MINISTRY OF YOUTH AND SPORT

NATIONAL STRATEGY AGAINST DOPING IN SPORT (2015-2024)

2015
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INTRODUCTION

Through its positive effects on social inclusion, education, training and public health, sport contributes much to achieve smart, sustainable and inclusive growth and to create new jobs. By improving the health and productivity of the population and ensuring better quality of life in the third age, it helps to limit the growth of public expenditure on social security and health. The voluntary activities in sports sector can contribute to the increase of employment chances and social inclusion through its impact on education and training as well as on the greater civic participation, especially among young people. Sport, however, faces a number of threats, such as doping, violence and intolerance of which athletes, especially younger ones, and citizens must be protected.

By "doping" in sport is meant the use of prohibited substances or methods to achieve higher sporting achievements. Among the various types of doping are the acceptance of substances that allow greater strength, higher resistance to pain, faster recovery after hard training or competitions, as well as substances that modify the ability to critically evaluate the danger and allowing risk-taking. Therefore, doping is in conflict with the basic principle of sport for fair play, for a realistic assessment of the opportunities and sportsmanship. It vitiates sporting rules and destroys its educational role. In addition, the adoption of stimulating agents of the type of doping can be a real threat to the health of the athlete. There are numerous cases of damages resulting from doping agents – from transient impairment of normal physiological functions, to addiction, severe errors of metabolism, hormonal imbalance and even death.

As doping are used a number of medications that are not applied for medicinal purposes but with the intention to improve artificially the results of athletes. In medicine, these prohibited substances are used on medical prescription, but in this case they are obtained by other devious and illegal means, including the Internet.

The doping is a serious threat to sport. The use of doping substances by the athletes in amateur and professional sport and sport in leisure time leads to serious risks to public health and requires the need for preventive actions, including in terms of sites where recreational sports is practiced, such as fitness centres. The prevention of doping and the provision of penalties for the use of doping remain within the remit of sport organizations and the states.

The need to coordinate the laws of the countries in the field of doping and agree on measures taken at national and international level, has led to the creation in 1999 of the World Anti-Doping Agency – WADA (World Anti-Doping Agency). In 2003, WADA has adopted the World Anti-Doping Code (the Code), which is a precondition for harmonizing anti-doping policies, rules and regulations within sport organizations and public authorities. World Anti-Doping Code is changed every four years, reflecting the new guidelines in the fight against doping.

European Commission (EC) supports the fight against doping and stresses in its reports the important role of the World Anti-Doping Agency, the national anti-doping organizations, accredited laboratories, the Council of Europe and UNESCO. The Commission welcomes the fact that national anti-doping organizations increasingly have the status of independent bodies. It encourages the Member States to adopt and exchange national action plans to combat doping, which objective is to ensure coordination between all participants in the process. Already in 2011 in its report the EC emphasizes the need that anti-doping rules and practices to comply with the legislation of the European Union (EU) regarding the respect of fundamental rights and principles, such as respect for private and family life, protection of personal data, the right to a fair trial and the presumption of innocence. Any limitation on the exercise of these rights and freedoms must be set out by the law and should respect the essence of those rights and the principle of proportionality. The European Commission encourages the existing trend in Member States of the European Union to introduce criminal law provisions against trade with doping substances, carried out by organized networks, or to strengthen the already existing regulations.
The National Strategy for Fight against Doping in Sport 2015-2024 aims to analyze the state of measures to combat doping in Bulgaria, to outline the main problems and obstacles to effective policy to combat doping and to formulate objectives and guidelines for actions which help to achieve an environment with minimal risk of spread and use of doping among the athletes and people who practice sport in their free time. The main objective of the strategy is doping prevention, taking into account the most effective weapons in the fight against doping – the information and education.

Bulgarian society, the government and the sports community realize that the problem of the spread of doping, which until recently was mainly including athletes, today is becoming a problem that affects an increasing number of people. This puts at risk the health of the nation and becomes a serious challenge to the society.

Particular attention deserves the problem of doping substances among young people who practice sport in their free time, mostly in the field of fitness and bodybuilding. In some of the clubs are offered unobstructed harmful to health agents and substances. Internet marketing of such substances is also not regulated. For these reasons, the prevention and the fight against the use of doping must envisage serious measures regarding recreational sports.

The use of doping in sport both for excellence in sport and leisure activities is an increasingly common practice. Evidence of this are the numerous doping scandals in recent years and the removal and cancellation of many sporting results and titles. Although many athletes do not consider doping dangerous to their health, it hides many risks associated mostly with the side effects. Many of the used doping substances have a negative impact on the cardiovascular system, which is one of the busiest in sports activities. Taking doping in many cases leads not only to health problems, but is the major cause for the sudden death of athletes.

Realizing the seriousness of the problem the Government for sustainable development of the Republic of Bulgaria placed as a priority in its Management Program for the period 2014-2018 the prevention and control of the use of doping in sport. The main objective for implementing the priority is accreditation of the Laboratory for Doping Control to the Anti-Doping Centre.

The National strategy for combating the use of doping in sport is based on coordinated policies and actions against the use of doping in sport, which are aimed at reducing the production, traffic, distribution and use of illicit means and methods, as well as to information on the harmful consequences of their use.

The tasks lying ahead of the Bulgarian state to resolve in the context of the global anti-doping policy are urgent. The Government of the Republic of Bulgaria shall focus its efforts on promoting equality and principle of openness in sporting competitions and cooperation between bodies responsible for sports, and protecting the physical and moral integrity of sportsmen and sportswomen, especially of the youngest among them.

The National strategy for combating the use of doping in sport is directed to act in sports organizations, aiming ethical relations, honest wins in competitions and ensuring the health of the athletes. The strategy is long-term for a period of ten years, but could be upgraded as necessary.

National Strategy for Fight against Doping in Sport 2015-2024 has several target groups:

- Athletes and sport-technical staff including students from the sports schools and their parents;
- Students from general secondary schools and high schools and their parents.
- People practicing sports in their free time and in particular those involved in fitness (focusing on young people).
I. CURRENT STATE

Bulgaria is part of the international effort to clean sport. In 1992 Bulgaria ratified the Convention of the Council of Europe against doping and the UNESCO Convention of 2005. The World Anti-Doping Code was adopted by the Bulgarian Olympic Committee and the existing at that time National Anti-Doping Commission.

