

International Floorball Federation



IFF Test Planning & Anti-doping intelligence and investigation document

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1. Introduction and scope

This document has been created to meet the mandatory requirements in The World Anti-Doping Code International Standard for Testing and Investigations (ISTI). The ISTI is a mandatory International Standard developed as part of the World Anti-Doping Programme.

The International Standard for Testing (ISTI) is published by WADA with the purpose of the plan for intelligent and effective testing, both in-competition and out-of-competition. The second purpose of the International Standard for Testing and Investigations is to establish mandatory standards for the efficient and effective gathering, assessment and use of anti-doping intelligence and for the efficient and effective conduct of investigations into possible anti-doping rule violations.

The test distribution plan is developed based on the risk assessment in floorball:

- a) The physical demands of floorball and possible performance-enhancing effect that doping may elicit;
- b) Available doping analysis statistics;
- c) Available research on doping trends;
- d) The history of doping in floorball;
- e) Training periods and the competition calendar;
- f) Information received on possible doping practices

The International Floorball Federation's risk document is based on the ISTI model. In addition, the study made by Mads Drange from Anti-Doping Norway (AND), *Physiologically based risk assessment of the Olympic sports and the risk assessment for Ball and team Sports*, has been considered when evaluating the risks of doping in floorball.

2. Planning effective testing

The Code requires each Anti-Doping Organisation with testing authority to plan and implement intelligent testing that is proportionate to the risk of doping among Athletes under its jurisdiction, and that is effective to detect and to deter such practices.

The ISTI describes the steps that are necessary to produce a Test Distribution Plan that satisfies this requirement. This includes establishing the overall pool of athletes within the Anti-Doping Organisation's anti-doping programme, and assessment of which Prohibited Substances and Prohibited Methods are most likely to be abused in the sport(s)/sports in question, followed by appropriate prioritisation between categories of athletes, between types of testing, between types of samples collected, and between types of Sample analysis.

The ISTI allows International Federations to focus their anti-doping programmes (including testing) compete regularly at the international level.

The IFF definition of International level athletes:

- Athletes in the IFF Registered Testing Pool
- Athletes with the following ranking: National team Floorball players that represent the top three (3) nations based on the previous WFC results during the WFC year (Men: even years/Women: uneven years).
- Athletes who compete in the following official IFF Events: World Floorball Championships (WFC), U19 World Floorball Championships (U19 WFC), Champions Cup (CC), EuroFloorball Cup (EFC) and WFC Qualifications.

The international level athletes are a priority when planning the IFF prevention activities such as testing and education. Therefore, target testing is made a priority, focusing the testing resources where they are most needed within the overall pool of athletes.

3. IFF Risk Assessment

As set out in Code, the starting point of the Test Distribution Plan must be a considered assessment, in good faith, of which Prohibited Substances and/or Prohibited Methods are most likely to be abused in the sport(s) and sport discipline(s) in question. This assessment should take into account the following information:

- The physical and other demands of the relevant sport(s) (and/or discipline(s)) within the sport(s), considering in particular the physiological requirements of the sport(s)/sport discipline(s);
- The possible performance-enhancing effects that doping may elicit in such sport(s)/sport discipline(s);
- The rewards available at the different levels of the sport(s)/sport discipline(s) and/or other potential incentives for doping;
- The history of doping in the sport(s)/sport discipline(s);
- Available research on doping trends (e.g., peer-reviewed articles);
- Information received/intelligence developed on possible doping practices in the sport (e.g., Athlete testimony; information from criminal investigations; and/or other intelligence developed in accordance with WADA's Guidelines for Coordinating Investigations and Sharing Anti-Doping Information and Evidence) with the ISTI; and
- The outcomes of previous test distribution planning cycles

3.1 Physiological profile in floorball

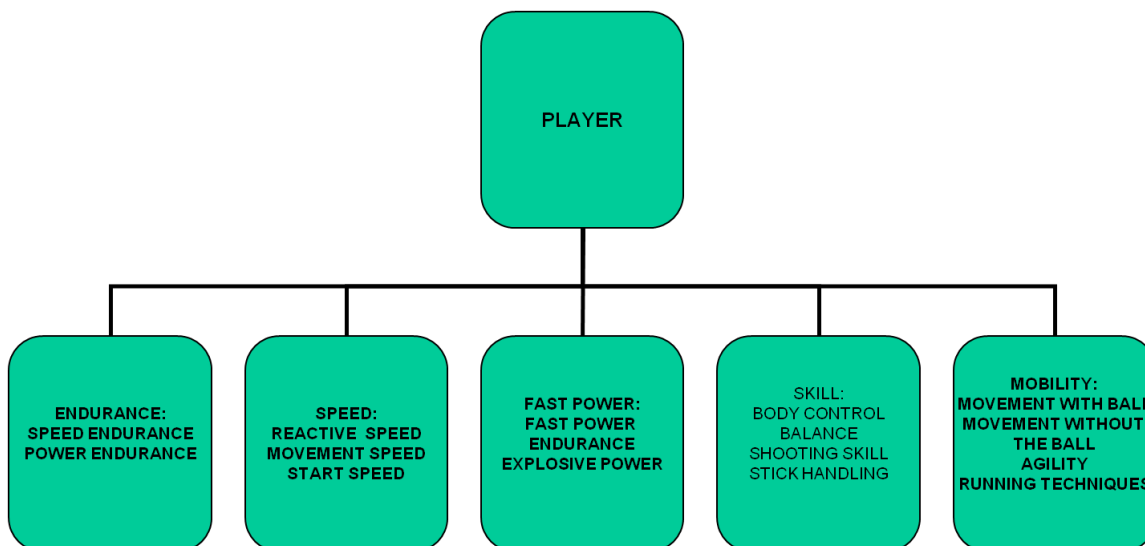
The qualities that make a top-level floorball player are diverse, and skill, match intelligence and overview, as well as the ability to play for the team are hard to achieve by using a doping substance or method. However, a complex physiological profile is needed in floorball.

