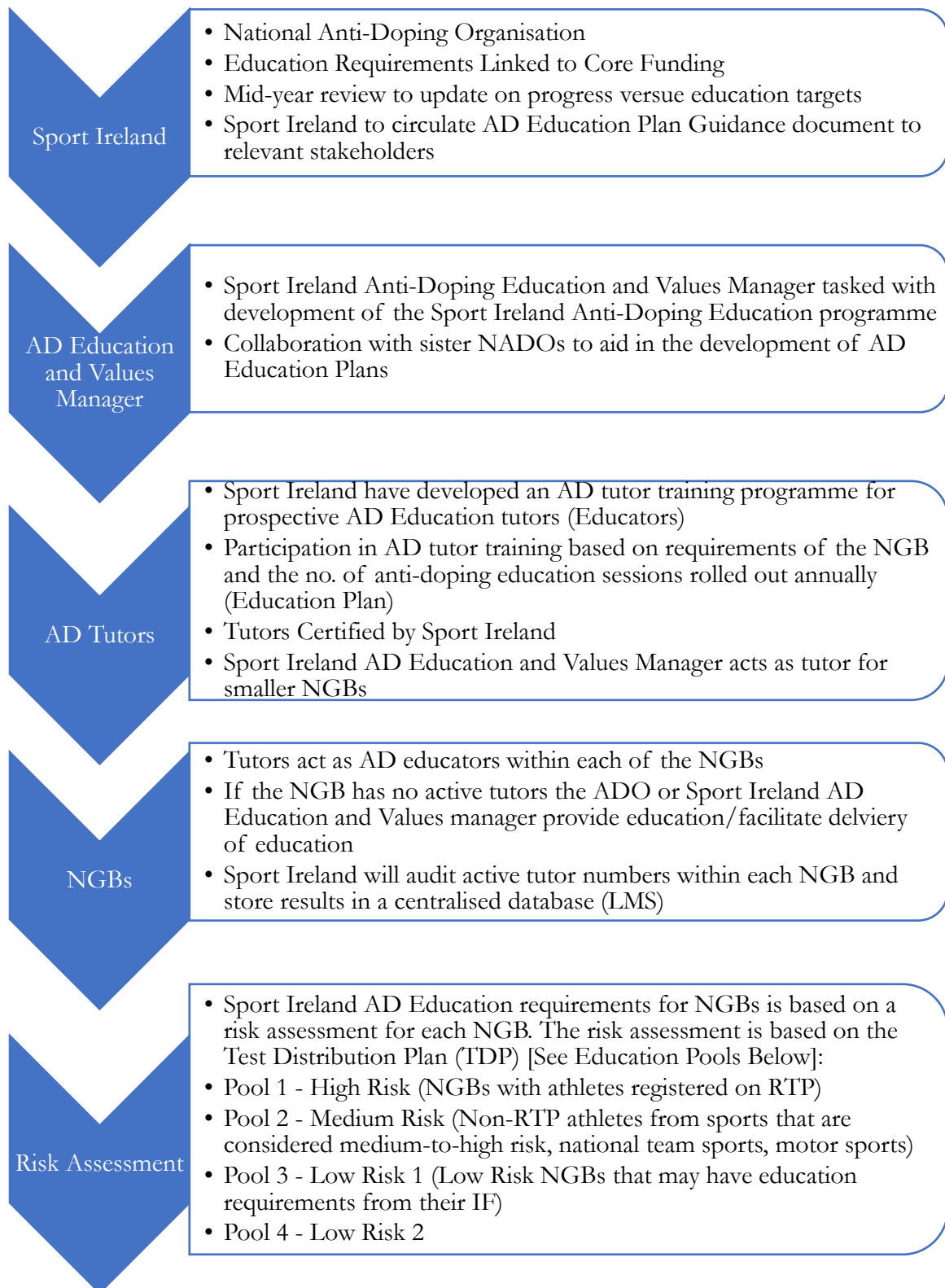
<ul style="list-style-type: none"> • Non-RTP Athletes (medium-to-high risk sports) • Team Sports (GAA, football, rugby) • Motor Sports 	<ul style="list-style-type: none"> ✓ Information Provision (e.g. up-to-date website); ✓ Awareness Raising (e.g. education seminars, distribution of wallet cards); ✓ Anti-Doping Education (e.g. e-Learning and F2F education seminars/workshops); ✓ All ASP working with these athletes are encouraged to complete e-Learning and attend in-person education session(s). <p><i>Where Possible?</i></p> <p>? <i>Depending on resources we look to include values-based education early in athlete pathway</i></p>
<p>Pool 3:</p> <ul style="list-style-type: none"> • Lower risk NGBs who compete at European/International comps with anti-doping programme (e.g. Basketball) 	<p>NGBs in this pool are encouraged to provide the following (facilitated by Sport Ireland where necessary):</p> <ul style="list-style-type: none"> ✓ Information Provision (e.g. up-to-date website); ✓ Awareness Raising (e.g. education seminars, distribution of wallet cards); ✓ AD Education (e.g. E-Learning as a minimum). <p><i>Where Possible?</i></p> <p>? Anti-doping education (e.g. F2F where possible – facilitated by AD Education and Values Manager);</p> <p>? F2F – for teams/athletes/ASPs attending international competitions.</p>
<p>Pool 4:</p> <ul style="list-style-type: none"> • Other NGBs 	<p>NGBs in this pool are encouraged to provide the following (facilitated by Sport Ireland where necessary):</p> <ul style="list-style-type: none"> ✓ Information Provision (e.g. up-to-date website); ✓ Awareness Raising (e.g. education seminars, distribution of wallet cards).

