

MONITORING GROUP (T-DO)

ANTI-DOPING CONVENTION



Strasbourg, 14 March 2025

T-DO(2025)06

Application of the Anti-Doping Convention by State Parties

**Evaluation visit to Armenia
25-27 June 2024**

**in accordance with the Guidelines regarding the evaluation of
States Parties' compliance with the Anti-Doping Convention**

EVALUATION REPORT

Context

The Monitoring Group oversees the implementation and application of the Council of Europe Anti-Doping Convention (**Convention**). The Additional Protocol to the Anti-Doping Convention (**Additional Protocol**) 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 to the Convention 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.

On 22 April 2024, the Armenian Government invited an Evaluation Team to conduct an Evaluation Visit. Prior to the visit Armenian authorities provided the National report to the Evaluation Team ([Annex 1](#)).

This Evaluation Report records the outcome of that Evaluation Visit.

The programme of the visit, including the participants, is included as [Annex 2](#) to this Evaluation Report. Comments by the Armenian authorities to the Evaluation report is included as [Annex 3](#).

This Evaluation Report is divided into two Sections:

[Section One](#)

A summary of the conclusions reached by the Evaluation Team; best practices that may be of use and benefit to other Parties; and the recommendations made to the Armenian Government.

[Section Two](#)

The observations, conclusions and recommendations of the Evaluation Team.

SECTION ONE

This Section constitutes –

- A. [Executive Summary - Evaluation Report](#)
- B. [Summary of Findings - Best Practices](#)
- C. [Recommendations](#)

A. Executive Summary – Evaluation Report

The Evaluation Team has considered the measures taken by the Armenian Government to comply with the Convention by reference to consultations held with a number of organisations engaged in the overall anti-doping framework in Armenia. These organisations included the Ministries tasked by the Armenian Government with responsibility for sport and health, together with sport administration bodies including the National Anti-Doping Organisation for Armenia.

The Armenian public authorities have implemented the Convention in a cumulative manner encompassing legislation, administrative policies, and public procurement policies. The primary public authority with responsibility for anti-doping matters in Armenia is the Ministry of Education, Science, Culture and Sport. The Convention refers specifically to the contribution that sport plays in ‘the protection of health, in moral and physical education and in promoting international understanding’, and consistent with this, sport and sport participation is increasingly a strategic priority for the Armenian public authorities. An effective anti-doping framework is seen as an important supporting feature for this strategy.

The central anti-doping body in many nations is the National Anti-Doping Organisation, which is most commonly a dedicated public body. In Armenia, the functions of the National Anti-Doping Organisation are carried out by the Armenian National Anti-Doping Organisation. A number of Armenian public authorities coordinate and collaborate with the Armenian National Anti-Doping Organisation, this Report noting that there is room for development in this space. The distribution, sale, and supply of certain banned substances, as well as devices that can be used in connection with doping, are regulated by a number of legislative and regulatory instruments. The Armenian National Anti-Doping Organisation is developing the basis on which it can exchange information with law enforcement bodies in relation to the investigations that relate to the distribution of banned substances.

Sport organisations collaborate with the Armenian National Anti-Doping Organisation as part of the overall anti-doping framework, most notably the National Olympic Committee of Armenia. The National Olympic Committee is an important partner for the Armenian National Anti-Doping Organisation, providing logistical, operational and financial backing and support. This support is currently essential for the Armenian National Anti-Doping Organisation to be able to adequately fulfil many of its functions.

The Armenian National Anti-Doping Organisation is responsible for the testing of sports persons within Armenia, including both domestic and overseas sports persons. This testing program fulfils the requirements of the Convention and has been confirmed as being compliant with the relevant standards within the World Anti-Doping Code by the World Anti-Doping Agency. There is no laboratory accredited by the World Anti-Doping Agency for the analysis of biological samples located within

Armenia, and so the Armenian National Anti-Doping Organisation routinely uses the services of accredited laboratories located overseas, primarily the laboratory located in Siebersdorf, Austria.

The Armenian National Anti-Doping Organisation is responsible for producing and communicating education and training related to anti-doping to sports persons and support personnel. This is conducted in collaboration with sports organisations and the National Olympic and Paralympic Committees. The Armenian National Anti-Doping Organisation is also the principal organisation with responsibility for investigating anti-doping rule violations and bringing forward disciplinary cases. Disciplinary cases are subject to resolution by an operationally independent hearing body.

The Armenian public authorities and the Armenian National Anti-Doping Organisation collaborate with a number of international partners, and contribute to the various activities of the Monitoring Group. Armenia has recently been elected as a member of the World Anti-Doping Agency Foundation Board.

A number of these features are reflected in the Best Practices identified, and Recommendations made, by the Evaluation Team, as detailed below.

B. Best Practices

The Evaluation Team identified a number of matters that are considered to be ‘Best Practices’ as far as implementation of the Convention is concerned. The full text of the Practices is within the main body of the Report at Section Two and are summarised below.

The Evaluation Team notes that the anti-doping system in Armenia has received increased attention from public authorities in recent years. This has resulted in the establishment of an operationally independent anti-doping agency, together with significant amendments to the Sport Law to align anti-doping standards with the World Anti-Doping Code. The commitment on the part of the Armenian authorities in this regard is in itself a best practice.

The Evaluation Team noted that the NADO is not solely relying on funding from the Armenian public authorities. It has successfully sought investment from a variety of external partners, including the National Olympic Committee, WADA, UNESCO, and the IOC. The proactive approach taken by the NADO to identifying partners with which it can work on fulfilling its roles and responsibilities is a good example of how an anti-doping organisation can maximise its resources in order to be as effective as it can be.

The NADO initiative in relation to the development of an Athlete-focussed information resource in the form of an application designed to assist Armenian Athletes in the identification of the status of medication brands and ingredients in relation to the Prohibited List in effect, is an impressive example of how an Anti-Doping Organisation can provide practical assistance to Athletes. The prevention of doping is a central feature of any successful anti-doping program, and this initiative is an impressive example of such a feature in action.

C. Recommendations

The Evaluation Report includes a number of Recommendations made to the Armenian public authorities in relation to various matters arising from the commitments made by the Armenian

Government in connection with the Convention. For ease of reference these Recommendations are not set out in detail in this Section One (the full text of the Recommendations is within the main body of the Report at Section Two), but the principal Recommendations are summarised below.

Funding

Parties to the Convention provide appropriate resources to their anti-doping authorities in a manner that is proportionate to the investment they make in sport generally, recognising that that this investment is safeguarded by having a robust and well-resourced anti-doping framework. In this context it is important that the Armenian public authorities ensure that the NADO maintains the trust and confidence of Athletes and the international anti-doping community, and provides sufficient resource for the NADO to undertake this role. The need to provide adequate funding to the NADO is a key Recommendation of this Report. In a related vein, the NADO's administrative status within the Armenian public body framework merits review, as the NADO would benefit from having a more efficient, secure, and worker-friendly procurement system.

A key role ascribed to the Armenian public authorities by the Convention is that a '*criterion for the grant of public subsidies to sports organisations*' should be the effective application of anti-doping regulations, and that '*subsidies from public funds*' provided to sports persons should be suspended following a doping offence. The Evaluation Team recommends that the Armenian public authorities examine the funding provision arrangements available to both sports organisations and sports persons in Armenia, with a view to ensuring that they are contingent on the relevant recipient accepting and complying with all relevant anti-doping standards.

Oversight

The Ministry of Education, Science, Culture and Sport is the sponsoring public authority agency for the NADO, but lacks an oversight methodology to assist the NADO in the planning and execution of activities according to a strategic plan. Such oversight methodologies provide an important reassurance to public authorities in that they can be tasked with reviewing how a National Anti-Doping Organisation is implementing Convention commitments, and, for example, identify risks (such as inadequate funding) to the effectiveness of the National Anti-Doping Organisation. They also provide an important resource to National Anti-Doping Organisations in terms of developing a strategic plan for its activities and a consulting body to review and advise as to the activities undertaken to fulfil that plan. The Evaluation Team recommends that the Armenian public authorities consult with the NADO as to what might constitute the best oversight methodology in this regard.

The National Olympic Committee

The National Olympic Committee plays an important part in the Armenian sporting system, including the anti-doping framework. It is an important and valuable partner to a number of Armenian sport organisations, supports the development of many Armenian sports persons, and provides practical and financial assistance to the NADO. A significant amount of the NOC's engagement is based on a political commitment on its part to support the development and success of Armenian sport. In that regard, given the status and role of the NOC, the Evaluation Team recommends that the Armenian public authorities ensure that the compliance of the NOC with the World Anti-Doping Code is maintained, and give consideration to the impact that any reduction or withdrawal of current levels of support and funding by the NOC would have.

Regulatory and Legislative Review

Doctors who work within sports organisations, including providing support to Athletes, have a responsibility as Athlete Support Persons to be aware of the Prohibited List and understand what substances are included within it, as well as the processes associated with Therapeutic Use Exemptions. This responsibility is additional to those responsibilities health professionals have as part of their professional certification or competence assessments. The Evaluation Team recommends that the Armenian Ministry of Health examine how a ‘joined-up’ approach as between medical certification and the demands placed on medical professionals by the Code and anti-doping rules could be devised, to ensure that all medical professionals who interact with sports persons and sport organisations have a basic understanding as to the responsibility of medical professionals as mandated by the Code.

The Armenian public authorities do not, it appears, include the trafficking of certain doping substances within their criminal framework, but rather, this conduct is treated as an administrative offence. The Evaluation Team recommends that the Armenian public authorities review the extent to which the distribution of dangerous banned substances such as steroids is regulated by Armenian criminal law, and make any changes to such regulation as appear necessary.

Information Sharing

The importance and value of information sharing between different agencies within public authorities has long been acknowledged as an important contributor to an effective anti-doping program. Information sharing can, for example, support coordinated enforcement activity and enable doping behaviour and trends to be identified and acted upon. The Evaluation Team recommends that the Armenian public authorities review the mechanisms available to their public authorities and the NADO as regards the sharing of information relevant to the distribution, use and dealings in of Prohibited Substances.

Resources Note

The Monitoring Group acknowledges that Parties to the Convention will have or develop a strategy in place for the implementation of the various provisions of the Convention. In this regard, the Recommendations identify a number of resources prepared by the Monitoring Group that the Armenian public authorities may find of use when considering the Recommendations.

In addition, the Evaluation Report refers at various instances to materials prepared for and adopted by the Ninth UNESCO Convention Against Doping in Sport Conference of Parties (**COP**). The COP is the sovereign body for the UNESCO Convention Against Doping in Sport (to which Armenia is a signatory) and as such is responsible for monitoring and assisting State Party compliance with that Convention. In connection with that function, it has developed a series of strategic and planning documents that are intended to assist State Parties to the UNESCO Convention Against Doping in Sport, collectively referred to as the **Model Strategic Framework**.

The Model Strategic Framework is a reference source for Parties that provides guidance as to strategic approaches to support the implementation of the Convention. It is referred to in this Evaluation Report

as being of potential use to the Armenian public authorities in connection with the Recommendations made, and in particular the strategic approach that the Armenian public authorities may wish to take as regards their implementation of the Convention. (As a member of the COP the Armenian Government has approved the Model Strategic Framework.)

The Model Strategic Framework comprises a number of Annexes, each of which refers to a specific aspect of a Party's anti-doping framework, with each Annex identifying an exemplar or best practice relevant to the subject matter of that Annex. At various stages in this Report reference is made to Annexes to the Model Strategic Framework that may be of assistance to the Armenian public authorities in relation to certain of the recommendations made herein, the details of which are referred to at [Schedule One](#) to the Report.

SECTION TWO

This Section of the Evaluation Report has been prepared by the Evaluation Team and constitutes a description of its findings primarily by reference to information provided to the Evaluation Team during the course of the Evaluation Visit.