In a floorball match there are alternating periods of high and low intensity. The players are on the field for a short period of a time, working at high intensity. But even during these 30-50 seconds time on the court, the level of intensity varies. When the players get off the court, they sit on the bench for a few minutes before going out again.

Optimal rhythm in a floorball match:

- 30 - 50 second shifts
- 2 - 3 minutes recovery
- 20 +/- shifts player/match (except goalkeeper)

3.1.1 Summary of requirement needed in floorball



Time on the field and changing rhythm within the match

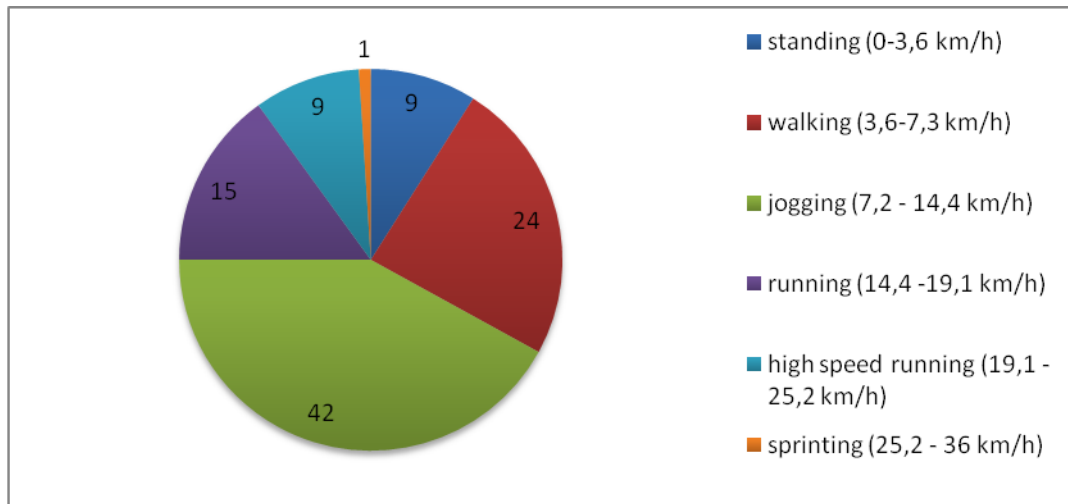
The average of a total match time is about 1h and 27 min and shows the total time of the competition strain for a player. The actual time that a player plays on the court is approximately 34 min. +/- 6 min depending on the system of playing. For each player (excluding the goalkeeper) the average time on the court with action is about 30-50 seconds.

	Average	Defence	Centre	Forward
Total game time	01:26:54	01:27:39	01:28:23	01:26:07
Time on the field	00:34:31	00:35:50	00:35:59	00:33:18
Shifts	20,4	20,3	19,6	23,2

3.1.2 Floorball running statistics

According to statistical analysis of Men's World Floorball Championships top players a floorball player runs 3839 m in average during a match and 192 m in average during one shift. There are quite big differences between different matches/teams/players, which are a result of different floorball tactics used.

The running intensity during a match is different and can be divided into different categories:



Based on a study made in Switzerland 2013 on a Swiss League & Finnish national team player

3.1.3 Floorball players' pulse measurements

Male top players' maximal pulses during a floorball match:

The averages of male players' maximal capacities (% max. pulse) and occasional max. pulses during a game in a study made on 19 Finnish national team players in 2000:

- Highest max. (average) 192 ±8
- Two players' values over 200
- All players average 180 ±7

Average pulse levels based on a study made on 18 Finnish League players during floorball games during season 2013-2014:

- Highest max (average): 186-188
- Average pulse level: 130 (86-188)
- Average %VO₂max (ml/kg/min): 20 (11-24)
- Highest %VO₂max (ml/kg/min): 48 (36-55)