One of the fundamental international standards applied by the Code is the List of substances and methods that are prohibited for use during competitions or out of competition or banned only in certain sports. These prohibited substances and methods are doping agents used mostly by athletes. The Prohibited List was first published in 1963 by the International Olympic Committee. Since 2004 it is supplemented and published annually, and for its preparation and publication is responsible the World Anti-Doping Agency. Many of the substances of included in the Prohibited List pharmacological groups are used as drugs in medical practice, which further hampers the fight against their use as doping agents in sports.

WEB-based system ADAMS was created for management of the Register of athletes for testing and filling forms for location. It facilitates the daily activities of athletes and of all organizations and laboratories involved in the fight against doping in sport. World Anti-Doping Agency requires its compulsory use by the competitors listed in the Register for testing.

Globally, the identified cases of doping in sport are numerous. The establishment of specialized national structures to combat this phenomenon with enormous adverse effects on ethics in sport and credibility of athletes and to health of sportspersons is part of the measures creating the conditions for limiting the use of doping. In sports doping incidents are numerous and therefore the creation of national anti-doping organizations is considered a major priority in the measures, restricting the use of doping agents. According to the WADA Code those organizations are responsible for the adoption and implementation of the anti-doping rules and policies at national level.

Despite the measures taken to combat the use of doping around the world, there is a tendency for more and more widespread use of doping agents by athletes at all levels.

1. Institutions relevant to the fight against doping

The Anti-Doping Centre (AC) is the national authority for doping controls, prevention and fight against doping in sport. Under current legislation in Bulgaria, partner institutions at national level for implementing the fight against doping in sport are: the Ministry of Youth and Sports (MYS), the Ministry of Education and Science (MES), the Ministry of Health (MoH), Bulgarian Agency for Food Safety/ Food Safety Agency (FSA), “Customs” Agency, Ministry of Interior (MoI) and the Bulgarian Olympic Committee (BOC), licensed sports organizations, non-governmental organizations/ NGOs and others.

- **Ministry of Youth and Sports (MYS)**

The Ministry carries out an unified governmental policy in the field of youth, sports and social tourism. Ministry of Youth and Sports has a leading role and coordinates the efforts at the state level to combat doping in sport. Under the Structural Regulations function of Ministry of Youth and Sports in the field of anti-doping policy is the organization of prevention and control of the use of doping in sport.

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Anti-Doping Centre and the Laboratory for Doping Control

In 2010 at the Ministry of Youth and Sports was created Anti-Doping Centre, which adopted the WADA Code and the responsibility to comply with the anti-doping rules. The centre operates as a national anti-doping organization for the implementation of commitments made by Bulgaria with the signing of the Copenhagen Declaration, the UNESCO International Convention against Doping in Sport and the Convention of the Council of Europe against the use of doping. It represents a structure to implement the policy to combat the use of doping in competition and out-of-competition activities in Bulgaria. The main functions of the centre are related to the implementation of doping control through doping tests; conducting educational and information campaigns on different aspects of the fight against doping; granting authorizations for therapeutic use of drugs and performing scientific research.

For the short period since its establishment, the Anti-doping centre has undertaken a number of specific actions aimed at preventing the fight against the use of doping in sport. In 2011-2014, training was carried out on doping issues of more than 500 people: athletes (participants in the Olympic Games in London and winter Olympic Games in Sochi), doctors of national teams, sports and technical personnel and young athletes. The centre implements training project for students from the sports schools - "Anti-doping training against the false self-affirmation", financed by the UNESCO Fund for the Elimination of Doping in Sport. In 2013 and 2014, under this project additionally were trained 250 students from 6 sports schools in the country and a group of children deprived of parental care. During the lectures together with the students attended their teachers and coaches.

To the Anti-doping centre was established the Laboratory for Doping Control, which is intended to carry out analyses of the taken doping samples. From 2012, the laboratory is housed in a renovated building with updated and expanded laboratories and hardware. New equipment was provided. Are also envisaged and strictly observed all the requirements for restricted access of unauthorized persons, independent activity of the employees is granted and proper archiving of the results of the tested samples is ensured.

New refrigeration and freezing chambers were constructed for receiving and storing a minimum of 3000 samples per year. The Laboratory for Doping Control to the Anti-Doping Centre was accredited by the Bulgarian Accreditation Service to ISO 17025: 2006. The goal is the Laboratory for Doping Control to the Anti-Doping Centre to obtain international accreditation by the WADA, which shall increase the level of fight against doping in Bulgaria.

Ministry of Health (MoH)

Under the Food Act the Minister of Health together with the Minister of Agriculture and Food implement the state policy on food safety, including food supplements. The Ministry of Health (MoH) conducts the drug policy as part of the state health policy in Bulgaria. Certain of the doping substances are types of medicinal products which are used by the medicine. The Executive Agency on Pharmaceuticals/Bulgarian Drug Agency (BDA) to the Minister of Health is a specialized supervisory body to monitor the quality, safety and efficacy of medicinal products that coordinates its activities with the regional health inspections with regard of the control of medicinal products. The functions of the Bulgarian Drug Agency cover the performance of control over the production, import, storage, wholesale and retail trade, clinical trials, the safety and the advertising of medicinal products.

Regional Health Inspections of the Ministry of Health in implementation of the Law on Health carry out state health control of the fitness centres as places of public intended purpose.

Bulgarian Agency for Food Safety/ Food Safety Agency (FSA)

The Bulgarian Agency for Food Safety / Food Safety Agency (FSA) to the Minister of Agriculture and Food, organized into regional directorates on food safety, is the only competent authority implementing control concerning safety and quality of foods to which according to the Food law belong also the nutritional supplements. The Agency exercises its powers to the stages of production and trade of foodstuffs and in the
marketing of new food additives The Food Safety Agency provides expert evaluation only on the presented sample of the label.

The Food Safety Agency exercises control through scheduled inspections of all registered sites for food trade pursuant Article 12 of Law on foodstuffs, and thereby the inspection covers all the fitness centres that have registered outlets of foodstuffs. By the month of April 2015 the registered facilities for food trade in the fitness centres are only 289. For all other sites that are not covered by the planned monitoring, a possibility is provided on the website of Food Safety Agency for submission of signals for infringements, related to foodstuffs, for which the agency is required to conduct checks. The Agency has the power to impose sanctions in respect of facilities located in the fitness centres where trade of food additives or foodstuffs for athletes is performed when such facilities are not registered as facilities for trade of foodstuffs under Law on foodstuffs.

- "Customs" Agency (CA)

In connection with the functions of the "Customs" Agency for implementation of customs control in Bulgaria, it has the authority to carry out investigations or particular actions on criminal investigations in the cases, terms and procedure of the Criminal Procedure Code.

