



Independence of the Doping Control Process

An historical perspective

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Independence of the Doping Control Process – An historical perspective

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1. INTRODUCTION

“The abstract principle of the need for ‘independence’ in anti-doping has been paid lip service for years and is commonly accepted. But it has not been achieved. We believe that most of the sport world, athletes, coaches, fans, sponsors, governments and the public at large want the advances and confidence in the anti-doping system that true independence will bring.”

Joseph de Pencier, CEO iNADO, 2017¹

In May 2025, the Institute of National Anti-Doping Organisations (iNADO) published a position statement on **“The Benefits of Expanding Operational Independence for Doping Control Activities Beyond only National Anti-Doping Organisations (NADOs).”**² iNADO argues that the idea behind independence is grounded in addressing potential conflicts of interest where doping controls are compromised by interests other than detecting doping, e.g. glory of a government, the commercial interests of sport (such as an International Federation), or the reputation of a sport/country above the protection of athletes and fair and honest sport. Therefore, it is imperative that independence is ensured for ALL involved in doping control.

The concept of operational independence for anti-doping organizations is not new. In November 2014, iNADO joined the Council of Europe’s celebration of the Anti-Doping Convention’s 25th Anniversary with a presentation **“Why Should NADOs be Independent”**. The presentation focused on the need to ensure independence for National Anti-Doping Organizations (NADOs) with a view to expanding their scope of responsibilities and providing them with the resources needed to implement the World Anti-Doping Code. In 2017, then

¹ iNADO Publication 07 March 2017, “Proposals for WADA Governance to Ensure Independence”

² iNADO Statement 16 May 2025: <https://inado.org/2025/05/16/the-benefit-of-expanding-operational-independence-for-doping-control-activities-beyond-only-national-anti-doping-organisations-nados-1/>

iNADO CEO Joseph de Pencier addressed the same concepts in an iNADO statement on the WADA Governance reform process.³

This paper provides more background to the 2025 iNADO position statement, by reference to the principles explained in the 2017 paper, but also addresses problems that arose at a later date which prompted a reaction to (re-)build trust and confidence in anti-doping authorities. It also incorporates more recent findings on (NADO/Sport) good governance.

This paper is intended to assist NADOs, as well as other anti-doping organizations, in their strategic planning, establishment, and core operations by emphasizing the value of operational independence, which extends far beyond the conduct of testing. It outlines instances in which a lack of independence undermined the effective protection of clean sport, in some cases irreversibly and fatally. Therefore, the planning, establishment, and operation of a NADO should embody the key attributes of independence identified herein to avoid repeating the failures described and to prevent the compromise of anti-doping efforts. In doing so, NADOs can more effectively safeguard the integrity of sport.

In the final part, the paper advocates that these principles should not apply exclusively to NADOs but are equally relevant to International Federations and entities responsible for managing anti-doping programs on their behalf. The fundamental objective is that the Code advocates that the anti-doping responsibilities of an International Federation should be carried out by an entity that is fully independent from that International Federation⁴.

Independence can be defined in multiple ways⁵, for example:

- “The freedom from control and influence of others”
- “Not subject to another’s authority or jurisdiction”

³ See Footnote 1

⁴ See Comment to art. 20.3.1 (WADC2027): “International Federations are encouraged, to the extent their resources and structural framework allow, to ensure that their anti-doping activities operate independently from their sport governance and operations.”

⁵ <https://www.oed.com/>; <https://www.merriam-webster.com/dictionary/independent>

- “A state of being separate and autonomous”

When considering the position of National and other Anti-Doping Organizations, the concept of “independence” will be understood primarily as freedom from the control, guidance, or influence of others. In the rest of this paper, we address what “independence” means for (national) anti-doping organisations, what is it to “not interfere with operational decisions and activities”, and what are considered the necessary elements of operational independence?

2. THE ABSENCE OF INDEPENDENT NADOS

The years 1988 – 1992 turned out to be pivotal in the regulation of anti-doping as operating independently from sports and governments. However, anti-doping had existed (long) before this time in some sports and in some countries, almost entirely in the form of in-competition testing based on fragmented, even inconsistent rules. The collapse of East Germany in this period led to the disclosure of (state-sponsored) doping that was long-suspected. Classified documents saved after the collapse of the German Democratic Republic in 1990 describe the promotion by the government of the use of drugs, notably androgenic steroids, in high-performance sports for decades through the involvement of physicians and scientists⁶.

A major catalyst in the late 1980’s was Ben Johnson’s disqualification as gold medallist and world record setter at the 1988 Seoul Olympic Games: it brought doping to the forefront of sport’s problems. In the absence of an independent NADO, the organisation then mandated to deal with doping in Canadian athletics, the Canadian Track and Field Association (CTFA), failed to address the Johnson situation, in part due to the conflict of interest between protecting clean sport and maximizing sports performance⁷.

⁶ Franke, WW & Berendonk, B (1997). Hormonal Doping and Androgenization of Athletes: A Secret Program of the German Democratic Republic Government, *Clinical Chemistry*, vol. 43 no. 7

⁷ Government of Canada (1990). Commission of Inquiry into the Use of Drugs and Banned Practices Intended to Increase Performance in Sport (referenced as the “Dubin Inquiry”, after Charles L. Dubin, Commissioner)

The Johnson case prompted both private sport organisations and government authorities to develop or radically improve anti-doping programs, pursue innovative anti-doping practices (such as out-of-competition testing), and in some countries to create specialised organisations to promote and protect clean sport. One of the principal recommendations from the Dubin Inquiry, acting for the Canadian government and sport community, was the creation of an independent NADO, "*the central independent agency responsible for doping control of Canadian athletes and coordination of Canada's anti-doping activities*"⁸. This took the form of the Canadian Centre for Drug-Free Sport in 1990 (later, the Canadian Centre for Ethics in Sport, now Sport Integrity Canada).

In Australia, in the meantime, the Australian Institute of Sport (AIS) was responsible for supporting elite athlete development and performance, as well as anti-doping. Apparently, the potentially conflicting goals of the two were not appreciated. A government inquiry about the AIS drug testing program found that "*... the AIS drug testing policy was worse than no drug program at all. It provided protection of appearing to do something to prevent the use of drugs, but was conducted in such a manner that it may have been possible for athletes using drugs to claim that the program showed them to be drug free.*"⁹

A second government report¹⁰ included the recommendation that effective and independent testing and education programs, together with ongoing and publicly accountable investigative mechanisms are essential to permanently minimize the drug program in Australian sport. The Government of Australia implemented the recommendation that an independent body be established. This body became known as the Australian Sports Drug Agency, later Australian Sports Anti-Doping Authority (since 2020 under the umbrella of Sports Integrity Australia).

