

The Trade in Doping Products: how is it organized and how best to tackle it?

Letizia Paoli
University of Leuven, Belgium

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Doping: a rising public health problem, but no attention to supply yet

- Doping products: substances and methods banned by WADA
- Used by athletes and sportspeople to enhance performance
- Increasingly also used outside sports to enhance non-sport performances, image or aggressiveness
 - Lifetime prevalence of steroid use estimated in at least 3% in young men worldwide (Kanayama et al. 2009)
 - Comparable to prevalence of some illegal drugs
- Numerous studies on demand, hardly on supply

**How is the market organized? Who are the suppliers?
What are their motivations, modus operandi revenues and profits?**

Anti-doping system: from athletes' testing to law enforcement

- Anti-doping system has traditionally focused on elite athletes, with testing as primary control measure
- Testing is increasingly seen as ineffective and costly
 - Only about 1% of athletes tests positive
- Sports governing bodies increasingly see criminal law enforcement as attractive option
 - For WADA President Fahey, law enforcement is “future of anti-doping”
- Wide differences in state policies concerning possession of, and trade in, doping products
 - A few countries, *in primis* Italy, have criminalized trade in doping products and actively prosecute suppliers

What can anti-doping criminal law enforcement achieve?

Outline

- **Paoli and Donati's WADA-funded study on the Italian doping market**
 - The size of the Italian market and its users
 - The suppliers and the web of distribution chains
 - Prices, revenues and profits
 - Anti-doping criminal provisions and their enforcement in Italy
 - Generic conclusions and lessons for policy-making

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Paoli and Donati Report

On January 22, 2013, representatives from nearly 20 organizations gathered in Lausanne to attend a presentation on the report '[The Supply of Doping Products and the Potential of Criminal Law Enforcement in Anti-Doping: An Examination of Italy's Experience](#)', and a related workshop on cooperation between law enforcement and anti-doping organizations hosted by WADA.

The report – written by Dr. Letizia Paoli and Alessandro Donati and funded by WADA – examines the experience of Italy's anti-doping law, analyzes the production and trade of doping products, and explores the challenges of reducing their supply.

In particular, the authors identify challenges faced by anti-doping law enforcement, including those in the field of international cooperation, and look to draw policy implications from their analysis.

WADA Director General David Howman: "WADA was pleased to support this research. It is now agreed that the fight against doping in sport requires a closer collaboration between law enforcement and anti-doping organizations to gain further effectiveness, as demonstrated by numerous investigations and non-analytical doping cases.

"The presentation of the report and the law enforcement, public authorities, WA Organizations to discuss the impact of substances and the fight against doping intelligence sharing."

Click [here](#) for more details on the Janu

Last Updated March 2013



WADA-funded study with two main aims:

- On the basis of Italy's anti-doping criminal law experience
 1. To analyze production and distribution (supply) of doping products
 2. To understand how anti-doping criminal provisions and their enforcement can contribute to improve control of doping

Research design

- Thanks to intense collaboration with Comando Carabinieri per la Tutela della Salute (NAS), we drew on multiple data sources, largely from criminal justice system
 - Official documents of 46 anti-doping investigations
 - 80 data files on major NAS investigations from 1999 to 2009
 - Data on anti-doping activities of all 38 NAS Branch Offices
 - Seizure data from all police forces
 - Interviews with 26 NAS officers
 - Interviews with 7 prosecutors and 2 other experts
 - All relevant statistics
 - Scientific and grey literature and media
- Triangulated data to validate findings

Doping is conceived as semi-legal market

- Market approach is new in case of doping
- Legal status of doping products suffers the burden and ambiguity of contextual specificity
- Legal status of supply-side activities varies depending on legislation in different countries and, even within each country, depending on
 - Products exchanged and their final use
 - Bona fide of some suppliers (e.g., pharmacists)
 - Applicable offences

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A large market, a public health issue

| | Users of doping products | Percent of total | Users w/o cannabis or cocaine | Percent of total |
|----------------------|-------------------------------------|-----------------------------|--|-----------------------------|
| Athletes | 185,000 | 73% | 150,000 | 69% |
| Body-builders | 68,700 | 27% | 68,700 | 31% |
| Total | 253,700 | 100% | 218,700 | 100% |

- Estimate is very conservative:
 - Based on CVD's positive results and investigation results for body-builders
 - No estimate for non-competitive sports-persons and physically inactive people
- Roughly same amount of people consume doping products as heroin
- CONI's super-elite athletes (10,000) represent tiny minority (3.9%)

CONI v. CVD

Anti-doping-tests carried out by the Italian National Olympic Committee (CONI) and sports federations on elite athletes – 2002-07

| | 2002 | 2003 | 2004 | 2005 | 2007 | Average |
|------------------------------------|-------|-------|-------|-------|--------|-------------|
| Total tests | 7,823 | 9,431 | 9,950 | 8,791 | 11,154 | 9,430 |
| Positive results | 48 | 62 | 65 | 52 | 69 | 59 |
| Percent of positive results | 0.61 | 0.66 | 0.65 | 0.59 | 0.62 | 0.63 |

Source: CONI, 2012.