- Other institutions involved in the fight against doping substances

Relevant to the problem connected to the distribution and use of doping have the Ministry of Justice and Ministry of Interior (with purpose of the potential criminalization of such acts into the Bulgarian legislation) and the Ministry of Education and Science (in connection with the opportunities to include training related to anti-doping fight in curricula programs).

2. Legal Regulatory and Strategic Framework

Bulgaria as part of the international effort to clean sport is also guided by a number of international documents:

- World Anti-Doping Code;
- International Convention against doping in sport; Council of Europe;
- Convention against the use of doping - UNESCO;
- Optional Protocol to the Convention against doping in sport;
- List of prohibited substances and methods (annually updated and amended);
- International Standard for Therapeutic Use permits;
- International Standard for the protection of privacy and personal data;
- International Standard for Testing and investigations;
- Annex to the International Standard for the protection of privacy and personal data.

The national documents concerning the fight against the use of doping agents are:

- Law on Physical Education and Sports;
- Food Law;
- Implementing Regulations of the Law on Physical Education and Sports;
- Regulations of Organization and Operation of the Anti-Doping Centre;
- Ordinance on doping control in training and competitive activity;
– Rules of the Medical Control Commission to the Anti-Doping Centre for permits for a Therapeutic Use;
– Technical procedure for management of the register of athletes for testing of the Anti-Doping Centre;
– Instruction on the criteria for including athletes into the register of athletes for testing of the Anti-Doping Centre;
– Ordinance No. 47 of December 28, 2004 on the requirements for food supplements;
– Ordinance on specific requirements for foods intended for intense muscular effort, especially for sportsmen;
– Ordinance on the labelling and presentation foods.

**Under Bulgarian law, particularly the Law on Physical Education and Sports**, the state should encourage the development of physical education and sport, taking measures to comply with anti-doping rules to combat the use of doping. In the Law is provided that physical education, sport and tourism in preschool childcare facilities, general education, special and vocational schools should be an integral part of the educational and training process and to be implemented under programs of the Ministry of Education, in coordination with the Ministry of Youth and Sports.

The Law on Physical Education and Sports regulates the issues related to the financing of the activities of the Anti-Doping Centre. The sport organizations can not use in their business forms and methods leading to health damage of the athletes, being prohibited the use of doping in sport. Amateur athletes, professional athletes and officials are obliged to comply with the requirements and procedures for doping control established by acts of state bodies and internationally recognized organizations in this field. In the Law are foreseen also provisions in case of violation of anti-doping rules.

**The Law on Foodstuffs covers food additives and is relevant to the fight against doping resources.** Within the meaning of this Act food is any substance or product which is intended, or may be used for human consumption. It regulates:

- The food requirements, the measures and conditions to ensure the food hygiene and its safety, packaging, labelling, presentation, including their promotion;
- The requirements at all stages of production, processing and distribution of food including the control thereof.

**By the Ordinance No. 47 of December 28, 2004 on the requirements for food supplements** are defined the requirements for food supplements, introducing the requirements of the Directive 2002/46/ EC on food additives. To the Regulation there are:

- List of vitamins and minerals which may be used in the manufacture of food supplements;
- Forms of vitamins and minerals which may be used in the manufacture of food supplements;
- Maximum authorized amounts of vitamins and minerals input in food supplements for daily intake recommended by the manufacturer;
- Plants and parts thereof not permitted for use in food supplements.

By Ordinance have also been determined the specific requirements for foods intended for intense muscular effort (Ordinance on specific requirements for foods intended for intense muscular effort, especially for athletes). The Ordinance covers all athletes - those for which the sport is the main occupation, as well as persons who conduct systematic training and competition activities, but for them it is not the main profession.
Since December 2014 is in force a new ordinance that regulates the issue of labelling requirements and the presentation of food. It sets out the requirements for:

- Labelling, presentation and advertising of foodstuffs in order to guarantee right of consumers to information;
- The presentation of nutritional information on the labelling of food, including in cases of the submission nutrition claims.

**Article 350 of the Criminal Code** provides imprisonment for the preparation, distribution and sale of food or beverages intended for general use, when therein are created or caught substances hazardous to health.

In December 2014 the government adopted a new Regulation on doping control in training and competition activities, as main document of the country in the fight against doping. The objective is to bring Bulgarian national legislation in accordance with the latest amendments to the World Anti-Doping Code, which came into force from 1 January 2015.

By the Ordinance has been extended the range of acts that constitute violations of anti-doping rules, as therein are included the so called "forbidden relations" of an athlete or any other person with sports-technical individuals who are already serving their sentences for doping offenses. Ordinance on doping control in training and competition activities shall apply only to licensed sports organizations and athletes who have been filed to the licensed sports organizations.

The **National Strategy for the Development of Physical Education and Sports in the Republic of Bulgaria 2012-2022** draws attention to the alarming gaps in the organization and quality of medical insurance and comprehensive recovery of athletes, which reflects on the use of prohibited substances and methods. The fight against the use of doping is a top priority of the Council of Europe, the European Commission, WADA, the International Olympic Committee, UNESCO and all organizations related to sports. Unfortunately, over the last five years, there are 32 cases of positive doping samples of elite athletes. As a result, the strategy provides only to be undertaken active actions for modernization and international accreditation of the laboratory for doping control.

No measures and actions were also planned in the **National Youth Strategy for the period 2012-2020**, despite the recognized problem of distribution of doping agents among young people One of the strategic goals is: "Promoting a healthy lifestyle among young people" by means of prevention of the factors posing at risk the health of young people. The strategy placed as well the task to create training opportunities for young people on matters of health, sport and physical activity.

**II. EXISTING PROBLEMS**

Notwithstanding the effort deployed in Bulgaria are observed a number of problems that characterize the distribution and use of doping and which require to activate the fight against this negative phenomenon.

1. **Lack of a clear legislative and regulatory and strategic framework for control of the traffic and distribution of doping substances**

Despite the established legal regulations at the moment in Bulgaria there is still no clear legal framework for control over the traffic and distribution of prohibited substances. There is no legal definition of the doping substances with a high degree of risk to public health due to the harmful effects of misuse (for example substances provoking high risk for health). There is also no regulatory framework to control the production, processing, transfer, transport, trade, import, export, transit and storage of high-risk doping substances.