1. Legislation, Regulations and Administrative Provisions

- 1.1. The Armenian Government signed the Convention in 2000 and the Additional Protocol to the Convention in 2002, with ratifications taking place in 2004 and 2007 respectively. The Armenian Government is also a signatory to and has ratified (in 2010) the UNESCO International Convention Against Doping in Sport (**the UNESCO Convention**).
- 1.2. The primary piece of legislation enacted by the Armenian public authorities in relation to its anti-doping framework (that is, the institutions and legal instruments that establish the rights, obligations, and rules relating to persons and bodies involved in sport in Armenia to whom anti-doping rules routinely apply) is the ‘Law on Physical Culture and Sports’ (**the Sport Law**), enacted in 2001 and amended most recently in 2023. These latter amendments were made in part to align the Sport Law with relevant provisions of the World Anti-Doping Code (**Code**).
- 1.3. The Ministry of Education, Science, Culture and Sport of the Republic of Armenia (referred to in this Report as ‘the **Ministry**’) is designated by the Sport Law as being the leading public authority agency responsible for advising on, coordinating, and developing legislative and strategic matters associated with anti-doping. The Ministry has regulatory and financial responsibilities for anti-doping, as well as leading Armenia’s international engagement on anti-doping policy through the Council of Europe and UNESCO.
- 1.4. Both the Convention and the UNESCO Convention anticipate that public authorities may entrust implementation of the commitments made pursuant to those instruments to a designated authority. Most typically this designated authority is the relevant National Anti-Doping Organisation. The Sport Law provides the legal foundation for and regulates the National Anti-Doping Organisation for Armenia (**NADO**). The NADO receives its operational funding from the Ministry.
- 1.5. The Convention, and the UNESCO Convention, require the Armenian public authorities to adopt and give effect to the International Standard for the Prohibited List (**Prohibited List**). The Prohibited List is updated and published annually by the World Anti-Doping Agency (**WADA**). The Evaluation Team was advised that the Ministry of Internal Affairs leads on the process of legal implementation of the Prohibited List, and that Anti-Doping Rules prepared by the NADO for adoption by sports organisations within Armenia incorporate the Prohibited List, and give effect to each annual revision of the Prohibited List.

Best Practice

- 1.6. The Evaluation Team notes that the anti-doping system in Armenia has received increased attention from public authorities in recent years. This has resulted in the establishment of an operationally independent National Anti-Doping Organisation, together with significant

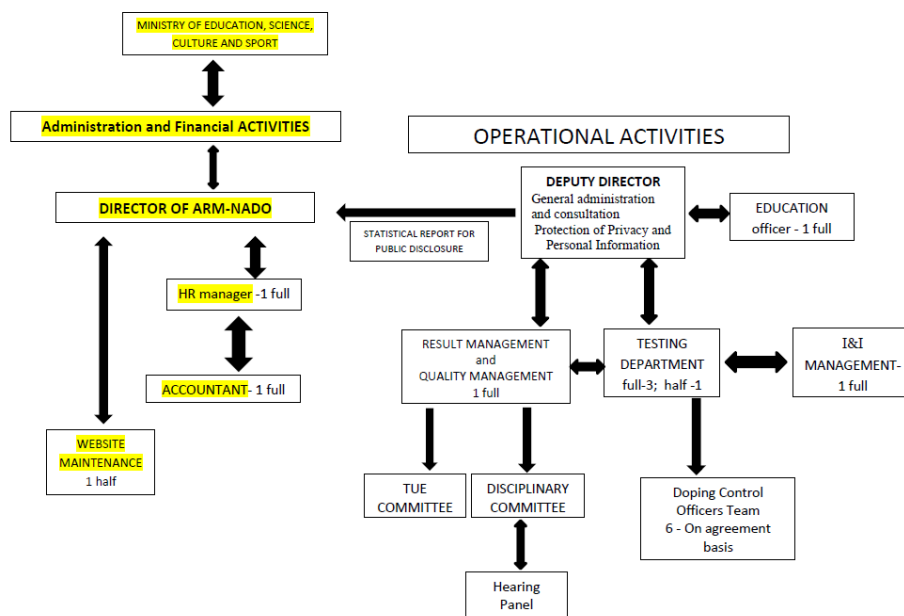
amendments to the Sport Law to align anti-doping standards with the Code. The commitment on the part of the Armenian authorities in this regard to provide a secure legal basis for both the National Anti-Doping Organisation and its status as an independent organisation is in itself a best practice.

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

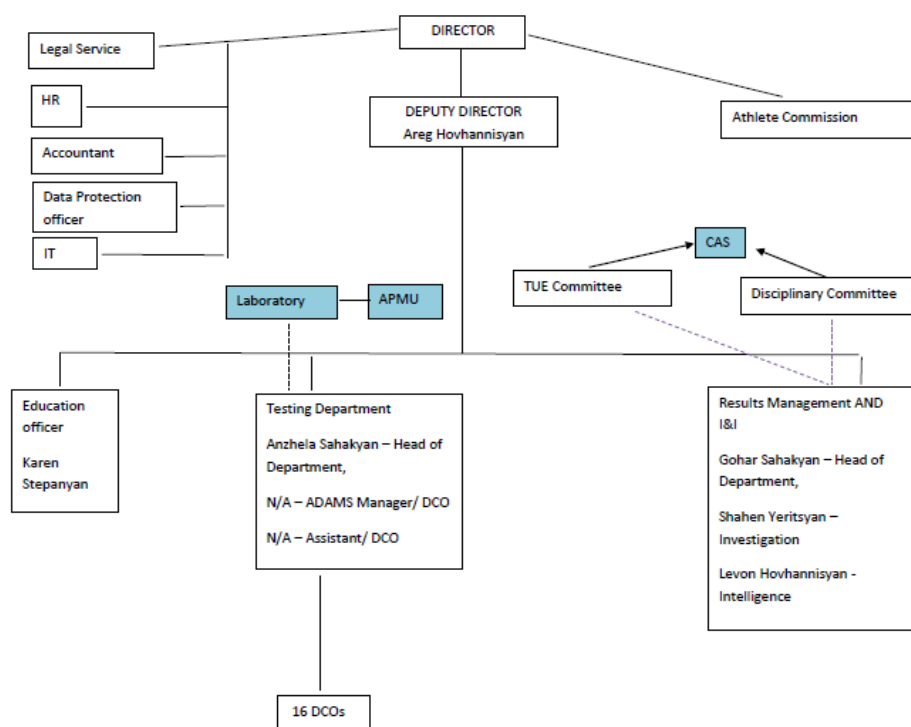
- 2.1. The NADO was established by the Government of Armenia in 2020, as the legal successor of the “Republican Center for Sports Medicine and Anti-Doping Service”, which carried out equivalent anti-doping activities prior to 2020. The NADO is a public body and classified within Armenian public law as a ‘state non-commercial organization’, or ‘**SNCO**’. The legal and regulatory frameworks that apply to an SNCO – primarily those contained within the Civil Code of the Republic of Armenia – impose upon the NADO a degree of regulation that in turn has an impact on certain of its operational activities. These are referred to further below in this Report.
- 2.2 The Evaluation Team was advised that the NADO is obliged pursuant to the Sport Law to comply with the World Anti-Doping Code (**Code**) and to fulfil the obligations of a National Anti-Doping Organisation as they are provided for in the Code. The Evaluation Team was also advised that the NADO is expressed to be operationally independent of state and non-governmental organizations in relation to its activities and decisions, a matter that is provided for specifically in the Sport Law. Since 2015, the Code has required that National Anti-Doping Organisations should be ‘operationally independent’ in terms of their activities and decisions, a matter that is addressed in the Monitoring Group Recommendation as to the Operational Independence of National Anti-Doping Organisations (**T-DO Rec 2018.01**).
- 2.3 The NADO has developed and published the Anti-Doping Rules of Armenia, approved by WADA on October 26, 2020. The Evaluation Team was advised that the Sport Law makes provision for the adoption and implementation of the Anti-Doping Rules of Armenia by National Federations in Armenia.
- 2.4 The NADO is wholly funded by the Ministry (supplemented as explained below in this Report by the National Olympic Committee). The Evaluation Team was advised that the budget assigned to the NADO has increased over the last three years, from approximately €155,000 in 2021 and 2022, to €210,000 in the last two reporting years, with a projected budget of €290,000 in 2025. The Evaluation Team heard a number of concerns raised to the effect that the funding made available to the NADO was not commensurate with the operational activities and resource requirements of the NADO – for example, although 2024 was a year in which the Summer Olympic and Paralympic Games took place (which constitute an increased doping risk), no extra funding was allocated to the NADO to support any increased education and testing activities.
- 2.5 The Evaluation Team was advised that the current NADO structure is as illustrated below, with a revised structure (also illustrated below) to be adopted in 2025. The NADO is managed by its Executive Director, who in turn is appointed by the Deputy Minister assigned for sport at the Ministry. Staff members of the NADO are recruited in accordance with the general recruitment policies of the public institutions of the Republic of Armenia. The Evaluation Team was advised that the remuneration offered to NADO Staff is considered to be uncompetitive and may contribute to the emergence of corruption risks given the complex and sensitive nature of the NADO’s

operations, and the alternative opportunities available to such skilled persons in the Armenian labour market.

Current NADO Structure



Future NADO Structure



2.6 In relation to the NADO's Testing program (that is, the collection and analysis of biological samples from Athletes for the purposes of analysis by a WADA-accredited Laboratory), the NADO engages a total of ten Doping Control Officers. Four of these personnel are qualified as international Doping Control Officers, and so are accredited to undertake Testing of overseas Athletes and International Level Athletes participating in competitions in Armenia. The NADO advised the Evaluation Team that it has significantly increased its overall testing program in the last two reporting years (2023 and 2024), comprising the testing of National Level Athletes, together with Armenian and foreign International Level Athletes.

2.7 As noted above, the NADO is classified as an SNCO under Armenian public law, which in turn requires the NADO to adopt the policies and processes mandated for SNCOs by Armenian public and administrative law. These include a requirement that the NADO uses a specific procurement system for hiring and retaining Doping Control Officers (albeit that the system is primarily designed for purchasing products and services rather than employing staff). This system can, the Evaluation Team was told, cause a degree of delay and difficulty, including the fact that the NADO is required to tender for services at a relatively low cost threshold. These features can slow down the recruitment and payment process for Doping Control Officers, and the uncompetitive fees made available to potential Doping Control Officers (a function of the SNCO status) have a dampening effect on recruitment.

2.8 Consistent with the **T-DO Rec 2018.01** and the Code, there appears to be a clear separation as between the NADO and the Ministry as to the Testing Program undertaken by the NADO. The NADO provides information to the Ministry as regards Testing by way of statistical reporting, albeit that there appears to be an absence of strategic oversight as to the Testing Program and any direct means by which the Ministry can monitor the extent to which the NADO is executing the activities delegated to it by the Ministry in terms of Convention commitments, and the extent to which the NADO is compliant with the Code.

2.9 A significant aspect of the NADO's activities relate to the provision of education, together with related information, resources and materials to Athletes and Athlete Support Persons (in particular coaches and sports physicians). The NADO has been supported in this regard by being awarded several grants by the WADA, UNESCO and the IOC.

Best Practice

2.10 The Evaluation Team noted that the NADO is not solely relying on funding from the Armenian public authorities. It has successfully sought investment from a variety of external partners, including the National Olympic Committee, WADA, UNESCO, and the IOC. The proactive approach taken by the NADO to identifying partners with which it can work on fulfilling its roles and responsibilities is a good example of how an anti-doping organisation can maximise its resources in order to be as effective as it can be.

