

Departmental Disclosure Statement

Integrity Sport and Recreation Bill

The departmental disclosure statement for a government Bill seeks to bring together in one place a range of information to support and enhance the Parliamentary and public scrutiny of that Bill.

It identifies:

- the general policy intent of the Bill and other background policy material;
- some of the key quality assurance products and processes used to develop and test the content of the Bill;
- the presence of certain significant powers or features in the Bill that might be of particular Parliamentary or public interest and warrant an explanation.

This disclosure statement was prepared by Sport New Zealand and the Integrity Transition Programme.

Sport New Zealand certifies that, to the best of its knowledge and understanding, the information provided is complete and accurate at the date of finalisation below.

24 March 2023

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Part One: General Policy Statement

The Integrity Sport and Recreation Bill (the Bill) implements a single broad policy to strengthen and protect the integrity of New Zealand's sport and recreation sector by establishing an independent body and consolidating integrity functions within it.

Several reports into New Zealand's sport and physical recreation sector have highlighted that there is insufficient capability across the sector to deal with integrity-related issues, in particular the management and resolution of complaints made by athletes and participants. The Play, Active Recreation and Sport Integrity Working Group (the Integrity Working Group) recommended the establishment of an independent body to promote and protect the safety and wellbeing of participants by preventing and addressing threats to integrity.

The Integrity Working Group's report emphasised that the new entity should be participant-centred, human rights focused, accessible and responsive to the needs of athletes and participants. The report also recommended that the new entity should be independent of Sport New Zealand and High Performance Sport New Zealand to ensure that responsibility for integrity is separate from funding and selection. This responded to feedback from athletes and participants that existing integrity functions lacked independence, both actual and perceived, and were difficult to access and navigate.

To achieve these objectives, the Bill establishes a new independent Crown entity called the Integrity Sport and Recreation Commission (the Commission).

The key functions of the Commission will be to:

- promote, advise, and educate on integrity issues and threats to integrity within the sport and physical recreation sector; and
- engage with participants and the sport and physical recreation sector on integrity issues; and
- develop and issue integrity codes including to set out minimum standards of conduct; and
- prescribe policies and procedures for complaints management and dispute resolution; and
- implement the World Anti-Doping Code and facilitate compliance with New Zealand's international obligations with respect to doping in sport; and
- investigate suspected breaches of integrity codes and threats to integrity.

Threats to integrity include competition manipulation, corruption and fraud, use of prohibited substances (doping), abuse (including abuse of children), bullying, violence, harassment, intimidation, racism, and other forms of discrimination.

While integrity issues for elite athletes are more widely publicised, participants in sport and physical recreation at all levels experience integrity issues. The ambit of the Commission will therefore include grassroots and community sport and physical recreation as well as elite sport.

Sport and physical recreation organisations will still be responsible for managing and resolving integrity issues in an appropriate way. However, the Commission will provide education, guidance and independent pathways for the resolution of complaints and integrity matters. This reflects that sport and physical recreation organisations are often small, largely volunteer, and have varying capability to manage integrity issues. The Commission will help lift the overall capability of the sector to deal with integrity issues and provide mechanisms for resolution and accountability where this cannot be done appropriately by an organisation.

The Bill will streamline the current integrity system for participants by moving existing government functions into the Commission so they are more accessible and participant-focused. Drug Free Sport New Zealand will be disestablished, and its anti-doping functions will be folded into those of the Commission. This will ensure the ongoing ability to issue, implement, and review the Sports Anti-Doping Rules to facilitate New Zealand's compliance with the World Anti-Doping Code. The

integrity functions that currently sit within Sport New Zealand will also transfer to the Commission along with the Sport and Recreation Complaints and Mediation Service.

The Bill will enable the Commission to make integrity codes through secondary legislation. The codes are intended to be the cornerstone of the new integrity system as they will set standards of conduct and prescribe policies and procedures for managing and resolving integrity issues. Organisations can opt to adopt a code and will then be bound to implement the prescribed standards and procedures.

The Commission will have powers to investigate suspected breaches of integrity codes, and to investigate other threats to integrity if it is in the public interest to do so. The Commission will have the power to require information to be provided if that information cannot be obtained by consent. The Commission will also be able to prescribe sanctions for breaches of an integrity code by an individual and, in some circumstances, convene a disciplinary panel to determine whether an integrity code has been breached by a participant and any sanctions to be imposed. Integrity codes may also prescribe means of holding organisations accountable for breaches of an integrity code, including by requiring them to take steps to change their policies or to pay compensation.

