

1 **Managing Compliance with the World Anti-Doping Code: China's Strategies** 2 **and their Implications**

3 4 Abstract

5
6 With the problems of doping in sport becoming more serious, the World Anti-
7 Doping Code was drafted by **the** World Anti-Doping Agency (WADA) in 2003 and
8 became effective one year later. **Since its passage, the Code has been renewed four**
9 **times, with the fourth and the latest version promulgated in January, 2015.** The Code
10 **was intended to tackle** the problems of doping in sports through cooperation with
11 governments to ensure fair competition **as well as** the health of athletes. To
12 understand China's strategies for managing compliance with the Code and also the
13 implications behind those strategies, this study borrows ideas from theories of
14 compliance. China's high levels of performance in sport, **judged by medal success,**
15 have undoubtedly placed the country near the top of the global sports field. Therefore,
16 how China acts in relation to international organizations, and especially how it
17 responds to WADA, is highly significant for the future of elite sport and for the
18 world anti-doping regime. In response to WADA, China developed strategies related
19 to seven institutional factors: 'monitoring', 'verification', 'horizontal linkages',
20 'nesting', 'capacity building', 'national concern' and 'institutional profile'. As for
21 the implications, the Chinese government is willing and able to comply with the
22 WADA Code. In other words, the Chinese government is willing to pay a high price
23 in terms of money, manpower and material resources so that it can recover from the
24 disgrace suffered as a result of doping scandals in the 1990s. **The government wants**
25 **to ensure that China's prospects as a participant, bidder and host of mega-sporting**
26 **event are not compromised, especially as the host of the 2022 Winter Olympics in**
27 **Beijing.**

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29 Key Words: China, Compliance, Government, Strategy, World Anti-Doping Code
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1 Introduction

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3 The Olympic motto ‘Faster, Higher, Stronger’ is intended to encourage athletes to
4 continue participating in sport, to strive for excellence and to seek personal bests. These
5 goals, however well-intentioned, can motivate some athletes to use substances to
6 enhance their performance when disappointing results might adversely affect their
7 social status, monetary pay-offs or other forms of rewards (Houlihan, 2002a, 2002b). A
8 winning-obsessed culture has led to numerous tragedies with athletes dying while
9 competing due to the effects of doping. As far as the International Olympic Committee
10 (IOC) is concerned, the death of a cyclist at the 1960 Rome Olympics and the tragic
11 passing of a British cyclist during the 1967 Tour de France sounded alarm bells about
12 the need to tackle doping. A series of doping scandals led to the formation of the IOC
13 Medical Commission, which began conducting drug tests at the Olympics (Wilson &
14 Derse, 2000). However, as doping became rampant, the Commission found itself unable
15 to tackle the problem on its own and calls for an anti-doping agency, independent of the
16 IOC, were eventually answered in 1999 when the World Anti-Doping Agency (WADA)
17 was established. However, as a non-governmental organization, WADA could only
18 issue non-binding guidelines and had limited impact on nation states. To alter this
19 situation, WADA began working with the United Nations Educational, Scientific and
20 Cultural Organization (UNESCO) in the hope of exerting greater influence over
21 national governments. With UNESCO’s support, WADA held the Second World
22 Conference on Doping in Sport in Copenhagen, Denmark, in 2003, when 73 countries
23 signed the Copenhagen Declaration on Anti-Doping in Sport (Liu, 2003). The following
24 year, WADA introduced the World Anti-Doping Code (hereinafter referred to as ‘the
25 Code’)¹ (Houlihan, 2008), hoping to combat doping with the support of national
26 governments, to ensure fairness in sport and to protect the health of athletes. Of course,
27 doping was not exclusive to the Olympics. Many professional sports also fell victim to
28 the use of performance enhancing drugs. In recent years, several high-profile athletes
29 have been caught doping, including Major League Baseball player Barry Bonds, the
30 American sprinter Justin Gatlin and seven-time Tour de France winner Lance
31 Armstrong. In early 2016, Russian tennis star Maria Sharapova tested positive for
32 meldonium at the Australian Open. This relatively minor scandal was followed by
33 revelations that Russia had engaged in large-scale systematic doping, causing uproar
34 among sports fans around the world. These incidents raise tantalizing questions: Why
35 has WADA failed to control doping effectively since its inception? Could this be the
36 consequence of governments’ unwillingness to comply with the Code? If so, what

¹ Since its passage in 2003, the WADA Code has been renewed four times. The latest version 4.0 went into effect in January, 2015 (World Anti-Doping Agency [WADA], 2015b).