3.1.4 Floorball lactic acid measurements

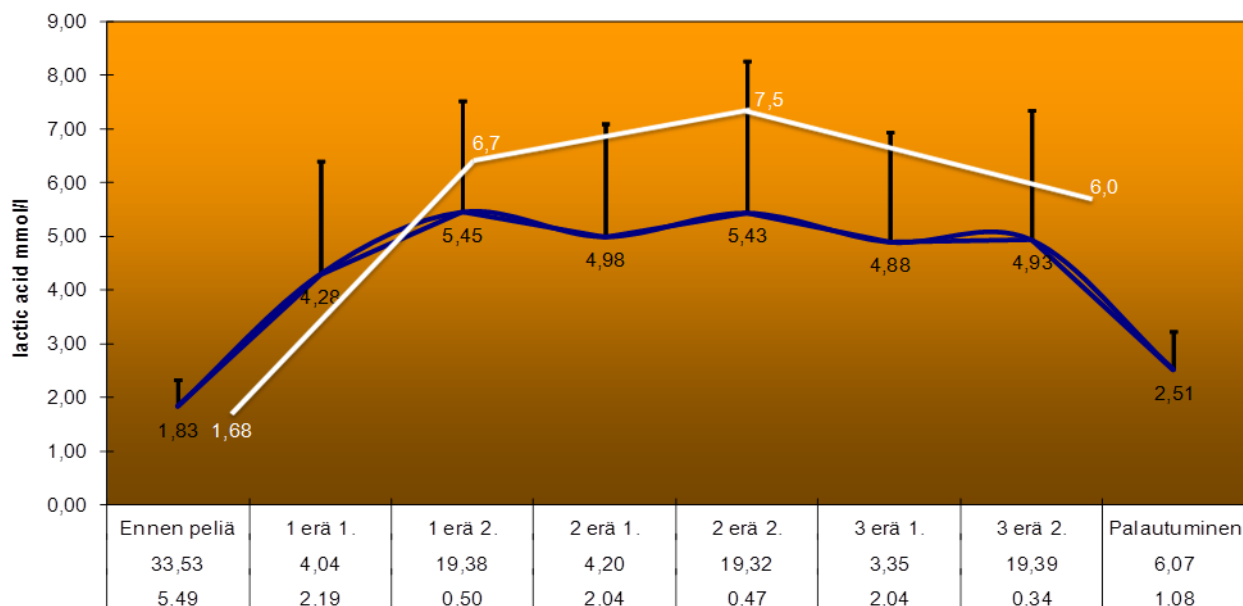
Lactic acid measurements made on 19 Finnish top floorball players made in 2000:

- Biggest occasional value 14,56
- All players average 4,98 ±1,62

Lactic acid measurements made on 18 Finnish top floorball players made in 2014:

- Biggest occasional value 11,47
- All players' average 6,7

The average lactic acid values on different measuring points (before the game, first period, 2nd period, 3rd period and after the game):



Lactic acid values measured in floorball matches in 2000 (in blue) compared to 2014 (in white)

Based on studies made on Finnish top male players in 2000 and top Finnish top male players in 2014

3.1.5 Countermovement jumps (CMJ)

CMJ measurements made during season 2013-2014 on 18 top Finnish Floorball players in three games:

- Average CMJ before the game: 41,0 cm
- Average CMJ after first period: 45,7 cm
- Average CMJ after second period: 45,6 cm
- Average CMJ after the match: 45,7 cm

3.1.6 Physiological differences between the different player positions

The different player positions have an effect on the physiological profiles. Still there is not that much difference between the defenders, wing forwards and centres. Not much studies have been made on floorball goalkeepers, who need to have fast reactions, agility, muscle endurance and balance, whereas the running skills or endurance are not important.

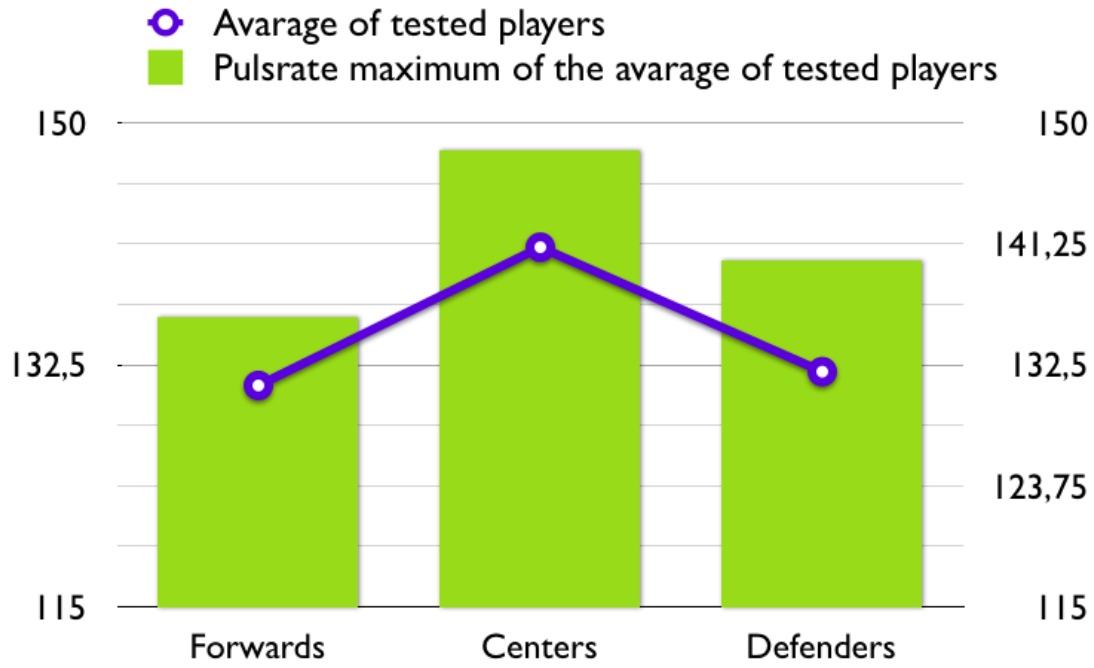
The chosen floorball tactic of the team, for example fore-checking style etc, also affects the workload for different players.

There is a small tendency that centre players need to run more than others. But the difference is not significant.