The lack of legal framework to control the high-risk doping substances also leads to lack of normatively regulated functions and responsibilities, and consequently also to a lack of co-ordination between the
different government bodies which should be involved in the fight against doping. In this connection are present the following specific deficiencies:

- Despite the established by the "Customs" Agency cases of trafficking across the border of large quantities of doping substances, at the moment does not exist legal ban on the import or export of such substances;
- The National Strategy for the Development of Physical Education and Sports in the Republic of Bulgaria 2012-2022, provides only the following measures targeted just to the elite sport, "Updating of the Regulation for doping control in accordance with the standards of the International Olympic Committee and the World Anti-Doping Agency", "Undertaking active steps to modernization and international accreditation of the laboratory for doping control." With the so planned measures, the strategy for the development of physical education and sport does not give clarity as to which specific actions will be undertaken to combat the doping;
- In the National Youth Strategy 2012-2020 are not planned measures and actions to combat doping, despite the recognized problem of distribution of doping agents among youth;
- Ordinance №18 of 09.01.2012 for the acquisition of professional qualification "fitness instructor" and Ordinance № 54 of 25.01.2012 for the acquisition of professional qualification "assistant fitness instructor" determine the necessary professional knowledge, skills and competencies. The competences for the professions are defined based on a description of the profession, which includes the basic work activities, responsibilities, characteristics of working conditions, equipment and others. In the above described professions are not included knowledge about the foods and beverages, including food supplements, energy drinks and doping substances. At present such knowledge, skills and competencies are not subject to regulations in these professions.

2. Increased use of doping agents by athletes
In Bulgaria there is a use of doping agents among athletes. During the period 2010-2014 have been registered 32 cases of positive doping samples of Bulgarian elite athletes. The use of doping among athletes in Bulgaria presents risks to their health, violates the principle of fair play and damages the image of Bulgaria at international level. Reasons for the use of doping among athletes in Bulgaria are complex, but perhaps one of the most important is the lack of information on various aspects of the doping use. This fact is confirmed in a study on the prevention of doping within the European Union that was commissioned by the European Commission and published in December 2014. It specifies that at the moment large part of doping practices are a result of lack of knowledge and understanding of the effects of the doping; there is ignorance or confusion among athletes on whether the products they consume are illegal, or contain prohibited substances and are harmful to their health. The ignorance of the matter relating to doping has also been confirmed under the project "Anti-doping education against the false self-affirmation", financed by the UNESCO Fund for the Elimination of Doping in Sport. Under the project among young athletes have been conducted preliminary inquiries concerning their awareness of doping. The results showed an unsatisfactory level of knowledge on the problems associated with the doping use.

3. Performance of sports recovery work by inadequately prepared individuals
During the last years there have been cases of alleged of doping Bulgarian athletes. The work on the recovery of the competitors (including procurement and administration of medications for recovery) in sport organizations in Bulgaria is performed by medical professionals, coaches or other sports technical
personnel, and not all of them are adequately prepared on the issues of doping. In Bulgaria to the sports clubs in general do not work sports doctors.

The Anti-Doping centre carries out training sessions and courses for the sports and technical personnel on the issues of doping, but the sport organizations are not obliged to employ individuals who have passed the anti-doping training. As a result, sports and recovery activities in the sport organizations are carried out by incompetent and unaware of doping persons. This leads to the risk of implicating athletes in the use of prohibited substances. It remains open the question also for the sport medical facilities. There is no normative order for the functioning of these institutions, which should play an essential role in the recovery of the athletes.

4. Increased use of doping agents in recreational sports

Along with the registered during the last years high levels of doping among athletes in Bulgaria, just as alarming is the scale of the distribution and use of doping in sport leisure activities. Historically the documents and initiatives at international level concerning the fight against doping have mechanisms that are mainly focused on fight against doping use in sport for high achievements. They are not focused on measures against the production, distribution and use of high-risk to health substances by the people practicing sports in their free time. The study for the prevention of doping in European Union indicates that since the Code itself does not prohibit the anti-doping organizations to take samples of non-elite athletes, practically it appears that those who train for good health are not in the focus either of Code, nor the anti-doping organizations in different countries. The Anti-doping prevention in sports in leisure time is quite different from the prevention in sport for high achievements - in respect of which organization is leading, from which athletes can be taken samples and what rules are applicable. This is especially true for the members or visitors of the fitness centres, which typically are not members of any federation that adheres to the Code, and thereby are not in the focus of the preventive measures, except where the government institutions do not take any special actions. In this regard, the prevention on the spread and use of doping in recreational sports is in the focus of anti-doping initiatives from comparatively short period of time. In Bulgaria there is no systematic focus on prevention of the risk of the growing ease of doping substances distribution, especially among young people practicing popular sports as fitness. With the increasing popularity of sport as a lifestyle and in particular with the growing popularity of sports such as fitness, among young people in Bulgaria increases the desire to use substances that are believed to contribute to achieve the desired visible outcomes from exercises. According to unofficial data, in Bulgaria about 100 000 persons, mostly young people are practicing fitness for good health. According to the data derived from a study in 2011 under the project "Fitness against doping"\(^3\), about 12% of the practicing fitness and bodybuilding in Bulgaria use doping. According to this indicator Bulgaria is ranked first among the countries participating in the study. This requires serious prevention measures to be undertaken, especially in the distribution and use of doping out of the sport for high achievements.

When analyzing the problem of the spread of doping in sports in Bulgaria, it appears that young people who are engaged in fitness in their free time have access to the doping in the fitness centres. In them are distributed various doping substances, such as products advertised as dietary supplements or foods intended for intense muscular effort containing prohibited ingredients that are not reported on the label. This raises some basic questions about the fitness centres themselves. The activity in these facilities is not subject to specific regulation by the state. Some basic information is also missing about their number in Bulgaria. As a result – there is not accumulated information on the nature and scope of trade thereof with products declared as dietary supplements, foods intended for intense muscular effort or other agents with

\(^3\) http://www.ehfa-programmes.eu/node/3
potential doping effects. The study for the prevention of doping in the EU indicates that the fitness centres in Bulgaria do not participate and are not active in the measures to combat doping. They do not address the issue of doping in recreational sports as a major problem.4

An important aspect of the problem is related to the checking of the activities of the fitness centres in Bulgaria and the lack of control on the qualifications of the persons who work therein. A common practice in the fitness centres is that the fitness instructors and assistant instructors are those persons who recommend and/ or provide the doping agents to people who train there.