NB: CONI has published no data about positive results since 2007; it published in late 2012 data on adverse results.

Anti-doping-tests carried out by Commissione per la vigilanza e il controllo sul doping e per la tutela della salute nelle attività sportive (CVD) on recreational athletes – 2003-11

| | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | Average 2008-11 |
|------------------------------------|------|-------|-------|-------|-------|------|-------|------------|-------|-----------------|
| Total tests | 740 | 1,556 | 1,875 | 1,511 | 1,607 | 955 | 1,328 | 1,115 | 1,676 | 1,374 |
| Positive results | 20 | 42 | 37 | 37 | 46 | 39 | 42 | 53 | 52 | 46.5 |
| Percent of positive results | 2.7 | 2.7 | 2.0 | 2.4 | 2.9 | 4.1 | 3.2 | 4.8 | 3.1 | 3.8 |

Source: Ministero della Salute and ISS; several years.

Doping doses for the main types of doping substances seized by NAS

| Doping substances | 1 dose |
|---|------------------|
| Anabolic agents | 10 mg |
| Peptide hormones, growth factors and related substances, of which | |
| - EPO and other similar peptide hormones | 200 IU or 1 mcg |
| - GH and other similar peptide hormones | 1 IU or 0.333 mg |
| - Chorionic gonadotrophin | 1,000 IU |
| - Gonadorelin | 1.2 mg |
| - Adrenocorticotrophic hormone (ACTH) and other corticotrophins | 0.25 mg |
| - Insulin | 10 IU |
| Beta-2 agonists | 2 mcg |
| Hormones and metabolic modulators | 10 mg |
| Diuretics and other masking agents | 25 mg |
| Stimulants | 25 mg |
| Narcotics | 50 mg |
| Glucocorticosteroids | 25 mg |
| Beta-blockers | 5 mg |

88 m doses seized by NAS in 1999-2009

| Type of substance | Pills, ampoules and other packages seized | Active ingredients seized (mg) | No. of doping doses | % of total doses |
|--|---|--------------------------------|---------------------|------------------|
| Anabolic agents | 3,531,232 | 745,476,230 | 74,547,623 | 83.16% |
| Peptide hormones, growth factors and related substances, of which: | 45,812 | Not comparable | 1,604,608 | 1.79% |
| -EPO and similar hormones | 12,430 | Not comparable | 626,335 | 0.70% |
| -GH and other growth factors | 20,482 | Not comparable | 928,335 | 1.04% |
| -Related substances* | 12,900 | Not comparable | 49,938 | 0.06% |
| Beta-2 agonists | 640 | 9,780 | 4,890 | 0.01% |
| Hormones and metabolic modulators | 35,561 | 355,610 | 35,561 | 0.04% |
| Diuretics and other masking agents | 13,339 | 340,125 | 13,605 | 0.02% |
| Stimulants | 3,373,570 | 291,379,175 | 11,655,167 | 13.00% |
| Narcotics | 1 | 6,750 | 135 | 0.00% |
| Glucocorticosteroids | 130,802 | 4,549,125 | 181,965 | 0.20% |
| Beta-blockers | 11 | 55 | 11 | 0.00% |
| TOTAL | 7,176,780 | 1,042,116,850 | 88,043,565 | 100.00% |

Source: our elaboration on NAS data.