Other Education Groups

Sport Ireland ADU also provide education for other groups who are directly linked to NGBs:

Group	Education Details
Talented Youth	<ul style="list-style-type: none"> • Overview of the Anti-Doping Programme: <ol style="list-style-type: none"> 1. Anti- Doping Rule Violations (ADRVs); 2. Checking Medications and Therapeutic Use Exemptions (TUEs); 3. Risks Associated with Supplements; 4. Sample Collection Procedures.
Sports Administrators	<ul style="list-style-type: none"> • Overview of the Anti-Doping Programme (points 1-4 listed in Talented Youth); • Emphasis on Results Management.
Sport and Exercise Medicine Students	<ul style="list-style-type: none"> • Overview of the Anti-Doping Programme (points 1-4 listed in Talented Youth); • Emphasis on categories of substances on the Prohibited List; • Key Updates to the Prohibited List for that year; • TUE Physician Guidelines (Examples).
Leaving Cert PE Programme	<ul style="list-style-type: none"> • Overview of the Anti-Doping Programme: <ol style="list-style-type: none"> 1. Values in Sport/Ethics; 2. ADRV's; 3. Checking Medications; 4. Risks Associated with Supplements.
Youth Athletes	<p><i>AS PER TALENTED YOUTH ABOVE</i></p> <ul style="list-style-type: none"> • If athletes are competing internationally – emphasis on the importance of understanding the anti-doping rules for the event(s), based on the rules of that IF (e.g. Definition of In-Competition, TUE applications).
Faculty of Sports Medicine	<ul style="list-style-type: none"> • Detailed update on additions to the Prohibited List to be carried out in Q4 each year.

Practical and Operation Aspects of Anti-Doping Education Programme



Research

The table below outlines the research projects Sport Ireland have been involved with since 2016:

Year	Description
2016-17	Sport Ireland research exploring attitudes, beliefs and behaviours of Irish sports bodies and sportspersons to Ireland's Anti-Doping Programme
2017	"Mass Spectrometric Studies on Selective Androgen Receptors Modulators (SARMS) using electron ionisation and electrospray ionisation/ collision-induced dissociation" with Institute of Biochemistry Centre for Preventive Doping Research German Sport University Cologne.
2017-19	Research-Embedded Strategic Plan for Anti-Doping Education: Clean Sport Alliance for Tackling Doping (RESPECT)
2018-2020	Collaborative Partnerships "National Anti-Doping Governance: Benchmarking Governance in National Anti-Doping Organisations
2020-22	Research-Embedded Strategic Plan for Anti-Doping Education: Clean Sport Alliance for Tackling Doping in Para Sport (RESPECT-P)
2022	LEAP Project. Sport Ireland is a partner in a research group currently looking to secure funding to explore the role of parents in clean sport with the view to developing educational materials and action plans for integrating parents into clean sport education

Part Eight: Disciplinary Measures

Sport Ireland's Disciplinary Measures are laid out in Article 8 Disciplinary Proceedings of Irish Anti-Doping Rules <https://www.sportireland.ie/sites/default/files/media/document/2021-03/2021-irish-anti-doping-rules.pdf> and in the Irish Sport Anti-Doping Disciplinary Panel procedures <https://www.sportireland.ie/sites/default/files/media/document/2020-12/irish-sport-anti-doping-disciplinary-panel-procedures-january-1-2020.pdf>.

The mutual recognition of sanctions is covered under Article 16 Implementation of Decisions, Governing law and Limitations in the Irish Anti-Doping Rules.

Part Nine: International Co-Operation and Provision of Information

Sport Ireland attends CAHAMA and T-DO meetings on a regular basis and is also part of the Education and Science Advisory Groups. Members of the Sport Ireland Anti-Doping Unit are also on WADA groups including the Anti-Doping Investigations and Intelligence Network (ADIIN) and have attended Olympic and Paralympic Games as part of the WADA Independent Observers Programme, part of Doping Control Centre or as part of the International Paralympic Committee's Anti-Doping Committee.

Sport Ireland also works closely with a number of NADOs and International Federations of sport including UKAD, CCES, DFSNZ, World Rugby and Athletics Integrity Unit.

On an annual basis, Sport Ireland completes the T- DO questionnaire and also releases an annual review of the activities of the Irish Anti-Doping Programme <https://www.sportireland.ie/about-us/publications/annual-reports>. Sport Ireland completes the AD Logic UNESCO questionnaire and has also completed WADA's Code Compliance Questionnaire.

Conclusion

This concludes the National Report for the Evaluation Visit. We hope we have provided an understanding of the Irish Anti-Doping Programme. Sport Ireland looks forward to welcoming the Evaluation team to Dublin, Ireland and to a productive three day programme.