Supply and performance of fitness services by unqualified and uncertified personnel may pose a danger to the health of young people involved in fitness, because these people are not trained for the negative effects of doping and/ or they are not part of the wider efforts to combat doping in Bulgaria. There is no statutory requirement for verification and control of the professional qualifications of the persons responsible for these professional activities in the fitness centres.

5. Reduction of age at which for the first time substances are used

In the context of the problem of doping in the fitness centres should be noted that particularly alarming are the data for increasingly early age at which persons practicing sports in free time start using doping.

The study, commissioned by the European Commission indicates that the young people are heavily reliant on "self-proclaimed" experts who give advice on what substances to be taken, how to be taken and what should be done to reduce side effects. This trend is emerging in the teenage years, when young people acquire information on the high risk doping substances from their friends or from their "informed" peers. Internet is also an important source of information for young people. The study also indicates that when viewing thousands of websites promoting the use and sale of high risk doping substances, is noticeable particular efforts that have been made to discredit the scientific evidences on the harmful effects of the use of doping agents.

The lack of information about the harmfulness of the use of stimulants, particularly among young people practicing fitness in their free time, leads to the fact that doping reaches more and more easily to increasingly young people, which fact poses serious health risks for the society in the future.

6. Distribution of products declared food supplements or foods intended for intense muscular effort containing prohibited ingredients undeclared on the label

There are numerous cases in which have been registered positive doping samples due to the fact that the caught athletes have used products, declared food supplements or foods intended for intense muscular effort, containing prohibited ingredients that are not reported on the label. The most frequently found undeclared substances are the steroids. The presence of such prohibited substances is however not indicated on the labelling of the products in question. Several such cases with Bulgarian athletes in recent years impacted negatively on the international sporting reputation of Bulgaria. In these cases, unfortunately, it was not found whether these are illegally manufactured products announced as food supplements or foods intended for intense muscular effort containing prohibited ingredients, which are non-declared on the label or such products to which, for one reason or another, has been added doping substance.

The discrepancy between the declared ingredients on the label and the actual content can be demonstrated only by laboratory analysis. Currently in Bulgaria there is no accredited laboratory for analysis of content of nutritional supplements, foods for athletes and products announced as dietary supplements.

7. **There is no internationally accredited Laboratory for Doping Control in Bulgaria**

In performance of its functions the Anti-Doping Centre performs doping controls of the athletes in Bulgaria. At present, the centre sends the doping samples taken to international laboratories for testing. This is related to the spending of significant financial resources from the State Budget.

Bulgaria do not dispose with a laboratory accredited by the World Anti-Doping Agency to perform analyses of doping samples collected from the centre. Thus is loaded the budget of Anti-Doping Centre, making more expensive the cost for carrying out the doping samples and thereby narrows the range of the doping control in Bulgaria performed by the centre.
### Analysis of the Strengths, Weaknesses, Opportunities and Threats (SWOT)

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<th>Strengths</th>
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<tr>
<td>1. Anti-Doping struggle is one of the main priorities of the Government in the field of sport;</td>
<td>1. Despite being a government priority have not yet been planned measures concerning the control and prevention of free use and distribution of the doping agents;</td>
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<td>2. Anti-Doping Centre and Laboratory for Doping Control were created;</td>
<td>2. Anti-Doping Centre carries out the doping controls only of the athletes in Bulgaria and the sports technical staff;</td>
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<td>3. Have been established institutions for the control of medicines, medical products, including products declared as dietary supplements and foods intended for intense muscular effort, especially for sportsmen;</td>
<td>3. There is no established institutional mechanism with clear, specific functions and responsibilities of the institutions that should be engaged in the control and prevention of doping;</td>
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<td>4. Ordinance on doping control in training and competition activities has been adopted, as well as other legal regulations and strategic documents;</td>
<td>4. The Ordinance and other legal regulations and strategic documents refer only to the doping control in sport excellence, and are not intended regulations regarding the distribution and control regarding the people practicing sports in their free time. The Ordinance may not be extended to persons, other than registered athletes;</td>
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<td>5. Information is available on doping, including the regular publication of prohibited substances, and information on the violations of athletes, caught with positive doping samples at national and international level;</td>
<td>5. Information on damages caused by the doping agents is not spread sufficiently among young people;</td>
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<tr>
<td>6. Bulgaria observes and regularly publishes an updated List with prohibited substances;</td>
<td>6. Despite the presence of the Prohibited List, the banned substances therein are freely distributed and used. The list refers only to the athletes;</td>
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<tr>
<td>7. Were created opportunities throughout the country for recreational sports - sports clubs, gyms and more.</td>
<td>7. Accessible conditions for establishing fitness centres – they have no a special regime of regulation, have been established as commercial outlets, such are not subject to inspections and controls of the professional qualification of fitness instructors and assistant instructors, as well as persons performing occupational activities in the fitness centres;</td>
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<tr>
<td>8. Availability of a large number of fitness centres for those who want to practice sports in their free time, and is provided employment of the fitness instructors</td>
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<tr>
<td><strong>OPPORTUNITIES</strong></td>
<td><strong>THREATS</strong></td>
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<tr>
<td>1. The Government must continue to undertake serious measures in the anti-doping fight;</td>
<td>1. The lack of commitment of the institutions carries risks to the health of the athletes, violates the principle of fair play and damages the image of Bulgaria internationally;</td>
</tr>
<tr>
<td>2. Accreditation of Laboratory for Doping Control by World Anti-Doping Agency - opportunities to participate in scientific research projects to combat doping through special programs of the EU and WADA;</td>
<td>2. The analysis of the samples taken in Bulgaria shall continue to be carried out abroad;</td>
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<tr>
<td>3. Precise clear rules for the mechanism for prevention and control of doping;</td>
<td>3. Without implementation of prevention and control of distribution and use of the doping agents is increasing the health risk for people practicing sport, including young people;</td>
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<td>4. Legal regulatory and strategic framework to address the issue of people who practice sport in their free time (not just for athletes);</td>
<td>4. The lack of legal grounds could contribute to increasing and free distribution and use of illicit and dangerous to health substances;</td>
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<td>5. Conducting information campaigns about the risks of doping and performing training educational activities among students;</td>
<td>5. The lack of knowledge and understanding of the effects of doping leads to ignorance or confusion among people who practice sports referring to the products they use, as to whether they are legal or not, or whether they contain prohibited substances and harmful to their health agents;</td>
</tr>
<tr>
<td>6. The list of prohibited substances to become compulsory and applicable to all people (not just the athletes) through changes in legislation and carrying out checks for their illegal distribution, including carrying out Customs controls and verification of the fitness;</td>
<td>6. The free distribution and use of harmful and prohibited substances, including by young people; represents a real threat to increasing number of mortality or adverse health effect;</td>
</tr>
<tr>
<td>7. Further development of the legal regulatory framework in the field of sports in order to strengthen the control over the distribution of doping substances, including through the introduction of so-called checks &quot;Secret Client&quot; type;</td>
<td>7. Risk of increasing trafficking, distribution and use of prohibited agents and methods will contribute to increasing harmful consequences;</td>
</tr>
<tr>
<td>8. Possibility to regulate the activity of the fitness clubs in order to reduce the spread and use of harmful substances, introduction of the requirement fitness centres to be provided with at least one employee suitably trained in matters of fight against doping</td>
<td>8. The free distribution and use of prohibited and hazardous to the health doping substances, especially by incompetent in this context individuals</td>
</tr>
</tbody>
</table>
VISION:
Developed environment in which operates a strong mechanism to combat doping, minimizing the spread and the use of doping in Bulgaria