⁸ Government of Canada (1990). Commission of Inquiry into the Use of Drugs and Banned Practices Intended to Increase Performance in Sport, Recommendation 11

⁹ The Parliament of the Commonwealth of Australia (1989). Drugs in Sport – An interim report of the Senate Standing Committee on Environment, Recreation and the Arts (referenced as the "Black Report 1989" after Senator John Black who shared the Senate Standing Committee)

¹⁰ The Parliament of the Commonwealth of Australia (1990). Drugs in Sport – Second report of the Senate Standing Committee on Environment, Recreation and the Arts ("Black Report 1990")

The situations in East Germany, Canada and Australia at the time demonstrate that, in the absence of an independent NADO, clean sport was compromised because organisational priority was given to national and international sport performance at any cost – whether through fraud and corruption (East Germany), ignorance and indifference (Canada), or conflict of interest (Australia).

Around the same period, other authorities also began to challenge the evidence of doping worldwide and across multiple sports. In June 1988, the IOC sponsored the “First Permanent World Conference on Doping in Sport” in Ottawa, Canada to discuss drug testing issues. This initiative led to the “International Olympic Charter Against Doping in Sport”¹¹.

At the same time, the European Ministers responsible for Sport agreed that, in order to maintain and improve the Council of Europe’s lead in anti-doping efforts, it would be advisable to prepare an anti-doping convention open for signature by non-member states. Building on earlier Council of Europe texts concerning the ethical principles of sport and the health dangers for athletes¹², the Council of Europe adopted the “Anti-Doping Convention” in 1989 (ETS No. 135).¹³

Nevertheless, it was not until the seizure of prohibited substances by border control officials during the 1998 Tour de France that public authorities and the sport community were galvanized to take seriously the need for an independent international agency. Such an agency would establish harmonized standards for anti-doping activities and coordinate the efforts of sports organizations and public authorities. In response, the IOC took the initiative by convening the First World Conference on Doping in Sport in Lausanne in February 1999. The International Olympic Committee recommended the goal *“to sponsor the establishment of an independent*

¹¹ Todd J & Todd T (1990). Significant Events in the History of Drug Testing and the Olympic Movement: 1960-1999. In: Wilson, W & Derse, E. (eds.). Doping in Elite Sports: The Politics of Drugs in the Olympic Movement. ISBN 0-7360-0329-0.

¹² Starting with Resolution (67) 13 “The Press and the Protection of Youth” - adopted by the Ministers Deputies on 29th June 1967

¹³ <https://www.coe.int/en/web/sport/anti-doping-convention>

world doping control agency”, like in the Ben Johnson inquiry 10 years before¹⁴, which led to the establishment of the World Anti-Doping Agency (WADA) in November that same year¹⁵.

But even after the establishment of WADA and the installation of national anti-doping organizations and programmes, pressure on NADO independence remained (and sometimes still remains) apparent.

The Australian Sports Anti-Doping Authority (ASADA) was founded by legislation in 2005 as a government body. The then Sport Minister Kevin Andrews stated that setting up ASADA would mean *“sport, athletes and the public can have complete confidence that doping allegations will be investigated and pursued in an independent, robust and transparent way.”*¹⁶ However, ASADA’s (co-)investigation into the use of peptide hormones in professional football and rugby was plagued by government intervention, even interference, belying the Minister’s assurances¹⁷. The report was published eight days after Prime Minister Julia Gillard called a federal election. It was an election the government was widely predicted to lose – and it did. This meant that ASADA, a small government agency, would have to conduct its investigation into drug use in the country’s two largest professional sport organizations in a highly politicized as well as public environment. In a subsequent court case¹⁸, evidence was adduced of government attempts to influence ASADA concerning the conduct and timing of the investigation.

The link between government interference and sport associations, both nationally and internationally, became very apparent in the sport of athletics in 2014. On 3 December the German television channel ARD aired the documentary *“Top Secret Doping: How Russia makes its Winners”*¹⁹ alleging a sophisticated and well-established system of state-sponsored doping

¹⁴ Government of Canada (1990). Commission of Inquiry into the Use of Drugs and Banned Practices Intended to Increase Performance in Sport, Recommendation 33

¹⁵ <https://www.wada-ama.org/en/who-we-are>

¹⁶ Cited in Le Grand C (2015). The Straight Dope. ISBN-13: 978-0522870275 (Chapter 2)

¹⁷ Australian Crime Commission, Organized Crime and Drugs in Sport (2013)

<https://catalogue.nla.gov.au/catalog/6224963>

¹⁸ Essendon and Hird v. ASADA [FCA] 2014 2019, para. 171, appeal dismissed VID569/2014

¹⁹ ARD Sportschau: Geheimsache Doping – Wie Russland seine Sieger macht.

<https://www.ardmediathek.de/video/sportschau/geheimsache-doping-wie-russland-seine-sieger->

within the All-Russia Athletics Federation (ARAF). The ARAF (now the Russian Athletics Federation, RusAF) is the national federation governing athletics in Russia recognized by the responsible International Federation, the International Association of Athletics Federations (IAAF, now World Athletics). The documentary implicated Russian athletes, coaches, national and international sport federations, the Russian Anti-Doping Agency (RUSADA) and the Moscow WADA-accredited laboratory. The documentary included recordings, documents and other evidence alleging collusion among athletes, coaches, doctors, regulatory officials, and sports agencies. Their aim, according to ARD, was to systematically provide Russian athletes performance-enhancing drugs in order to achieve the state's goal of successful Russian athletes, and to conceal evidence of that doping.

WADA established an Independent Commission *"to conduct an independent investigation into doping practices; corrupt practices around sample collection and results management; and, other ineffective administration of anti-doping processes that implicate Russia, the International Association of Athletics Federations (IAAF), athletes, coaches, trainers, doctors and other members of athletes' entourages; as well as, the accredited laboratory based in Moscow and the Russian Anti-Doping Agency (RUSADA)"*²⁰. The Independent Commission questioned the independence of the Russian Anti-Doping Agency (RUSADA) both from its government and from members of the Russian sport committee²¹.