1 strategies have states adopted in response to the Code and what are the implications
2 behind these strategies? By addressing these questions, we can acquire a better
3 understanding of how the Code can be effectively implemented and whether doping
4 can be eradicated, reduced to an acceptable level, or controlled at the present level.

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6 At present, most studies on sports doping focus on prohibited substances,
7 prohibited methods or testing methods (Lombardi, Perego, Sansoni, & Banfi, 2016;
8 Wang, Zhou, Liu, Dong, & Zhang, 2017), the use of prohibited substances and drug test
9 adulterations (Antonopoulos & Hall, 2014; Maughan, 2007), ethical issues relating to
10 athlete support personnel (Miah, 2006; Newsham & Mokha, 2017) and athlete privacy
11 and human rights in doping control (Elbe & Overbye, 2014; Waddington & Møller,
12 2014). Other researchers have examined WADA's anti-doping policies and their
13 effectiveness in doping control (Houlihan, 2004; Loland & Hoppeler, 2011; Stewart &
14 Smith, 2004; Wagner, 2011) or the appropriateness of anti-doping policies (de Hon,
15 2017; Efverström, Bäckström, Ahmadi, & Hoff, 2016; Malcolm & Waddington, 2008;
16 Houlihan, 2015; Hunt, 2015). Also examined have been impact of the prohibited lists
17 and the whereabouts requirements on athlete privacy and welfare (Henne, 2015; Sefiha
18 & Reichman, 2016) and on athlete health and anti-doping education (Henning & Dimeo,
19 2015; Mazanov, Huybers, & Connor, 2012). As shown above, research on sports doping,
20 thus, mainly takes a microscopic view centred on athletes or their support personnel.
21 Although some studies touch on the institutional and policy aspects of anti-doping, few
22 examine compliance at a national level or from a governmental perspective. Among
23 these, studies by Houlihan (2014) and Hanstad & Houlihan (2015) are the most relevant
24 to the present study. Houlihan (2014) first looked at compliance from WADA and
25 UNESCO perspectives, discussing how the two international bodies bring signatories
26 into compliance. His main focus, however, was on the organization's top-down
27 governance and not the signatories' response to WADA which is where this study places
28 its emphasis. Furthermore, Houlihan (2014) only interviewed two officials from WADA
29 and UNESCO and did not indicate any contact with officials from the signatory states.
30 Understandably, the data collected through his interviews only comprise a small portion
31 of his paper, the majority of which consists of a literature review. Nevertheless,
32 Houlihan (2014) examined anti-doping policy by looking at *compliance*, which is an
33 area of research worth pursuing. Hanstad and Houlihan (2015) later discussed how
34 bilateral collaboration facilitates anti-doping, using the example of Norway, an anti-
35 doping role model, working with China, a repeated violator of international anti-doping
36 rules. Although the paper sheds light on the interactive and cooperative relationship
37 between China and Norway, its primary focus is limited to the anti-doping history of
38 the two countries and their collaboration. Little is said about how the two countries

1 actually respond to the WADA Code. Although these two papers (Houlihan, 2014;
2 Hanstad & Houlihan, 2015) were of value to us in terms of theoretical application and
3 literature review, neither of them followed the same research direction as the present
4 study.

5 Previous scholars have discussed China's compliance with the Code. For example,
6 according to Yang and Leung (2008) and Fan and Lu (2012), following the doping
7 scandals involving Chinese athletes at the 1994 Asian Games in Hiroshima and the
8 1998 FINA World Championships, China began to take anti-doping seriously, hoping
9 to restore its reputation and respond to growing international pressure. By that time, the
10 doping crisis not only threatened to jeopardize Beijing's chances of competing at
11 Sydney 2000, it also appeared that China's bid for the Beijing Games could be derailed
12 (Fan & Lu, 2012, p. 140). Both studies went a step further by praising the Chinese
13 government's willingness to comply with WADA and revamping its anti-doping system.
14 However, the limitations of both studies are evident. First, although Fan and Lu (2012)
15 explained the impact of doping on China using historical accounts and attempted to
16 delineate the evolution of China's anti-doping policies, by adopting documentary
17 analysis as their research method, they merely identified connections between related
18 events without referring to the policy discourse of important stakeholders or to other
19 policy documents. Yang and Leung (2008) pointed out that China achieved continued
20 progress in relation to anti-doping. They based their argument on the fact that the
21 Chinese swimming team passed all drug tests while winning multiple medals in
22 international competitions in 2004. However, their study only cited official figures and
23 media reports, their arguments being corroborated by field surveys. As a result, the
24 findings did not offer a complete picture of China's anti-doping policy. In addition,
25 neither of the two studies used theories to inform their analysis and constantly ran the
26 risk of being overly speculative. Lacking any theoretical basis and having failed to use
27 field surveys as supporting documents, the two studies were unable to fully capture
28 China's anti-doping policy and the implications behind its compliance strategies.
29 Therefore, the aim of the present study is to overcome the limitations of previous
30 research by establishing a theoretical basis and by analyzing data collected from semi-
31 structured interviews. The authors of this study have sought to answer the following
32 questions: (1) What were China's strategies for managing compliance with the Code
33 after 2004? (2) What were the main drivers and the significance of China's compliance
34 strategies? To answer these questions, this study is divided into two parts; the first
35 examines China's strategies for managing compliance with the Code and the second
36 investigates the implications of these strategies.

