

# 2027 Code & International Standard Update Process : Stakeholder Engagement Phase - World Anti-Doping Code & International Standards : Formatting

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## Concept #1: Italicization of defined terms in the Code (10)

### International Tennis Integrity Agency

Nicole Sapstead, Senior Director, Anti-Doping (United Kingdom)

Sport - Other

SUBMITTED

This should remain in the format as it is currently as they aid reading and understanding of the text.

### Sport NZ

Jane Mountfort, Principal Policy and Legal Advisor (New Zealand)

Public Authorities - Government

SUBMITTED

This submission is made on behalf of Sport New Zealand, which is the Crown agency responsible for advising the New Zealand government on anti-doping policy and ensuring New Zealand's compliance with the International Convention against Doping in Sport 2005.

Sport NZ would prefer to retain italicisation since it signals a precise meaning of the words therefore supporting consistent application.

### Organizacion Nacional Antidopaje de Uruguay

José Veloso Fernandez, Jefe de control Dopaje (Uruguay)

NADO - NADO

SUBMITTED

Good Clear Strong In accordance

### Anti-Doping Sweden

Jessica Wissman, Head of legal department (Sverige)

NADO - NADO

SUBMITTED

For clarity and understanding that some of the terms are defined in Appendix 1 of the Code, italicization should remain as it is today.

### Sport Integrity Australia

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)

NADO - NADO

SUBMITTED

Yes, it is helpful to differentiate the defined terms and we have no issues with this continuing to be done using italics.

### Canadian Centre for Ethics in Sport

Elizabeth Carson, Senior Manager, Canadian Anti-Doping Program (Canada)  
NADO - NADO

SUBMITTED

Yes, italicization should remain, as having the terms formatted is helpful for identifying the defined terms.

### Swiss Sport Integrity

Ernst König, CEO (Switzerland)  
NADO - NADO

SUBMITTED

Issue: Should defined terms in the Code remain italicized in the updated version of the Code (see example)?  
Swiss Sport Integrity is of the opinion that this should not be kept. In our opinion, the italicized terms throughout the Code are hindering the flow of reading. Therefore, in the Swiss Doping Statute, there is no such thing as italicized terms and it works just fine.  
In the PDF version WADA could include links to the definitions.

### Anti Doping Danmark

Silje Rubæk, Legal Manager (Danmark)  
NADO - NADO

SUBMITTED

Supported

### UK Anti-Doping

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

SUBMITTED

We support the continued italicisation of defined terms within the Code. This remains useful for practitioners.

### NADA India

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

The use of italicization for defined terms in legal documents, including codes and regulations, is a common practice. It serves to visually distinguish defined terms from the rest of the text, making it easier for readers to identify and understand their specific meaning within the context of the document. However, whether or not to italicize defined terms in the updated version of the World Anti-Doping Code depends on various factors, including style preferences, readability considerations, and the overall structure of the document.

Here are some considerations: -

1. **Consistency:**As the current version of the World Anti-Doping Code already uses italicization for defined terms, maintaining consistency in formatting is essential. It helps in preserving the document's coherence and makes the transition smoother for readers familiar with the previous version.
2. **Readability:**Italicization can enhance clarity by visually highlighting defined terms, but excessive use may also lead to visual clutter. Striking a balance between emphasis and readability is crucial.
3. **Alternative Formatting:**If italicization is not favoured or if there are concerns about readability, consider alternative formatting options. For example, defined terms could be bolded, placed in quotation marks, or presented in a different font style or colour to set them apart.
4. **Annotations or Glossary:**In addition to or instead of relying solely on formatting, consider incorporating annotations or a glossary section within the document. This provides readers with a centralized reference for understanding the meaning of specific terms without relying solely on formatting cues.

Ultimately, the goal should be to enhance the clarity and accessibility of the document for its intended audience that is the stakeholders in the anti-doping domain. Experimenting with different formatting options, seeking input from legal experts, and considering the specific needs of the users can guide the decision-making process.

## Concept #2: Underling of defined terms in the International Standards (10)

### International Tennis Integrity Agency

SUBMITTED

Nicole Sapstead, Senior Director, Anti-Doping (United Kingdom)  
Sport - Other

This should remain in the format as it is currently as they aid reading and understanding of the text.

### Sport NZ

SUBMITTED

Jane Mountfort, Principal Policy and Legal Advisor (New Zealand)  
Public Authorities - Government

This submission is made on behalf of Sport New Zealand, which is the Crown agency responsible for advising the New Zealand government on anti-doping policy and ensuring New Zealand's compliance with the International Convention against Doping in Sport 2005.

Definitions contained in the IS but not in the Code being formatted in a different way to definitions found in the Code is very helpful.