In May 2016, the newsmagazine 60 Minutes and The New York Times, reported stories of state-sponsored doping and manipulation of the doping control processes within Russia, including in relation to the Sochi 2014 Olympic and Paralympic Winter Games. The primary source of these allegations was the former director of the Moscow and Sochi doping control

[macht/daserste/Y3JpZDovL3dkci5kZS9CZWl0cmFnLTgxYjE3Mjc3LTI0OTAtMTFINS1hOWE3LTUyMjFhZjBjMmJiNQ](https://www.wada-ama.org/en/resources/independent-commission-terms-reference)

²⁰ WADA, 2015, Independent Commission – Terms of Reference. <https://www.wada-ama.org/en/resources/independent-commission-terms-reference>. The ToR were expanded on August 20, 2015 following a second ARD broadcast (ARD Sportschau: Geheimsache Doping – Im Schattenreich der Leichtathletik. <https://www.ardmediathek.de/video/die-story/geheimsache-doping-im-schattenreich-der-leichtathletik/wdr/Y3JpZDovL3dkci5kZS9CZWl0cmFnLWYyMmYzMzlkLWMxZTMtNDJMS05YmE1LTRjMTYyZjZmNTc0Zg>) and the publication of IAAF blood data on hundreds of athletes (ADD REF)

²¹ WADA Independent Commission, First Report, 09 November 2015, pp. 191 and 192

laboratories, who ran the testing of thousands of Russian and international athletes. WADA ordered an independent investigation, conducted by Professor Richard McLaren, which revealed:

- 1) *The Moscow Laboratory operated, for the protection of doping Russian athletes, within a State-dictated failsafe system, described in the report as the Disappearing Positive Methodology;*
- 2) *The Sochi Laboratory operated a unique sample swapping methodology to enable doped Russian athletes to compete at the Games;*
- 3) *The Ministry of Sport directed, controlled and oversaw the manipulation of athletes' analytical results of sample swapping, with the active participation and assistance of the FSB [Russian Federal Security Services, ed.], CSP [Center of Sports Preparation of National Teams of Russia, ed.], and both Moscow and Sochi Laboratories.²²*

In December 2016, Professor McLaren released a second and final report that confirmed that the Russian government, from the highest levels, conspired *"to make the desire to win medals supersede their collective moral and ethical compass and Olympic values of fair play"* by systematically manipulating and covering up positive tests at the London 2012 Summer Games, the Universiade Games 2013, the Moscow IAAF World Championships 2013, and the Olympic and Paralympic Winter Games in Sochi in 2014²³.

As a result, Russia was suspended from all international athletic competitions by the IAAF; the IOC removed over 100 athletes from the Rio 2016 Olympics entry list (the IOC rejected WADA's recommendation to ban Russia from the Rio 2016 Olympics, and announced that a decision would be made by each sport federation); the International Paralympic Committee unanimously voted to ban Russian athletes from the Rio 2016 Paralympics; RUSADA was declared non-compliant; and the Moscow laboratory's full accreditation was revoked. In follow-up investigations, WADA discovered the manipulation of data extracted from the Moscow

²² McLaren R. The Independent Person Report – 18 July 2016

²³ McLaren R..The Independent Person 2nd Report – 09 December 2016

laboratory, ultimately leading to a CAS award confirming and sanctioning RUSADA for non-compliance with the World Anti-Doping Code²⁴.

These examples, going back over several decades, and from a variety of countries and sporting environments, show that NADO independence is fundamental. Hence it has been embedded in the World Anti-Doping Code since 2015²⁵. Independence from both national sport organisations and from government hereby is equally important and serves the need to ensure that anti-doping activities at the national level are conducted by entities without conflicts of interests in relation to anti-doping management.

In addition, WADA has responded to international criticism by implementing institutional arrangements that are aimed at improving independence, ethical conduct, and transparency. These governance reforms have gradually been implemented since 2018, and strengthened in 2022, when the WADA Foundation Board approved a series of recommendations by the WADA Governance Working Group on Governance Matters and the Working Group on the Review of WADA Governance Reforms.²⁶

3. WHY NADO INDEPENDENCE IS NEEDED?

From this history, there emerge at least five reasons why NADO independence - freedom from the control, guidance, or influence of others - is essential:

- To protect clean athletes (and support personnel)
- To prevent conflicts of interest / compromises
- To ensure dedicated expertise (in a complicated field)
- To optimize anti-doping services across sports

²⁴ CAS 2020/O/6689 World Anti-Doping Agency v. Russian Anti-Doping Agency

²⁵ Starting with WADC 2015, art. 20.4.2 [Roles and Responsibilities of NOCs and NPCs] “To respect the autonomy of the NADO in its country, and not to interfere in its operational decisions and activities; art. 20.5.1 [Roles and Responsibilities of NADOs] To be independent in their operational decisions and activities; art. 22.6 [Involvement of Governments] Each government will respect the autonomy of a NADO in its country and not interfere in its operational decisions and activities.” These provisions have been elaborated in subsequent versions of the WADC (see further in this paper).

²⁶ <https://www.wada-ama.org/en/who-we-are/governance>

- To be a credible public advocate for clean sport

NADOs need independence to protect clean athletes (and support personnel) from doping without compromise. This core responsibility should not be confused or diluted by conflicting mandates. This requires single-minded dedication in principle. It requires an absolute commitment to combat doping in both the short and long term, no matter how important the sport (financially and/or culturally) or how big a star the athlete is. No other type of organization can put such interests of clean athletes and other individuals at the forefront. This exemplary leadership is furthermore to the benefit of other stakeholders in the business of sport for whom publicity of a doping scandal can be detrimental.

As the historical remarks above indicate, conflicts of interest are a particular and central problem resulting in ineffective anti-doping. By giving exclusive anti-doping authority to a dedicated and independent organisation, the possibility of such conflicts is largely reduced or mitigated, as long as the independence is respected by stakeholders with inherent conflicting interests. This also protects sport organisations and governments from having to balance competing interests and getting that balance wrong (as described in the Dubin and Black Reports²⁷). However, as described in the next section of this paper, NADO independence does not necessarily prevent individuals in sport organizations or in governments from seeking to influence every day anti-doping operations.

Anti-doping activities are an increasingly complex undertaking requiring a mix of specialized scientific, legal, investigative, sporting, pedagogical and ethical skills and expertise. They are not for amateurs. Anti-doping rules under the World Anti-Doping Programme now run to hundreds of pages, thousands if you include models of best practice and guidelines in addition to the mandatory documents. Only a dedicated and specialist organization with appropriate expert staff can manage and administer all the existing (and future) requirements.