The Bill requires the Commission to carry out its functions with a strong focus on the needs of participants, including Māori, disabled people, and children and young people. The Commission will be required to have te ao Māori capability, including on the board, and be responsive to tikanga Māori and te Tiriti o Waitangi / the Treaty of Waitangi. In undertaking its functions, it will be required to reflect the needs of participants, including psychological, cultural, language and disability needs, and the needs of rainbow communities, and promote the best interests of children and young people.

The Commission will have 7 to 9 board members appointed by the Governor-General on the advice of the Minister for Sport and Recreation. The board is required to have a mix of knowledge and experience including in law, sports medicine, sport and physical recreation participation and administration, human rights, and te Tiriti o Waitangi / the Treaty of Waitangi.

The Bill requires a review within 5 years from the commencement of the Act to see how widely and effectively integrity codes have been implemented.

Part Two: Background Material and Policy Information

Published reviews or evaluations

2.1. Are there any publicly available inquiry, review or evaluation reports that have informed, or are relevant to, the policy to be given effect by this Bill?	YES
<p>The establishment of an independent body to strengthen and protect the integrity of the New Zealand sports and physical recreation sector is a recommendation of the Play, Active Recreation and Sport Integrity Working Group in its April 2022 report (accessible at https://sportnz.org.nz/media/5144/final-iwg-report-april-2022-to-be-released.pdf).</p> <p>The Integrity Working Group's recommendations were informed by several earlier reviews into sports and physical recreation integrity issues in New Zealand including:</p> <ul style="list-style-type: none">• the Sport Integrity Review (2019) (accessible at https://sportnz.org.nz/about/news-and-media/news-updates/sport-integrity-review/)• the feasibility study for a complaints management and dispute resolution service for NZ sport (2020) (accessible at https://sportnz.org.nz/media/3451/final-report-9-september-2020-pdf-34063470-v-1.pdf), and• reviews into integrity issues within specific sports including cycling, gymnastics, football, hockey and canoe racing.	

Relevant international treaties

2.2. Does this Bill seek to give effect to New Zealand action in relation to an international treaty?	YES
<p>New Zealand is a party to the UNESCO International Convention against Doping in Sport (accessible at https://www.unesco.org/en/legal-affairs/international-convention-against-doping-sport) which commits New Zealand to adopt measures consistent with the principles of the World Anti-Doping Code (accessible at https://www.wada-ama.org/en/resources/world-anti-doping-program/world-anti-doping-code).</p> <p>The Bill requires the Commission to do all things necessary to comply with and implement the World Anti-Doping Code and to always have rules to implement the Code. This function is currently the responsibility of Drug Free Sport New Zealand. The Bill will disestablish Drug Free Sport New Zealand and move its responsibilities for sports anti-doping, including implementing the World Anti-Doping Code, to the Commission.</p>	

2.2.1. If so, was a National Interest Analysis report prepared to inform a Parliamentary examination of the proposed New Zealand action in relation to the treaty?	YES
<p>New Zealand became a party to the UNESCO International Convention against Doping in Sport in 2005. The National Interest Analysis report was prepared by Sport and Recreation New Zealand in October 2005 (accessible as an appendix to the Report of the Government Administration Committee at https://www.parliament.nz/resource/en-NZ/48DBSCH_SCR3285_1/f352c4ebe0d3737cc30edd0ff340a3620858add0).</p>	

Regulatory impact analysis

2.3. Were any regulatory impact statements provided to inform the policy decisions that led to this Bill?	YES
<p>Regulatory Impact Statements were prepared to support in principle policy decisions in June 2022 and final policy decisions in September 2022.</p> <p>Regulatory Impact Statement: A new sport and recreation integrity entity, Sport NZ, 23 May 2022. Accessible at: https://sportnz.org.nz/media/5194/regulatory-impact-statement-a-new-sport-and-recreation-integrity-entity.pdf</p> <p>Regulatory Impact Statement: Sport Integrity Bill, Sport NZ, 21 September 2022. Accessible at: https://sportnz.org.nz/media/ttleihzt/redacted-final-ris-sport-integrity-bill.pdf</p>	