	Average	Defence	Centre	Forward
Total distance	3838,9	3756,9	3939,6	3883,5
Distance per shift	191,6	188,4	203,6	192,0

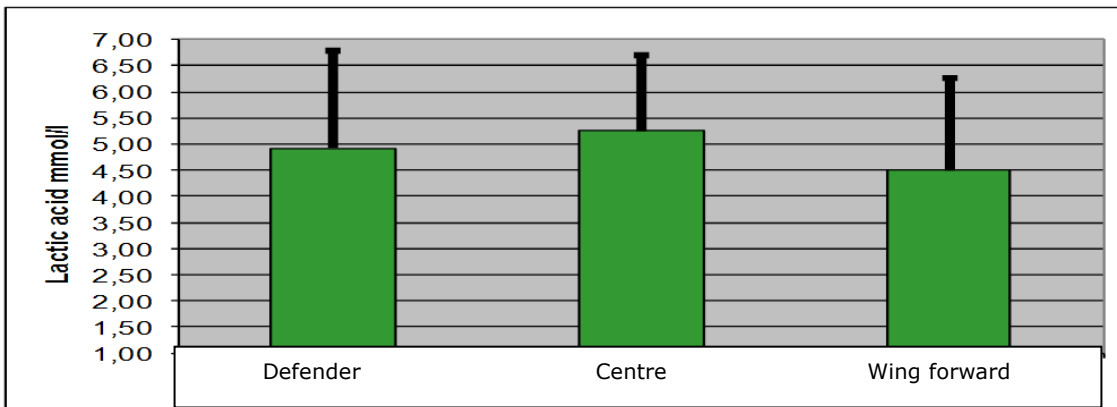
Based on a study made in Switzerland 2013 on Men's WFC top players

Average max pulse levels according to position:



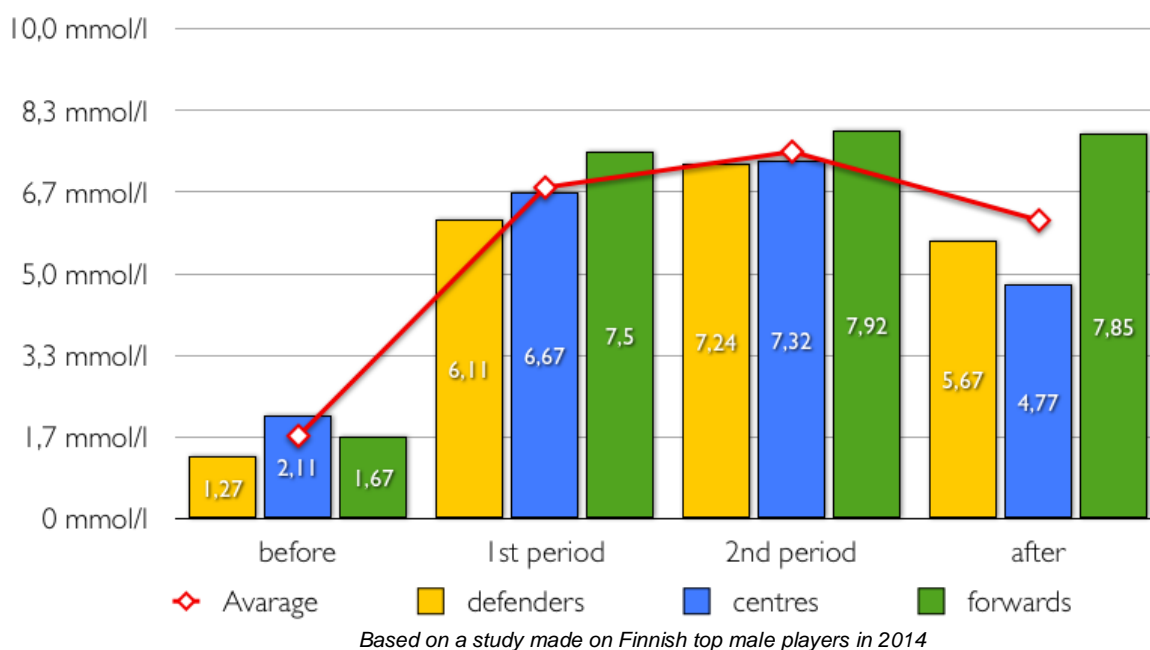
Based on a study made on Finnish top male players in 2013-2014

Lactic acids according to position in 2000 and in 2014:



Based on a study made on Finnish top male players in 2000

Lactate-Acid-Test

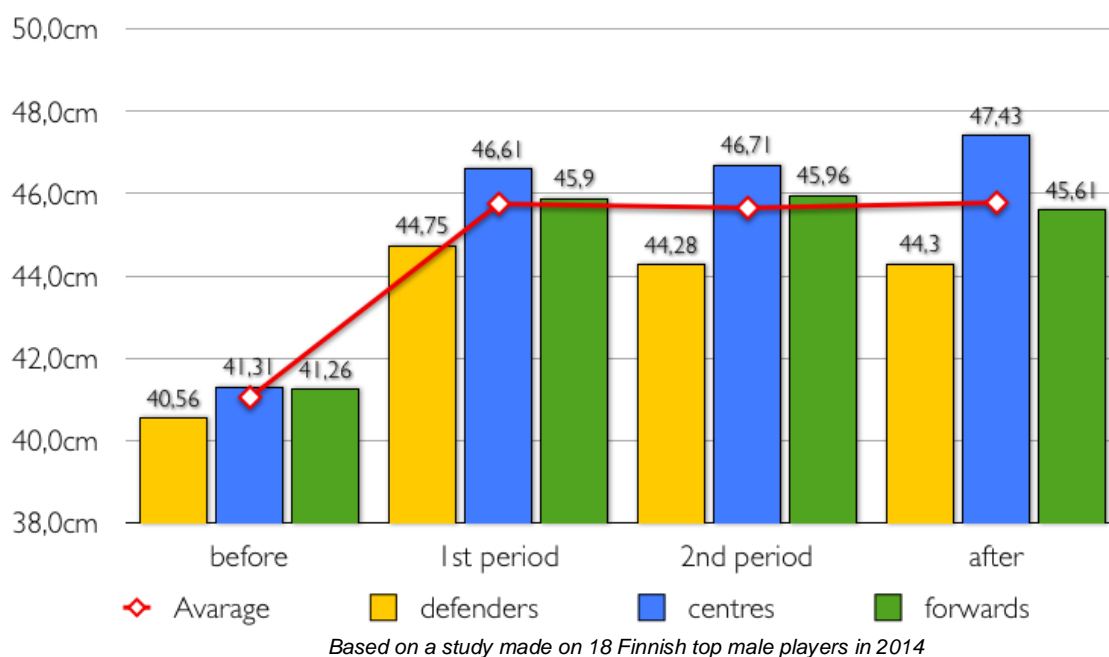


Lactic acid measurements made during season 2013-2014 on 18 top Finnish Floorball players in three games:

- Average lactic acid levels before the game: 1,6
- Average lactic acid levels after first period: 6,7
- Average lactic acid levels after second period: 7,5
- Average lactic acid levels after the match: 6,0

CMJ according to position:

Counter-Movement-Jumps



3.2 Performance-enhancing drugs in floorball

Floorball requires a complex physiological profile, and there are some differences within players of the same team. At the moment, not much study has been made on the goalkeepers.

As the physiological profile of floorball players is complex it is hard to evaluate which substances in particular could be abused to enhance performance? Even though some prohibited substances might have a positive effect on the performance of a floorball player; it can also be argued that the level of the physiological features that are required to become the best floorball player in the world can be reached without using prohibited substances. A top floorball player needs to be fast enough, strong enough and have enough endurance to be able to perform on the court, but none of the qualities are that much more important than the other. In addition, a top-level athlete cannot become a top-level floorball player without mastering the technical and tactical aspects of the sport.

It is also important to take into consideration other factors that have a huge effect on the players' performance on the floorball court. Factors such as ball handling skills, shooting technique, game understanding skills, tactical skills as well as social and psychological factors make a big difference in how good a player and team perform on the court.

Also, the incentives and economical rewards have an effect of the risk of doping. The risk of doping abuse is still low in floorball due to the fact that there are no professional leagues and not a lot of money involved. Only a few players in the world receive salary for playing and the economical benefits are still low.

3.3 Training and competition schedules

A floorball season can roughly be divided into a competition season and off season. The competition season in the top men's and women's leagues starts in September and ends in April. The month of August is usually a pre-competition season meaning that many top teams then play pre-season matches.

3.3.1 National League seasons

As floorball is a team sport the players train mostly together as a team. During the season, the teams train together 3-5 times a week in addition to various kinds of physical exercises like strength training, agility training, endurance training and technique trainings. The focus and exercises differ a lot depending on the team and the time during season.

The top national floorball leagues start in September and continue until April the following year. National league matches are played, except from rare occasions, only during the weekends as many of the players have a regular job. Usually the teams play 1-2 matches per week.

The total amount of regular season matches in the top leagues varies between 22-26 matches and then the best teams advance to the play-offs. During the international weekends, the national leagues have a break.

3.3.2 International Events & training camps

The major international floorball events, the Adult World Floorball Championships (WFC), are played in December. The Men's WFC is played during even years (2018, 2020 etc.) and the Women's WFC is played during uneven years (2019, 2021 etc.). The Qualifications to the World Floorball Championships Final Round are played in February the same year.

In addition to the World Floorball Championships the top club competition for the best men's and women's club teams in the world, the Floorball Champions Cup (CC), is played each year in January.

The national teams also play international tournaments or single internationals during the international weekends, 1st weekend of February (when not playing in the WFC Qualifications), 4th weekend of April 2nd weekend of September and 1st weekend of November.

In connection with and in addition to the international events the top national teams also organise training camps. The amount of national team training camps per year vary depending on if it is the WFC year for men or women. The top three national teams have 2-5 national team training camps per year.

3.4 Doping control test statistics

The IFF annually publishes the IFF test statistics on the IFF website www.floorball.org under Anti-Doping.

There has been a decrease in the total number of doping tests conducted in floorball during the recent years. This reflects the overall change in planning and initiating testing, where the focus has shifted from quantity to quality. Instead of testing the athletes randomly and analysing samples only with the standard menu, the tests are more targeted than before and follow a smarter testing plan.