²⁷ See footnotes 7 and 9

Harmonized anti-doping standards across sports can only be achieved under the authority of an independent, central agency. Prescribing these standards and monitoring compliance with them has now become WADA's most important role. But independent administration on a national level is required to ensure the optimal spread of resources over many sports and at all levels of sport. Independence ensures that the NADO can balance the needs and demands for anti-doping services by its sport stakeholders. There is never enough money or other resources to provide an ideal anti-doping programme. Only an independent – and properly sourced – NADO has the judgment, expertise, and impartiality to allocate available resources in the most effective and balanced way to provide the most effective programme in its national context.

Of course, doping reflects wider societal forces. Those include the search for and use of shortcuts (e.g. use of prohibited substances and methods) in all fields of society to make life easier. How often are we told that taking a pill can solve any manner of problem, or urged to buy "labour-saving" devices? Taking prohibited short cuts in sport however is cheating and not only a breach of the sporting rules, but sometimes even illegal. In face of societal pressures, there needs to be a credible public advocate to defend sport's integrity. Clean athletes and their support personnel need to see that someone with authority and credibility is guarding their interests. Independent NADOs are best placed to speak for clean sport as essential to sport's very meaning and purpose in each country.

4. LIMITS TO INDEPENDENCE

Independence cannot be absolute. At least the following factors will always, and probably should always, moderate NADO independence:

- Reliance on funding sources
- Need for accountability
- Observance of national laws
- Compliance with global norms
- Cooperation with stakeholders
- Partnerships with other bodies
- Public perceptions

The funding for anti-doping has to come from somewhere. For most NADOs it comes from the government directly or through public agencies such as national lottery operators. But it can also come from domestic sport organisations, from commercial partners or sponsors or from charitable organisations or foundations. Increasingly, NADOs generate revenue from the sale of their services to other organisations, such as International Federations, domestic sport organisations (especially for emerging sports) and the local organising committees of major event organisers²⁸. The point is that funders must respect the autonomy and the mandate of the NADO; there must be no expectation that funding buys influence or constrains authority on the NADO's day-to-day operations and anti-doping activities. Supported by WADA requirements²⁹, NADOs must be careful to secure funding streams to safeguard that autonomy.

The need for accountability is the appropriate exchange for funding and for the grant of authority for anti-doping. This can take many forms: financial accountability for public or other funds; legal accountability for meeting general statutory requirements (such as annual corporate or financial filings); and accountability for exercise of the NADO's mandate or authority (setting and meeting strategic and operational goals). This is all part of good governance and therefore does not impact a NADO's independence in any negative way. NADOs act in the public interest and the interest of their sport communities. They should do so in a way that is above reproach and be seen to be so.

NADOs must observe the laws of its country. For example, with respect to its legal constitution, employment practices, data protection, ownership of property, the control of prohibited substances through general drug laws (for manufacturing, possession, trafficking, importing/exporting, etc.) and so on. But national laws with respect to sport may also deal with doping and anti-doping to a greater or lesser degree. For example, they (may)

- Recognise/implement international anti-doping commitments (such as the UNESCO Anti-Doping Convention and the Council of Europe Anti-Doping Convention)

²⁸ iNADO Capability Register (2021), section „General: Staff & Resources”

²⁹ As an example, see WADA Guide Operational Independence of National Anti-Doping Organizations under the 2021 World Anti-Doping Code (October 2020) – Chapter 9

- Implement the World Anti-Doping Code and WADC International Standards
- Create the NADO (and/or binding sport arbitration procedures for doping cases)
- Give special powers to the NADO (for example to cooperate with public authorities, to conduct investigations or to conduct anti-doping programmes outside of organised sport in commercial training gymnasias)
- Criminalise doping and the use/possession of prohibited substances through a special anti-doping law
- Legislate for athlete support personnel anti-doping rule violations (doping as professional misconduct / malpractice as determined by professional governing bodies)

These laws and regulations may on occasion be a challenge for NADOs, who equally are required to be compliant with the (international) World Anti-Doping Code and International Standards (see next point). NADOs must be vigilant so this does not happen, and if it does legislative changes ought to be sought. But equally, governments rely on their NADOs for their anti-doping expertise, so that the ongoing relationship between NADO and government colleagues must be one of mutual respect.

NADOs are signatories of the World Anti-Doping Code, and therefore must implement and act in compliance with the global norms as defined in the World Anti-Doping Code and the WADC International Standards. Amongst others, this requires bilateral relations with other NADOs, with International Federations and their service providers, and with major event organizers to ensure exchange of anti-doping information and cooperation where that information indicates doping problems requiring cooperative action. This can be facilitated through active participation in international fora and organisations. All of these actions enhance a NADO's stature and influence and, therefore, its operational independence.

Athletes are the most important stakeholders of NADOs. Therefore, cooperation with athletes and their support personnel should be at the heart of a NADO. This can be achieved through a close relationship with the national athletes' organization or commission – and a dialogue with other leading voices of organized players, as required – to secure athletes' perspectives in

governance, education, and policy-making, and support the development and implementation of clear policies and resources to support athletes and their representatives.³⁰

Partnerships with other professional entities, both governmental and non-governmental, extend a NADO's reach. NADOs are often very small organizations serving large sporting populations and indeed the national population at large. Partnerships with professional bodies (such as for sport doctors, coaches and pharmacists who serve athletes on a daily basis and need to be advocates for clean sport) and with public authorities (such as customs and border control agencies, food and drug regulators, police forces and public prosecutors), are increasingly essential for the delivery of comprehensive anti-doping programs. Partnerships with the sports and general media, with mutual respect for each other's independence and autonomy, are necessary if the NADO is to participate in and shape public consciousness and debate about doping and clean sport.

Finally, the public at large should also be encouraged to support clean sport and understand the risks of doping in both sport and outside of it (such as the promotion of illegal practices and even organized crime when individuals purchase prohibited substances). However, this should not so much be seen as a limitation on a NADO's independence, but rather as a necessary part of achieving its mandate.

5. NADO INDEPENDENCE IN PRACTICE

That NADOs play a pivotal role in the fight against doping is underscored by the scope of their activities, which, in turn, led to an increasing realisation that enhancing the effectiveness and trustworthiness of NADOs implies enhancing the quality of their institutional design and operational management.