Steroids and body-builders account for lion's share of market

| Substances | Athletes | Body-builders | Total doses per class | Percent of total |
|--|-------------|---------------|-----------------------|------------------|
| Anabolic agents | 45,304,348 | 173,522,903 | 218,827,251 | 58.93% |
| Peptide hormones, growth factors and related substances*, of which | 19,956,522 | 3,767,419 | 23,723,941 | 6.39% |
| - EPO | 7,675,907 | 0 | 7,675,907 | 2,07% |
| - GH** | n.a. | 3,564,001 | 3,767,419 | 0,96% |
| - Chorionic Gonadotropin | 12,280,615 | 203,418 | 12,484,033 | 3,36% |
| Beta-2 agonists | 13,130,435 | 11,081 | 13,141,515 | 3.54% |
| Hormones and metabolic modulators | 0 | 132,968 | 132,968 | 0.04% |
| Diuretics and other masking agents | 32,391,304 | 55,403 | 32,446,708 | 8.74% |
| Stimulants | 24,739,130 | 27,036,774 | 51,775,905 | 13.94% |
| Narcotics | 7,000,000 | 0 | 7,000,000 | 1.89% |
| Glucocorticosteroids | 21,130,435 | 531,871 | 21,662,306 | 5.83% |
| Beta-blockers | 2,608,696 | 0 | 2,608,696 | 0.70% |
| Total doses | 166,260,870 | 205,058,419 | 371,319,290 | |
| Percent of total | 44.78% | 55.22% | 100.0% | |

Key substances are excluded for which there are clues of misuse: e.g., gonadorelin

| Region/Province | Packages sold | Total value | Packages sold per 100,000 | Total value per 100,000 |
|--|---------------------------------|------------------------------------|---------------------------|-------------------------|
| Piedmont | 28,178 | 7,342,211 | 635.7 | 165,642 |
| - Novara province | 4,063 | 1,113,759 | 1,184.4 | 324,673 |
| Aosta Valley | 28 | 8,106 | 22.0 | 6,379 |
| Trentino Alto Adige | 97 | 26,557 | 9.5 | 2,607 |
| Venetium | 5,675 | 1,661,377 | 116.2 | 34,006 |
| Friuli | 1,645 | 507,734 | 133.6 | 41,248 |
| Liguria | 814 | 235,196 | 50.4 | 14,563 |
| Emilia Romagna | 2,942 | 758,387 | 67.8 | 17,482 |
| - Ferrara province | 2,396 | 623,474 | 669.3 | 174,164 |
| Tuscany | 851 | 203,713 | 23.0 | 5,494 |
| Umbria | 12 | 1,576 | 1.3 | 176 |
| Marche | 867 | 242,723 | 55.2 | 15,464 |
| Latium | 872 | 233,825 | 15.5 | 4,156 |
| Abruzzo | 42 | 5,211 | 3.1 | 390 |
| Molise | 401 | 147,955 | 125.0 | 46,121 |
| Campania | 12,311 | 2,921,818 | 211.8 | 50,268 |
| - Salerno Province | 6,207 | 1,508,804 | 561.2 | 136,408 |
| Apulia | 157 | 35,247 | 3.4 | 864 |
| Basilicata | 270 | 89,674 | 45.7 | 15,184 |
| Calabria | 15,317 | 4,297,389 | 762.5 | 213,938 |
| - Cosenza province | 7,049 | 2,024,430 | 961.0 | 275,993 |
| Sicilia | 8,542 | 2,266,027 | 169.6 | 44,980 |
| - Caltanissetta province | 2,583 | 748,339 | 948.6 | 274,833 |
| - Palermo province | 5,406 | 1,393,428 | 434.3 | 111,951 |
| Sardegna | 431 | 78,859 | 25.8 | 4,719 |
| Total | 101,310 | 26,727,207 | 168.7 | 44,512 |
| Selected provinces and region | 35,972 (35.5%) | 9,685,193 (36.2%) | 674.5 | 181,616 |
| Rest of country | 65,338 | 17,042,014 | 119.4 | 31,148 |
| Hypothetical sales in selected provinces and region at average rate | 11,564 | 1,661,081 | 119.4 | 31,148 |
| Difference effective and hypothetical sales | 24,408 (24.1%) | 8,024,112 (30.0%) | n.a. | n.a. |

Source: CVD, 2010 and Istat, for the population data.

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Suppliers are NOT marginalized

- Mostly men
- Mostly Italian
- Few have criminal records for doping-related offences or fights
 - Hardly anybody has traditional criminal career
- Most of them have legitimate profession or occupation

Most suppliers are white-collar criminals

| Category | Type |
|---------------------------------------|--|
| Gym | Gym managers or owners and body-building instructors Managers or owners of dietary supplement shops |
| Health care | Pharmacists Physicians Hospital, health clinic and nursing home employees Employees or salesmen of (para-) pharmaceutical companies |
| (Human) Organized sports world | Staff members of sports teams Staff members of sporting federations |
| Horseracing | Veterinary physicians Breeders Drivers |
| Use | Athletes Law enforcement officers practicing as body-builders |
| Other | People with no distinctive profession or occupation (e.g., truck robbers) |

