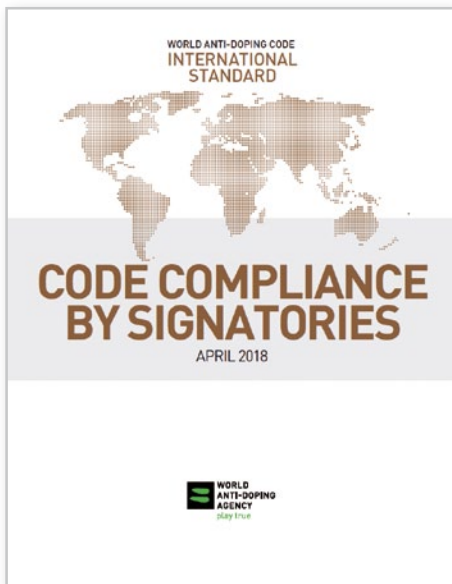




BULL'S EYE THE ISSF IPOD ON DOPING

MONITORING COMPLIANCE TO THE ISSF ANTI-DOPING RULES AND TO THE WORLD ANTI-DOPING CODE

AS A SIGNATORY TO THE WORLD ANTI-DOPING CODE (THE CODE) AND THROUGH THE IMPLEMENTATION OF ITS ANTI-DOPING PROGRAM, THE ISSF IS COMMITTED TO COMPLY WITH SEVERAL LEGAL, TECHNICAL AND OPERATIONAL REQUIREMENTS THAT ARE SET OUT IN THE CODE AND ITS ACCOMPANYING INTERNATIONAL STANDARDS. SUCH COMPLIANCE BY ALL CODE SIGNATORIES IS NECESSARY TO DELIVER HARMONIZED, COORDINATED AND EFFECTIVE ANTI-DOPING PROGRAMS AT THE INTERNATIONAL AND NATIONAL LEVEL, SO THAT ATHLETES AND OTHER STAKEHOLDERS CAN EXPERIENCE DOPING-FREE COMPETITION ON A LEVEL PLAYING FIELD WHEREVER SPORT IS PLAYED.¹



THE INTERNATIONAL STANDARD FOR CODE COMPLIANCE BY SIGNATORIES

As a means of monitoring all its Signatories' compliance to the Code, WADA has published the International Standard for Code Compliance by Signatories (ISCCS) which came into effect April 1, 2018. One of the main objectives of the ISCCS is to ensure that all Signatories deliver anti-doping programs within their respective spheres of responsibility that meet the many requirements of the Code and the International Standards, so that there is a level playing field wherever sport is played².

As a Signatory to the Code, the ISSF has many responsibilities and obligations to fulfill. Under the ISCCS, failure by the ISSF (or any other Signatory) to respect these responsibilities and obligations could result in a finding of Non-Compliance by the WADA Compliance

Review Committee. Such a finding would result in the imposition of corrective actions as well as possible sanctions. Pursuant to Article 20.3 of the Code, as an International Federation, the ISSF roles and responsibilities are as follows:

20.3.1 To adopt and implement anti-doping policies and rules which conform with the Code.

20.3.2 To require as a condition of membership that the policies, rules and programs of their National Federations and other members are in compliance with the Code, and to take appropriate action to enforce that condition.

20.3.3 To require all Athletes and each Athlete Support Person who participates as coach, trainer, manager, team staff, official, medical or paramedical personnel in a Competition or activity authorized or organized by the International Federation or one of its member organizations to agree to be bound by anti-doping rules in conformity with the Code as a condition of such participation.
(...)

20.3.5 To require each of their National Federations to establish rules requiring all Athletes and each Athlete Support Person who participates as coach, trainer, manager, team staff, official, medical or paramedical personnel in a Competition or activity authorized or organized by a National Federation or one of its member organizations to agree to be bound by antidoping rules and Anti-Doping Organization results management authority in conformity with the Code as a condition of such participation.
(..)

20.3.7 To take appropriate action to discourage noncompliance with the Code, in accordance with Article 23.5 and the International Standard for Code Compliance by Signatories.