Recommendations

Funding - NADO

- 2.11 The Evaluation Team makes the following recommendations as regards the operational funding made available to the NADO.
- 2.12 As a general matter, the Evaluation Team notes that the profile of sports activities in Armenia has increased in recent years, with an increased number of international events being staged and hosted in Armenia, and larger numbers of overseas Athletes visiting Armenia to train and prepare for Competitions. The Evaluation Team was advised that sports funding provided by the Armenian public authorities has also increased over this timeframe.
- 2.13 A number of Parties to the Convention have adopted a strategy of providing appropriate resources to their anti-doping authorities in a manner that is proportionate to the investment they make in sport generally, recognising that this investment is safeguarded by having a robust and well-resourced anti-doping framework. In this context it is important that the Armenian public authorities ensure that the NADO maintains the trust and confidence of Athletes and the international anti-doping community, and provides sufficient resource for the NADO to undertake this role. The term ‘sufficient resource’ is, naturally, inherently subjective, but there are instruments that the Armenian public authorities may find of use when assessing the appropriate level of funding that is needed to support the NADO.
- 2.14 The Monitoring Group *Recommendation on the operational independence of National Anti-Doping Organisations* encompasses a recommendation that Parties to the Convention provide adequate funding to National Anti-Doping Organisations. The Evaluation Team recommends that the Armenian public authorities review and implement the steps referred to in this document, in particular Recommendation (f). Also in this regard, see [Schedule One, Note One](#), regarding the potential use of the Model Strategic Framework to support implementation of this recommendation.
- 2.15 In a related vein, the NADO’s status as an SNCO encompasses a number of responsibilities, certain of which are not ideal in the context of a NADO’s operational activities. The status and obligations of SNCOs is a matter of Armenian public law and the status of the NADO as an SNCO exists within that context; that being so, it nevertheless appears to the Evaluation Team that the NADO would benefit from having a more efficient, secure, and worker-friendly procurement system that would permit a more flexible hiring and payment process to be used with DCOs. This would have advantages both in terms of attracting and retaining DCOs, DCOs being one of any Anti-Doping Organisations most important human resources. Whether this can be accommodated within the NADO’s status as an SNCO, or whether the NADO would benefit from redesignation, is a matter for the Armenian public authorities.

Operations and Oversight

- 2.16 Article 1 of the Additional Protocol refers to the desirability of National Anti-Doping Organisations being ‘*certified to the ISO quality standards for doping control recognised by the Monitoring Group*’. The Evaluation Team recommends/notes that the NADO has not achieved ISO compliance in this regard, although steps are being undertaken to do so. The Evaluation Team recommends that these steps be completed as soon as is practicable.
- 2.17 There does not appear to be any oversight body to assist the NADO in the planning and execution of activities according to a strategic plan. Such oversight bodies provide an important reassurance to public authorities in that they can be tasked with reviewing how a National Anti-

Doping Organisation is implementing Convention commitments, and, for example, identify risks (such as inadequate funding) to the effectiveness of the National Anti-Doping Organisation. They also provide an important resource to National Anti-Doping Organisations in terms of developing a strategic plan for its activities and a consulting body to review and advise as to the activities undertaken to fulfil that plan. The Evaluation Team recommends that the Armenian public authorities consult with the NADO as to what might constitute the best oversight body in this regard.

3. Public Authorities

- 3.1 The Evaluation Team welcomed the opportunity to meet with representatives from Armenia public authorities and discuss their roles within the general anti-doping framework. These are described below.

The Ministry

- 3.2 As noted above, the Ministry is designated by the Sport Law as being the competent government body for overseeing anti-doping activities in the Republic of Armenia. The Ministry supports the operational activities of the NADO, by looking to ensure that sport organisations and their members comply with the anti-doping requirements and promote clean sport and fairness in their activities, especially if they are receiving state budget funding.
- 3.3 The Ministry is committed to a policy of withdrawing funding from sports persons who have committed a violation of anti-doping standards, and to withhold funding from sports organisations that do not comply with the Code. That being so, the Ministry also advised that sports persons tend not to receive large amounts of funding or grants from public authorities – but can be financially supported by their National Federations. There are, as a result, no formal mechanisms for withdrawing financial support in the event of doping violations.
- 3.4 The Ministry provides financial support to approximately 35 National Federations. This funding supports athlete preparation for major events, training, development and medical care. The NADO largely limits its operational program and activities to these National Federations – these National Federations having the recognition of their relevant International Federation. The Ministry indicated that the mechanisms for ensuring that the National Federations comply with the Code and conform to national anti-doping standards are light, and need focus and development.
- 3.5 The Ministry also provides financial support to the National Olympic Committee in connection with its costs associated with the delegation for the Olympic Games (being primarily equipment and operational costs). This support is provided in the year of the relevant Olympic Games (Summer and Winter). The role of the National Olympic Committee is to select and prepare athletes for participation in the Olympic Games, including provision of education, together with related information, resources and materials to Athletes and Athlete Support Persons (in particular coaches and sports physicians). The same applies to the National Paralympic Committee.
- 3.6 The Ministry expressed satisfaction with the overall anti-doping program in Armenia, pointed to absence of any doping violations at the international level and increase in testing numbers year on year. The Ministry has a positive view of the NADO, stressing that the NADO is fully independent, and that the Ministry has no operational involvement in its work.

- 3.7 The Ministry noted that Armenia's increasing sporting status is illustrated by fact that in recent year several international sport events have taken place in Armenia. The Ministry acknowledged that Armenia being a credible 'anti-doping nation' is an important factor in attracting such events to Armenia. Increased international sport events in Armenia show a level of trust in sport in Armenia, which is viewed as a strategic asset and needs to be maintained.
- 3.8 The Ministry further noted that the budget made available to the NADO had been increased in recent years, but also acknowledged that the demands associated with a comprehensive anti-doping program are also increasing year on year. The Ministry will maintain close contact with the NADO to understand what is required, and why, in terms of funding and resources.
- 3.9 The Ministry acknowledged that cooperation and coordination with other public authorities and agencies is important, but also recognised that this is an area for development. There is some integration of the Prohibited List with the regulatory approach taken by the Ministry of Health, but this is not formalised to any extent. In relation to the trafficking of narcotics and other substances within Armenia, the NADO and Customs have agreed a Memorandum of Understanding. This allows for a degree of cooperation, in that the Armenian Customs authorities regulate doping substances that fall mainly into the classes of medicines, narcotics and prohibited stimulants, and may share information relating to their interventions and actions with the NADO. The Evaluation Team was advised that the Armenian public authorities do not include the trafficking of certain dangerous doping substances within their criminal framework, but rather, this conduct is treated as an administrative offence.

National Olympic Committee/National Paralympic Committee

- 3.10 The Evaluation Team welcomed the opportunity to meet with representatives of the National Olympic Committee of Armenia (NOC). Although as noted above, the NOC receives a degree of public funding, in practice the NOC is largely privately funded by the current President of the NOC. This covers the operational and running costs of the NOC, amounting to more than \$1 million per annum. The current President has been in post since 2006, when he assumed his role at a time of reported crisis for the NOC. The Evaluation Team was advised that at that time, the NOC was not adequately funded or structured, and sports persons were emigrating in significant numbers.
- 3.11 Since then, the Evaluation Team was advised that significant infrastructure investment has resulted in the recruitment and retention of coaching personnel, and the development of modern, high quality facilities (which the Evaluation Team was able to visit). The NOC has acquired and is based in its own building, which includes in addition to office and administrative space a medium sized sports complex, housing facilities for a number of sports, including swimming, basketball and combat sports. The NOC provides direct funding for sports persons. It does not appear though that the funding is provided under any formal arrangement whereby funding is terminated if a doping violation takes place. There are, however, some policies adopted by the NOC that will result in a sport person's exclusion from sport if a violation occurs, that appeared to the Evaluation Team to be at least consistent with the roles and responsibilities assigned to National Olympic Committees in the Code.
- 3.12 The NOC and the NADO cooperate in relation to education and awareness raising activities, and in relation to tools and resources that are made available to sports persons. The practical involvement of the NOC (and NPC) in anti-doping matters is limited to education and training, the

primary engagement in this respect being around major events, most obviously the Olympic and Paralympic Games. All Athletes in the Olympic and Paralympic teams are required to at least undertake anti-doping education, as well as coaches and support personnel.

- 3.13 It is unclear as to what would happen if the current NOC funding model was changed and in particular it is not clear that the funding would be matched by an alternate source. It is, however, clear that there would be a significant effect on Armenian sport, and that the activities of the NOC that the NADO relies on would be displaced.

Recommendations

Funding Agreements and Withdrawal of Funding

- 3.14 A key role ascribed to the Armenian public authorities by the Convention (Article 4) is that a ‘*criterion for the grant of public subsidies to sports organisations*’ should be the effective application of anti-doping regulations, and that ‘*subsidies from public funds*’ provided to sports persons should be suspended following a doping offence. The Code (Article 20.4) places obligations on National Olympic Committees that are similar in nature.
- 3.15 The Evaluation Team was not provided with any detailed information as to the mechanisms used and standards applied to the provision of sports funding and the commensurate need for compliance with anti-doping standards. This applies to both funding provided by the Armenian public authorities and to that provided by the NOC.
- 3.16 The Evaluation Team recommends that the Armenian public authorities examine the funding provision arrangements available to both sports organisations and sports persons in Armenia, with a view to ensuring that they are contingent on the relevant recipient accepting and complying with all relevant anti-doping standards. In this regard, see [Schedule One](#), [Note Two](#), regarding the potential use of the Model Strategic Framework to support implementation of this recommendation.

The Role of the NOC

- 3.17 The NOC plays an important part in the Armenian sporting system, including the anti-doping framework. It is an important and valuable partner to a number of Armenian sport organisations, supports the development of many Armenian sports persons, and provides practical and financial assistance to the NADO. A significant amount of the NOC’s engagement is based on a political commitment on its part to support the development and success of Armenian sport. In that regard, given the status and role of the NOC, the Evaluation Team recommends that –
- 3.17.1 The Armenian public authorities consider the measures that it may wish to implement to ensure that the compliance of the NOC with the roles and responsibilities assigned to National Olympic Committees in the Code (Article 20.4) is maintained; and
- 3.17.2 The Armenian public authorities give consideration to the impact that any reduction or withdrawal of current levels of support and funding by the NOC would have, and develop a strategic approach for such an eventuality.

Health Regulation

- 3.18 Doctors who work within sports organisations, including providing support to Athletes, have a responsibility as Athlete Support Persons (as defined within the Code and relevant anti-doping rules) to be aware of the Prohibited List and understand what substances are included within it, as well as the processes associated with Therapeutic Use Exemptions. This responsibility is not something, however, that falls within their professional certification or competence as medical professionals per se. The Evaluation Team recommends that the Armenian Ministry of Health examine how a ‘joined-up’ approach as between medical certification and the demands placed on medical professionals by the Code and anti-doping rules could be devised, to ensure that all medical professionals who interact with sports persons and sport organisations have a basic understanding as to the responsibility of medical professionals as mandated by Code.

4. Sport Organisations

- 4.1. The Evaluation Team welcomed the opportunity to meet with National Federations for Boxing, Powerlifting and Wrestling, all of which are popular sports in Armenia. The National Federations advised that they receive financial and practical support from the NOC, and that the NADO tends to lead on education with support from National Federations, which make sure that sports persons are aware of education and training events and attend them.
- 4.2. The National Federations made reference to the rules being in existence that provide that sports persons face financial penalties in the event of a doping violation, although it appeared that this reference was to the more informal arrangements put in place by the NOC, as referred to above in this Report. The National Federations were not able to express a view as to whether the level and breadth of testing undertaken in relation to Athletes from their respective sports was proportionate.
- 4.3. The NADO has a dedicated education platform for coaches available on its website, which is designed to be adopted and used by National Federations. The Evaluation Team found that among national sports, only boxing and powerlifting provide specific anti-doping education for coaches, whereas others, such as wrestling, do not.
- 4.4. The National Federations work with their sports persons on their overall health and nutrition needs. This is significant as several sports persons come from farming or semi-agrarian backgrounds where they produce their own food, which requires a more tailored education approach than that used to more mainstream sports persons.
- 4.5. The Evaluation Team observed that integration with NADO appears to be reasonably well established in relation to ‘strength’ sports, which are generally considered to be at high risk of doping. This is seemingly less so with other sports, notably football.
- 4.6. The Evaluation Team was advised that there are a number of sports organisations in Armenia that operate outside of the NADO’s jurisdiction, and which do not respect or conform to accepted anti-doping standards, including the Anti-Doping Rules of Armenia and the Code. This is seen as undermining the integrity of sport and the anti-doping system in Armenia. The Evaluation Team is aware that this is a perennial issue for the Monitoring Group and the Convention itself, in that the funding incentive for sports organisations and sports persons to comply with anti-doping standards is absent if those sports organisations and sports persons do not receive funding, or

choose to operate outside of the mainstream sporting framework. The Convention is, however, predicated on the basis that sport *‘plays an important role in the protection of health’* and the concern that the abuse of different substances and methods has significant consequences for *‘the health of participants and the future of sport’*. This point is returned to in the Recommendations below.