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1 **Theoretical Framework and Research Methods**

2 The analytical framework of the seven institutional factors for this study is based
3 on Haas and Bilder's (2003) 'compliance theories' used here for the purpose of
4 scrutinizing China's compliance strategies and their implications since signing up to
5 the Code. The theoretical framework used specifically in the analysis of *strategies* and
6 *implications* is as follows.

7 According to Haas and Bilder (2003), the international regime induces state actors
8 to comply mainly through the following means: 'monitoring', 'verification', 'horizontal
9 linkages', 'nesting', 'capacity building', 'national concern' and 'institutional profile'.
10 In 'monitoring', the regime demands that states honor their responsibilities and
11 obligations, and inspectors oversee their compliance. In 'verification', the regime
12 approves and certifies state compliance or empowers states to enforce anti-doping
13 policies. 'Horizontal linkages' are connections built between organizations to help bring
14 states into compliance. Enhanced interaction between organizations creates the
15 collective momentum needed to encourage states to comply. 'Nesting' entails tying
16 international norms to high-level issues to raise awareness. 'Capacity building' refers
17 to the provision or withholding of resources as a means to encourage or force states
18 'National concern' means raising awareness among social elites or the general public
19 so that the issue receives greater attention. Finally, 'institutional profile' calls on
20 regimes to strengthen their system or raise the level of discourse. In the context of this
21 study, the WADA-led international regime seeks to bring states into compliance by
22 implementing the Code.

23 To satisfy the research aims of the study, the researchers designed an analytical
24 framework based on the seven institutional factors identified by Haas and Bilder (2003).
25 The result is a similar list of seven factors characterizing the WADA-led regime's
26 efforts in inducing states to comply. **Based on the 2015 version of the WADA Code, we**
27 **identified seven factors of compliance and with them developed our interview outline**
28 **(see Table 1).** By 'monitoring', the regime demands that states comply with the Code
29 and push for necessary domestic legislation or amendments. By 'verifying', WADA
30 accredits national anti-doping laboratories and certifies state compliance. By forging
31 'horizontal linkages', WADA encourages cooperation between different anti-doping
32 agencies. Through 'nesting', WADA stresses the importance of anti-doping on national
33 agendas. 'Capacity building' helps expand states' capacity to enforce anti-doping
34 policies. By raising 'national concern', WADA calls for more public education about
35 anti-doping control and an increase in the publicity for anti-doping issues through
36 promotions. 'Institutional profile' calls for efforts to stimulate genuine interactions
37 between states and international organizations, such as WADA, IOC and UNESCO.
38 The purpose is to increase the level of attention paid by each state to anti-doping. As

1 shown above, this study has listed the factors which explain how WADA seeks to induce
 2 international and national sports bodies to comply. It has also described the
 3 responsibilities and obligations that WADA demands from signatories. These
 4 discussions helped determine the dimensions of our analysis and also helped us to
 5 prepare, in a more systematic fashion, an interview outline to be used for questions
 6 about ‘strategies’. The researchers conducted in-depth interviews with Chinese officials
 7 who have responsibility for devising China’s anti-doping policies (see table 2).

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9 **Table 1 Interview outline (Seven factors of compliance with the WADA Code)**

Factors	Interview questions (in brief)
monitoring	1. What are the monitoring measures that WADA imposes on national anti-doping agencies (e.g. spot checks, inspection)? How does China respond to them? Why? 2. Does non-compliance with WADA incur punishment? Have you considered not to comply with WADA? Do you comply with WADA out of fear for punishment?
verification	1. Are you aware of the status of compliance of other states? Does their compliance (or your knowledge of their compliance) mean anything to China? 2. Does China have any WADA accredited laboratories? What are their status? How are they funded?
horizontal linkages	1. What other agencies do you work with (e.g. Norwegian authorities)? What is the nature of your cooperation? Why do you cooperate? What is the status of your cooperation? 2. Are domestic doping tests carried out externally by NADOs? What countries do you work with? Why those countries? What is the status of your cooperation?
nesting	1. How do Chinese athletes gain membership of their respective sport associations? Are there any anti-doping requirements (e.g. signing contracts that contain anti-doping clause)? Do domestic sports events impose restrictions on participating athletes regarding anti-doping (e.g. demanding that athletes must sign anti-doping contract to compete)? Why do/don’t they have such requirements? 2. Are there any anti-doping requirements for entering international sports bodies, participating in or bidding for sport events? How does China respond to those requirements? Why?