IFF Test Distribution Plan 2010-2020:

2010:

Out of competition tests 2010: 19

In competition tests 2010: 54

2011:

Out of competition tests: 26

In competition tests: 58

2012:

Out of competition tests: 28

In competition tests: 61

2013:

Out of competition tests: 31

In competition tests: 61

2014:

Out of competition tests: 31

In competition tests: 64

2015:

Out of competition tests: 32

In competition tests: 62

2016:

Out of competition tests: 32

In competition tests: 65

2017:

Out of competition tests: 34

In competition tests: 64

2.5. History of doping

When looking at the anti-doping rule violations in floorball, cannabis is the most common prohibited substance. Since 2005, when for the first time the statistics were systematically collected by the IFF, there have been 18 anti-doping rule violations in floorball from which eight are results of recreational drugs, including seven cannabis cases.

All except three of these anti-doping rule violations have been collected in the national leagues and the national anti-doping organisation has been the results management authority. The three IFF initiated tests that led to an ADRV has been for the use of cannabis, higenamine and sibutramine.

Anti-Doping rule violations in floorball (2005 – 2018):

Year	Substance	Nationality	Event/League	Sanction
2005	Cannabinoids	FIN	Finnish League	6 months
2005	Norandrosterone	NOR	Out of comp. NOR	Two years
2005	Norandrosterone	NOR	Norwegian League	Two years
2005	Cocaine	NOR	Norwegian League	Two years
2007	Cannabinoids	CZE	Czech League	3 months
2007	Cannabinoids	GER	German League	6 months
2008	Methylephedrine	JPN	Japanese League	3 months
2010	Cannabinoids	FIN	Norwegian League	1 year (2nd ARDV)
2010	Cannabinoids	SWE	Norwegian League	4 months
2010	Terbutaline	FIN	Finnish League	Warning
2012	Cannabinoids	CZE	Czech League	14 months
2012	Methylhexanamine	NOR	Norwegian League	6 months
2012	Methylhexanamine	NOR	Norwegian	6 months

			League	
2015	Testosterone	SWE	Swedish 5th division	Two years
2015	Dehydrochlormethyltestosteron (attempted use)	SUI	Swiss 4 th division small field league	Two years
2016	Cannabinoids	ESP	World Floorball Championships Qualifications	9 months
2017	Higenamine	AUS	Admitted use	Warning
2018	Sibutramine	THA	World Floorball Championships Qualifications	9 months

Based on the above figures, one can say that floorball is at least for now, a quite clean sport. The prohibited substances used are mostly recreational drugs. The “real” doping cases, with substances like testosterone, have been reported from samples of quite low-level floorball players, not top-level players. In most of these cases the reason for taking the substance has been reported to be other than performance enhancement in floorball. These lower level floorball players have been more involved in gym activities than in floorball.

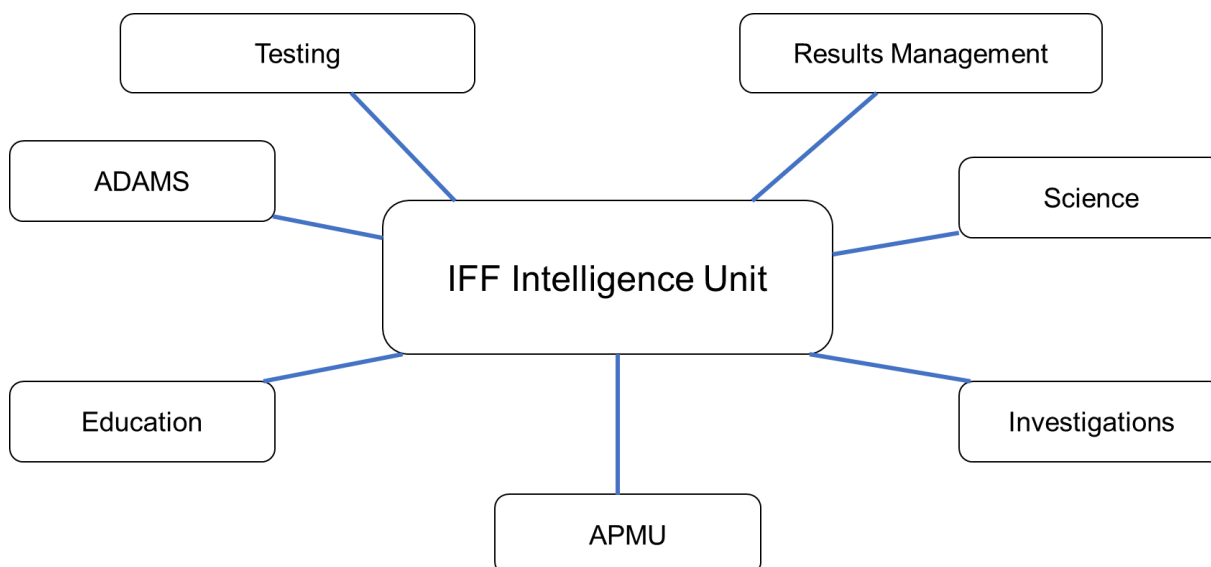
The testing statistics and anti-doping rule violations need to be taken into consideration when planning the future IFF prevention strategies including both testing and investigations but also the anti-doping education activities.

4. Anti-Doping Intelligence

The main purpose of the intelligence function is to support the IFF anti-doping programme through intelligence-led anti-doping. Intelligence will provide consistent support to different anti-doping sectors, specifically:

- Investigations
- Testing
- Results Management
- Science
- Education

The following diagram shown how IFF interacts with other programmes.