Recommendations

- 4.7. The Evaluation Team noted that guidance for sport organizations, federations, and the public bodies that explains the interrelationship between the NADO anti-doping rules, anti-doping rules adopted and implemented by National Federations, and the anti-doping rules implemented by the International Federations under whose jurisdiction the National Federations fall would be of assistance. Subject to resource availability, the Evaluation Team recommends that the NADO prepare such a guide, so that the relative application of the various standards is transparent to those to whom they apply.
- 4.8. The Evaluation Team recommends that National Federations include anti-doping knowledge in their accredited coach training programs, and that anti-doping education should be included in the basic training of athletes, coaches, and other sports personnel by National Federations.
- 4.9. The Evaluation Team recommends that the Armenian public authorities, in collaboration with the NADO, invite and encourage sport organisations that operate outside the mainstream of sport in Armenia to accept and adopt the NADO anti-doping rules and develop a means by which persons involved in these sports receive access to key health and risk information relevant to the abuse of doping substances.

5. Restricting the Availability of Doping Substances

- 5.1. There is a patchwork of legislative and regulatory instruments in effect in Armenia that relate to the distribution and availability of Prohibited Substances. The Evaluation Team was advised that medicines legislation is the basis of a degree of law enforcement action and investigations, concerning substances that are imported and/or distributed that do not appear to be on registered medicines listings. The possession of unlicensed or unregulated medicines and related substances is not treated as a criminal issue, but organised distribution is treated as such. Offences can attract potentially significant sanctions depending on the seriousness of the offence.
- 5.2. The Evaluation Team was advised that medical personnel who might be identified as being involved in doping activities are not subject to disciplinary sanctions imposed by the regulatory authorities for medical personnel, because the licencing of medical personnel is not centralised to a sufficient extent.
- 5.3. Specifically, the institutions that medical personnel work within are licensed and it is for the institution to enforce standards that they apply to their personnel. The Evaluation Team understands that doctors operate under hospital licenses rather than individual licenses. This complicates, if not eliminates, the possibility of meeting the requirement set forth in 7.2. e) of the Convention, which states that Parties should develop *“procedures for the imposition of effective penalties for officials, doctors, veterinary doctors, coaches, physiotherapists and other officials or*

accessories associated with infringements of the anti-doping regulations by sportsmen and sportswomen”.

- 5.4. Nutritional supplements are not routinely analysed in Armenia, and it appears that their use in private gyms is commonplace. The NOC is involved in discussions with public authorities regarding regulation of public gyms, where the availability and use of banned substances is understood to be a problem.

Information Sharing

- 5.5. Although a Memorandum of Understanding exists as between the NADO and police/customs authorities to facilitate the exchange of information relevant to anti-doping operations, the Evaluation Team was advised that the uptake has been sporadic. The Evaluation Team was advised that the prioritisation of law enforcement actions with a focus on anti-doping is low, primarily because of a lack of education and training. The police may not be able to share information because they may not appreciate its significance, and they tend not to share law enforcement information in real time or especially promptly.
- 5.6. There is limited cooperation as between the NADO and the Health Ministry as regards food and dietary supplements, their use, manufacture and distribution. Supplements are very widely used and available but are not considered to be medicines and so are very lightly regulated.
- 5.7. There is room for development in terms of a ‘culture of sharing’ across public authorities that would make sharing of information and investigation experiences more routine. This is referred to in the Recommendations below.

Medicrime Convention

- 5.8. Armenia ratified the Medicrime Convention in 2016. The Evaluation Team noted that the Council of Europe has explained as follows as regards this Convention –

The "Medicrime Convention" is the first international criminal law instrument to oblige States Parties to criminalise:

- *the manufacturing of counterfeit medical products;*
- *supplying, offering to supply and trafficking in counterfeit medical products;*
- *the falsification of documents;*
- *the unauthorised manufacturing or supplying of medicinal products and the placing on the market of medical devices which do not comply with conformity requirements*

The Convention provides a framework for national and international co-operation across the different sectors of the public administration, measures for coordination at national level, preventive measures for use by public and private sectors and protection of victims and witnesses.

Furthermore, it foresees the establishment of a monitoring body to oversee the implementation of the Convention by the States Parties.

- 5.9. The Evaluation Team noted that the uneven application of the Medicrime Convention may result in the distribution of counterfeit and/or unlicensed medicinal and pharmaceutical products being under-regulated.

Recommendations

Information Sharing

- 5.10. The importance and value of information sharing between different agencies within public authorities has long been acknowledged as an important contributor to an effective anti-doping program. Information sharing can, for example, support coordinated enforcement activity and enable doping behaviour and trends to be identified and acted upon. The Evaluation Team recommends that the Armenian public authorities review the mechanisms available to their public authorities and the NADO as regards the sharing of information relevant to the distribution, use and dealings in of Prohibited Substances; and consider whether reinforcing such cooperation by establishing a basis for such sharing in law would provide the most secure foundation for such information exchange.
- 5.11. The Evaluation Team recommends that the Armenian public authorities review and where relevant adopt the matters outlined in *Recommendation Rec (2016) 1 of the Monitoring Group on Information Sharing between Public Agencies and Anti-Doping Organisations in the Fight against Doping*, which recognises that ‘an effective sharing of information between public services and agencies and Anti-Doping Organisations is essential to meet the requirements of the Convention’. Further in this regard, see [Schedule One, Note Three](#), regarding the potential use of the Model Strategic Framework to support implementation of this recommendation.

Criminal Regulation of Banned Substances

- 5.12. The adoption and ratification of the Medicrime Convention by the Armenian public authorities is welcome. The Evaluation Team recommends that the manner in which it is to be implemented could be developed to assist public authorities in their efforts to restrict the availability of unlicensed and counterfeit pharmaceutical products and substances across Armenia. The Armenian public authorities do not, it appears, include the trafficking of certain doping substances within their criminal framework, but rather, this conduct is treated as an administrative offence. The Evaluation Team recommends that the Armenian public authorities review the extent to which the distribution of dangerous banned substances such as steroids is regulated by Armenian criminal law, and make any changes to such regulation as appear necessary. In this regard, see [Schedule One, Note Four](#), regarding the potential use of the Model Strategic Framework to support implementation of this recommendation

6. Testing and the Analysis of Biological Samples

- 6.1. The NADO is the primary testing authority in Armenia. The Evaluation Team was advised that there are no restrictions on the ability of other Anti-Doping Organisations to obtain biological samples from Athletes in Armenia, either directly or through intermediary bodies (including the NADO). The NADO has benefitted in recent years from training and support provided to it by

WADA, and the National Anti-Doping Organisations of Austria, Bulgaria, Hungary and Poland. The NADO Test Distribution Plan is dynamic and is based on information received, generated, and prepared by the NADO staff.

- 6.2. A significant degree of financial support is provided by the NOC to the NADO, including the financing of testing and whereabouts obligations education video training materials. This support is essential to the effectiveness of the NADO's operations. The operational process for the collection of samples involves Doping Control Officers being engaged to collect samples, which are then delivered to the NADO, which then sends them by courier to an accredited Laboratory. As noted above in this Report, the NADO shares office space with the NOC within the same building - the NOC/NADO building is secure, and common areas are monitored with CCTV. Samples are held in a locked office and refrigerated.
- 6.3. The adequacy or otherwise of the NADO Testing program is primarily a matter reserved to WADA as the regulator of the NADO's operational activities. The Evaluation Team observed that there are no obvious impediments to Testing taking place per se, although the spread of Testing and Testing numbers are modest. Football, for example, is subject to very light testing, with only 16 tests being allocated each year. It appears that it is assumed that overseas players are tested in the nations that they are playing in.
- 6.4. It is apparent that more Testing would be undertaken if funds were available. The NADO has 10 DCOs. Viewing matters purely arithmetically, if each DCO conducted on average one test per week, that would amount to over 500 tests a year. That is significantly more than takes place, the current figure being approximately 300 tests per year. The Evaluation Team noted that the lack of Doping Control Officers is not as issue as much as an absence of effective and adequate funding to support a more comprehensive Testing program. With adequate funding and an increased number of DCOs, which is planned for 2025, the NADO believes that it can reach a level of testing undertaken by equivalent NADOs, being in the region of at least 500 tests a year. The Armenian NADO budget is sufficiently flexible to allow reactive/exceptional circumstances Testing, although the reaction time was not seen to be sufficiently nimble – reference was made to timeframes of 'two to three days', which would not be effective in instances where it was believed that a sports person may be using a substance that has a short half-life/rapid wash-out.
- 6.5. The NADO manages the recruitment, training, certification, and performance of Doping Control Officers according to recognised International Standards relating to quality assurance. Doping Control Officer trainings are provided on a regular basis to ensure that Doping Control Officers remain aware of the requirements of the International Standard for Testing and Investigations, and related standards applicable to testing. The Evaluation Team was made aware that on occasion NADO staff members fulfil the duties of Doping Control Officers. This practice is not an intrinsic concern, but the Evaluation Team noted that appropriate safeguards should be implemented to ensure that such staff members do not participate in any subsequent Results Management proceedings.
- 6.6. There is no laboratory accredited by the World Anti-Doping Agency in respect of the analysis of biological samples located in Armenia. The NADO utilises the services of WADA-accredited laboratories located in countries that are easily accessible by postal courier, most particularly that located in Seibersdorf, Austria.

Best Practice

- 6.7. As noted above in this Report, the cooperation between the NADO and the NOC, especially in relation to the provision of funding, support and information, has resulted in significant benefits to the anti-doping program in Armenia. Subject to appropriate safeguards as regards information security, independence and avoidance of conflicts of interest, this is a model that other Parties may find useful.

Recommendation

- 6.8. The NADO does not currently use paperless testing. While this is not problematic in itself, it would be advisable to start implementing it in preparation for the upcoming Francophone Games in 2027 (which Armenia is hosting), even on a partial basis (initially for some out-of-competition samples), and then to develop it further for all samples.

7. Education and Research

- 7.1. The NADO operates a national anti-doping education and training program utilising a number of individual components and modules. It is closely integrated with the other main sport stakeholders. The Evaluation Team was advised by the NADO that it provides education to Athletes, coaches, trainers, medical staff, and other athlete support personnel each year. This is provided through in person education sessions conducted in Yerevan and online resources.
- 7.2. The NADO was heavily involved in the development of a mobile application designed to assist Armenian Athletes in the identification of Prohibited Substances. This involved the NADO receiving an official listing of medicines and pharmacological products registered in Armenia including the chemical and trade names of substances included in those products. This was compared with the Prohibited List and a facility produced whereby a mobile application was able to be utilised. The Evaluation Team was advised that this application was perceived to be of significant value to Athletes in their preparations for the Summer Olympic Games in Paris. The NADO also publishes information on its website in relation to contaminated products and supplements, to help Athletes to avoid inadvertent violations.
- 7.3. The NADO supports a limited amount of research in relation to anti-doping related matters, including participation in a WADA sponsored Social Science Research project (2017-2019). The NADO and the NOC cooperate with regards to the provision of education to Athletes through the NADO's Athlete Commission. This provides an effective education experience for Athletes, although the Evaluation Team noted that there may be some absence of clarity at times as to who the provider is.

Best Practice

- 7.4. The NADO initiative in relation to the development of an Athlete-focussed information resource in the form of an application designed to assist Armenian Athletes in the identification of the status of medication brands and ingredients in relation to the Prohibited List in effect, is an impressive example of how an Anti-Doping Organisation can provide practical assistance to Athletes.