20.3.12 To promote anti-doping education, including requiring National Federations to conduct anti-doping education in coordination with the applicable National Anti-Doping Organization.
(...)

Clearly, the ISSF is required to undertake many tasks under the Code to ensure its anti-doping program remains Code Compliant. Inevitably, some of these responsibilities are shared with its national federations whom, as a condition of participation, must also have rules and regulations that are in conformity with the Code and ISSF Anti-Doping Rules.

THE ROLES AND RESPONSIBILITIES OF ISSF NATIONAL FEDERATIONS UNDER THE CODE AND ISSF ANTI-DOPING RULES

As stated above, Code Article 20.3 requires, among others, that International Federations enforce Code compliance by their members/recognized bodies.

Notably, as expressly stated in articles 20.3.2, 20.3.3 and 20.3.5 of the Code, the ISSF is required to ensure as a condition of participation that each of its national federations establishes anti-doping rules that respect the ISSF Anti-Doping Rules.

WADA does not actively monitor Code compliance by ISSF member Federations. Under the ISCCS, WADA expects the ISSF will do so. And, if during its monitoring activities WADA learns that an ISSF national federation appears to be non-compliant, it will notify the ISSF for appropriate follow-up and action in accordance with the ISSF's obligations under the Code. WADA would then impose reme-

¹ Introduction and Scope. WADA International Standard for Code Compliance by Signatories

² Part two Article 5.1 of the WADA ISCCS

dial actions and/or sanctions as necessary and warranted. In accordance with article 17 of the ISSF Anti-Doping Rules, it is incumbent upon each national federation to not only establish anti-doping rules that comply with the ISSF Anti-Doping Rules and the Code but to also actively implement them. Accordingly, it is the ISSF's responsibility to oversee and monitor each of its national federations regulatory documents, particularly those which relate to anti-doping.

Therefore, as part of a mandatory WADA Code Compliance exercise, the ISSF sent out a circular letter to all its national federations at the beginning of 2018 informing them that the ISSF was performing an audit to ensure they have proper anti-doping rules in place. Each national federation was asked to submit its national level policies/rules to the ISSF in order to confirm recognition and respect of the ISSF Anti-Doping Rules. More specifically, each respective national federation and its members, athletes, and athlete support personnel need to formally acknowledge by way of regulations that they agree to be bound by the relevant provisions of the ISSF Anti-Doping Rules in all matters arising out of ISSF's jurisdiction.

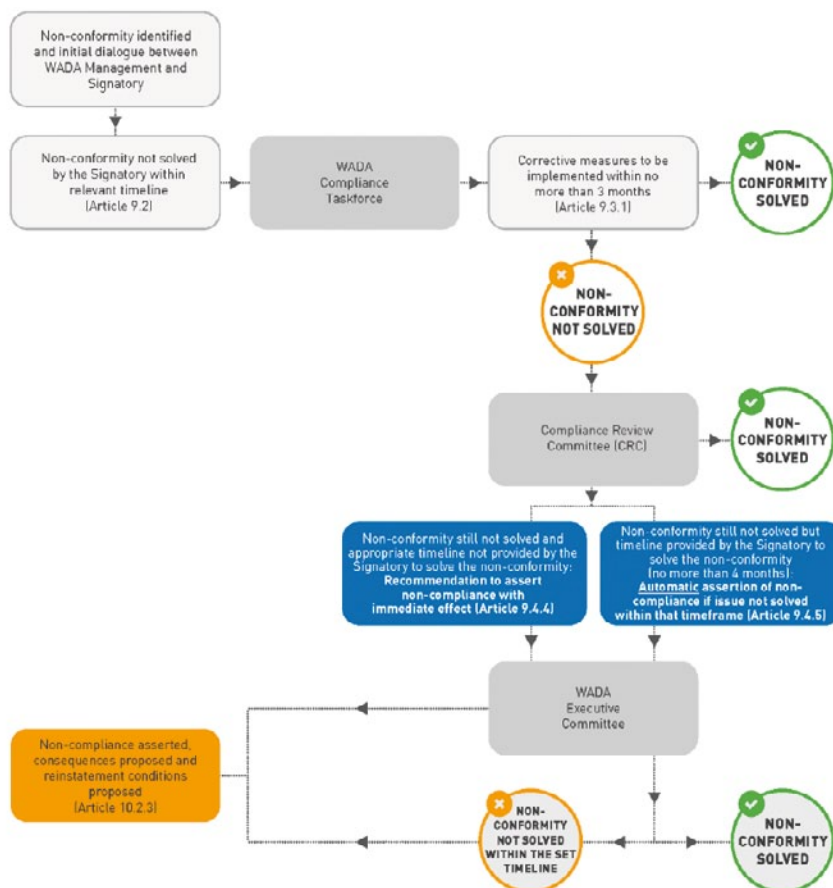
What are ISSF National Federations' responsibilities and obligations under the ISSF Anti-Doping Rules?