2.3.1. If so, did the RIA Team in the Treasury provide an independent opinion on the quality of any of these regulatory impact statements?	NO
<p>The Treasury had no feedback on the regulatory impact statements. The Ministry of Culture and Heritage Quality Assurance team also reviewed the regulatory impact statements.</p>	

2.3.2. Are there aspects of the policy to be given effect by this Bill that were not addressed by, or that now vary materially from, the policy options analysed in these regulatory impact statements?	NO

Extent of impact analysis available

2.4. Has further impact analysis become available for any aspects of the policy to be given effect by this Bill?	NO

2.5. For the policy to be given effect by this Bill, is there analysis available on:	
(a) the size of the potential costs and benefits?	YES
(b) the potential for any group of persons to suffer a substantial unavoidable loss of income or wealth?	NO
<p>Detail about the potential costs and benefits can be found in the Regulatory Impact Statement (September 2022).</p> <p>The primary benefits of establishing the Commission are non-monetary. Participants will benefit from a safer and fairer sport and recreation system and from having clearer pathways for raising and resolving integrity-related issues. Organisations will benefit from improved guidance and support to raise their capability to manage integrity matters and through access to independent pathways for resolving integrity-related issues. More broadly, the new entity will enhance public trust and confidence in the sport and recreation sector through increased independence and having appropriate powers to protect integrity in sport and physical recreation.</p>	

2.6. For the policy to be given effect by this Bill, are the potential costs or benefits likely to be impacted by:	
(a) the level of effective compliance or non-compliance with applicable obligations or standards?	YES

(b) the nature and level of regulator effort put into encouraging or securing compliance?	YES
<p>Realising the benefits identified in the Regulatory Impact Statement will rely on adoption of the integrity codes by the sport and physical recreation sector and the Commission's effectiveness at encouraging adoption and compliance.</p> <p>Integrity codes issued by the Commission will not be mandatory. Organisations can choose to adopt a code and will then be bound to implement the code, and the organisation's participants will be bound by its terms as a condition of participation.</p> <p>A non-mandatory and collaborative approach to adoption of the codes is considered appropriate given that sport and recreation organisations are often small, local, volunteer-based and may have several functions of which sport and recreation is just one. Stakeholder engagement suggests that much of the sector will adopt the code voluntarily. There will be a risk that a small number of organisations do not adopt or demonstrate serious non-compliance with the code.</p> <p>It will be open to the Commission to develop an accreditation scheme to incentivise adoption and compliance or to explore other non-legislative mechanisms available to government to encourage compliance. Clause 49 provides that the Commission can charge fees. This could be used to support the delivery of an accreditation scheme.</p>	

Part Three: Testing of Legislative Content

Consistency with New Zealand's international obligations

3.1. What steps have been taken to determine whether the policy to be given effect by this Bill is consistent with New Zealand's international obligations?

The Bill disestablishes Drug Free Sport New Zealand and transfers its responsibilities for sports anti-doping to the Commission. This includes facilitating compliance with New Zealand's obligations under the UNESCO International Convention against Doping in Sport. The Bill provides that the Commission will do all things necessary to comply with and implement the World Anti-Doping Code and must make, and always have, rules to implement the Code. There are no substantive amendments to the relevant provisions, which were thoroughly considered when the Sports Anti-Doping Act 2006 was passed.

Consistency with the government's Treaty of Waitangi obligations

3.2. What steps have been taken to determine whether the policy to be given effect by this Bill is consistent with the principles of the Treaty of Waitangi?

The policy objectives of the Bill have been informed by engagement undertaken by the Integrity Working Group and the Integrity Transition Programme, and Treaty of Waitangi interest analysis.

The Integrity Working Group undertook consultation with Māori regarding rights and obligations under the Treaty of Waitangi. This informed its recommendations that the integrity entity provide for te ao Māori approaches and uphold the principles of te Tiriti o Waitangi.

The Integrity Transition Programme undertook initial targeted consultation with Māori and established a Māori Advisory Group (comprised of representatives from the sport and recreation sector) to inform further policy development.

Engagement and additional Treaty analysis identified that there are te Tiriti interests in respect of ngā taonga tākaro (sports, games and activities developed in te ao Māori) and equity interests (including participation and freedom from discrimination).