Many suppliers belong, or are close to, organized sports world

- Pharmacists:
 - E.g., Dr. Nigrelli
- Physicians:
 - E.g., Prof. Conconi, Dr. Ferrari and others
- Staff members of sports teams:
 - E.g., staff members of cycling teams as well as manager and chief team physician of Juventus football club
- Staff members of sports federations:
 - Dr. Faraggiana, FIDAL physician, and Camerini, FCI high-level official involved in “Oil for Drug”
- Veterinary physicians, breeders and horse riders
- Athletes from different sports

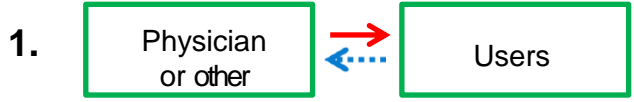
Many of them abuse position of authority and athletes' trust

Distribution chains are also semi-legal

1. Doping methods
 - No separate distribution system
2. Substances manufactured for doping purposes
 - In pharmacies or in illegal labs, in Italy or abroad
 - “Producers-retailers” or distribution chain
 - Internet plays increasingly important role in sale of substances produced in illegal labs
3. Substances manufactured for legitimate purposes, in Italy or abroad, then diverted by
 - Manufacturers or distributors, their dependencies or employees
 - Traders, who sometimes sell drugs on the internet
 - Robbers stealing from trucks or deposits
 - Hospital or health clinic employees stealing from deposits
 - Pharmacists or their employees