### Organizacion Nacional Antidopaje de Uruguay

SUBMITTED

José Veloso Fernandez, Jefe de control Dopaje (Uruguay)  
NADO - NADO

No comments

### Anti-Doping Sweden

SUBMITTED

Jessica Wissman, Head of legal department (Sverige)  
NADO - NADO

In ADSE's opinion the defined terms in the International Standards should remain underlined, for clarity and for separation of the defined terms in the Code.

### Sport Integrity Australia

SUBMITTED

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)  
NADO - NADO

For the purpose of consistency, consideration should be given to presenting defined terms in the same manner as in the Code.

### Canadian Centre for Ethics in Sport

SUBMITTED

Elizabeth Carson, Senior Manager, Canadian Anti-Doping Program (Canada)  
NADO - NADO

Having the terms formatted is helpful for identifying the defined terms, but consider whether there is a need to distinguish between the terms that are defined in the Code and those defined in International Standards. Perhaps all defined terms (regardless of their origin) can be identified by the same formatting.

**Swiss Sport Integrity**

Ernst König, CEO (Switzerland)

NADO - NADO

SUBMITTED

Issue: Should defined terms in the International Standards remain underlined in the updated and new versions of the International Standards (see example)?

Swiss Sport Integrity is of the opinion that this should not be kept. In our opinion, the underlined terms throughout the International Standards are hindering the flow of reading. Therefore, in the Swiss Prescriptions d'exécutions, there is no such thing as italicized terms and it works just fine.

In the PDF version WADA could include links to the definitions.

**Anti Doping Danmark**

Silje Rubæk, Legal Manager (Danmark)

NADO - NADO

SUBMITTED

Supported

**UK Anti-Doping**

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

SUBMITTED

We support the continued underlining of defined terms within the International Standards. This remains useful for practitioners.

**NADA India**

NADA India, NADO (India)

NADO - NADO

SUBMITTED

The underlining of defined terms in legal documents, including International Standards, is another formatting convention that can serve to visually distinguish such terms. Like italicization, the decision to underline defined terms depends on various factors, including existing conventions, style preferences, and the specific needs of the document's audience.

Here are some considerations:-

1. **Consistency:**As underlining is already a part of the existing formatting conventions in the International Standards, maintaining consistency is important. Readers accustomed to the previous version may find it easier to navigate the document if familiar formatting conventions are retained.
2. **Readability:**Consider the impact of underlining on the overall readability of the document. While underlining can provide clear visual cues, excessive use may lead to visual clutter. Striking a balance between emphasis and readability is crucial.
3. **Alternative Formatting:**If underlining is not preferred or if there are concerns about readability, consider alternative formatting options. As mentioned in the previous concept, defined terms could be italicized, bolded, placed in quotation marks, or presented in a different font style or colour.
4. **Annotations or Glossary:**Similar to the first concept, consider incorporating annotations or a glossary section within the document. This provides a centralized reference for readers to understand the meaning of specific terms without relying solely on formatting cues.

Ultimately, the goal is to enhance clarity and accessibility for the intended audience. Experimenting with different formatting options, seeking input from experts, and considering user preferences can help in making informed decisions about whether to continue underlining defined terms in the updated and new versions of the International Standards.

### Concept #3: Positioning of comments in International Standards (9)

#### International Tennis Integrity Agency

Nicole Sapstead, Senior Director, Anti-Doping (United Kingdom)  
Sport - Other

SUBMITTED

This should remain in the format as it is currently as they aid reading and understanding of the text.

#### Organizacion Nacional Antidopaje de Uruguay

José Veloso Fernandez, Jefe de control Dopaje (Uruguay)  
NADO - NADO

SUBMITTED

Must be clear ahead and permit more time of consult and participating

#### Anti-Doping Sweden

Jessica Wissman, Head of legal department (Sverige)  
NADO - NADO

SUBMITTED

In ADSE's opinion, the comments should be the same in the Code and the International Standards, preferably positioned in the body of the text. That entails less risk that the comment will not be read along with the article.

#### Sport Integrity Australia

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)  
NADO - NADO

SUBMITTED

Comments presented in the body of text provide for more ease of reading than in a footnote.

## Canadian Centre for Ethics in Sport

Elizabeth Carson, Senior Manager, Canadian Anti-Doping Program (Canada)  
NADO - NADO

SUBMITTED

For ease of reading and understanding, the CCES believes that any comments should appear within the text of the Code, immediately following the Rule the comment reference. The CCES implemented this practice with the Canadian Anti-Doping Program.

## Swiss Sport Integrity

Ernst König, CEO (Switzerland)  
NADO - NADO

SUBMITTED

Issue: Should comments to the different articles in the International Standards be positioned in the body of the text or in a footnote below (see example)?  
Swiss Sport Integrity would like to encourage WADA to position the comments in the body of the text. This would make it more helpful than in a footnote, as the comment will follow the text of the article. In Switzerland, we already have our comments in the body of the text, in the Doping Statute as well as in the Prescriptions d'exécutions, and it is very helpful and easy.