³⁰ See 2025 iNADO Report „Athlete Representation in Anti-Doping Organisations” ([New iNADO Report Highlights the Value of Athlete Representation within Anti-Doping Organizations | Institute of National Anti-Doping Organisations](#))

The operative international instruments do not deal directly with the issue. The UNESCO International Convention Against Doping in Sport³¹ does not say very much about “NADOs” as such. Nor does the Council of Europe’s 1989 Anti-Doping Convention (ETS No. 135)³² nor its 2002 Additional Protocol (ETS No. 188)³³. But the fact that both conventions recognise “*national anti-doping organizations*” as entities distinct from States Parties and from “*sport organisations*” suggests that substance is to be given to such distinction, i.e. that NADOs are to be independent from other entities. In 2018, the Council of Europe approved a recommendation “... *recognising the crucial role of National Anti-Doping Organisations ... and the need to ensure their independence in operational decisions and activities.*”³⁴ Amongst others, the Recommendation calls for an adequate foundation in law, respect for NADO autonomy, governance structures that avoid actual or potential conflicts of interest, and the adoption of policies that reflect overriding principles of good governance.

On the other hand, the World Anti-Doping Code required operational independence since 2015, and the (new) 2027 World Anti-Doping Code does explicitly set out the expectation that each country should have a NADO, and that the NADO should operate autonomously from its government and from its NOC/NPC³⁵ (Table 1). WADA facilitates the interpretation of the principles of NADO Operational Independence as defined by the WADC by means of a WADA Guide on Operational Independence of NADOs³⁶. This guide recommends best practice which NADOs are encouraged to adopt and provide examples of their implementation.

³¹ <https://www.unesco.org/en/legal-affairs/international-convention-against-doping-sport>

³² See Footnote 12

³³ <https://rm.coe.int/1680081569>

³⁴ Council of Europe T-DO/Rec (2018/1), Recommendation on the operational independence of National Anti-Doping Organisations.

³⁵ Art. 20.4.6 of the WADC states that NOC or its designee shall fulfil the responsibility of a NADO where one does not already exist. In a comment to the (new) definition of NADO Operational Independence (WADC 2027), it is furthermore stated that the NOC, when acting as a NADO pursuant to Article 20.4.6, shall comply with the requirements of National Anti-Doping Organization Operational Independence.

³⁶ Actual version available from <https://www.wada-ama.org/en/resources/guide-operational-independence-national-anti-doping-organizations-nados>. At time of publication, this Guide is updated to match with the provisions of the WADC2027.

Table 1. Provisions related to NADO (Operational) Independence in the 2027 World Anti-Doping Code³⁷

20 Additional Roles and Responsibilities of Signatories and WADA

Anti-Doping Organizations shall work together ethically and in good faith to achieve the purposes of the Code.

...

[Notwithstanding the foregoing,] an Anti-Doping Organization shall not delegate any aspect of Doping Control (including, without limitation, Testing and Results Management) to a Delegated Third Party where such delegation could reasonably lead to a potential or actual conflict of interest; [...].

20.1 Roles and Responsibilities of the International Olympic Committee

20.1.18 To respect the autonomy and independence of National Anti-Doping Organizations as well as the requirements of National Anti-Doping Organization Operational Independence

20.2 Roles and Responsibilities of the International Paralympic Committee

20.2.16 To respect the autonomy and independence of National Anti-Doping Organizations as well as the requirements of National Anti-Doping Organization Operational Independence

20.3 Roles and Responsibilities of International Federations

20.3.2 To require, as a condition of membership, that their National Federations have used their best efforts to ensure that the National Anti-Doping Organization in their country possesses complete authority to implement their Anti-Doping

³⁷ <https://www.wada-ama.org/en/resources/world-anti-doping-code-and-international-standards/world-anti-doping-code>

activities over all Athletes and other Persons under the jurisdiction of the National Federation [...].

...

(ii) requiring that their National Federations and the International Federation's affiliates respect the autonomy and independence of the National Anti-Doping Organization in their country as well as the requirements of National Anti-Doping Organization Operational Independence

(iii) requiring that their National Federations and the International Federation's affiliates recognize the authority of the National Anti-Doping Organization in their country in accordance with Article 5.2.1 and assist as appropriate with the National Anti-Doping Organization's implementation of the national Testing program for their sport; [...]

20.3.23 To respect the autonomy and independence of the National Anti-Doping Organization in their country as well as the requirements of National Anti-Doping Organization Operational Independence

20.4 Roles and Responsibilities of National Olympic Committees and National Paralympic Committees

20.4.3 To respect the autonomy of the National Anti-Doping Organization in their country and not to interfere in its operational decisions and activities and to use their best efforts that the National Anti-Doping Organization in their country possesses complete authority to implement their Anti-Doping Activities over all Athletes and other Persons under the jurisdiction of the National Olympic Committee or National Paralympic Committee.

20.4.6 To cooperate with their National Anti-Doping Organization and to work with their government to establish a National Anti-Doping Organization where one does not already exist, provided that, in the interim, the National Olympic Committee or its designee shall fulfil the responsibility of a National Anti-Doping Organization.

20.4.21 To respect the autonomy and independence of National Anti-Doping Organizations as well as the requirements of National Anti-Doping Organization Operational Independence.

20.5 Roles and Responsibilities of National Anti-Doping Organizations

20.5.1 To comply with the requirements of National Anti-Doping Organizational Independence.

20.6 Roles and Responsibilities of Major Event Organizations

20.6.15 To respect the autonomy and independence of the National Anti-Doping Organization in their country as well as the requirements of National Anti-Doping Organization Operational Independence.

22 Involvement of Governments

22.8 Each government that does not have a National Anti-Doping Organization in its country should work with its National Olympic Committee to establish one.

22.9 Each government should respect the autonomy and independence of a National Anti-Doping Organization in its country or a Regional Anti-Doping Organization to which its country belongs, as well as the requirements of National Anti-Doping Organization Operational Independence, [...]

Definition NADO Operational Independence

This means that, in addition to complying with the obligations of *Operational Independence*: (1) a *National Anti-Doping Organization* shall implement its operational activities without any undue influence, interference, or involvement from any sport organization or government entity; (2) no *Person* who is involved in the management or operations of a sport organization or government entity shall be simultaneously involved in or interfere with the operational activities of a *National Anti-Doping Organization*; (3) a *National Anti-Doping Organization* shall neither delegate any *Doping Control* responsibility to a sport organization or government entity nor permit a sport organization or government entity to conduct any *Doping Control* responsibility; and (4)

a *National Anti-Doping Organization* shall independently determine the allocation of its budget and staff.

[Comment to Definition NADO Operational Independence: A National Anti-Doping Organization's operational activities include the implementation of day-to-day administration and decision-making regarding staff and budget allocation, and the Doping Control process.