Pursuant to article 17 of the ISSF Anti-Doping Rules, the roles and responsibilities of each ISSF national federation are as follows:

17.1 All National Federations and their members shall comply with these Anti-Doping Rules. All National Federations and other members shall include in their regulations the provisions necessary to ensure that the ISSF may enforce these Anti-Doping Rules directly against Athletes within their anti-doping jurisdiction (including National-Level Athletes). These Anti-Doping Rules shall also be incorporated either directly or by reference into each National Federation's rules so that the National Federation may enforce them itself directly as against Athletes within its anti-doping jurisdiction (including National-Level Athletes).

17.2 All National Federations shall establish rules requiring all Athletes and each Athlete Support Personnel who participates as coach, trainer, manager, team staff, official, medical or paramedical personnel in a Competition or activity authorized or organized by a National Federation or one of its member organizations to agree to be bound by these Anti-Doping Rules and to submit to the results management authority of the Anti-Doping Organization responsible under the Code as a condition of such participation.

17.3 All National Federations shall report any information suggesting or relating to an anti-doping rule violation to the ISSF and to their National Anti-Doping Organizations and shall cooperate with investigations conducted by any Anti-Doping Organization with authority to conduct the investigation.



Flow-chart depicting process from identification of Non-Conformity to assertion of non-compliance (Articles 6.1 to 6.3)

17.4 All National Federations shall have disciplinary rules in place to prevent Athlete Support Personnel who are Using Prohibited Substances or Prohibited Methods without valid justification from providing support to Athletes under the jurisdiction of the ISSF or the National Federation.

17.5 All National Federations shall be required to conduct anti-doping education in coordination with their National Anti-Doping Organizations.

ISSF'S NATIONAL FEDERATION ANTI-DOPING RULE REVIEW

Clearly, the incorporation of the ISSF's Anti-Doping Rules into each of its national federations rules is mandatory under Article 17. Accordingly, during its audit, ISSF asked each of its national federations to send its existing anti-doping policies for review, and, where they did not have rules, the ISSF provided a few different templates that would satisfy the general compliance requirements under the ISSF Anti-Doping Rules and Code.

Because this is a formal ISSF audit that has been imposed upon ISSF by the World Anti-Doping Agency for Code Compliance purposes, national federations were required to answer to the ISSF within two months.

In this two-month timeline, national federations were asked to provide confirmation that they have fulfilled or are in the process of fulfilling this requirement and to attach all anti-doping rules, or the relevant excerpt of their supporting rules. This deadline was

later extended to April 1 to allow certain federations to ratify their Rules accordingly.

The ISSF legal team reviewed each national federation's regulatory documents as soon as they were received. Where the existing policies did not satisfy the requirements, the ISSF informed the national federation accordingly and offered suggestions as to what could be done to effectively meet these requirements. Where the existing policies generally complied with the ISSF Anti-Doping Rules and the Code, the ISSF provided the necessary formal confirmations to the national federation and encouraged it to actively implement these rules not only in theory but also in practice.

At the time the extended deadline had expired, there were many ISSF national federations who still had not submitted their Rules for review. These national federations have been noted as being non-compliant for the time being.