## Anti Doping Danmark

Silje Rubæk, Legal Manager (Denmark)  
NADO - NADO

SUBMITTED

Supported

## NADA India

NADA India, NADO (India)  
NADO - NADO

SUBMITTED

The positioning of comments in International Standards is a matter of document design and clarity. The decision on whether to include comments in the body of the text or as footnotes below each relevant article depends on several factors.

Here are some considerations: -

### Comments in the Body of the Text

1. **Visibility and Integration:** Placing comments directly in the body of the text ensures that they are immediately visible to readers as they engage with each article. This integration can enhance the flow and coherence of the document.
2. **Contextual Understanding:** Comments within the text can provide immediate context to the relevant article, helping readers understand the rationale or additional information associated with specific provisions.
3. **Readability:** However, if comments are extensive or frequent, they might interrupt the flow of the main text, potentially affecting readability.

### Comments in Footnotes

1. **Space Efficiency:** Placing comments in footnotes can help conserve space in the main body of the document. This can be beneficial when comments are relatively brief or when the main text needs to be concise.

2. **Visual Cleanliness:**Footnotes can contribute to a visually clean and uncluttered main text, allowing readers to focus on the primary content without distractions.
3. **Accessibility:**On the downside, footnotes may require readers to shift their attention away from the main text, potentially disrupting the reading experience.

## Potential Solutions

1. **Balancing Act:**Consider a balanced approach. For critical or concise comments, inclusion in the body of the text may be suitable. For more extensive explanations or less critical information, footnotes could be utilized.
2. **Hierarchical Structure:**If the International Standards have a hierarchical structure, with main articles and sub-sections, consider placing high-level comments in the body of the text and more detailed or ancillary comments in footnotes.
3. **Formatting Consistency:**Whichever approach is chosen, maintaining consistency throughout the document is crucial. This consistency can contribute to a professional and organized appearance.

In conclusion, the decision on whether to position comments in the body of the text or as footnotes in the International Standards depends on factors such as document structure, the nature of comments, and the preferences of the intended audience. Experimenting with both approaches and gathering feedback can help make an informed decision based on the specific needs of the document and its users.

### UK Anti-Doping

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)  
NADO - NADO

SUBMITTED

Comments in International Standards should remain positioned in the body of the text.

## Other Comments / Suggestions (5)

### COCOM

Stephanie Sirjacobs, Legal adviser (Belgium)  
NADO - NADO

SUBMITTED

Je ne savais pas très bien où mettre les éléments qui suivent :

- 1) L'AMA est une fondation bilingue, or ce bilinguisme est trop souvent oublié, notamment en matière de documents officiels ce qui est inadmissible. Que les documents de travail soient uniquement en anglais, nous pouvons le comprendre. Toutefois, il est primordial que les documents soient publiés simultanément dans les deux langues. Un délai de 6 mois ou plus entre les deux publications est inadmissible et perturbe sérieusement le travail pour ceux qui doivent rédiger leurs textes internes en française.
- 2) Le point qui précède est d'autant plus important que la team qui revoit les textes n'est pas flexible et j'espère que pour la prochaine réforme, il y aura plus de flexibilité dans la démarche. En effet, je ne conçois pas avoir perdu des heures de discussions ou corrections parce que j'ai écrit "notamment" au lieu de "par exemple". Il s'agit de synonymes sauf que l'un est acceptable en légistique et pas l'autre. La traduction française du Code et des SI ne brille pas par sa qualité. Les phrases sont trop longues et ne respectent pas les principes de base en matière de légistique. A partir du moment où le texte d'un signataire dit la même chose, mais pas de la même façon, il faut l'accepter.

### Anti-Doping Sweden

Jessica Wissman, Head of legal department (Sverige)  
NADO - NADO

SUBMITTED

ADSE suggests that the terms “must”, “shall”, “may” and “should”, are used in the same way throughout the Code and the International Standards.

**Sport Integrity Australia**

Chris Butler, Director, Anti-Doping Policy and International Engagement (Australia)

NADO - NADO

SUBMITTED

Large sections of continuous text, make it more difficult to read and accurately interpret many of the provisions of the Code. Where possible, we encourage the Drafting Team to separate the text, especially where there are subsections. As just one example please see 10.8.2.

**Dopingautoriteit**

Robert Ficker, Compliance Officer (Netherlands)

NADO - NADO

SUBMITTED

No comments

**UK Anti-Doping**

UKAD Stakeholder Comments, Stakeholder Comments (United Kingdom)

NADO - NADO

SUBMITTED

The formatting styles contained within the Code and International Standards are well established and understood by practitioners, and do not require revisions.