Users bypass domestic distribution by buying stuff on internet

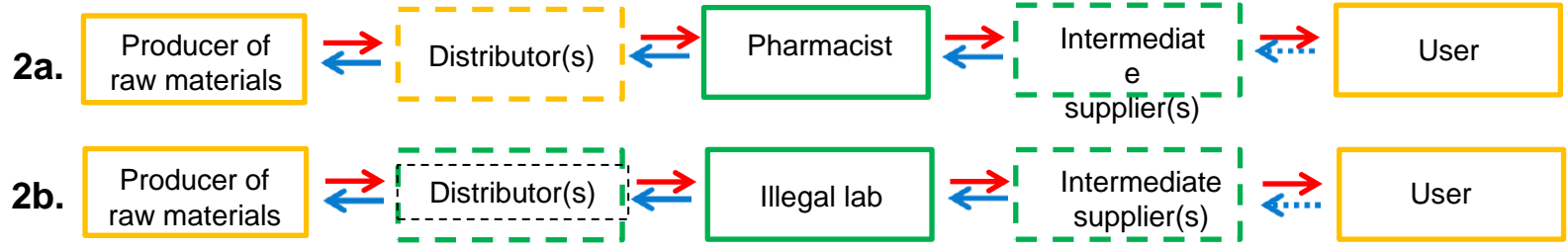
Methods



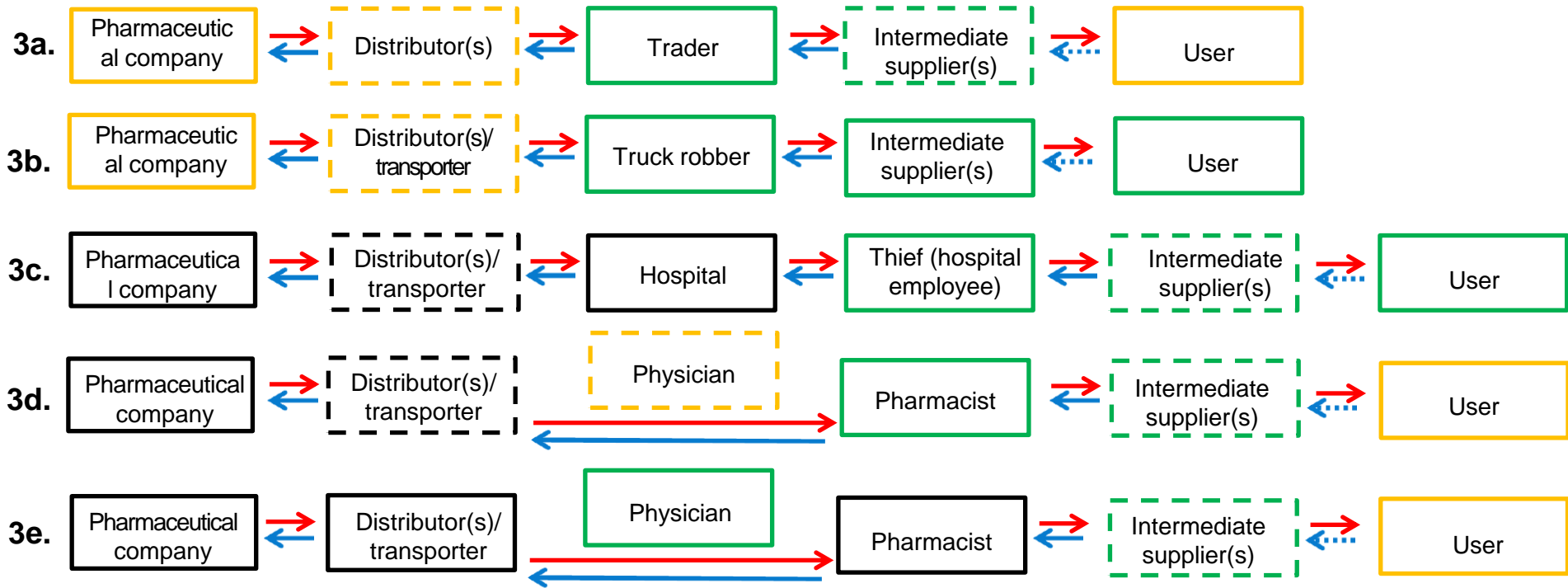
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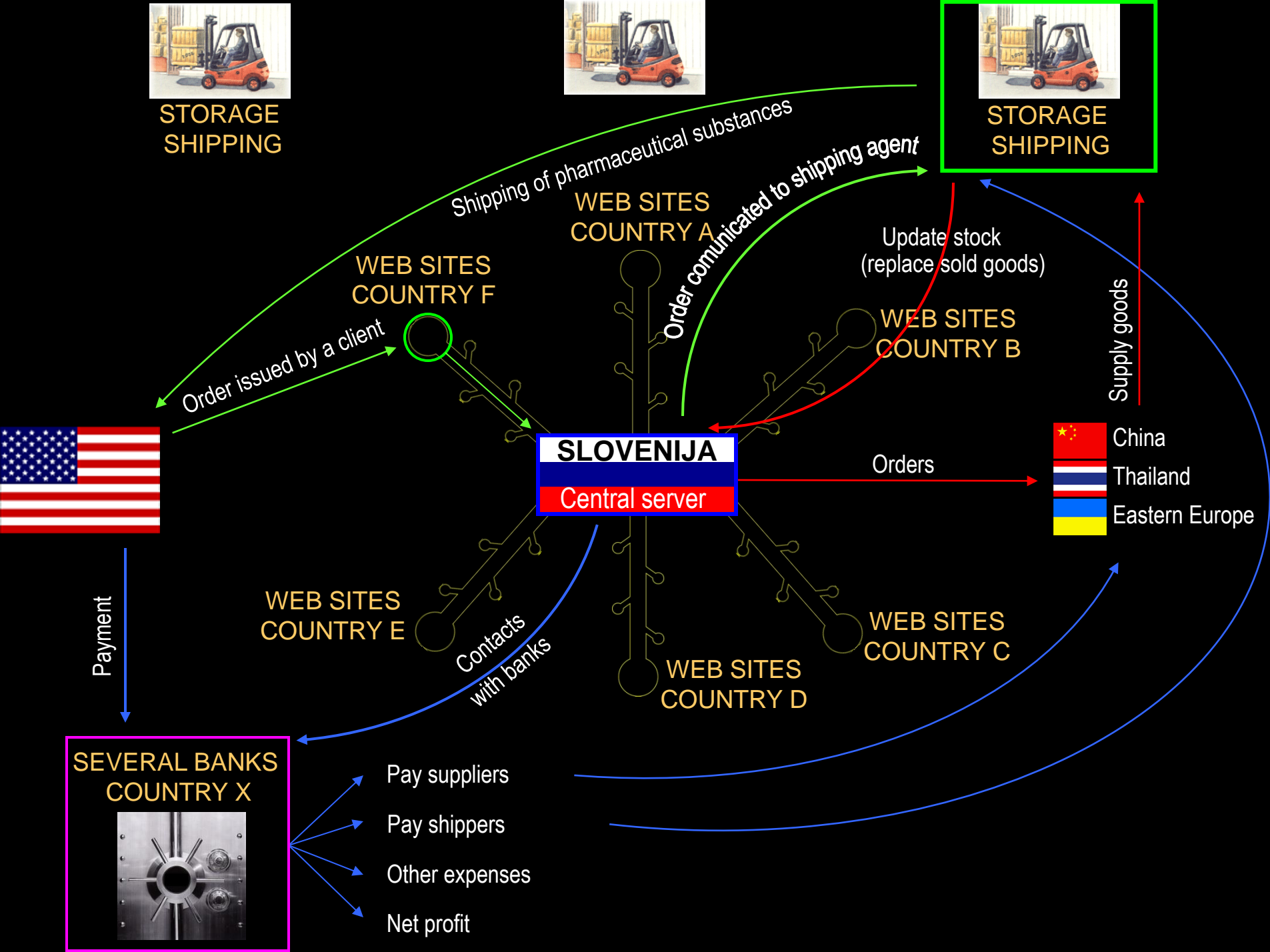
- Actor committing a crime
- Actor unaware of committing a crime
- Sale, transfer or administration of doping substance or method
- ← Money payment
- Possible actor
- Actor may or may not commit a crime
- ←···· Possible money payment