MISSION:
A strategy to contribute for the activation of measures to combat doping in all areas, in order to achieve clean sport and elimination of doping as significant risk to the health of the nation.

GUIDING PRINCIPLES FOR IMPLEMENTATION OF THE STRATEGY:

1. Partnership and Cooperation
2. Commitment from the government, media, non-governmental sector
3. Responsibility towards the citizens
4. Transparency and comprehensibility of objectives set
5. Motivation for implementing the objectives
6. Striving for greater efficiency
7. Comprehensiveness - creation of a wide environment in which will be created conditions and will be implemented activities to promote the fight against doping

STRATEGIC GOALS:

1. Prevention of the use of doping in the sport for high achievements and in sport in leisure time
2. Limit the spread of doping through legislative and regulatory measures
The use of hazardous to the health doping substances in the sport is the result of the joint impact of various factors (personal, cultural, social, biological, economic, technological and etc.). The understanding of the complex nature of this problem is a prerequisite for the implementation of various approaches to its successful solution. This is at the heart of this strategy, which is aimed at creating conditions for sports without doping. Should be strictly respected the guidelines and the principles of the World Anti-Doping Code, taking into account the current trends of increased doping in elite sport, growing traffic and uncontrolled supply of doping agents, as well as the consequent need for additional measures concerning education, science, medicine and investigations in this area.

To be effective the fight against the use of doping in the sport, it is necessary to combine the monitoring of compliance with anti-doping rules with targeted preventive actions for training of the athletes, sports technical personnel and all young people, about the harm of doping, and also to suppress trafficking and distribution of doping agents.

Following an analysis of the problems, mostly related to the distribution of doping substances in Bulgaria, the strategy seeks to intensify the fight against doping on Bulgaria through targeting its focus on new guidelines with a view to all existing challenges - the complex institutional and legal environment, the limited resources, the popularity among the young people of sports that are highly exposed to doping, the lack of information about the harmfulness of the use of doping.

To achieve both strategic objectives, the National Strategy for combating the use of doping in the sport for the period 2015-2024 sets the following OPERATIONAL OBJECTIVES:

1. Legal regulatory changes to the control and prevention of doping
2. Greater awareness about the negative impact of the use of doping with an emphasis on young people and their families.
3. Regulation of the activities of the persons engaged in recovery of the athletes at the sports organizations
4. Regulating the activity of the fitness centres in Bulgaria
5. Control of content of products declared dietary supplements or foods intended for intense muscular effort
6. International accreditation of the Laboratory for doping control
7. Accreditation of the Laboratory for analysis of dietary supplements or foods intended for intense muscular effort
8. Scientific research activity

To achieve the operational objectives of the strategy it is necessary to undertake the following measures:

1. **Legislative Changes to doping control**
Essential to combat the spread of doping in recreational sports is undertaking the necessary legislative changes, which would allow the creation of an effective mechanism to combat this phenomenon. The normative changes should be aimed at limiting the use of doping in the sport for high achievements and its restriction in leisure time sports through an effective initial and subsequent control and efficient preventive actions. By the normative acts should be solved the issue as well for the prevention of the use of doping. Particularly efficient can be the prevention by measures taken in schools, universities, sports venues, through the media and others.

Given the complexity of the problem of doping, the strategy will strive to achieve realistic results of controlling the spread of doping. The scope of the regulatory changes should be limited on several types of doping substances with a high risk to the health, and which are considered to be the most commonly used by those young people involved in fitness, and which are the most widely spread type of stimulants. In this sense, it is necessary to undertake steps in the following aspects:

- Research of the best practices of other countries that have made progress in the fight against the use of doping in sport. Based on the developed analysis must be decided on the need to adopt a new Law on Physical Education and Sport or to modify the existing law that regulates the state function for effective limitation of the spread of doping in sport. In the new framework the doping substances can be classified according to the degree of risk, which in its turn should be consistent with their level of risk on the physical and mental health.

- Legal regulation of doping substances that have a high degree of risk to public health, due to the harmful effects of their misuse. The number and type of high-risk doping substances, the form in which they are administered and so, need to be further specified by the competent authorities: Ministry of Health, Ministry of Youth and Sports, the Anti-Doping Centre and others. Prohibited substances should be entered in the relevant list, such as the existing similar list to the Regulation for the classification of plants and substances as narcotic drugs. The list must comply with the requirements of the normative acts and will have legal effect for all target groups falling within the scope the strategy. Must be available the opportunity to promptly complement this list with new agents and substances.

- Introduction of legal prohibition and penalties for production, distribution, placing, supply, sale and purchase of high-risk doping substances. Ministry of Health, Ministry of Interior, Ministry of Justice and Ministry of Youth and Sports should further specify the scope of the regulatory changes, the responsible institutions and the mechanism for the development and adoption of the changes.

- Introduction of prohibition and penalties for import and export of high-risk substances. "Customs" Agency, Ministry of Justice and Ministry of Youth and Sports should further specify the scope of regulatory changes and the mechanism for the development and adoption of the changes.

- It is necessary to make an analysis of the possibilities to test as well foods intended for intense muscular effort, especially for athletes.

- The criminalization of illegal activities with high-risk doping substances. This is one of the main issues that need to be clarified. For the adoption of possible criminalization it is necessary to analyze to what extent the prosecution of some of the activities as criminal offenses would achieve significant positive result in the direction of limiting the spread of such substances and the protection of public health and interest. Article 354 of the Criminal Code provides imprisonment up to two years or a fine from one hundred to three hundred BGN for the production, acquisition, possession and distribution of highly active or toxic substances that are
not narcotic drugs. It should be considered whether this type of criminalization should be extended to high-risk doping substances after being legislatively defined.