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| capacity building | <ol style="list-style-type: none"> 1. Do international sports bodies provide subsidies for anti-doping education? Are there other ways of obtaining resource for anti-doping education or promotion? What actions has China taken? Why? 2. What is the impact on funding if China fails to comply with the WADA Code? What actions have you taken to avoid this? |
| national concern | <ol style="list-style-type: none"> 1. When investigating doping incidents, do you collaborate with national police agencies? How? What measures or actions have you taken? Why? What is the status of this collaboration (e.g. cooperative or confrontational)? 2. On the issue of anti-doping, what educational measures have you taken domestically? How do you promote the concept of anti-doping? Why? |
| institutional profile | <ol style="list-style-type: none"> 1. On anti-doping, how does China interact with UNESCO? What is the status of those interactions? What is the significance of UNESCO to China in terms of anti-doping? |

1 Source: Modified from Haas & Bilder (2003); WADA Code (2015)

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3 Our second aim was to understand the implications behind those strategies. On

4 this matter, Haas and Bilder (2003) argued that the level of the compliance of state

5 actors with international norms is decided by two factors: ‘willingness’ and ‘capacity’,

6 i.e. how states’ ‘willingness’ to comply is influenced by the interest orientation and

7 interaction of domestic stakeholders, and how their ‘capacity’ to comply is affected by

8 the availability of resources. By combining ‘willingness’ and ‘capacity’ as factors

9 affecting state compliance, Haas and Bilder concluded with several scenarios: costly

10 compliance, low-cost compliance and non-compliance. They also analyzed the reasons

11 behind each scenario. For example, if a state is willing and capable of bearing the cost

12 of compliance, it may engage in either low-cost or costly compliance. On the contrary,

13 if a state is incapable of carrying the cost, non-compliance or inability to comply may

14 occur.

15 Following the above considerations, we adopted documentary analysis – a

16 research tool in qualitative content analysis as our research method as we developed

17 our analytical framework for a study of compliance. The researchers conducted semi-

18 structured interviews with Chinese officials handling anti-doping policies, including

19 representatives of the General Administration of Sports of China (GAS), the China

20 Anti-Doping Agency (CHINADA), the Chinese Swimming, Weightlifting, Football

21 and Table Tennis Associations, administrators of Chinese Super League Football and

22 scholars in related fields to seek answers to the two research questions. As regards

1 China's strategies for managing compliance with the Code, the interviews helped us to
 2 examine how China responded to the seven institutional factors with which the
 3 international regime seeks to bring states into compliance. On the implications behind
 4 those strategies, the interviews focused on the dimensions of 'capacity' and 'willingness'
 5 to help determine whether state compliance or non-compliance was at play.

6 Arguably because of the political sensitivity of our research topic, access to
 7 interviews did not go smoothly. A lot of time was spent on networking. Fortunately,
 8 since 2006, the researchers have made multiple visits to China to investigate elite sports,
 9 including soccer, basketball, table tennis, gymnastics and swimming, and have
 10 established personal connections. For this study, by requesting repeated interviews and
 11 snowball sampling, and with the help of various associates, referrals were made to key
 12 sports personnel, including officials at GAS, CHINADA, individual sport associations,
 13 sport scholars and leading officials of China's professional sports leagues. Through
 14 painstaking efforts, the researchers visited Beijing to conduct field research four times
 15 and interviewed a total of 22 policy makers, administrators or scholars who were
 16 directly or indirectly involved in China's anti-doping policy (see table 2).

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 18 **Table 2 Profiles of interviewees**

Interviewee	Affiliated organization/position	Date of interview
A	The vice director of the Sports Ethics and Integrity Risk Research Center, Beijing Sports University	2015.01.18
B	An official from the Athletic Sport Department, GAS	2015.01.21 2018.01.16
C	A leading official from the Chinese Table Tennis Association	2015.01.21
D	A leading official from the Anti- Doping Division, Chinese Football Association (1)	2015.08.07
E	A leading official from the Anti- Doping Division, Chinese Football Association (2)	2015.08.08 2018.01.19
F	A professor from the Research Center of the Olympic Movement, Beijing Sport University	2015.08.09 2018.01.22
G	An official of the Department of Science and Education [DSE], GAS	2015.01.23 2015.08.06 2017.01.16 2018.01.26
H	A leading official from CHINADA	2015.01.13