Substances manufactured for doping purposes



Substances manufactured for legitimate purposes by pharmaceutical companies





Protection of national sports bodies is startling peculiarity of doping market

- Officials and staff members of sports bodies were openly accomplices of doping elite athletes until 1990s
 - Three CONI Presidents charged of criminal organization with Prof. Conconi for administering dangerous drugs to super elite athletes
 - IOC accredited antidoping lab in Rome closed in 1998 because it did not test football players for steroids
 - Reports of doping practices were covered up by sport body officials
- Since 2000 lack of commitment in anti-doping and seeming tolerance of elite athletes' doping practices

**Unparalleled case of government-tolerated and funded (!)
system of illegality**

A case of organized crime?

- Most suppliers are white-collar criminals
- Very limited mafia involvement
 - Only Neapolitan camorra groups are involved in two side-activities
 - “Receive” drugs stolen by truck robbers
 - Engage in fixing horse races in Naples area by administering doping substances to horses
- No evidence of bribery or explicit violence
- Yet, if EU definition of organized crime is accepted, both suppliers and trade can be seen as organized crime

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Low (official) prices per dose

| Type of substance | Active ingredients of one dose | Average price/dose |
|---|--------------------------------|--------------------|
| Anabolic agents (including testosterone) | 10 mg | 1.12 |
| Peptide hormones, growth factors and related substances,* of which: | Variable | 4.76 |
| - EPO and other similar hormones | 200 IU or 1 mcg | 3.09 |
| - GH and other similar hormones | 1 IU or 0.333 mg | 13.90 |
| - Related substances**, of which | Variable | 2.50 |
| *Chorionic gonadotrophin | 1,000 IU | 3.27 |
| *Gonadorelin | 1.2 mg | 48.05 |
| *ACTH and other corticotrophins | 0.25 mg | 3.70 |
| *Insulin | 10 IU | 0.03 |
| Beta-2 agonists | 2 mcg | 0.20 |
| Hormones and metabolic modulators | 10 mg | 1.26 |
| Diuretics and other masking agents | 25 mg | 0.40 |
| Stimulants | 25 mg | 0.60 |
| Narcotics | 50 mg | 1.28 |
| Glucocorticosteroids | 25 mg | 0.49 |
| Beta-blockers | 5 mg | 0.26 |

- Official prices are cheaper than those of illegal drugs
 - Exceptions are GH and gonadorelin
 - By comparison, 0.25 gram doses of heroin and cocaine cost €10.49 and €17.29 and a hashish joint €3.73
- But, prices paid by users may differ greatly from official price

Source: Our calculations on the basis of the Database on NAS investigations.

Relatively modest revenues and profits

- By multiplying official prices per dose with estimate of doses consumed, we estimate yearly revenues of €537 million
 - Smaller than illegal drugs (e.g., cocaine revenues ca. €3,685 million)
 - Estimate is very conservative, as it reflects limits of testing and excludes GH and gonadorelin
- No information on manufacturers' revenues and profits, as only one lab has been seized in Italy
- Most other suppliers do not earn much
 - Few physicians (e.g., Ferrari) serving elite athletes constitute exception

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Legislation: Act 376/2000 is key but other offences are also relevant

- Act 376/2000 is cornerstone of Italy's anti-doping policy
 - Establishes three offences of anti-doping
 - First two concern athletes and their support personnel for procuring, administering, assuming or even encouraging the use of doping substances or methods, to improve an athlete's performance or to modify test (art. 9, §§ 1 and 2)
 - The third tackles illegal suppliers trading in doping substances outside official distribution channels (art. 9, § 7)
 - Sets up CVD
- Other offences are also charged in investigations, e.g.:
 - Several offences of criminal code
 - Sporting fraud (art. 1 of Act 401/1989)
 - Other offences from drug law, customs law and law implementing European Directive 2001/83/CE on Human medicines