- It is necessary to analyze the needs of strengthening the administrative capacity of the institutions responsible for the checks for distribution of doping.

2. Greater awareness of the negative effects of doping

With regard to sport for high achievements:

Given the identified serious problem associated with the use of banned substances among the athletes in Bulgaria, over the next ten years should be undertaken the necessary steps for the continuation and strengthening of measures to prevent doping among the athletes. The main responsibility in this regard will have Anti-Doping Centre, which will continue to organize information events related to the prevention of doping in elite sport through:

- Workshops for sports medical doctors and sports technical staff on anti-doping rules and the harm of doping to health;
- Holding national conferences on doping issues;
- Elaboration of anti-doping programs in cooperation with the sports federations;
- Conducting anti-doping trainings for all athletes who have received quotas for Olympic Games (summer and winter Olympic Games), for expanding the knowledge about the consequences (legal, medical, social, ethical) of doping use in sport;
- Rules for therapeutic use permit.

With regard to sport in leisure time:

It is necessary to intensify the fight against the spread and use of doping among young people and special emphasis should be placed on young people who are engaged in sports for health in their free time, popular sports such as fitness, as well as on their parents. In this field are provided for the following activities:

- Conducting information campaigns about the risks of the use of doping

Over the next few years will be carried out information campaigns on the risks of the use of doping. The campaigns will be implemented by the Ministry of Youth and Sports through various communication channels - press, television and radio and the internet. At least one of the planned campaigns will represent massive national information campaign which will be implemented via broadcasting clips on several television channels. It will be focused on young people who are engaged in their free time, mostly with fitness and bodybuilding, the students and their parents. The campaigns will rely to produce lasting and systemic effect on the target group on the issues of the adverse effect of doping on health and appearance. The campaigns will focus on the following topics:

- Health risks of the doping use;
- Risk of the use of products advertised as food supplements that are not certified to have undergone laboratory analysis;
- Specific risk to purchase products advertised as food supplements or foods intended for intense muscular effort from Internet shops, where there is no control.

- Educational activities among students and their parents
Particular efforts will be made to intensify the measures to educate the students from schools and their parents about the risks of doping use. The Ministry of Youth and Sports will initiate discussions with the Ministry of Education and Science and the municipalities to develop a campaign in the schools for informing the students about the risks of doping use in fitness. Will be specified the form of the trainings, as the idea is specially prepared trainers during certain classes of the curriculum program (in classes of tutor or classes in biology and health education, chemistry and environmental protection) to hold training courses. Concept is that training courses should be in the form of a short lecture about the risks of doping and should include videos aiming to influence the audience. The target group of the campaign must be students of VIII-XII grade of secondary schools and high schools. At this age young people begin to practice fitness and in this regard is especially important that precise at this point they obtain information about the negative effects of doping, the products in which form might be available (focusing on food for athletes, products advertised as dietary supplements containing high-risk doping substances), as well as the fact that fitness centres are the most common place where the doping is spread. Students should be alerted to be careful in their contacts with instructors in the fitness centres, since often they are those who offer the use of foods for athletes and/ or products advertised as dietary supplements containing banned ingredients, which are not reported on the label, in order to obtain rapid and desired effect of the exercises

Except in secondary schools, educational campaigns should take place in the sports schools. Such campaigns should focus not only on the doping use in fitness, but on wider aspects of the doping use in competitive activities (legal, medical and ethical).

– Training for instructors working in fitness centres

The Anti-Doping Centre should develop a special training module for instructors working in the fitness centres in Bulgaria. The module will include knowledge about the types of doping substances, the risks of doping, the statutory requirements to food supplements and foods intended for intense muscular effort, especially for athletes and others. The trained people will receive a certificate of passed training course. The employment of staff certified on doping issues will be one of the requirements of the planned regulation of the activities of the fitness centres in Bulgaria.

3. Regulation of the activities of persons engaged in recovery of athletes in sport organizations

In subsequent years steps must be made to regulate and monitor the activities of persons engaged in sport and recovery works (including procurement and prescription of drugs for the recovery of competitors) in the sport organizations in Bulgaria.

4. Regulation of activity of fitness centres in Bulgaria

The analysis of the situation related to the spread of doping among young people in Bulgaria shows clearly, that they have the easiest access to it in the fitness centres where they are training.

The most common practice is that namely the instructors in the fitness centres are those persons who offer the practitioners products advertised as dietary supplements or foods intended for intense muscular effort containing prohibited ingredients, which are unannounced on the label: for example - high-risk doping substances. In this regard in the coming years should be undertaken measures to regulate the activity of the fitness centres and fitness instructors in the following areas:

– Creating a map of fitness clubs in Bulgaria
In cooperation with non-governmental organizations, Ministry of Health, Food Safety Agency, Ministry of Interior, the National Revenue Agency and the National Statistical Institute should be established a map of the fitness clubs in Bulgaria. The map will be public and will contain information about all the fitness centres in Bulgaria, and will designate particularly those that are registered for trade with food and dietary supplements according to the Food Law. The availability of information on the number and location of fitness centres is of critical importance to undertake further measures in the direction of controlling the spread of doping therein. The creation of the map will facilitate the work of the competent government authorities responsible for the fight against doping.

5. Regulation of fitness centres activity to comply with the anti-doping rules

In view of the fact, that at the moment the anti-doping rules in Bulgaria have no legal effect on fitness centres, in the coming years will be undertaken actions to solve this problem in the following aspects:

- After the development of normative legal analysis, will be adopted changes regarding the regulation of the activities of fitness centres in terms of compliance with anti-doping rules. After the adoption of the necessary legislative changes, Food Safety Agency (in case of doubt or signals for marketing of products advertised as food supplements or foods intended for intense muscular effort, especially for sportsmen containing doping substances), Ministry of Health, the Anti-Doping Centre and the Executive agency for medicines, together with Ministry of Interior will have the powers and duties to exercise control over the distribution of risky for the health doping substances in the fitness centres, as well as on compliance with the requirements for the operation of fitness centres, by performing inspections on the spot.

- Establishment of an obligation for inspection type "Secret Client".

- Should be adopted a normative act on the introduction of obligation of the fitness centres to hire at least one employee trained in Anti-Doping Centre on the risks of doping. After a certain period of entry into force of the normative act, the managers of the fitness centres must prove that they have hired at least one person having completed the training on doping issues.