The requirement of National Anti-Doping Organization Operational Independence would not prohibit, for example, the collaboration between Signatory staff members at International Events; National Anti-Doping Organization representatives providing expert advice to other Anti-Doping Organizations; the involvement of state-employed doctors or nurses as sample collection personnel; the participation of National Anti-Doping Organization staff in local sports associations or clubs; or the involvement of National Federation staff in anti-doping Education activities.

Where the National Olympic Committee is acting as a National Anti-Doping Organization pursuant to Article 20.4.6, it shall comply with the requirements of National Anti-Doping Organization Operational Independence. If, however, the National Olympic Committee acting as the National Anti-Doping Organization cannot ensure that it fully respects the requirements of National Anti-Doping Organization Operational Independence, it should delegate its Doping Control activities to a Delegated Third Party for independent implementation.]

At a level of fundamental principle, it is suggested that NADO independence should be based on at least these three elements:

- Independent governance
- Operational independence
- Freedom to determine interdependencies (nationally and internationally)

Independent governance is perhaps the most sensitive. Theoretically, the governance of the NADO should be independent of funders and of other stakeholders. But many credible NADOs have governing boards made up of representatives of stakeholders (athletes, domestic sport organizations, government, sport doctors, and so on). Some do not have a governing board but answer directly to sport ministries or Ministers. Even the most independently-governed NADOs include on their governing boards individuals with past ties to sport, such as retired world-class athletes, sport doctors or sport administrators. Valuable expertise cannot entirely be ignored, but as advocated above, will require management of potential conflicts of interest³⁸.

The legal form of NADOs also varies depending on national history, the domestic legal system and the domestic sport environment, making it difficult standardize governance. Some NADOs exist as a government agency or some quasi-governmental entity. Some are units in sport confederations, National Olympic Committees or other umbrella sport groups. Some are private companies or foundations with no legal connection to government or to domestic sport organizations. Most of these are not-for-profit entities. These variations reflect the variety in sports culture and in legal system from country to country. To ensure maximum integrity and credibility regardless of legal form or governing board composition, transparent governance is necessary. Transparent governing board appointment criteria and processes (and personal conflict of interest measures), transparent meetings and decision-making (except when personal, financial or operational privacy must be protected), transparent objectives and performance evaluation, external financial oversight (and published audited financial statements), periodic public policy or operational reviews, periodic briefings for stakeholders and consensus-building on anti-doping program changes: all these are necessary to protect independence and demonstrate trustworthiness. To a large extent, good governance is independent governance.

³⁸ See Geeraert A., & van Eekeren F (2021). *Good Governance in Sport: Critical reflections*. (Routledge Research in Sport Business and Management). Routledge. ISBN 9781032001234

A number of provisions of the 2027 World Anti-Doping Code make reference to the need for information sharing between public authorities and NADOs.³⁹ This requires, presumably, NADOs with the legal capacity to be at the receiving end of that information and intelligence. This operative imperative may - and even should – drive the legal constitution of a NADO in some countries to be public or quasi-public entities.

Operational independence takes many forms. Within the confines of international norms for anti-doping, NADOs must find the most effective way to protect clean sport nationally. The autonomy to find the appropriate balance between education, prevention, testing, and the use of intelligence and investigations to have the greatest deterrence against doping and the most effective detection of anti-doping rule violations. The autonomy to decide what efforts to devote to international anti-doping capacity building so national athletes can be more confident that their competitors from other countries are competing clean. The autonomy to decide how and when to enter the public debate about protecting the integrity of sport. The autonomy to balance services between dozens of stakeholder sport organizations, especially in light of the differences in risk of doping from sport to sport. The autonomy of advancing and developing (technical) best practices that have considerable financial and staffing implications. The discretion to determine which possible cases to pursue and to what outcome, and which to abandon or seek accommodation because of flaws in doping control, evidentiary problems or proportionality. This all requires adequate resources (financial, human and technical) and ensure the freedom to find additional sources of revenue to supplement public or sport organization funding, independence in hiring, in managing finances and in managing public relations.

Finally, the freedom to determine interdependencies entitles NADOs to the right to decide with whom and why they enter into casual or binding relationships. In other words, when and for what reasons to surrender a part of their independence. For example, some NADOs rely on outside experts to advise them or even determine for them whether the files on possible anti-doping rule violations ought to be pursued. This surrender of decision-making is seen as an

³⁹ This refers, amongst others, to art. 5.7, art. 22.3, art. 22.6 of the 2027 WADC, and numerous provisions of the 2027 WADC International Standard for Intelligence and Investigations.

acceptable price as part of risk management. Another example relates to successful working relationships with public authorities such as customs and border agencies or police forces. They will require the NADO to implement certain administrative, IT and staff security measures. Otherwise, useful information will not be shared by those public authorities. Such measures will constrain the NADO and require financial commitment. But given the expectations of the 2027 World Anti-Doping Code, such appropriate surrenders of NADO sovereignty are increasingly necessary for a national antidoping program to follow best practices.

Over the past years, there is a growing academic interest (and literature) on (sport) good governance, under the conception that good governance is concerned with greater organizational effectiveness. However, good governance has most and foremost to deal with a way of being, organizing and thinking.⁴⁰ This interpretation of governance led to an assessment of NADO good governance⁴¹ through an easily applicable measurement tool spanning six dimensions, operationalized through principles - 50 in total - which are measured via dichotomous indicators (Table 2)⁴².

Table 2. Dimensions of good governance for NADOs

Dimension 1: Operational Transparency (10 principles)
Dimension 2: Anti-Doping Transparency (9 principles)
Dimension 3: Democratic Processes (8 principles)
Dimension 4: Internal Accountability and Control (8 principles)
Dimension 5: Operational Independence (7 principles)
Dimension 6: Anti-doping Responsibility (8 principles)

⁴⁰ Camy, cited in ISCA (2013), *Grassroots Governance: Focus on Policy, People and Processes*. (p. 9)

⁴¹ Geeraert A (Ed.) (2021). *National Anti-Doping Governance Observer. Final report*. Aarhus: Play the Game / Danish Institute for Sports Studies (ISBN 978-87-93784-05-5), p. 12

⁴² Full details on the scoring system can be found in Geeraert A (2021). *National Anti-Doping Governance observer. Indicators and instructions for assessing good governance in national anti-doping organisations*. Aarhus: Play the Game / Danish Institute for Sports Studies (ISBN 978-87-93784-49-9)

According to the authors of this tool, it is intended as a starting point for discussions about proper structures in place, governance deficits and the policies aimed at addressing them. It provides a holistic and readily understandable diagnosis of potential institutional weaknesses and shortcomings of NADOs in different dimensions of good governance which allows for benchmarking that serves as an ideal starting point for a discussion on good governance policies. It should not be used as a single rigid template for governance reforms. Dialogue with and within NADOs is necessary to come to adequate institutional solutions to governance challenges. Benchmarking is merely a first step in a longer process towards better governance in NADOs.