Recommendations

- 7.5. Online education is a fundamental anti-doping education accessible to all athletes anywhere and anytime. The Evaluation Team recommends that the NADO continue to evaluate and where considered desirable implement on-line education tools to complement its in-person activities, and continuing the digitalization and innovation of anti-doping education at the national level. The Evaluation Team recommends that the NADO examines the utility of the WADA ADEL platform for online anti-doping education.
- 7.6. The Evaluation Team recommends in cooperation with relevant public institutions the adoption of systematic anti-doping education at the higher levels of schools, especially those with a sports focus.
- 7.7. The Evaluation Team recommends implementing anti-doping education in tertiary education institutions (*Recommendation Rec (2016) 2 of the Monitoring Group of the Anti-Doping Convention Anti-Doping Education Guidelines for Tertiary Education Institutions*).

8. Disciplinary Measures

- 8.1. The NADO has the primary responsibility for investigating anti-doping rule violations and initiating disciplinary proceedings against sports persons who are alleged to have committed anti-doping rule violations. These disputes will generally concern the commission or otherwise of an anti-doping rule violation and/or the Consequences that fall to be imposed in relation to an anti-doping rule violation. The NADO handles matters for which it has Results Management responsibility according to the processes and protocols mandated by the International Standard for Results Management and the recommendations included within the Guidelines to Results Management.
- 8.2. The NADO rules and procedures related to disciplinary process were being revised in cooperation with CEADO (Central European Anti-Doping Organization) experts at the time of the Evaluation Visit. The revised processes will constitute an updated and compliant process for Results Management. The current Results Management process follows the processes and protocols mandated by the International Standard for Results Management. The Evaluation Team was advised that Athletes very rarely have any independent support or advice; any support is provided by coaches or medical staff. This is – according to the NADO – because there are very few ‘sport lawyers’ (in the sense that that term is used in many nations) in Armenia. The Evaluation Team was advised that the NADO has very limited experience in relation to non-analytical violations.
- 8.3. The Evaluation Team was advised that disputes arising under the NADO Anti-Doping Rules are resolved by the NADO Disciplinary Committee. The Evaluation Team did not have an opportunity to meet with any of the members of the NADO Disciplinary Committee. The Evaluation Team was advised that the NADO Disciplinary Committee is composed of a Chair and four Members. When a hearing panel is required, the Chair appoints panels from a pool of members. The Chair is appointed by the NADO, and the Chair in turn recruits the pool of members. The Chair is a legally qualified person who provides the NADO with some legal-related support also. There is no appeal mechanism, with an ad hoc position agreed whereby all Athletes can appeal directly to CAS.

- 8.4. The Evaluation Team noted that the role of the NADO Disciplinary Committee, and that of the Court of Arbitration for Sport, is not referred to in the Sport Law, which may create some legal uncertainties. It also noted that the NADO Disciplinary Committee does not have any fixed procedural rules.

Recommendations

- 8.5. The NADO should identify training opportunities in relation to the investigation and prosecution of non-analytical anti-doping rule violations. This might, for example, be undertaken with the assistance of partner Anti-Doping Organisations and/or anti-doping specialists.
- 8.6. The Results Management and associated disciplinary processes are matters that are receiving ongoing attention from the NADO. A fair trial in the anti-doping context requires an independent investigation and competent jurisdictions, the right to be heard and to have an effective defence, public hearings, and the publication of decisions. *Recommendation CM/Rec (2022)14 on general principles of fair procedure applicable to anti-doping proceedings* aims to ensure that the safeguards enshrined in Article 6 of the European Convention on Human Rights apply fully to antidoping proceedings. The Evaluation Team recommends that the Armenian public authorities and the NADO utilise this Recommendation as they develop their Results Management and associated disciplinary processes.
- 8.7. Further in this regard, see [Schedule One, Note Five](#), regarding the potential use of the Model Strategic Framework to support implementation of this recommendation.

9. International Co-operation and Provision of Information

- 9.1. The Convention emphasises the importance of coordination and cooperation among States Parties to the Convention at the international level. A main channel for such cooperation is the Monitoring Group of the Anti-Doping Convention (T-DO) and the Ad hoc European Committee for the World Anti-Doping Agency (CAHAMA), which is responsible for the coordination of the positions of all States Parties to the European Cultural Convention, with regard to questions and policy relating to WADA, WADA policies and WADA's operational activities.
- 9.2. The Armenian Government and NADO are encouraged to attend and/or are consistently be represented at the meetings of the T-DO as well as the meetings of CAHAMA. At an operational level, the Evaluation Team was made aware that the NADO collaborates with many Anti-Doping Organisations and networks. This is welcomed and to be encouraged.
- 9.3. The Evaluation Team has been made aware that since the Evaluation Visit the Armenian Government has been elected to the WADA Foundation Board. This is a further welcome development.

Schedule One

Note 1*NADO Funding*

A number of Parties to the Convention have adopted a strategy of providing appropriate resources to their anti-doping authorities in a manner that is proportionate to the investment they make in sport generally, recognising that that this investment is safeguarded by having a robust and well-resourced anti-doping framework. In this context it is important that the Armenian public authorities ensure that the NADO maintains the trust and confidence of Athletes and the international anti-doping community, and provides sufficient resource for the NADO to undertake this role. The term ‘sufficient resource’ is, naturally, inherently subjective, but there are two instruments that the Armenian public authorities may find of use when assessing the appropriate level of funding that is needed to support the NADO.

The Model Strategic Framework includes as Annex B a *National Strategy for a National Anti-doping Organisation* and as Annex D a *National Strategy for Funding Relating to Anti-Doping Activities*. These Strategies includes provisions relating to the funding of a National Anti-Doping Organisation, including a strategic commitment to providing a level of funding that allows a National Anti-Doping Organisation to carry out its responsibilities on an effective scale. These resources may be of assistance in the development of an integrated funding strategy for the NADO.

Note 2*Sports Persons and Organisations Funding*

The Evaluation Team recommends that the Armenian public authorities examine the funding provision arrangements available to both sports organisations and sports persons in Armenia, with a view to ensuring that they are contingent on the relevant recipient accepting and complying with all relevant anti-doping standards. In this regard -

- a) The Model Strategic Framework includes as Annex D a *National Strategy for Funding Relating to Anti-Doping Activities*. This Strategy includes provisions relating to the provision of funding to sports organisations and sports persons, the conditions attached to such provision, and the withdrawal of such funding in specified circumstances. The Armenian public authorities may wish to review the measures referred to in this document when developing their strategic approach to funding provision for sports organisations and sports persons.
- b) The Model Strategic Framework also includes as Annex F a *National Strategy for Standards of Conduct*. This Strategy includes provisions relating to the implementation of appropriate codes of conduct, good practice and ethics relating to a Party’s anti-doping framework, and in particular to the adoption by public authorities of regulations and policies that apply to officials and staff of agencies involved in that framework. The Armenian public authorities may wish to review the measures referred to in this document when developing their strategic approach to funding provision for sports organisations and sports persons, particularly in relation to the persons and roles tasked with making key funding decisions.

Note 3*Information Sharing*

The importance and value of information sharing between different agencies within public authorities has long been acknowledged as an important contributor to an effective anti-doping program. Information sharing can, for example, support coordinated enforcement activity and enable doping behaviour and trends to be identified and acted upon. The Armenian public authorities may wish to review Annex A of the Model Strategic Framework, being a *National Strategy for Information Sharing*. This Strategy refers specifically to the value and benefit that the lawful sharing of information as between public authorities and the bodies responsible for implementing anti-doping rules, and the contribution that such sharing can have to the ability of a Party to implement its Convention commitments.

Note 4*Criminal Regulation of Banned Substances*

The Armenian public authorities do not, it appears, include the trafficking of certain doping substances within their criminal framework, but rather, this conduct is treated as an administrative offence. The Evaluation Team recommends that the Armenian public authorities review the extent to which the distribution of dangerous banned substances such as steroids is regulated by Armenian criminal law, and make any changes to such regulation as appear necessary.

The Model Strategic Framework includes as Annex E a *National Strategy for Regulating Prohibited Substances and Prohibited Methods*. This Strategy refers to the measures that a Party may take to restrict the availability of Prohibited Substances and Methods, including those related to the production, movement, importation and distribution of such substances. The Strategy dovetails with the Armenian public authorities commitments under the Medicrime Convention, and as such the Armenian public authorities may wish to review this document with a view to identifying elements that would be useful in relation to any review of criminalisation.

Note 5

The Results Management and associated disciplinary processes are matters that are receiving ongoing attention from the NADO. A fair trial in the anti-doping context requires an independent investigation and competent jurisdictions, the right to be heard and to have an effective defence, public hearings, and the publication of decisions.

The Model Strategic Framework includes as Annex C a *National Strategy Sports Disciplinary Matters – Fair Hearings and Dispute Resolution*. This Strategy refers to the measures that a Party may take to ensure that its anti-doping dispute resolution process complies with international standards relating to proportionality, fairness and transparency. The Armenian public authorities may wish to review this document as it may be of assistance in developing its strategy for the adoption of *Recommendation CM (2022) 14*.

**NATIONAL REPORT
REPUBLIC OF ARMENIA**

**for the Council of Europe's T-DO Monitoring Group of the Anti-Doping Convention's
Evaluation Visit**

**25-27 June 2024, Yerevan
Armenia**

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Provided by the ARM-NADO SNCO
23 June 2024

PART ONE - Legislation, Regulations and Administrative Provisions

(Article 1, Article 2, Article 7(2)(a)(b)(c))

Physical culture and sport is a part of national culture. Sport based on fair play, respect and cooperation is seen as a means of bringing peoples closer, establishing peace and friendship. Sport is regulated by the Law on Physical Culture and Sports (2001). This law regulates the principles of the state policy in the field of physical culture and sports, the organizational-legal and financial-economic bases of the physical culture-sports system, as well as the principles that must be observed to integrate into the international sports movement.

Considerable part of the Law is dedicated to anti-doping in accordance with amendments that entered into force on 23 March 2023

<https://www.arlis.am/documentview.aspx?docid=175704>).

The Sports Law provides definition of doping and anti-doping activities. The law directly refers to the World Anti-Doping Code and International Standards.

The Sport Law also defines the National Anti-Doping Organisation of Armenia and provides that it is established by the government, and that it is an operationally independent institution. The Sport Law mandates that the “*Authorized Body of State Management of Physical Culture and Sports of the Republic of Armenia*”, which in current government is the ministry of Ministry of Education, Science, Culture and Sport of the Republic of Armenia, will be the competent body for overseeing anti-doping activities in the Republic of Armenia.

Ministry of Education, Science, Culture and Sport of the Republic of Armenia implements the unified state policy and development strategy in the field of physical culture and sport, adopts legal acts in the field of physical culture and sports, in particular mass sports, sports of higher achievements and legal acts related to youth sports.

The Ministry also is responsible for funding and controlling the implementation of the relevant programmes from the state budget.

In line with the mandate given by the Sport law to the NADO in respect of implementation of the UNESCO Convention against Doping in Sport and the World Anti-Doping Code, the NADO translates and publishes on its website the Prohibited list currently in force. No additional recognition of the Prohibited list, which is the Annex to the UNESCO Convention and an integral, binding part of the World Anti-Doping Programme, is given to ensure its validity in the Republic of Armenia.

PART TWO - National Anti-Doping Organisation (NADO) – Structure and Governance (Article 1, Article 3(2), Article 4(3)(a), Article 4(4))

“ARM-NADO” SNCO was established by the Government of Armenia with the 2020 July 9 N1156 decision as the legal successor of the “Republican Center for Sports Medicine and Anti-Doping Service”, which carried out anti-doping activities until then. As explained above the Sport law defines ARM-NADO and the government undertakes to establish it as an operationally independent institution.

ARM-NADO (see the Charter).

ARM-NADO is a State non-commercial legal entity in the field of physical culture and sports for implementing the anti-doping activities as defined in the World Anti-Doping Code established in the Republic of Armenia July 9, 2020.

State non-commercial legal entities are regulated by the Civil Code of the Republic of Armenia, the Law of the Republic of Armenia "On State Non-Commercial Organizations". The founder of the organization is the Republic of Armenia, represented by the Government of the Republic of Armenia.