The IFF ensures that anti-doping intelligence captured or received is handled securely and confidentially, that sources of intelligence are protected, that the risk of leaks or inadvertent disclosure is properly addressed, and that intelligence shared with by law enforcement, other relevant authorities and/or other third parties, is processed, used and disclosed only for legitimate anti-doping purposes.

4.1 Gathering and utilising of anti-doping intelligence

The IFF collects information from both internal and external resources and does everything in its power to ensure that it will be able to capture or receive anti-doping intelligence from all available resources. Internal resources include for example ADAMS, athlete whereabouts, associations, athlete biological passports, competition schedules, doping control forms, TUEs, injury data and testing history. External resources include for example athletes and athlete support personnel and members of the public, sample collection personnel, laboratories, pharmaceutical companies, national member associations, law enforcement other regulatory and disciplinary bodies, open source data and the media.

IFF also follows the recent global doping trends and the specific risks that might be associated with floorball when planning its anti-doping activities. Additional means for collecting intelligence are concerns raised by the IFF athletes' commission.

The IFF utilises WADA's "Speak Up" secure digital platform (<https://speakup.wada-ama.org>). Athletes and others can report using "Speak Up" on alleged Anti-Doping Rule Violations (ADRVs) under the World Anti-Doping Code (Code); non-compliance violations under the Code; or, any act or omission that could undermine the fight against doping in sport.

The Athlete Passport Management Unit (APMU) has a central role in gathering intelligence and their expert reviews are utilised for testing purposes, especially for target testing and/or specific additional analysis.

The IFF collects this information for many different purposes. The data can be used for smart test planning as well as for other purposes such as defining current anti-doping education needs and re-defining testing pools.

The Athlete Passport Management Unit (APMU) has a central role in gathering intelligence and their expert reviews are utilised for testing purposes, especially for target testing and/or specific additional analysis.

4.2 Collation and analysing collected anti-doping intelligence

When the anti-doping intelligence is collected from various resources the IFF will collate and analyse the information. The collation will help identify relationships and patterns between data.

The IFF assesses the source by for example the following means:

- Whether the source has provided accurate information in the past
- The motivation of the source for providing the information
- How the source obtained the information
- Whether the source is corroborated or contradicted by other sources

The analysis process involves examining collected information to establish patterns and relationships that could be meaningfully interpreted. The analysis seeks to explain the significance of the information and clarifies if it is consistent with the direction given.

The main purpose of analysis is to:

- Reduce levels of uncertainty
- Explain a situation
- Anticipate/predict an outcome
- Explain the significance of trends, patterns and relationships

4.3 Intelligence reporting

Once the intelligence has been gathered, collated and analysed the IFF will formulate the data into an intelligence report. The intelligence reports need to be timely, accurate, precise and concise.

The intelligence report should:

- Present the conclusions reached and the logical reasons for reaching these conclusions.
- Use clear, concise and unambiguous language to ensure brevity and efficiency, minimizing the use of jargon and/or technical words.
- Spell out less commonly used abbreviations on first use, followed by initials or acronyms in parentheses.

5. Investigations

The International Standard for Testing and Investigations (ISTI) establishes standards for the efficient and effective conduct of investigations that IFF must conduct under the Code, including:

- The investigation of Atypical Findings and Adverse Passport Findings, in accordance with the Code
- The investigation of any other analytical or non-analytical information or intelligence where there is reasonable cause to suspect that an anti-doping rule violation may have been committed, in accordance with Code respectively; and
- Where an anti-doping rule violation by an athlete is established, the investigation into whether Athlete Support Personnel or other Persons may have been involved in that violation, in accordance with the Code

In each case, the purpose of the investigation is to achieve one of the following: either (a) to rule out the possible violation/involvement in a violation; or (b) to develop evidence that supports the initiation of an antidoping rule violation proceeding in accordance with Code.

6. IFF Testing Pools and Whereabouts

The IFF Whereabouts requirements meet the requirements of the Code and the ISTI. Whereabouts are intended to support out of competition no advance notice testing needs.

Whereabouts information is not an end in itself, but rather simply a means to an end, namely the efficient and effective conduct of no advance notice testing. Therefore, when the IFF has determined that it needs to conduct testing (including out of competition testing) on particular athletes, it must then consider how much information it needs about the whereabouts of those athletes in order to conduct that testing effectively and with no advance notice.

The IFF collects all of the whereabouts information that it needs to conduct the testing identified in the Test Distribution Plan effectively and efficiently. The IFF will not collect more whereabouts information than it needs for that purpose. In order to maintain a pool of Athletes from whom whereabouts information is obtained, which can be used to increase the effectiveness of the IFF's out of competition testing programme, the IFF will maintain a Testing Pool.

In uneven years (2019, 2021 etc.) when it is the Women's WFC year the IFF TP consists of the top three (3) Women's National Teams according to the results from the previous World Floorball Championships. All Athletes taking part in the events (camps, tournaments, international matches) of the Women's Top three ranked National Teams are included in the IFF Testing Pool. The IFF will collect the needed whereabouts information through the National Federation.

In even years (2018, 2020 etc.) when it is the Men's WFC year the IFF TP consists of the top three (3) Men's National Teams according to the results from the previous World Floorball Championships. All Athletes taking part in the events (camps, tournaments, international matches) of the Men's Top three ranked National Teams are included in the IFF Testing Pool. The IFF will collect the needed whereabouts information through the National Federation.