But there are likely more and more complementary models to explore. One suggestion is to formalize peer-review programs of ADO governance: transparent assessment of an organization by one or more peers would provide a measure of external and expert analysis. The “compliance with commitments” program of the Monitoring Group for the Council of Europe’s Anti-Doping Convention would be a model.⁴³ Equally, different NADOs initiated their own quality assessment through independent ISO Certification, e.g. ISO 9001:2015 Quality management systems Certification⁴⁴. This follows a recommendation by WADA already dating back to 2004⁴⁵. The added value of such independent assessment is the focus on meeting customer expectations (increasingly important from the perspective of the athlete, the NADO’s main stakeholder) and the commitment to improve quality. Such an ISO Standard helps identify and eliminate inefficiencies, reduce waste, streamline operations, and promote informed decision-making, ultimately resulting in cost savings and better outcomes.

⁴³ See https://www.coe.int/en/web/sport/monitoring_t-do. Although it is to be remembered that the Monitoring Group did conduct a compliance visit to Russia in 2013, and the resulting report did not disclose problems of the sort found by the WADA Independent Commission (see footnotes 19-20)

⁴⁴ <https://www.iso.org/standard/62085.html>

⁴⁵ https://www.wada-ama.org/sites/default/files/resources/files/WADA_Guidelines_Certification_EN.pdf

6. OPERATIONAL INDEPENDENCE NOT LIMITED TO NADOs

The credibility of anti-doping and the confidence of clean athletes is not only undermined by government interference on a national level. Earlier in this paper, reference is made to the 1998 Tour de France scandal as a turning point in anti-doping management.

Nevertheless, cycling continued to face problems, not least due to the hesitant and poor leadership of the UCI under different presidents. In 2015, the UCI commissioned a Report on how its own anti-doping program was undermined by a lack of independence⁴⁶, which concluded that the (then) UCI leadership had a significant influence on anti-doping matters. Different interviews confirmed that the UCI leadership took strategic decisions in anti-doping and was informed and aware of, as well as involved in, decisions in relation to all important anti-doping matters on an operational level. In combination with the UCI leadership keeping very close ties with some of the riders that were highly suspected of doping, these facts were considered a source of conflicts of interest. This became particularly evident in relation to Lance Armstrong. The creation of the Cycling Anti-Doping Foundation (CADF), and in particular its full independence from the UCI since 2013, was considered a key element in restoring the UCI's damaged credibility in anti-doping matters, as it guaranteed independence preventing inappropriate influence by the UCI leadership on the UCI anti-doping program.

In the aftermath of the previously mentioned ARD documentaries, an independent commission led by Richard Pound, former WADA President, identified systemic failures within the IAAF and Russia that prevented or diminished the possibility of an effective anti-doping program. Implied were (a) the Moscow Laboratory; (b) RUSADA; (c) ARAF; (d) the Russian Federation (Ministry of Sport); and (e) the IAAF. In a follow up report, the Independent Commission concluded *"...that the IAAF lacked a system of good governance that could have identified improper conduct ..."*⁴⁷. As part of their work, the Commission provided information to Interpol that *"tends to demonstrate*

⁴⁶ Report of the Cycling Independent Reform Commission (CIRC) (2015).

<https://www.lawinsport.com/topics/news/item/the-uci-publishes-cycling-independent-reform-commission-report>

⁴⁷ Independent Commission Report #2, January 14, 2016

criminal conduct on the part of certain individuals and organisations."⁴⁸. This included information on the conduct of the then IAAF President (and his son), and the IAAF anti-doping manager.

As a result of all this, the IAAF (now World Athletics) suspended ARAF, the IAAF Ethics Commission disciplined members of the IAAF's former top management, and the IAAF formed the Athletics Integrity Unit.⁴⁹ The unit, founded in 2015, covers all areas of integrity for international-level athletes and athlete support personnel (anti-doping, illegal betting, anti-corruption, transfers of allegiance and age manipulation). In 2020, the former IAAF President, together with his son, the former IAAF anti-doping manager, and a few others, were convicted in France on charges of cover up, corruption and money laundering for covering up Russian doping cases, revealed through the ARD documentaries and the subsequent investigations.

Recognizing the need for action, the 4th Olympic Summit in Lausanne (October 2015) agreed that a unified approach was needed to ensure anti-doping testing is independent from sports organizations⁵⁰, and formally requested that WADA explore the concept of an independent testing authority that could serve the collective anti-doping needs for all International Federations. One month later, WADA, along with the IOC and representatives from the IFs agreed to establish a small working group to define the issues requiring a feasibility study, and any terms of reference for independent testing.. In 2017, this led to the establishment of the International Testing Agency, becoming operational in 2018. This is a significant step to make anti-doping programs fully independent from the International Federations. The ITA, however, is not mandatory for International Federations. While some International Federations delegated their entire anti-doping activities to the ITA, others delegated parts of their activities, some have established their own operationally independent integrity units (see examples from UCI and World Athletics above), and others keep anti-doping operations within the same operational structure as their sports operations. Recognizing the need for operational independence, under the 2027 World Anti-Doping Code "*International Federations are encouraged, to the extent their*

⁴⁸ Independent Commission Report #1, November 9, 2015

⁴⁹ <https://worldathletics.org/news/press-release/araf-accepts-full-suspension>

⁵⁰ <https://stillmed.olympics.com/media/Document%20Library/OlympicOrg/Documents/Conferences-Forums-and-Events/Events/Olympic-Summit/4th-Olympic-Summit-Communique-Lausanne-2015.pdf>

resources and structural framework allow, to ensure that their anti-doping activities operate independently from their sports governance and operations.”⁵¹

The importance of the delegation of anti-doping operations to the ITA or to independent units is underlined by two other major scandals in Olympic sport.