NAS carries out bulk of anti-doping investigations

- NAS is specialized unit of Carabinieri, its main mission is health protection
 - 3,794 suspects reported for doping and 446 arrested in 2001-2010
 - Invest about 14% of their resources in doping
 - Direct personnel costs for anti-doping are €1.4 million
- Other law enforcement agencies occasionally seize doping substances and carry out investigations
- Prosecutors are fully independent on executive, few very resolute and have launched high-level investigations
 - Negative side-effects: lack of prioritization and coordination, dependence on single prosecutor's good will and competence

Outcomes: Significant number of cases initiated and persons charged ...

| | Section 1 | | Section 7 | | Total | |
|------------------------|-----------|-----------------|-----------|-----------------|------------|-----------------|
| | Cases | Persons charged | Cases | Persons charged | Cases | Persons charged |
| 2001 | 1 | | 0 | | 1 | |
| 2002 | 3 | | 1 | | 4 | |
| 2003 | 9 | | 9 | | 18 | |
| 2004 | 14 | | 8 | | 22 | |
| 2005 | 10 | | 15 | | 25 | |
| 2006 | 31 | 76 | 42 | 156 | 73 | 232 |
| 2007 | 19 | 40 | 34 | 116 | 53 | 156 |
| 2008 | 27 | 73 | 22 | 44 | 49 | 117 |
| 2009 | 36 | 64 | 32 | 114 | 68 | 178 |
| Total 2001-09 | 150 | n.a. | 163 | n.a. | 313 | n.a. |
| Average 2001-09 | 17 | n.a. | 18 | n.a. | 35 | n.a. |
| Total 2006--09 | 113 | 253 | 130 | 430 | 243 | 683 |
| Average 2006-09 | 28 | 63 | 33 | 108 | 61 | 171 |

Source: our elaboration on Istat, 2012.

- Among the persons charged, there are high-level athletes, support personnel and other suppliers

Outcomes: ... but very few criminal convictions

- No exact statistics but few final verdicts are known
 - Some verdicts involved high-level athletes
- Three explanations:
 - Many proceedings are still ongoing, most started after 2003
 - They often end with a *patteggiamento* (bargaining agreement)
 - Statute of limitations expires on many proceedings
- Criminal investigations provides evidence for successful disciplinary proceedings under sports rules
 - According to Haas, 90% of the cases he reviews at CAS concerning support personnel comes from Italy
- Some prosecutors hesitate to share data with CONI due to mistrust

Five challenges hamper anti-doping criminal action

- General inefficiency of Italian criminal justice system is major obstruction
- Four are domestic:
 - Specific aspects of Act 376/2000
 - Prosecutors and judges' insufficient knowledge of doping and anti-doping legislation, need to rely on external experts
 - Limited cooperation between law enforcement agencies and sports authorities
 - CVD's deficient coordination of Italy's anti-doping policy
- Fifth challenge concerns difficulties in international police and judicial cooperation