COMPLIANCE BY ALL

The ISSF must comply with the World Anti-Doping Code. By extension, ISSF national federations must comply with the ISSF Anti-Doping Rules (as well as their National Anti-Doping Organization or National Olympic Committee's rules at a national level).

Conversely, athlete and athlete support personnel also have various responsibilities and obligations that are clearly outlined in the ISSF Anti-Doping Rules, rules to which they are bound as a condition of membership and participation in the ISSF.

What are the responsibilities and obligations of each athlete under article 23.1 of the ISSF Anti-Doping Rules?

- To be knowledgeable of and comply with the ISSF Anti-Doping Rules.
- To be available for Sample collection at all times.
- To take responsibility, in the context of anti-doping, for what they ingest and Use.
- To inform medical personnel of their obligation not to Use Prohibited Substances and Prohibited Methods and to take responsibility of ensuring that any medical treatment received does not violate these Anti-Doping Rules.
- To disclose to their National Anti-Doping Organization and to the ISSF any decision by a non-Signatory finding that the Athlete committed an anti-doping rule violation within the previous ten years.
- To cooperate with Anti-Doping Organizations investigating anti-doping rule violations.
- Failure by any Athlete to cooperate in full with Anti-Doping Organizations investigating anti-doping rule violations may result in disciplinary action being taken by the ISSF Executive Committee in accordance with the ISSF Rules and Regulations.

What are the responsibilities and obligations of athlete support personnel under article 23.3 of The ISSF Anti-Doping Rules?

- To be knowledgeable of and comply with the ISSF Anti-Doping Rules.
- To cooperate with the Athlete Testing program.
- To use his or her influence on Athlete values and behavior to foster anti-doping attitudes.
- To disclose to his or her National Anti-Doping Organization and to the ISSF any decision by a non-Signatory finding that he or she committed an anti-doping rule violation within the previous ten years.

- To cooperate with Anti-Doping Organizations investigating anti-doping rule violations.
- Failure by any Athlete Support Personnel to cooperate in full with Anti-Doping Organizations investigating anti-doping rule violations may result in disciplinary action being taken by the ISSF Executive Committee in accordance with the ISSF Rules and Regulations.
- Athlete Support Personnel shall not Use or Possess any Prohibited Substance or Prohibited Method without valid justification.
- Use or Possession of a Prohibited Substance or Prohibited Method by an Athlete Support Personnel without valid justification may result in disciplinary action being taken by the ISSF Executive Committee in accordance with the ISSF Rules and Regulations.

CONCLUSION

If the ISSF has requested its national federations to submit their anti-doping rules for review and suggested that modifications be brought to their existing policies when they were inadequate, it is only in the best interest of shooting sport and its athletes.

First, it is imperative that the ISSF not be deemed non-compliant by WADA because of some of its national federations not complying with the ISSF Anti-Doping Rules and Code. Such a decision would be detrimental to all. While there is a range of graded and proportionate Signatory consequences that are to be applied in cases involving non-compliance, the ISSF believes that any consequences related to non-compliance should be avoided by ensuring compliance is met by the ISSF and its member federations.

Second, the legal exercise that has been requested of all national federations should not be perceived as onerous. Rather, it is a demonstration of a collaborative effort between the ISSF and its national federations to both meet their obligations under the Code and to mutually commit to the fight against

doping in sport. Finally, all must be reminded that the ultimate objective of such compliance exercises is most importantly to ensure that strong, Code-compliant anti-doping rules and programs are applied and enforced consistently and effectively across all sports and all countries, so that clean athletes of all nations can trust that they are competing on a fair and level playing field, and so that public confidence in the integrity of sport can be maintained.

To those National Federations who have already submitted their Rules for review to ISSF, we thank you once again for your cooperation and dedication to the ISSF's anti-doping efforts.

To those National Federations who have not, we urge you to do so at your earliest opportunity so that the ISSF and all its member federations may be deemed Code-compliant by WADA in this regard.

We are all partners in the ongoing fight against doping in sport.

Janie Soublière BSS, LL.M, LL.B.

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