The Agency is obliged to comply with the World Anti-Doping Code and to fulfill its obligations provided by the Code. The agency is independent of state and non-governmental organizations when making its practical decisions. The Agency has developed and published the Anti-Doping Rules of Armenia, which were approved by the World Anti-Doping Agency (WADA) on October 26, 2020. The primary subject of the Agency’s activity is to provide education and training to athletes, coaches, sports doctors, for the implementation of which the Agency was awarded 14 grants by the WADA, UNESCO and the IOC in 2011-2022. The Agency annually carries out about 150 in-competition and out-of competition doping tests of national level athletes, as well as doping tests of Armenian and foreign athletes of international level. During the last 10 years, the Agency’s doping officers, 4 of whom are qualified as international doping control officers (IDCO), have worked in 6 major world and European championships.

The organization is financed by the founder (Ministry); property is formed at the time of the establishment, from the property transferred to later by the founder with the right of ownership, as well as from the property acquired during the activity of the organization.

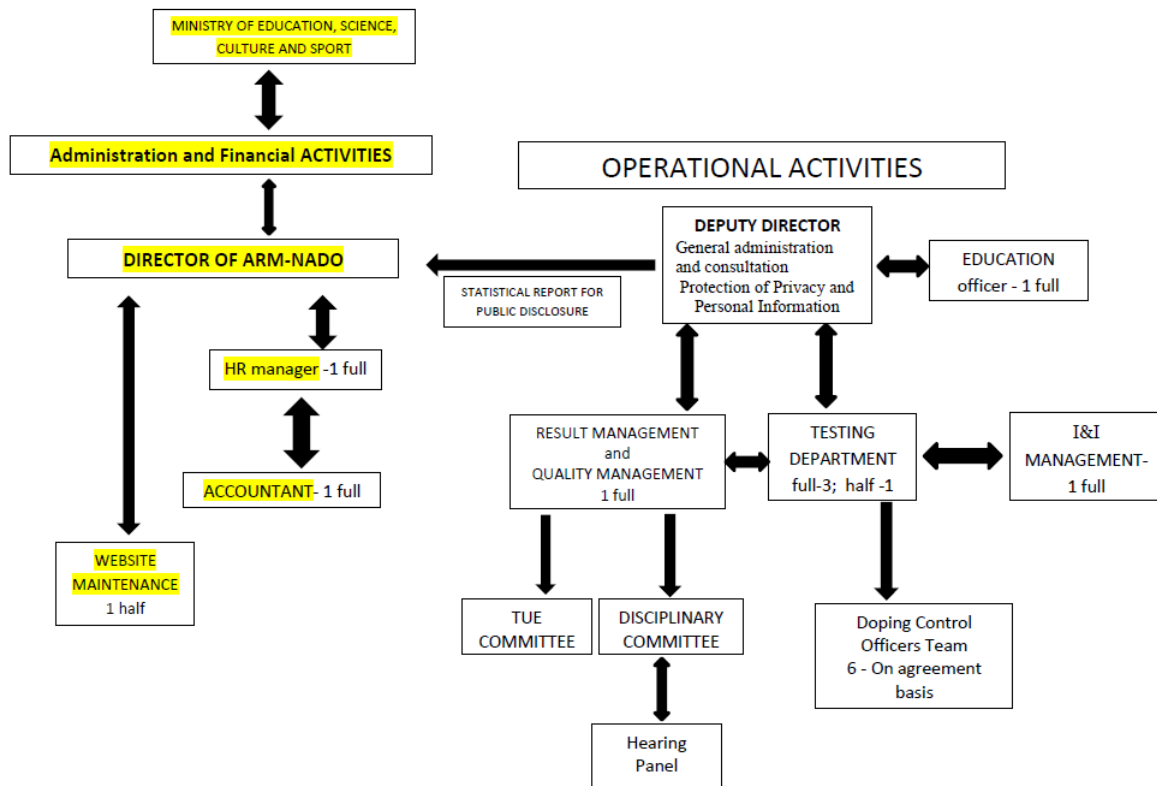
Budget in 2021-2022 was approximately 160.000,00 Euro. In 2023 (212.562,250 Euro) and in 2024 (212.562,250 Euro).

Activities of the ARM-NADO are managed by the Director, who is appointed and dismissed by the Minister of Education, Science, Culture and Sports of the Republic of Armenia

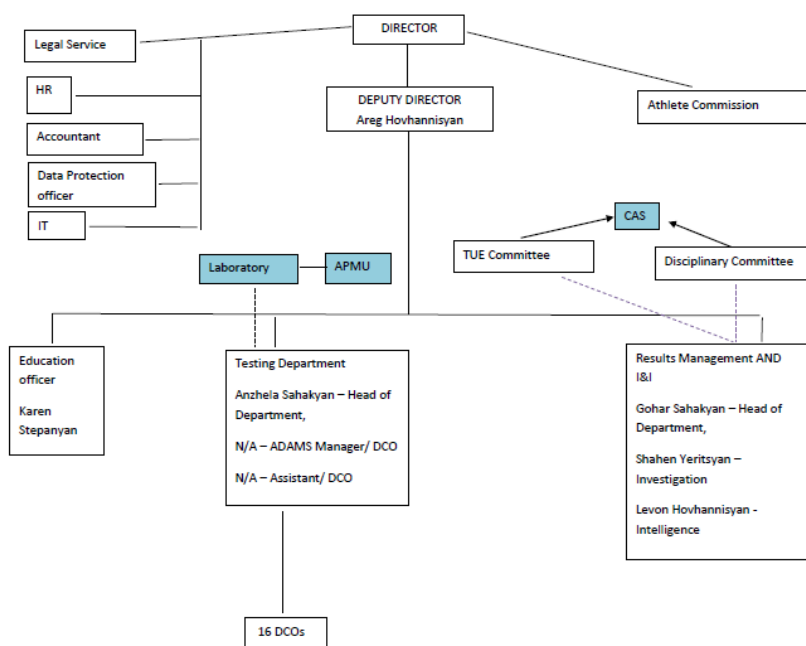
Other staff members are recruited by the director in accordance with the general recruitment policies of the public institutions of the Republic of Armenia. The remuneration for the employees of the public institution is not fully compatible with the complex and sensitive

nature that the ARM-NADO is performing. Therefore maintaining and motivating the staff members is an important challenge for the ARM-NADO.

Currently the ARM-NADO structure is as follows:



In future on 2025 ARM-NADO plan change the structure to following. The final decision plans to do on August 2024 after consultation with Ministry.



PART THREE - Public Authorities

(Article 3(1))

Ministry of Education, Science, Culture and Sport of the Republic of Armenia is designated by the Sport Law as the competent government body for overseeing anti-doping activities in the Republic of Armenia.

The close relation with formal education sector as well as science and research allow for finding synergies and joint activities in future.

Currently the most important role of the Ministry is to support the recognition of the ARM-NADO work, ensuring that the sport organisations and their members comply with the anti-doping requirements and promote clean sport and fairness in their activities, especially if they are receiving state budget funding.

In case a sport organisation or an individual athlete or sport specialist would commit an anti-doping rule violation, all funding from the state budget will be withheld (ARM-NADO Anti-Doping Rules, Article **10.14.4**)

Another important partner among the public authorities are the law enforcement agencies – police and customs. ARM-NADO with the support of the Ministry of Ministry of Education, Science, Culture and Sport of the Republic of Armenia are finalising the details for a memorandum of understanding between the police and ARM NADO that will allow sharing information and cooperating in dismantling doping distribution.

Health care professionals are occasionally trained by ARM-NADO. Special attention and dedicated programme is implemented for the medical professionals working in sport. ARM-NADO has a good contact with Armenian Sport doctors association. Most recent seminar took place in January for football clubs' doctors and in February for the doctors of the Sport medicine centre.

For the future work aimed at restricting availability of doping substances, a closer cooperation with health care system, especially with the Centre of Drugs and medicament expertise will be required. Another area for future cooperation with the health care system will be looking at the use of doping outside organised sport in fitness centres and gyms, where painkillers, anabolic steroids, unregistered nutritional supplements and other substances are being used thus posing a threat to the public health. Currently ARM-NADO does occasional education and testing activities in fitness centres and gyms.

PART FOUR - Sport Organisations

(Article 3(1))

The Sports Law defines clear responsibility of sports organisations in implementing anti-doping activities.

There are specific articles defining that the National Olympic Committee (ANOC) should support the ARM-NADO National Anti-Doping Organization in Armenia in preventing and combating the use of doping in sports. As a part of its anti-doping effort, the ANOC adopted the anti-doping rules that are in line with the World Anti-Doping Code.

The ANOC in cooperation with ARM-NADO carries out education and prevention work aimed at the participants and support personnel of Olympic and Paralympic Games.
Sport.

Sport Law also provides that the national sport federations (NFs) work with the National Anti-Doping Organization in Armenia in implementing its obligations under the World Anti-Doping Code and the International Standards. Several sport federations have signed a co-operation agreement with the ARM-NADO that gives a framework for NF anti-doping programme, which mainly is focusing on information and education of athletes and their support personnel. Athletes and their support personnel, especially coaches and doctors, in accordance with the Sport law are obliged to be informed and fulfil the requirements for the use of prohibited substances and methods and the anti-doping rules adopted in accordance with the World Anti-Doping Code. NFs are the link between specific target groups and ARM-NADO. Some federations are more active in this cooperation, some still need encouragement.

PART FIVE - Restricting the Availability of Doping Substances*(Article 4(1))*

There is no specific legislation to address availability of doping substances and methods. Relevant legislation is enforced when medications are produced, imported, sold or administered without application of general legislation applicable to all registered medications, and with regard to the specific provisions that regulate narcotics and precursors. Police reported in 2022 that they made 20 seizures of substances that relate to doping. In order to allow information sharing, increase awareness of law enforcement agents and coordinate actions to restrict availability of doping substances and methods, ARM-NADO with the support of the Ministry of Sport is in the process of finalising a memorandum of understanding.

Awareness raising actions are undertaken by ARM-NADO to explain the risks related to the use of nutritional supplements. Every two years, the List of contaminated supplements is updated on the ARM-NADO website (<https://armnado.am/wp-content/uploads/2024/03/New-List-of-Contaminated-Supplements-2022-2023.pdf>). Cooperation with the Ministry of Health will be increased, aimed at ensuring that contaminated and counterfeit healthcare products don't enter the market.

PART SIX - Testing and the Analysis of Biological Samples

(Article 4(3)(c)(d), Article 5, Article 7(3)(b)(e))

ARM-NADO is performing testing for many years. There are internationally and nationally qualified doping control officers. The testing programme is now undergoing a considerable upgrading following the recommendations and instructions received from the auditors of the World Anti-Doping Agency and our cooperation partners from Austria, Bulgaria, Hungary and Poland.

In accordance with the Sport law the ARM-NADO adopts the National Anti-Doping Rules (ARM-NADO Rules) that are binding to all members of the Armenian sport federations. ARM-NADO Rules are based on model rules developed by WADA and had been validated by WADA as compliant with the 2021 World Anti-Doping Code. These rules give ground for implementing a testing programme that incorporates all international standards and requirements.

A renewed risk assessment policy helps ARM-NADO to develop test distribution plan that allows most efficient and aim-directed use of the limited resources. Current ARM-NADO funding allows to perform around 300 tests. See the statistics for 2022:

	Urine	Blood (including ABP)
In-competition samples <small>Min numeric value allowed : 0</small>	75	23
Out-of-competition samples <small>Min numeric value allowed : 0</small>	165	19

2023

	Urine	Blood (including ABP)
In-competition samples	59	3
Out-of-competition samples	220	8

The efforts to comply with the international standards allow ARM-NADO also to serve as a service provider for other anti-doping organisations and collect samples on their behalf. This generates additional income (15%) for the ARM-NADO and increases the experience and competence of the national DCOs.

ARM-NADO Rules allow testing of overseas athletes who are temporarily present in Armenia if requested by their anti-doping organisation. Testing of Armenian athletes abroad is allowed based on the ARM-NADO Rules and the ARM-NADO cooperates with other anti-doping organisations to ensure that their testing pool athletes are sufficiently controlled.