The Bill reflects these interests and the outcomes of engagement by requiring the Commission to:

- have Board members with knowledge of the Treaty of Waitangi, and at least two members with experience and expertise in te ao Māori and tikanga (clause 11)
- have capability and capacity to be responsive to the rights and interests of Māori, tikanga Māori and te Tiriti o Waitangi / Treaty of Waitangi (clause 15), and
- provide reasonable opportunity for Māori to comment on an integrity code being made (clause 20).

Te Arawhiti and the Crown Law Office were consulted on the development of the policy and the Bill. The Treaty Provisions Oversight Group was consulted and provided feedback that has been incorporated into the Bill. Te Puni Kōkiri was also informed of the policy and Bill.

Further engagement with Māori is underway to ensure that the establishment and ongoing operation of the Commission continues to incorporate the rights and interests identified.

Consistency with the New Zealand Bill of Rights Act 1990

3.3. Has advice been provided to the Attorney-General on whether any provisions of this Bill appear to limit any of the rights and freedoms affirmed in the New Zealand Bill of Rights Act 1990?

YES

Should the Attorney-General choose to waive legal privilege, the advice will be published on the Ministry of Justice website at: <https://www.justice.govt.nz/justice-sector-policy/constitutional-issues-and-human-rights/bill-of-rights-compliance-reports/>

Offences, penalties and court jurisdictions

3.4. Does this Bill create, amend, or remove:	
(a) offences or penalties (including infringement offences or penalties and civil pecuniary penalty regimes)?	NO
(b) the jurisdiction of a court or tribunal (including rights to judicial review or rights of appeal)?	YES
<p>Clause 35 creates a new jurisdiction for the District Court. The Commission will be able to apply to the District Court for orders against a specified person who does not comply with a request to provide information or documents to the Commission. The Court may make an order for the person to comply with the request to provide information or documents, or any order that the Court considers appropriate.</p> <p>Clause 64 amends section 38 of the Sports Anti-Doping Act 2006 to change the jurisdiction of the Sports Tribunal. The Tribunal's jurisdiction will be expanded to include:</p> <ul style="list-style-type: none"> • disputes arising from the application of an integrity code • appeals from a decision of a disciplinary panel convened by the Commission under clause 41, • appeals from a decision of an organisation's disciplinary body relating to a breach of an integrity code, and • any matter referred to the Tribunal by the Commission. 	

3.4.1. Was the Ministry of Justice consulted about these provisions?	YES
<p>The Ministry of Justice was consulted at several stages during the policy and legislative process, including on clause 35 which applies to the District Court.</p>	

Privacy issues

3.5. Does this Bill create, amend or remove any provisions relating to the collection, storage, access to, correction of, use or disclosure of personal information?	YES
<p>The Bill provides the Commission with reasonable and proportionate information gathering powers to assist in the conduct of investigations.</p> <p>Clause 34 prescribes the Commission's powers to obtain information relevant to an investigation. The Commission will first attempt to obtain the information by consent. If the information cannot be obtained by consent, then the Commission may require a person to provide the information or documents. This power can only be used to obtain information from Sport New Zealand (or a subsidiary), the New Zealand Olympic Committee, Paralympics New Zealand, a national sporting organisation (or an affiliate of a national sporting organisation), or a national recreation organisation. The power does not apply to athletes or participants.</p> <p>Clause 38 requires the Commission to keep confidential information that may identify a complainant or a person who provided information to the Commission during an investigation. Information that identifies a person could only be disclosed by the Commission with the consent of the person that the information would identify; if necessary to effectively conduct an investigation or disciplinary process; to prevent or lessen a serious risk to health or safety; for law enforcement purposes or the conduct of court or tribunal proceedings; for the purposes of an investigation report by the Commission; or if required under any other legislation such as the Official Information Act 1982 or Privacy Act 2020.</p> <p>Clause 44 enables a New Zealand Police officer, New Zealand Customs officer or any other person to provide evidence or information to the Commission if they believe that it will assist the Commission in complying with or implementing an integrity code or the anti-doping rules or would assist an investigation.</p>	

3.5.1. Was the Privacy Commissioner consulted about these provisions?	YES
<p>The Office of the Privacy Commissioner was consulted ahead of Cabinet decisions in October 2022.</p> <p>Officials also consulted with the Privacy Commissioner when preparing additional advice to the Minister for Sport and Recreation and Minister of Justice on the design of the Commission's investigation powers. Several amendments were made to the proposals in light of feedback received from the Office.</p> <p>The Office was consulted on a draft of the Bill but advised that, due to current resourcing limitations, it was unable to provide comment.</p>	