By June 2017, a targeted re-analysis of samples collected from the 2015 World Championships and the Beijing 2008 and London 2012 Olympic Games had resulted in seventy-three (73) weightlifters having their medals rescinded as they had retrospectively been identified to have committed an anti-doping rule violation. In 2020, an ARD documentary accused the then IWF President, Tamás Aján, of corruption in anti-doping procedures and financial malpractice⁵². Following the ARD documentary, Richard McLaren was appointed to carry out an investigation into the doping and corruption claims. He discovered that more than 10 million US dollars was unaccounted for, that 40 doping positives had been covered up, and that vote-buying was rampant at electoral congresses of the IWF⁵³. In 2017, WADA-led investigations revealed that doping within weightlifting extended beyond the athletes and included support or complicity from DCOs, support personnel, coaches and officials⁵⁴. A number of unprocessed doping cases were passed onto the International Testing Agency for investigation, ultimately leading to (lifetime) bans.

Different sport, same problem. In April 2018, it was widely reported that the criminal authorities in Austria and Norway were investigating allegations that then-IBU President Anders Besseberg and IBU Secretary General Nicole Resch had buried evidence of Russian doping in

⁵¹ Comment to art. 20.3.1 of the 2027 World Anti-Doping Code

⁵² ARD Documentary “Lord of the Lifters” (18.04.2020): <https://www.ardmediathek.de/video/sportschau/geheimsache-doping-der-herr-der-heber/das-erste/Y3JpZDovL3dkci5kZS9CZWl0cmFnLTl0ZDlxYTY5LTZhNzgtNGJhMC05OWFiLWQ4ZGYwYjc5NDNjZg>

⁵³ McLaren Independent Investigator Report to the Oversight and Integrity Commission of International Weightlifting Federation, June 04, 2020, available from <https://ita.sport/resource/mclaren-independent-investigator-report-to-the-oversight-and-integrity-commission-of-the-international-weightlifting-federation/>

⁵⁴ WADA Intelligence and Investigations Department (October 2020). A summary of WADA investigations into the IWF and the sport of weightlifting.

return for improper benefits. The IBU External Review Commission Report⁵⁵ identified a pattern of corrupt and unethical decision-making by the IBU President - at the time a member of the WADA Foundation Board - and his close allies *"protecting Russian interests in virtually everything they did"*, in combination with the lack of any proper governance controls in the sport to hold them accountable. The findings ultimately also led to the then IBU President Besseberg being found guilty of corruption-related offences in Norway. In parallel, as allegations of corruption, fraud and wrongdoing were uncovered in 2018, the IBU created the Biathlon Integrity Unit as an operationally independent and specialized unit of the IBU in 2019. As well as addressing ethical issues in the sport independently and expertly, the Unit also carries out the IBU's anti-doping work.

The idea behind independence is grounded in addressing potential conflict of interest where doping control activities are compromised by interests other than detecting doping, e.g. glory of a government, the commercial interests of sport, such as an International Federation (IF), or the reputation of a sport/ country above the protection of athletes and fair and honest sport. Therefore, it is imperative that independence is ensured for ALL involved in doping control activities. When applying the principle, there is no difference between the need for operational independence of NADOs and the need for operational independence of anti-doping activities in IFs or other entities involved in doping control, as has been made possible through the establishment of independent anti-doping units, the outsourcing antidoping operations to the ITA, and/or the implementation of vetting processes for official positions.

7. OUTLOOK

Policies enabling a metaphorical fox guarding the henhouse of sport allowing sport policing itself and threats from lack of independence, undue state influence, and corruption, are part of the history of anti-doping and have prompted welcome changes in response. Steps have been taken to rebuild and reinforce good governance principles in the wake of these events. These

⁵⁵ IBU External Review Commission Final Report, January 28, 2021, https://assets.ctfassets.net/cz0vl36hcq0x/7qVMY41VSetZAfKFMDL3ix/9ee089840f6321162af1de3d3ccff2e8/ERC_Final_report_Redacted_publication_version_28.01.2021.pdf

include the establishment of IF independent integrity units or the transfer of the IF anti-doping program to the International Testing Agency, a revision of the governance of WADA, updated operational independence provisions in subsequent versions of the WADC, as well as the establishment of National Anti-Doping Agencies.

Independence may not be the only answer, but it is a fundamental principle which must operate for other checks and balances to be credible and effective. Oversight that monitors compliance with current “NADO Operational Independence” provisions of the Code is a good start. However, WADA’s compliance scrutiny risks focusing on the more technical operations of ADOs, such as whether they operate an intelligent testing program, or conduct results management in individual cases of doping in a fair and efficient manner, or make therapeutic use exemptions decisions strictly in accordance with the Code and other relevant international norms. Such operations are important, but these parts of a Code-compliant program will be undermined if the organization conducting them lacks independence. Furthermore, it is still important to remember – and safeguard – that ultimately NADOs cannot be held liable and accountable for decisions NADOs don’t make. This applies, amongst others, to decision-making by independent hearing and appeal panels or by national governments regarding legislation that is deemed not to meet the standards set forth under the Code.

To future proof the Code and ensure that all anti-doping processes are subject to good governance and protected from undue influence, the principle of independence should apply equally to all entities, including the IFs and their respective anti-doping units, as well as the NADOs. iNADO advocates for this through its position statement, released in May 2025⁵⁶.

Whatever solutions are brought forward, it is unlikely that one single tool should ever be used as a template for autonomy/independence. As concepts under the umbrella terminology of “sporting governance”, one needs to recognize that it is exercised by people who hold particular beliefs and ideas and who are influenced by the broader (institutional) environment in which they operate. Consequently, cultural-ideational, personal, or systemic factors are also

⁵⁶ See Footnote 2

important determinants of organizational outcomes, so that dialogue with and within all partners in the anti-doping eco-system is necessary to come to adequate institutional solutions to governance challenges.

Until such institutional approaches are developed, the measures outlined in this paper can be analyzed by individual Anti-Doping Organizations (NADOs and other anti-doping organizations) to enhance their independence and better immunize themselves against the external pressures that have previously undermined, and in some cases continue to undermine, anti-doping practice.

iNADO⁵⁷

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⁵⁷ Dr. Peter Van de Vliet, iNADO CEO, is the main author of this paper, which expands on previous iNADO documents from the hand of Joseph de Pencier, first iNADO CEO. Comments on previous versions were provided by Anders Solheim as iNADO Chairperson, Dr. Lars Mortsiefer of NADA Germany, Shin Asakawa and Chika Hirai of the Japan Anti-Doping Agency, Martin Holmlund Lauesen of Anti-Doping Norway, Chris Lavey of Bird & Bird, and prof. Mike McNamee of Interdisciplinary Centre for Ethics, Regulation and Integrity in Sport, KU Leuven.