The Sport Law and ARM NADO Rules also enforce the right for the athletes *“in case of illnesses, injuries, to receive medical assistance and service in medical organizations, institutions providing dispensary (continuous) control service, if possible, constantly inform the medical staff about their obligation not to use prohibited substances and prohibited methods, and in case of prescribed mandatory treatment, to use the right of Therapeutic Use Exemption stipulated in the World Anti-Doping Code.* The International Standard for therapeutic Use Exemptions is also an annex to the UNESCO Convention against Doping in Sport.

Samples collected within the ARM-NADO testing programme are sent by secure express postal service (DHL) to the WADA accredited laboratory in Seibersdorf, Austria. The relations between ARM-NADO and Seibersdorf laboratory are set out in the business agreement respecting all the requirements of the International Standard for laboratories, which is also the annex to the Council of Europe Anti-Doping Convention and an informative attachment to the UNESCO Convention against Doping in Sport. The cooperation with the Seibersdorf laboratory is following the latest trends in fight against doping, including the fact that the Seibersdorf laboratory serves as an athlete passport management unit for ARM-NADO since 2020.

Statistics of ADRV in 2022

Sport Discipline	ADVR	Start of Disqualification	End of Disqualification
Boxing	Article 2.1 Furosemide S5. Diuretics and Masking Agents	29.01.2022	29.01.2024
Cycling	Article 2.1 Meldonium S4. Hormone and metabolic modulators	28.05.2022	28.11.2022
Powerlifting	Article 2.1 Dehydrochloremethyl-testosterone S1. Anabolic androgenic steroids	25.12.2022	25.12.2026
Powerlifting	Article 2.1 19-norandrosterone S1. Anabolic androgenic steroids	25.12.2022	25.12.2026
Powerlifting	Article 2.1 Clenbuterol, Dehydrochloremethyl-testosterone, Metandienone S1. Anabolic androgenic steroids	25.12.2022	25.12.2026
Powerlifting	Article 2.1 19-Norandrosteron, Dehydrochloremethyl-testosterone, Metandienone S1. Anabolic androgenic steroids	25.12.2022	25.12.2026
Powerlifting	Article 2.1 Meldonium S4. Hormone and metabolic modulators	25.12.2022	25.12.2025
Wrestling	Article 2.1 Octodrine and Methylhexanamine S6. Stimulants	20.12.2022	20.02.2023

PART SEVEN - Education and Research

(Article 6, Article 7(3)(c)(d)(f))

Education is key to doping prevention, which is why ARM-NADO provides education to thousands of athletes, coaches, trainers, medical staff, and other athlete support personnel each year. Through in person education in Yerevan and Armenian regions, as well as a multitude of other resources, ARM-NADO helps to ensure that athletes and support personnel have the tools they need to navigate anti-doping rules and responsibilities, while also understanding the role they play in keeping sport clean.

- 27% of all Armenian athletes take the Education face-to-face and e-learning courses
- 221 surveys for in-person education completed

Major success in 2023-2024 was creation of a mobile application for recognition of prohibited substances for Armenian athletes for using it for the upcoming Olympic Games 2024. In the run-up to the 2024 Olympic Games, protecting clean athletes and in particular helping athletes avoid inadvertently ingesting prohibited substances is essential. With this in mind, the ARM-NADO considers it very important to create a mobile prohibited substances and methods recognition app for Armenian athletes to use for the upcoming 2024 Olympics Game. Given that 98% of Armenian athletes speaks and reads mostly Armenian it is extremely important to have such an application in the Armenian language.

At the first stage of the implementation of the Project ARM-NADO was received from the Scientific Center of Drug and Medical Technologies Expertise (SCDMTE), an Excel version List of medicines and pharmacological substances registered in Armenia on 2023 in Armenian and English with the chemical and trade name of substances.

At the second stage the ARM-NADO selected all trade name of prohibited substance registered on European countries the based on 2024 WADA List of prohibited substance and methods.

The final version of Excel version was send to «Optimizeay » LLC IT company for creation in ARM-NADO website and preparing the mobile application for recognition of prohibited substances. A new link in ARM-NADO website “Search for Prohibited substances” was created and check by special group of coaches and sport doctors headed by ARM-NADO Director Dr. David Mosinyan – MD, Sport doctor. During the checking process the group fined a same technical mistake which was edited by Optimizeay LLC IT company and after that the final version was installed on ARM-NADO website.

The last step was developing the mobile application for smartphones. The app is now available for Android

(<https://play.google.com/store/apps/details?id=com.armnado.substances&hl=ru&gl=US>) and iOS (<https://apps.apple.com/pl/app/substances-arm-nado/id6473699767>) .

After the application is created and tested by ARM-NADO specialists, the NOC was organized two awareness seminars in Yerevan on the ARM-NADO conference hall (Davitashen, Olympavan) and the Olympic reserve College. The total number of participants at first seminar (November 7, 2023) was 41 participants including (10 Sport Community-Sporting journalists, 21 Coaches, 11 Athletes support personnel, etc.) and at second seminar (November 10, 2023) total number of participants were 30 elites athletes who already have rating licenses to participate in the 2024 Olympic Games and were included in ARM-NADO RTP and 50 youth athletes according to forecasts, total 127 participants.

At the seminars the ARM-NADO experts was explain to athletes the principles of using the application and a practical workshop was held, which also will include disassembly of individual non-standard search cases. The instruction of the use the application was also presented ARM-NADO websites and Facebook pages. At the end of the workshop, the athletes were receiving the final questionnaires for the evaluation of the effectiveness of the application. 100% survey participants highly appreciated the work done and were satisfied with the content, ease of use and design of the application.

Education statistics in 2023 per target group:

Target group	Number of participants
12–16-Year-Old Athletes	74
16–19-Year-Old Athletes	56
Talented Young Athletes	32
National Level Athletes	280
International Level Athletes	67
RTP Athletes	46
Coaches	46
Parents	7
Students	28
Athletes Support Personals	68
Sports Administrators	20
Total	724

ARM-NADO also performs activities in the research and science area to the extent that the limited resources permit. Prof. Areg Hovhannisyan is a PhD Doctor of biochemistry & pharmacology, Academician of Russian Academy of Medico-Technical Sciences and Academician of International Academy of Ecology and ensuring safety of life. Throughout his carrier he published 15 anti-doping related scientific articles in International and National Scientific Journals. One of the most recent ones:

ԳԻՏՈՒԹՅՈՒՆԸ ՄՊՈՐՏՈՒՄ. ԱՐԴԻ ՀԻՄՆԱԽՆԴԻՐՆԵՐ 2022 №3 (7)

UDC 316.43

DOI: 10.53068/25792997-2022.3.7-66

**KEY WEAKNESSES IN COACHES' ANTI-DOPING KNOWLEDGE THAT
MAY INFLUENCE ATHLETES' USE OF PROHIBITED SUBSTANCES. A
CROSS-NATIONAL INVESTIGATION**

*Prof., doctor of biological science A.S Hovhannisyan,
G.G.Sahakyan, T.Ukleba, E. Arhip, G. Jalleh, Prof. R. Donovan
"Anti-Doping Agency" SNCO of Armenia, Yerevan, Armenia
Georgian National Anti-Doping Agency, Tbilisi, Georgia
National Anti-Doping Agency of Moldova, Kishinev, Moldova,
School of Medical and Health Sciences, Edith Cowan University, Perth, Australia.
School of Human Sciences, University of Western Australia, Perth, Australia
Correspondent author: Areg Hovhannisyan,
E.mail:dopingareg@gmail.com*

PART EIGHT - Disciplinary Measures

(Article 7(2)(d)(e)(f))

The ARM-NADO rules and procedures related to the disciplinary process, and in particular the review of potential anti-doping rule violations, is undergoing a considerable changes right at the moment when this report is being drafted. In cooperation with the CEADO (Central European Anti-Doping Organization) experts and under supervision of WADA legal team, a new set of procedures, document templates and internal regulations will be finalised during summer 2024.

The main features of the revised Internal Results Management Procedure will be described below. A draft document is also provided as an annex to this report.

ARM-NADO, as required by the Armenian Law of “On physical culture and sports” approved 01.03.2023, shall do its anti-doping activities as defined in the World Anti-Doping Code and International Standards. Accordingly, ARM-NADO is required under Code Article 20.5.7 to vigorously pursue all potential Anti-Doping Rule Violations (ADRVs) within its jurisdiction and authority. The ARM-NADO has jurisdiction to manage the cases within the national testing programme, as well as non-analytical cases identified by ARM-NADO.

As required by the World anti-Doping Code and the International Standard for Result Management, the ARM-NADO is competent to conduct all the steps in this process – initial review, notification, issuing a notice of charge, informing all relevant stakeholders. Special attention is given to the procedure of provisional suspension – conditions for imposing and lifting it.

New ARM-NADO Internal Results Management Procedure provides an updated and compliant process for charging the person with an anti-doping rule violation (ADRV), and detailing all rights and responsibilities of this process. It also describes actions in different situations, such as prompt issuance of a decision without a hearing; decision to withdraw charge; one-year reduction and acceptance of sanction; a reduction in the period of ineligibility, and finally it describes in detail the hearing process.

The ARM-NADO Disciplinary Committee is responsible for ensuring a fair and timely hearing, within a reasonable time, and before a fair, impartial and Operationally Independent hearing panel and has jurisdiction to hear and determine whether an Athlete or other Person, subject to the ARM-NADO Anti-Doping Rules, has committed an ADRV(s), and if applicable, to impose relevant Consequences.

The ARM-NADO Disciplinary Committee is composed of the following Chair and Members:

Dr. Mary Ohanyan- Chair

MEMBERS

Sargis Aghasyan-Lawyer

Dr. Gayane Harutunyan, MD

Dr. Ani Kostandyan-Lawyer

Dr. Rafael Petrosyan, MD

The Hearing Process shall be conducted as soon as possible after the notification of the asserted ADRV to the Athlete or other Person. Once a decision has been taken by the hearing panel in charge of the case, ARM-NADO shall ensure that, shortly after the hearing, a complete and reasoned decision is notified to the parties with a right of appeal on a timely basis.

Decisions rendered by the ARM-NADO Disciplinary Committee shall notably include the following information:

- Whether an ADRV was committed, the factual basis for such determination, and the specific Articles violated; and
- The applicable disqualifications and, if and where applicable, with any resulting forfeiture of medals, points and prizes.

ARM-NADO staff members, including those with responsibility for results management or persons otherwise involved in the investigation and pre-adjudication of a matter, cannot interfere or partake in the decision-drafting or decision-making process of the ARM-NADO Disciplinary Committee.

ARM-NADO will ensure that the decisions of the Disciplinary Committee will be made public in accordance with the applicable rules. ARM-NADO will also strictly enforce all requirements related to the confidentiality, data privacy, collection of information, storing and destroying sensitive information. A training session for the ARM-NADO regarding data privacy is taking place right before the Evaluation team arrives to Yerevan for an evaluation visit.

ARM-NADO Rules stipulate that decisions made under the ARM-NADO Anti-Doping Rules may be appealed to Court of Arbitration for Sport (CAS) and that such decisions shall remain in effect while under appeal unless CAS orders otherwise.

ARM-NADO Internal Results Management Procedure describes in detail the different elements relating to appeals, including the scope of review, the types of appealable decisions under the ARM-NADO Anti-Doping Rules, the persons entitled to appeal, deadlines and other related information.

PART NINE - International Co-operation and Provision of Information

(Article 8, 9)

The Republic of Armenia joined the Council of Europe Anti-Doping Convention in 2000 by first signing the convention and later, in 2004 by ratifying it. In compliance with the Article 9 of the Convention, the Armenian authorities participate in the work of the Monitoring Group, its Advisory Groups and also submits annually the report on national anti-doping policies.

Republic of Armenia is also a full member of the UNESCO International Convention against Doping in Sport since 2007 and participates in the work of its Conferences of Parties.