External consultation

3.6. Has there been any external consultation on the policy to be given effect by this Bill, or on a draft of this Bill?	YES
<p>The policy development for the Bill was informed by the engagement undertaken by the Integrity Working Group. In completing its report, the Integrity Working Group undertook engagement with the sport and physical recreation sector including former high-performance athletes, athlete representative groups, national sports organisations and sport integrity agencies and service providers. This engagement informed the Working Group's recommendation for an independent stand-alone entity for sport integrity which the Bill is giving effect to.</p> <p>Additionally, the Integrity Transition Programme has undertaken targeted engagement with Māori partners in the sector to inform the design of the new entity.</p> <p>The following departments and entities were consulted on the policy and/or the Bill: the Department of Internal Affairs; Department of Prime Minister and Cabinet; Oranga Tamariki; Office for Disability Issues at Whaikaha - the Ministry of Disabled People; Ministry of Business, Innovation, and Employment; Ministry for Culture and Heritage; Ministry of Foreign Affairs and Trade; Ministry of Health; Ministry of Justice; Ministry for Primary Industries; Ministry for Pacific Peoples; Manatū Wāhine - Ministry for Women; New Zealand Police; the Public Service Commission; Te Arawhiti; Ministry of Social Development; Crown Law Office; New Zealand Customs Service; the Treasury; Drug Free Sport New Zealand; Serious Fraud Office; Sports Tribunal; Human Rights Commission; and the Office of the Ombudsman.</p> <p>Te Puni Kōkiri and the Office of the Auditor-General were informed of the policy development.</p>	

Other testing of proposals

3.7. Have the policy details to be given effect by this Bill been otherwise tested or assessed in any way to ensure the Bill's provisions are workable and complete?	YES
<p>A draft Bill was shared with Drug Free Sport New Zealand and the Sports Tribunal to ensure that aspects of the Bill impacting on their respective functions and powers were fit for purpose and workable. Several amendments were made to the Bill in light of feedback received from Drug Free Sport New Zealand and the Sports Tribunal.</p>	

Part Four: Significant Legislative Features

Compulsory acquisition of private property

4.1. Does this Bill contain any provisions that could result in the compulsory acquisition of private property?	NO

Charges in the nature of a tax

4.2. Does this Bill create or amend a power to impose a fee, levy or charge in the nature of a tax?	NO

Retrospective effect

4.3. Does this Bill affect rights, freedoms, or impose obligations, retrospectively?	NO
<p>The Bill preserves current investigations and proceedings in relation to the Sports Anti-Doping Rules and would not retrospectively affect these. Investigations into a breach of an integrity code, and any disciplinary proceedings that may result, would apply prospectively only.</p> <p>Under clause 32, the Commission will be able to investigate matters that appear to be a threat to integrity in circumstances where the organisation or individual is not bound by an integrity code, but it is in the public interest to investigate. Schedule 1, clause 10 provides that the Commission may conduct these investigations where the acts or commission occurred wholly or partly before the Act coming in force. In these instances, the Commission will only be able to issue a report with recommendations. The Commission would not be able to prescribe remedies or take disciplinary action against individuals.</p>	

Strict liability or reversal of the usual burden of proof for offences

4.4. Does this Bill:	
(a) create or amend a strict or absolute liability offence?	NO
(b) reverse or modify the usual burden of proof for an offence or a civil pecuniary penalty proceeding?	NO
The Bill does not create any new offences.	