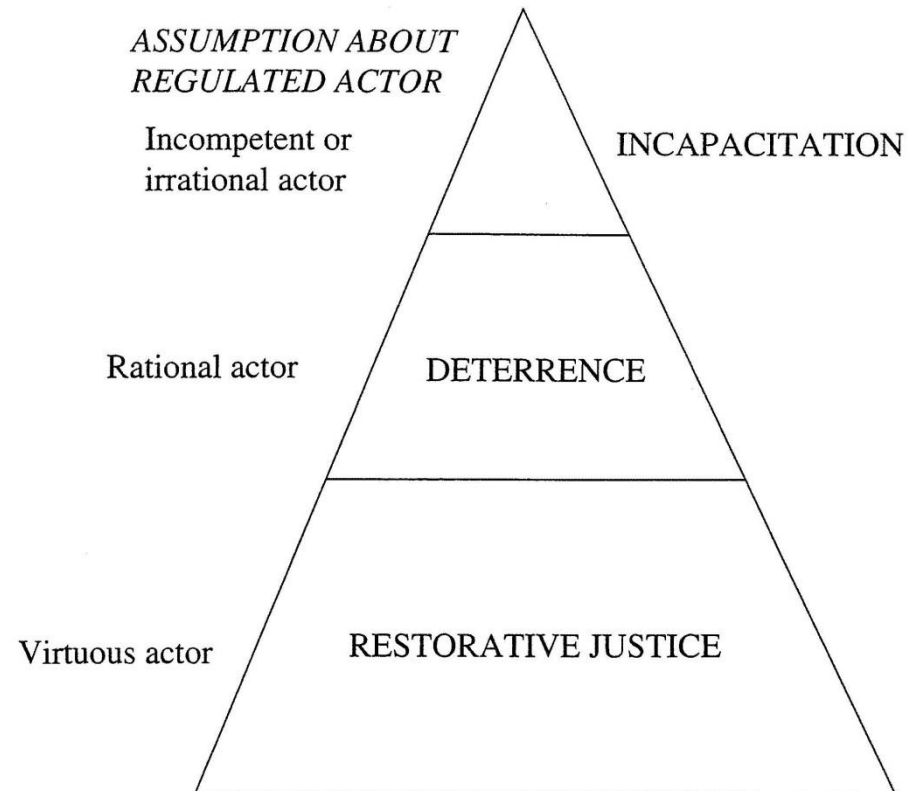
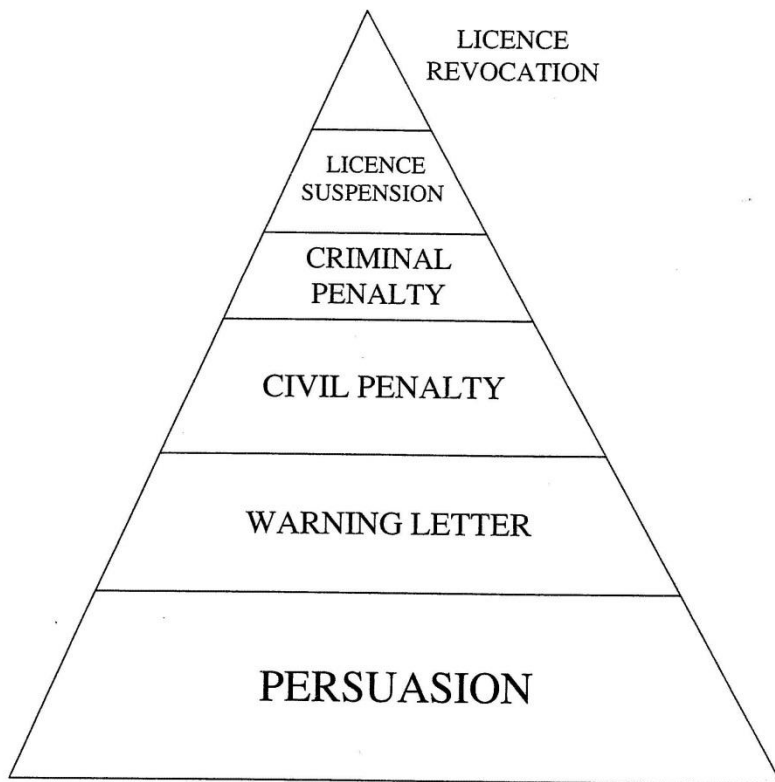
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Lessons for policy-making - Market

- Elite athletes targeted by CONI, sports federations and WADA constitute tiny minority of users
 - **Policy focus must be broadened to include recreational users**
- In other countries too, demand is met by semi-legal supply
 - **There is a need to know more**
- Users can obtain doping products from multiple sources, often through internet
 - **No doping-free world is possible, no “war on doping” makes sense**
- White-collar crime nature of supply is opportunity for controlling doping
 - **Use all means of Braithwaite’s “regulatory pyramid”**
- Organized sports world cannot be trusted with anti-doping and its means (testing) are insufficient
 - **National governments need to intervene directly**

Braithwaite's regulatory pyramid and its underlying philosophies



Lessons for policy-making - Enforcement

- Prosecution of key figures, under criminal law or sports rules, can play relevant symbolic and educational functions
 - **Make criminal investigations possible in all countries**
- Criminal investigations can better shed light on supply and are cheaper and “fairer” than testing
 - **Complement testing with criminal investigations**
- Better serve public health perspective
 - **Give up exclusive focus on elite sports**
- Are hampered by lack of harmonized legislation
 - **Harmonize national legislations, exploit equivalent offences**
- Depend on law enforcement’s specialized knowledge
 - **Create special units, train personnel, involve (NADO) experts**

Lessons for policy making - General

- Many relevant pieces of information on demand, supply and policy outcomes are still unknown
 - **Develop national and international monitoring system(s), exploiting existing networks (e.g., EMCDDA, UNODC), e.g.,**
 - on the supply:
 - Amounts of doping substances seized in standardized units
 - Share of counterfeited products out of those seized and sold
 - Wholesale and retail prices of different substances
 - Share of worldwide production of some key drugs misused for doping purposes
 - New substances entering the market
 - on anti-doping criminal law enforcement:
 - Doping-related criminal offenses and sanctions foreseen
 - Number of criminal proceedings initiated and their outcomes (e.g., reports, suspects, defendants, case law and sanctions)