I	An official from the Chinese Weightlifting Association	2015.01.20 2018.01.24
J	A scholar from Capital University of Physical Education and Sports	2015.01.20
K	An official in the Division of Legal Affairs and Investigation, CHINADA	2015.01.22
L	A WADA official	2015.02.02 2018.01.28
M	A sport policy scholar from Beijing Sport University	2015.07.28
N	A senior staff member of the Personnel Department, GAS (1)	2015.07.30
O	A senior staff member of the Personnel Department, GAS (2)	2015.07.30
P	A senior staff member of the Chinese Swimming Association	2015.07.31 2018.01.23
Q	A leading official from the Chinese Swimming Association (1)	2015.08.07
R	A vice chairman of a Beijing professional football club	2015.08.11
S	A leading official from CHINADA	2015.08.13
T	A former senior official in the Department of Science and Education [DSE], GAS	2015.08.13 2018.01.26
U	A leading official from the Chinese Swimming Association (2)	2015.08.14
V	A former leader of the Chinese Football Association Super League Co., Ltd	2015.08.15

1 Additionally, when handling the interview data, the researchers were aware of the
2 political sensitivity of the topic. Therefore, all interview data have been validated
3 through triangulation before being cited in this paper. The data were compared against
4 other interview data and original sources, including the organizations' internal data,
5 public documents and remarks of leading officials, to establish reliability. Both
6 documentary and interview data were subjected to thematic analysis (Patton, 2002).
7 Back translation was conducted to ensure linguistic consistency after the Chinese
8 material was translated into English.

10 **Research Results and Discussion**

11

1 **1. China's Strategies for Managing Compliance with the Code**

2
3 Starting in 1978, Chinese leader Deng Xiaoping pushed for the 'Four
4 Modernizations' with the goal of strengthening the fields of agriculture, industry,
5 national defense, and science and technology. China introduced capitalist measures and
6 hoped to swiftly boost its productivity (Oke, 1986). In the early 1980s, sports coaches
7 and performance-enhancing drugs were brought into China from the Soviet Union and
8 the German Democratic Republic in the interests of recruiting high-tech personnel and
9 products (Interviewee K). Some officials of the State Sports Commission (now GAS),
10 influenced by **the apparently successful** Soviet and East European sports culture, were
11 of the opinion that 'as long as it brings better sports results, poses no harm to athletes
12 and goes undetected by international regulators, the use of performance-enhancing
13 drugs is acceptable'. That comment was later interpreted as 'the three principles of
14 doping: useful, harmless and undetectable' (Yuan, 2009, p. 23). In fact, China's elite
15 sports in the 1990s were heavily plagued by doping scandals. At the 1994 Asian Games
16 in Hiroshima, 11 Chinese athletes tested positive for prohibited substances and were
17 later stripped of all medals and banned for two years. At the 1998 FINA World
18 Championships in Perth, Australia, Chinese swimmer Yuan Yuan was caught carrying
19 human growth hormone and eventually disqualified. Another four Chinese swimmers
20 failed drug tests later in the event (Sun, 2008; Yuan, 2009). As Chinese sports teams
21 were implicated in one doping violation after another at international competitions,
22 many in the West began to question China's growing sports achievements. Some even
23 categorically accused the Chinese government of supplying performance-enhancing
24 drugs to its athletes. In 2002, the world witnessed an example of collective doping
25 unfold at Shenyang Sport School, where school physicians administered the injection
26 of prohibited substances on student athletes. It was the first doping scandal involving
27 students on a campus (Fan & Lu, 2012). However, as doping in China gradually spread
28 to a younger population, including even adolescents, the severity of the problem
29 became clear. **Another major impact was that non-complying signatories of WADA**
30 **were barred from competing internationally and from hosting mega-sporting events**
31 **(Interviewees G and J; see also the 2015 WADA Code 20.1.8, 20.3.11, 20.6.6 and 22.8).**
32 Facing an apparently never-ending wave of doping revelations, the Chinese government
33 felt **obliged** to participate in the Second World Conference on Doping in Sport held by
34 WADA in 2003 and committed itself to implementing the Code following the
35 conference (Fan & Lu, 2012; Yang & Leung, 2008). The following discussions dissect
36 China's strategies for managing compliance with the Code in line with the seven factors
37 described in compliance theories, namely, *monitoring, verification, horizontal linkages,*
38 *nesting, capacity building, national concern* and *institutional profile*. An analysis of