Ever since establishment of WADA, Armenian experts followed and implemented to the best possible extent the requirements of the World Anti-Doping Code and International Standards.

ARM-NADO joined the group of East European anti-doping organisations, which were working together in the EERADO up until 2020. Ever since all members of EERADO continue supporting each other, and also join other cooperation networks.

A great support and knowledge is available from the CEADO (Central European Anti-Doping Organization) network. Members of CEADO graciously commit to support developing anti-doping organisations and ARM-NADO is benefiting from this support right now. As mentioned before the anti-doping experts from Austria, Bulgaria, Hungary and Poland provide training, help developing rules and procedures and held strategic negotiations vital for the development of anti-doping programme in the Republic of Armenia.

ARM-NADO also uses the opportunity to cooperate with the Olympic Solidarity, UNESCO Voluntary fund and WADA Social Science Research Programme to carry out education, prevention and information campaigns for different target groups.

EVALUATION TEAM

- Michael PETROU, Chair of the Monitoring Group of the Anti-Doping Convention, President of Cyprus Anti-Doping Authority (chair of the team) (Day 1 only)
- Graham ARTHUR, independent expert, UK (rapporteur)
- Zaneeta CSADEROVA, director of Slovak Anti-Doping Agency
- Tomáš FIBEK, Sport Policy Unit, National Sport Agency of the Czech Republic
- Gergely SZABO, legal director of Hungarian NADO

PROGRAMME AND ARMENIAN AUTHORITIES

DAY 1, TUESDAY 25 June 2024

Morning session (09:30 -13:00)

Public Authorities

VENUE:

Ministry of Education, Science, Culture and Sport, V. Sargsyan 3, 0010 Yerevan

- 09:30 Arrival of the Evaluation Team
- 09:40 Family photo
- 09:45 Welcome Speech of **Karen Giloyan**, Deputy Minister of Sport
- 10:00 Introduction
 - Evaluation Team
 - Armenian stakeholders (tbc)
 - Karen Giloyan, Deputy Minister of Sport
 - Areg Hovhannisyan, Director of ARM-NADO
 - Arsen Tadevosyan Federal Ministry of Interior/Federal Criminal Police Office:
 - Ani Tadevosyan Head Finance and Budget department Federal Ministry of Justice:
 - Artak Jumayam Deputy Minister of the Ministry of Health:
 - Department of Sport Governance and Unit for International Sport Relations of the State Secretariat for Sport
 - Ministry of Education, Science, Culture and Sport. Sport department
 - Ministry of Education, Science, Culture and Sport. Education department
 - Ministry of Education, Science, Culture and Sport. Finance and Budget department
 - Representative of Federal Ministry of Interior/Federal Criminal Police Office:
 - Representative of Federal Ministry of Health
- 10:30 Presentation and discussion
 - Armenian sport policy and the role of anti-doping – Karen Giloyan, Deputy Minister of Sport
 - International cooperation in anti-doping – Prof. Areg Hovhannisyan (Director of Armenian NADO)

Afternoon session (14:30-17:30)

Olympic Committee

NOC of Armenia, Abovyan 9, 0001 Yerevan

- Visit to the NOC of Armenia
- Presentation of the collaboration between ARM-NADO and NOC of Armenia

- Tour

Participants

- Olympic Committee of Armenia – Hrachyan Rostomyan (General Secretary),
- Areg Hovahnnisyan- NADO Director and responsible of NOC Anti-doping Education Programs using Olympic Solidarity Found

DAY 2, WEDNESDAY 26 June 2024

Morning session (10:30 -13:00)

Sport movement and NADO

VENUE:

OFFICE OF THE ARMNADO – A. Mikoyan 51, Yerevan 0054

9.00 Transport from the Hotel to the ARM-NADO Office

9.30 Meeting with Officials from the

- Armenian Powerlifting Federation – *Gagig Saroyan (president)*,
- Armenian Weightlifting Federation – *Dr. Davit Mosinyan (anti-doping expert)*
- Armenian Shooting Federation – *Dr. Areg Saribekyan (general secretary)*
- Armenian Boxing Federation – *Dr. Harutun Prazayn (anti-doping expert)*
- Armenian Football Federation- *Dr. Narek Vannesyanyan (chief of medical commission)*

11.00 Coffee Break (ARM-NADO)

11.30 Meeting and discussion with Officials from the National Police Headquarters, operating as law enforcement body and acting as drug control authority – *Sahen Eritsyanyan (I&I responsibility)*

12.30 Lunch (ARM-NADO)

13:30 ARM-NADO

- Meeting with officials of ARM-NADO presentation and discussion - Areg Hovahnnisyan (*Director and responsible for education*), Gohar Sahakyan (*Result management responsibility*) and Anzhela Sahakyan (*Testing Manager*)
 - ARM-NADO structure and legal status
 - Testing and Investigation
 - Result Management
 - Cooperation with Laboratories
 - Education

16:00 Transport from the ARM-NADO Office to the Hotel

18:00 Working dinner of the Evaluation Team

DAY 3, THURSDAY 27 June 2024

VENUE:

Ministry of Education, Science, Culture and Sport, V. Sargsyan 3, 0010 Yerevan

10:00 Arrival of the Evaluation Team

10.15am Conclusions of the Visit and feedback from the Evaluation Team to the State Secretariat for Sport

11:30 End of the visit

Comments by the Armenian authorities

Foreign Relations and Diaspora Department Ministry of Education, Science, Culture and Sport

Sent: jeudi 6 mars 2025 13:08

Subject: MoESCS_Armenia

Dear Sophie,

On behalf of the Ministry of Education, Science, Culture, and Sport of the Republic of Armenia, I wish to extend our sincere gratitude to the evaluation team for the comprehensive and meticulous work undertaken.

We are confident that the recommendations and proposed measures put forward by the Anti-Doping Convention Monitoring Group will contribute significantly to the enhancement of Armenia's anti-doping system.

It is important to note that the RA MoESCS "Anti-Doping Agency" SNCO has already implemented several of the recommendations outlined in the draft report. To my knowledge, Mr. Areg Hovhannisyan has apprised you of the actions taken to date.

Furthermore, the Ministry of Education, Science, Culture, and Sport of the Republic of Armenia has commenced discussions with the Ministry of Health to establish a unified approach to address the issue of doping.

At this stage, the Ministry has no further information or reservations to present.

I remain at your disposal should you have any further questions.

Sincerely,
Meri Badalyan

Foreign Relations and Diaspora Department Ministry of Education, Science, Culture and Sport

Armenian NADO

From: Hovhannisyan Areg

Sent: 20 February 2025 09:48

Subject: RE: Letter from Sophie Kwasny, Head of Sport Division, Council of Europe (T-DO evaluation in Armenia)

Dear Sophie,

Thank you very for draft of Report of the evaluation visit of the Anti-Doping Convention Monitoring Group.

First we would like say the Group a big thanks for preparing the Excellent and detailed report that very accurately depicted the situation of the fight against doping in Armenia and was very useful for us.

Taking into account the recommendations of the monitoring group members, together with the ministry, we have already resolved a number of important issues noted in the draft Report.

In particular, based on your recommendations, among other things, changed the new staffing schedule of ARM-NADO which was approved by the Ministry. The new employees we selected managed to obtain international certificates in the field of testing in 2024 and were hired for full time work at the Agency. Our leader Prof. Areg Hovhannisyan, who has extensive experience in working according to the requirements of ISO 9001, based on your recommendations, created new reporting methodology which was also proposed and approved by the Ministry for 2025-2027, which we have already begun to use.

To be honest, we are a little late with this response, since during this period we began an anti-doping educational session with students and lectures of the Institute of Physics Culture, the Medical State University and the Pharmacy Center of the Yerevan State University, also based on your recommendations.

Regarding the draft of Report, we have only a few minor, but important Comments that are attached to this letter and Draft of the Report.

Finally thank you again and we wish to inform you that we hope that by the time we receive the final Report we will try to translate the main points of the Report into Armenian, so that immediately after receiving the final Report we can provide the translation to the Ministry of ESCS as well.

Warm regards.

Areg

ARM-NADO COMMENTS

Comment 1, page 5 of Draft

Oversight

There is no oversight body to assist the NADO in the planning and execution of activities according to a strategic plan. Such oversight bodies provide an important reassurance to public authorities in that they can be tasked with reviewing how a National Anti-Doping Organisation is implementing Convention commitments, and, for example, identify risks (such as inadequate funding) to the effectiveness of the National Anti-Doping Organisation. They also provide an important resource to National Anti-Doping Organisations in terms of developing a strategic plan for its activities and a consulting body to review and advise as to the activities undertaken to fulfil that plan. The Evaluation Team recommends that the Armenian public authorities consult with the NADO as to what might constitute the best oversight body in this regard.

It seems to us that the commission slightly misunderstood our explanations regarding this point. The oversight body to assist the NADO in the planning and execution of activities according to a strategic plan is the Ministry of ESCS. The financial-economic department of Ministry is responsible for the action.

Unfortunately, the Ministry did not have an adequate methodology for monitoring the work of NADO.

On December 20, the NADO management proposed a new assessment methodology, developed on the basis of recommendations received during the assessment visit from Austria and Poland.

The methodology was approved by the Ministry and included as an appendix to the agreement between the Ministry and NADO.

We recommend to change this paragraph like this, if possible.

There is no oversight body(change to **Methodology**) to assist the NADO in the planning and execution of activities according to a strategic plan. Such oversight bodies **Methodology** provide an important reassurance to public authorities in that they can be tasked with reviewing how a National Anti-Doping Organization is implementing Convention commitments, and, for example, identify risks (such as inadequate funding) to the effectiveness of the National Anti-Doping Organization. They also provide an important resource to National Anti-Doping Organizations in terms of developing a strategic plan for its activities and a consulting body to review and advise as to the activities undertaken to fulfil that plan. The Evaluation Team recommends that the Armenian public authorities consult with the NADO as to what might constitute the best oversight body in this regard.

Comment 2. Article 2.5, Page 9

The Evaluation Team was advised that the remuneration offered to NADO Staff is considered to be uncompetitive **Please add if it is possible “ and may contribute to the emergence of corruption risks”** given the complex and sensitive nature of the NADO’s operations, and the alternative opportunities available to such skilled persons in the Armenian labour market.

Comment 3. Article 6.3, Page 20

Every years form 2022 to 2024 we do 16 In-Competition test at Armenian Football National Championship. 8 tests are conducted in April-May and 8 tests in September. Thus, during one football season, 16 tests are conducted. However, at the time of the monitoring group's visit in June, only the first 8 tests had been conducted.

The adequacy or otherwise of the NADO Testing program is primarily a matter reserved to WADA as the regulator of the NADO's operational activities. The Evaluation Team observed that there are no obvious impediments to Testing taking place per se, although the spread of Testing and Testing numbers are modest. Football, for example, is subject to very light testing, with only 8 (please change to 16 tests) tests being allocated each year. It appears that it is assumed that overseas players are tested in the nations that they are playing in.

Comments 4. Article 6.4, Page 20

It is apparent that more Testing would be undertaken if funds were available. The NADO has 10 DCOs. Viewing matters purely arithmetically, if each DCO conducted on average one test per week, that would amount to over 500 tests a year. That is significantly more than takes place, the current figure being approximately 300 tests per year. The Evaluation Team noted that the lack of Doping Control Officers is not as issue as much as an absence of effective and adequate funding to support a more comprehensive Testing program. The NADO budget is sufficiently flexible to allow reactive/exceptional circumstances Testing, although the reaction time was not seen to be sufficiently nimble – reference was made to timeframes of ‘two to three days’, which would not be effective in instances where it was believed that a sports person may be using a substance that has a short half-life/rapid wash-out.

If it is possible please add to Article 6.4, as it is very important for ARM-NADO

Considering the above, and also the fact that by 2025 the number of DCOs will increase to 20-25 DCOs, the Evaluation Team noted that in 2026 the Ministry of ESCS will increase NADO budget so that NADO will be able to operate according to this recommendations of the Evaluation Team and will be able to definitely conduct at least 500 tests a year.