- Fitness centres must have at visible places in their premises available information materials (stickers, posters, etc.) notifying visitors thereof, that the objects comply with anti-doping rules, that they are part of the efforts to eliminate doping in sport and that they do not offer products containing high-risk doping substances. Also will be distributed informational materials about the risks of using foods for athletes or products declared to be food supplements, that are not certified to have undergone laboratory analysis of their content and regarding the risks of buying such products, especially from uncontrollable Internet shops.

- Creation of a database of the fitness instructors

For the purpose of publicity and in order to promote the professional realization of those instructors who are certified and trained on the dangers of doping, should be established a database containing information on the certified fitness instructors. Thereby those who want to practice fitness in their free time, as well the managers of the fitness centres that must hire certified employees, will have easy access to the information for all certified instructors who have undergone anti-doping training courses.

6. Control of production, distribution and content of the products declared dietary supplements or foods intended for intense muscular effort (so-called "foods for athletes")
It is necessary to adopt measures to limit the cases in which in samples of athletes was found the presence of prohibited substances, resulting from the use of products (mainly foods offered as food supplements or foods intended for intense muscular effort) with unannounced ingredients on the labels, in the following aspects:

- Optimizing the regulation on the manufacture, import and distribution of food, declared dietary supplements or foods intended for intense muscular effort;
- Adoption of regulatory changes to improve the expert evaluation of the labels of foods advertised as dietary supplements or foods intended for intense muscular effort, taking into account any input components as well as other requirements to the contained in the label requisites;
- Adoption of legislative amendments to impose control on the compliance of the labelling of foodstuffs declared dietary supplements or foods intended for intense muscular effort with their content by performing analysis in an accredited laboratory;
- Undertake further measures to enhance public awareness about the problem of undeclared ingredients in foods for athletes or products offered as food supplements through the following actions:
  √ Food Safety Agency should continue to promptly inform about this on its website upon receiving information/detection of distribution on the market in EU Member States or other countries of products, containing undeclared on the label potentially hazardous to health substances, including such with doping effect;
  √ Envisaged in this strategy media information campaigns about the risks of doping will be also focused on the risk of possible contents of high-risk doping substances in various types of products such as food supplements.

7. International accreditation of the Laboratory for anti-doping control to the Anti-Doping Centre

The presence of a laboratory in Bulgaria accredited by World Anti-Doping Agency will eliminate the need that the analysis of samples taken in Bulgaria is carried out abroad. The Anti-doping Centre will send the samples taken in the context of the performed doping control to an accredited laboratory in Bulgaria and will spend considerably less financial resources. This will enable the Anti-doping Centre to increase significantly the number of the samples of competitive and non-competitive doping control, which will allow expanding the scope of doping control and performing all year round monitoring of various groups.

8. Accreditation of the Laboratory for anti-doping control to the Anti-Doping Centre for analyzing food supplements

After the intended accreditation by the World Anti-Doping Agency, the Laboratory for Doping Control to the Anti-Doping Centre must be accredited by the Bulgarian Service for Accreditation and Analyzing of nutritional supplements. The Laboratory will make analysis for the presence of prohibited or high-risk substances in the most widespread products, advertised as food supplements and used by the sports organizations and in leisure time sports in Bulgaria.

The Anti-Doping Centre will maintain on its website a list of the supplements that have passed analysis in the laboratory and for which was demonstrated that do not contain banned or high-risk substances.

The objective is to reduce the health risks related to the use of products declared as dietary supplements or foods intended for intense muscular effort, containing undeclared ingredients and prevention of cases, in
which Bulgarian athletes are accused of the use of substances included in the Prohibited List, due to the presence of undeclared ingredients or contamination.

Following an analysis it is necessary to consider what is the need to strengthen the administrative capacity of the Anti-Doping Centre.

9. **Scientific research activity**

In subsequent years, must be activated also scientific research to combat doping.

Anti-Doping Centre will use part of the additional financial resources resulting from the accreditation of the Laboratory for Doping control by World Anti-Doping Agency, to expand its scientific research activities for combating doping.

The Anti-Doping Centre, together with the Ministry of Youth and Sports will identify the opportunities to participate in research projects for combating doping, under special programs of the European Union, World Anti-Doping Agency and UNESCO.

It is necessary to continuously improve the competence of the personnel through training, exchange of experience, international cooperation and opportunities to acquire academic degrees.
1. Executive and coordinating body of the tasks associated with the National Strategy for the fight against doping in sport for the period 2015-2024:
   - The Ministry of Youth and Sports

2. Institution responsible for the implementation of doping control, prevention and fight against doping in sport is Anti-Doping Centre (AC).

3. Partner institutions at national level:
   - Ministry of Health
   - Ministry of Interior
   - Ministry of Justice
   - Ministry of Education and Science
   - Bulgarian Agency for Food Safety
   - "Customs" Agency
   - National Sports Academy "Vasil Levski"
   - The Bulgarian Olympic Committee
   - licensed sports organizations
   - Others – in the course of implementation of the strategic tasks and after the improvement and updating of the legal framework

The implementation of the National Strategy for the fight against doping in sport, will count on the support and cooperation with World Anti-Doping Agency, UNESCO, Council of Europe and other institutions involved in the fight against doping in sport.

The international cooperation will be aimed not only at financial and logistical support, but rather to decent and equitable participation of our country together with European and other countries for the realization of the noble objectives of the fight against doping in sport - through participation in joint projects and studies, and through the experience of 'good practice'.

FINANCING OF ACTIVITIES

Ensuring the effective financial mechanisms to implement the objectives of this strategy for combating doping in sport provides:

- Budget funds within each department concerned in the implementation of the strategic tasks of combating doping in sport;
- Participation in international programs and projects for the utilization of financial funds of the European Union, UNESCO and other organizations.
The implementation of the measures envisaged by the National Strategy for the fight against doping in sport is extremely important both for the maintenance of good physical shape, health, morale and self esteem of the athletes, and the decent presentation of Bulgaria to the world, as well as for the prevention of health abuse of people engaged in sports in their free time. The general public awareness, the skilful management and better coordination of the participating institutions are a guarantee for its successful implementation.

**To implement the National Strategy to combat doping in sport will be developed an annual Action Plan.** The Action Plan will include specific actions for the realization of the objectives pursued and measures, indicators, sources of financing, indicative deadlines and responsible institutions. The work on the plan will be reported annually by the Ministry of Youth and Sports.