1 China's strategies in relation to each of these factors will be presented separately.

2 3 **(1) Enactment and Amendments of Anti-Doping Regulations and Measures for** 4 **the Administration of Anti-Doping in Response to the Code**

5
6 A succession of doping scandals at international competitions from the mid-1990s
7 involving China escalated into diplomatic incidents. The Chinese leadership was under
8 growing pressure to take doping seriously. It added Article 34 to the Sports Law, stating
9 that 'the use of prohibited substances and methods are strictly forbidden, and that drug
10 testing institutions should strictly test against prohibited substances and methods'
11 (General Administration of Sport [GAS], 2000, p. 5). In 1998, GAS issued the Rules
12 Prohibiting the Use of Banned Substances in Sports (Provisional) (Interviewee T).
13 Although the document was swiftly publicised and the then Chinese leader Jiang Zemin
14 publicly declared 'China would rather not take gold medals than resort to doping', the
15 flow of doping scandals did not stop (Yuan, 2009, p. 20). To demonstrate its resolve to
16 tackle doping, China committed itself to anti-doping campaign internationally, joining
17 the newly-established WADA in 1999. As a response to WADA's adoption of the Code
18 in 2004, Chinese Premier Wen Jiabao promulgated the Anti-Doping Regulations which
19 not only provided a legal basis for China's anti-doping policies, but also fulfilled the
20 promise China had made to the IOC when winning the right to host the 2008 Olympics,
21 i.e. prevent doping violations through legislation and other measures (Department of
22 Education, Science, Technology, Culture and Health Legislations, State Council
23 Legislative Affairs Office, GAS, 2004, p.20). Speaking to a seminar on the
24 implementation of the Anti-Doping Regulations, GAS Director Yuan Weimin stressed
25 that with the enactment of the Anti-doping Regulations, 'the Chinese government has
26 demonstrated to the world its solemn attitude and firm position on anti-doping, its
27 support for the international anti-doping campaign and that the Chinese government
28 and China's sports circle have established a good image internationally' (Yuan, 2004,
29 p. 183). Officials from the GAS Department of Science and Education (DSE)
30 emphasized that to be in line with the 2015 edition of the Code, the GAS established
31 and implemented the Measures for the Administration of Anti-doping and the General
32 Rules of Doping Control in 2015 to maintain a high level of compliance with the Code
33 (Interviewee G). To ensure smooth implementation of the Code in China, DSE stressed
34 in its internal documents that it would transform the 2015 edition of the Code into
35 domestic law in the form of a regulatory document (i.e. the General Rules of Doping
36 Control) and issue advisory guidelines on actual implementation to ensure, on a policy
37 basis, that the new rules would be fully implemented (DSE, GAS, 2015). In addition,
38 GAS also ensured that the Chinese Olympic Committee (COC) and CHINADA

1 establish Anti-Doping Rules that corresponded to the Anti-Doping Regulations and
2 submit these to WADA to fulfill China's obligations in complying with the Code
3 (Interviewees A, B, G). China's approach was different from that of Norway, a country
4 widely viewed as an anti-doping role model (Hanstad & Houlihan, 2015; Wagner &
5 Hanstad, 2011). Although the Norwegian anti-doping agency is publicly funded and its
6 leading officials directly appointed by the Norwegian Olympic and Paralympic
7 Committee, its operation is seen as having a high degree of autonomy. More notably,
8 unlike Chinese legislation, Norwegian laws have not criminalized the use of
9 performance-enhancing drugs.

10 11 **(2) Establishment of WADA-accredited Laboratories and Anti-Doping Centers**

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13 In 1987, when Beijing secured the hosting rights for the 1990 Asian Games, the
14 Chinese government prepared to set up an anti-doping laboratory. That task was handed
15 to the National Research Institute of Sports Medicine, which had been founded in June
16 of that year, under the State Sports Commission (SSC) (CHINADA, 2016). In 1992,
17 the COC established the Anti-Doping Commission, naming the then Deputy Director
18 of the SSC, Yuan Weimin, as its Chief. The DSE handled day-to-day affairs.
19 Consequently, the drug testing laboratory, established under the aegis of the National
20 Research Institute of Sports Medicine, was directly subordinate to the DSE (Zou, 2013,
21 p. 29). In 1994, Lou Dapeng, Deputy Chief of the Department of Sports Training and
22 Competition of SSC, was renamed Deputy Chief of the Anti-Doping Commission.
23 Using his personal connections, Lou became acquainted with the Chief of the
24 Department of Sport Policy, Ministry of Culture, Norway, who also served on the
25 International Association of Athletics Federations (IAAF). Thanks to the Norwegian
26 official, Norway's anti-doping laboratory assisted China in the establishment of an anti-
27 doping laboratory in Beijing in accordance with ISO9001, which later passed WADA's
28 accreditation (Interviewees F, J and T). The lab was created in preparation for the 2008
29 Olympics and in response to pressure from WADA. However, in 2006, the German
30 media accused the Chinese government of secretly performing gene doping on its
31 athletes, who were expected to win gold medals at the 2008 Beijing Olympics. The
32 report ridiculed the Beijing Olympics as being hosted by a doping country – an
33 observation shared by the then WADA President Dick Pound, who in turn sought
34 explanations from the Chinese authorities. Mounting pressure from the international
35 media and the WADA President was treated with utmost urgency by the Chinese
36 leadership, who instructed the relevant authorities to clarify the situation. According to
37 one DSE official, 'to clear up the misunderstanding, we immediately invited the WADA
38 President to inspect our anti-doping efforts and urged the State Council to form a