National Federation shall take care of following:

- a. Send the specific event information ten (10) days prior to the event (the information shall be sent with the "IFF Upcoming National Team Event Form")
- b. Send regular club team training activities (one regular training time/week during the season) of the league clubs of their country with current national team players from their country (you can use the "IFF Club Team Whereabouts Form"). Periods: February – March/April (until season ends) & September – December 31st. The National Federation shall also be responsible for providing possible updates in the regular training times to the IFF.

Information needed: Name of club team; training day; training time (local time); date until specified training time is valid; training venue name; training venue address; (venue training court number); name of club team contact person and his/her contact information.

- c. If needed, the IFF will ask for more whereabouts information (Women's national team whereabouts during Men's WFC year, more club team whereabouts, off-season club training times etc.). The IFF also has the possibility to identify players to a Registered Testing Pool. Players in the Registered Testing Pool are individually responsible for providing daily whereabouts information including a 60-minutes time slot.

Reporting Deadlines

The National Federation shall hand in the first top club team regular training times (1 training time/week) for the period February 15th – March/April (until the season ends). The first deadline to send in the information is on February 10th. The second deadline to send in the top club team training times is on September 10th for the period September 15th – December 31st.

When the regular training time is cancelled/changed, the National Federation shall keep the IFF updated of such changes, so that possible out-of-competition testing plans can be modified.

IFF Registered Testing Pool (RTP)

IFF may also identify a Registered Testing Pool of those Athletes who are required to comply with the strict whereabouts requirements of Annex I to the International Standard for Testing and Investigations. Athletes shall be notified before they are included in a Registered Testing Pool and when they are removed from that pool by the IFF. The IFF regularly evaluates the need for players in the IFF Registered Testing Pool.

7. IFF Test Distribution Plans and analysis

In order to meet the requirements of the ISTI and based on the risk assessment the IFF determines to what extent each of the following types of testing is required in order to detect and deter doping practices within the relevant discipline(s) and/or nation(s) intelligently and effectively.

The IFF follows the principals described in ISTI:

- In competition testing and out of competition testing;
 - In sports and/or disciplines that are assessed as having a high risk of doping during out of competition periods, out of competition testing shall be made a priority, and a significant portion of the available testing shall be conducted out-of-competition. However, some material amount of in competition testing shall still take place.
 - In sports and/or disciplines that are assessed as having a low risk of doping during out of competition periods (i.e., where it can be clearly shown that doping while out of competition is unlikely to enhance performance or provide other illicit advantages), in competition testing shall be made a priority, and a substantial portion of the available testing shall be conducted in competition. However, some out of competition testing shall still take place, proportionate to the risk of out of competition doping in such sport/discipline.
- Testing of urine;
- Testing of blood; and
- Testing involving longitudinal profiling, i.e., the Athlete Biological Passport program.

In floorball, the overall risk of doping is still low, the IFF will still conduct both in competition and out of competition testing and follow the Technical Document concerning testing of urine and testing of blood.

2018:

Out of competition tests 2018: 37

In competition tests 2018: 54

5% hGh: 5-6 tests

5% ESAs: 5-6 tests

MC recommendation: 6 hGh s tests in spring/summer + 6 ESAs tests in Autumn

2019 - 2021:

Out of competition tests: 35-40

In competition tests: over 50

5% hGh/GHRF: 5-6 tests

5% ESAs 5%: 5-6 test

MC recommendation: 5-6 hGh/GHRFs tests in spring/summer + 5-6 ESAs tests in Autumn

7.1 In competition testing plan

- **Adults World Floorball Championships (WFC)**
 - Minimum 1 per team in the preliminary round (16) +
 - Minimum 8 tests in the play-offs
- **World Floorball Championships Qualifications (WFCQ)**

- Minimum 1 test per team in the semi-finals (if semi-finals are played). Otherwise 2-6 teams will be tested according to the agreement with the organiser.
- **Under 19 World Floorball Championships (U19 WFC)**
 - Minimum 8 tests
- **Other IFF Events**
 - Decided annually

7.2 Out of competition testing plan

The IFF plans to conduct 35-40 out of competition tests that can for example be divided as follows:

- Testing pool tests on top 3 nations, both tests during national team camps and top league teams' trainings:
 - 1st ranked team: 14-15 tests (7 national team camps + 7 trainings)
 - 2nd ranked team: 12-14 tests (7 national team camps + 5 trainings)
 - 3rd ranked team: 10-12 SUI women (4 national team camps + 5 trainings)
- These tests could include:
 - HGH/Blood GH isoforms
 - 1st ranked team: 2
 - 2nd ranked team: 2
 - 3rd ranked team: 2
 - ESAs (urine)
 - 1st ranked team: 2
 - 2nd ranked team: 2
 - 3rd ranked team: 2

7.3 Sample analysis

IFF asks laboratories to analyse the samples collected in a manner that is tailored to the particular circumstances of the sport/discipline/country in question. In accordance with the Code, the starting-point is that the IFF shall have all samples collected on their behalf analysed in accordance with the sample analysis menus specified in the Technical Document.

The IFF may however ask laboratories to analyse their samples using more extensive menus than those described in the Technical Document; and may also ask laboratories to analyse some or all of its samples using less extensive menus than those described in the Technical Document where IFF has satisfied WADA that, because of the particular circumstances of their sport or discipline or nation (as applicable), as set out in the Test Distribution Plan, less extensive analysis would be appropriate.