Civil or criminal immunity

4.5. Does this Bill create or amend a civil or criminal immunity for any person?	YES
<p>Clause 46 provides that no civil or criminal proceedings can be brought against a person based only on their compliance with a statutory requirement to provide information to the Commission. As the Commission is a Crown entity, the immunities provided to Board members and employees under sections 120 and 121 of the Crown Entities Act 2004 apply.</p>	

Significant decision-making powers

4.6. Does this Bill create or amend a decision-making power to make a determination about a person's rights, obligations, or interests protected or recognised by law, and that could have a significant impact on those rights, obligations, or interests?	YES
<p>Clause 35 will allow the Commission to apply to the District Court for court orders to enforce an information request under clause 34. These powers only apply to specified persons named in clause 34 to ensure that the power is limited, proportionate and targets organisations that are most likely to have the information being sought.</p> <p>Clause 41 provides that the Commission can establish disciplinary panels to consider and determine whether an integrity code, or an organisation's policies made under an integrity code, have been breached by a participant and the relevant sanctions to be imposed. The composition and procedures of the panel will be set out in integrity codes made under clause 19.</p> <p>Organisations will continue to have the primary responsibility of disciplining their participants, however, the Commission would have the ability to run a disciplinary process if necessary (e.g. in circumstances where the organisation was not able to run a fair process).</p> <p>The disciplinary panels will determine sanctions related to the person's participation in the relevant sport or recreation (e.g. excluding someone from participation in the relevant sport or activity). Sanctions will be non-criminal, reasonable and proportionate.</p> <p>Disciplinary panels will operate similarly to panels established by sport and recreation organisations themselves. The relevant organisation will be responsible for enforcing any sanction. Clause 64 amends the jurisdiction of the Sports Tribunal to include disputes arising from the application of an integrity code, matters referred to the Tribunal by the Commission, and appeals against decisions made by a disciplinary panel of either the Commission or an organisation relating to breach of an integrity code.</p> <p>Clauses 39 and 40 provide protections for people that make or intend to make a complaint to the Commission or provide, or intend to provide, information to the Commission as part of an investigation. These apply where an organisation retaliates against a participant or where a person treats another person less favourably. In both instances, the protections could be enforced:</p> <ul style="list-style-type: none">• under an integrity code, if one applies,• through an application to the Sports Tribunal if the less favourable selection pertains to selection, or• through section 66 of the Human Rights Act 1993.	

Powers to make delegated legislation

4.7. Does this Bill create or amend a power to make delegated legislation that could amend an Act, define the meaning of a term in an Act, or grant an exemption from an Act or delegated legislation?	NO

4.8. Does this Bill create or amend any other powers to make delegated legislation?	YES
<p>The Bill creates the power for the Commission to make integrity codes and anti-doping rules. Integrity codes and anti-doping rules will be secondary legislation.</p> <p>The Commission will be able to make, amend and revoke integrity codes. Integrity codes will set out standards of conduct for the sport and recreation sector and prescribe processes for the investigation and resolution of integrity matters. Integrity codes will be non-mandatory meaning that organisations will need to adopt the code and their participants will need to agree to be bound by it.</p> <p>Clause 23 requires the Commission to make, and always have, rules to implement the World Anti-Doping Code. As the World Anti-Doping Code is an international instrument, the Commission will be required to implement specified articles of the Code without substantive changes. This power is necessary to ensure that New Zealand is meeting its obligations under the UNESCO International Convention Against Doping in Sport. These provisions reflect the existing obligations and powers of Drug Free Sport New Zealand under the Sports Anti-Doping Act 2006. The Commission will also be able to make any other rules necessary to support the Commission's anti-doping functions.</p> <p>An integrity code or anti-doping rules will come into force on the later of 28 days after it is published in accordance with Part 3 of the Legislation Act 2019, or the date specified in the rules or code being made. As a safeguard, the Commission is required to consult:</p> <ul style="list-style-type: none"> • participants, Māori, relevant stakeholders and the Privacy Commissioner on integrity codes, and • national sporting organisations, athletes, the Sports Tribunal, Māori and the Privacy Commissioner on the anti-doping rules. 	

Any other unusual provisions or features

4.9. Does this Bill contain any provisions (other than those noted above) that are unusual or call for special comment?	YES
<p>Clause 38 establishes an obligation of confidentiality on the Commission and its employees with respect to information that may identify a complainant or a person who has provided information to the Commission. This type of provision is common for organisations that have an investigative function in order to support the sharing, and continued sharing, of information with the Commission by people and organisations.</p> <p>The Bill provides the power for the Commission to make secondary legislation that is optional for an organisation to be bound by. The integrity codes made by the Commission under clause 19 will not be mandatory and organisations will need to opt-in for the integrity code to apply. This approach may be considered unusual compared to other secondary legislation however it is consistent with other regulatory approaches in the sport and physical recreation sector which are not mandatory such as the Sports Anti-Doping Rules.</p>	