1 national anti-doping center' (Interviewee G). The official pointed out that immediately
2 after visiting China's anti-doping facilities, the WADA President voluntarily stamped
3 out doping rumors about China at an international press conference, publicly praising
4 China 'as a role model in anti-doping'. Following this incident, the State Council agreed
5 to establish an anti-doping center (CHINADA) under GAS and reorganize the national
6 anti-doping laboratory under its auspices (CHINADA, 2016). However, CHINADA did
7 not operate independently from the Chinese government. In fact, CHINADA was still
8 under the control of GAS, being particularly dependent on DSE policies. In April 2014,
9 the DSE even created an anti-doping division to help implement the 2015 edition of the
10 Code and handle anti-doping affairs, which had become increasingly specialized (GAS,
11 2015). Although CHINADA wanted to and should be independent, the reality is that
12 under China's current development patterns, most agencies are still directly controlled
13 by the government. Anti-doping laboratories, in particular, need funding support and
14 can hardly operate independently from the government. Even some WADA officials
15 admit that it is understandable for CHINADA to receive large sums of funding from the
16 government (Interviewee L). Our data also show that the Chinese government paid
17 considerable attention to the running of CHINADA because it could affect the national
18 image and China's credentials to host mega-sporting events. Therefore, the government
19 invests heavily in CHINADA in the hope of gaining recognition from the IOC and
20 WADA (Interviewees G, H, S and T). It is also worth noting that China's anti-doping
21 tasks are led by the newly-established anti-doping division of the DSE, GAS, and not
22 by any elements of the elite sport sector. This helps to maintain a separation of powers
23 among the departments to avoid conflicts of interest. The addition of an anti-doping
24 division under GAS, considered rare at a time when China was downsizing its sports
25 administrative system (Interviewees G, J and M), reflected how much emphasis the
26 Chinese government put on anti-doping. In addition, during the interviews, two leading
27 officials from CHINADA revealed their desire to unshackle themselves from GAS,
28 operating as a non-profit organization completely independent from government
29 (Interviewees H, S). However, in April 2016, four months prior to the Rio Olympics,
30 an anti-doping lab under CHINADA was hit with a four-month suspension as it had
31 failed WADA's blind tests (accreditation already reinstated by the end of August, 2016)
32 (WADA, 2016). Later, when 31 Chinese athletes from the Beijing Olympics tested
33 positive for prohibited substances upon retesting, the management problem of
34 CHINADA was completely exposed (Interviewee G). The latest scandal disgraced the
35 Chinese leadership, prompting the government to reshuffle the leadership of
36 CHINADA. In addition to renaming Chen Zhiyu, Deputy Chief of DSE handling anti-
37 doping affairs, as the new Deputy Director of CHINADA (GAS, 2017), the government
38 also designated Li Yingchuan, Assistant to GAS Director at the time, as Director of

1 CHINADA concurrently. The purpose was to strengthen China’s anti-doping
2 administration to facilitate anti-doping operations for the 2022 Winter Olympics in
3 Beijing. In addition, a senior official from the DSE, GAS also emphasized that ‘we are
4 preparing to set up a second anti-doping laboratory aiming to pass WADA’s
5 accreditation for the 2022 Winter Olympics and to demonstrate our commitment with
6 the Code (Interviewee T).

7

8 **(3) Seeking International Cooperation in Anti-Doping**

9

10 Following the scandals at the 1994 Asian Games, during which several Chinese
11 athletes in swimming, track and field and cycling were caught doping (Department of
12 Education, Science, Technology, Culture and Health Legislations, 2004), the Chinese
13 government actively sought cooperation with overseas anti-doping agencies. It signed
14 bilateral agreements with countries such as Australia, Canada, Norway and Sweden to
15 promote collaboration and exchange, and also launched exchange activities with France,
16 the UK, etc. Through mutual visits of personnel, information exchange, operations
17 evaluation and collaborative research with other countries, China hoped to bolster its
18 anti-doping efforts (Interviewee S). Among the many overseas partners, Australia and
19 Norway have been the closest to China. Australia was an advanced country in the
20 world’s anti-doping community and had won the right to host the 2000 Olympics. It
21 was among the first countries to contact China, hoping to initiate bilateral exchange on
22 anti-doping. Initially, China hesitated, but soon felt isolated and helpless in light of the
23 1994 doping scandals and desperately needed help from the outside. In these
24 circumstances, China signed a formal agreement with Australia to begin annual
25 exchanges. Although the bilateral exchange program ended after the Sydney Olympics
26 due to Australia’s lack of funding, it paved the way for the current reciprocal testing
27 between the two countries (Interviewee H). In an interview, a former DSE official
28 pointed out: While the exchange agreement was partly motivated by Australia’s desire
29 to monitor Chinese athletes against doping and ensure fair play at the Sydney Games,
30 it nevertheless boosted China’s anti-doping development to a certain extent
31 (Interviewee T).

32 As for China’s collaboration with Norway, the two countries have maintained
33 close ties between their anti-doping laboratories since the 1990s. After the 2008
34 Olympics, China ran neck-and-neck with Norway in terms of drug-testing capabilities.
35 WADA President Dick Pound even publicly praised China for playing a leading role in
36 anti-doping following the Olympics. CHINADA officials believed that WADA deemed
37 China and Norway to be top performers in anti-doping and therefore called on the two

1 countries to collaborate in helping Kenya to establish its anti-doping agency. ‘It was a
2 way of recognizing China’s anti-doping achievements by WADA, but also an export
3 and manifestation of China’s soft power’ (Interviewees K, L), one CHINADA official
4 said, ‘To be frank, the three WADA assistance programs currently underway around the
5 world, namely, Canada assisting Jamaica, the US and the UK helping Brazil, China and
6 Norway supporting Kenya, are all examples of “good students leading bad students”’
7 (Interviewee K).

8 9 **(4) Promoting the Special and Important Role of Anti-Doping Issues among** 10 **Domestic Sports Bodies**

11
12 According to a former senior DSE official, change in China’s anti-doping policy
13 was often associated with international events and major doping scandals. A particular
14 case in point was the scandal at the 1998 FINA World Championships in Perth,
15 Australia (Interviewee T), after which the Chinese leader Jiang Zemin declared
16 unequivocally to China’s sports circle, ‘[China] would rather not take gold medals than
17 resort to doping’ (Yuan, 2004, p. 183). Jiang made this statement to ease growing
18 international pressure. But for Yuan Weimin, the newly appointed GAS Director, the
19 pressure of having responsibility for China’s success at the upcoming Sydney Games
20 was enormous. In his memoir, Yuan stated, ‘I was under huge pressure! Among the
21 athletes who failed GAS random drug tests and thereby lost the chance to compete in
22 Sydney, several could have won gold medals. If someone was caught doping, I took the
23 blame. If athletes didn’t perform well, I took the blame. If Beijing’s Olympic bid was
24 compromised due to doping, I would be given an extra “charge”’ (Yuan, 2004, p. 30).
25 In fact, as Yuan said, ‘the problem of doping concerns national pride and the image of
26 Chinese athletes. It is a “political” issue. It affected Beijing’s bid for the Olympics.
27 GAS must raise the banner of anti-doping and must not waver’ (Yuan, 2004, p.22). As
28 doping escalated into a ‘political’ issue, anti-doping began to play a special and
29 important role in China’s sports administration. It became obligatory for every sport
30 governing body under the GAS to designate one deputy chief to anti-doping duties
31 (Interviewees M, R and V). In addition, to ensure the cleanness of the Chinese national
32 athletes competing abroad, the authorities strengthened the control and screening of
33 athletes’ food intakes, dietary supplements and medication. More importantly, athletes
34 now had to pass CHINADA’s drug screening before competing overseas (Interviewee
35 I).

36 37 **(5) Securing Funding for Domestic Anti-Doping Operations** 38

1 China's anti-doping policies are mainly formulated by the Anti-Doping Division
2 of DSE and GAS and are primarily implemented by CHINADA. Under the direct
3 supervision of GAS, CHINADA is a public-sector organization fully funded by the
4 government. Administratively, it runs like any other government agency and is headed
5 by a Director directly appointed by GAS (Zou, 2013, p. 38). According to one of its
6 leading officials, CHINADA's operating expenses, including utilities, equipment,
7 refurbishment and personnel costs, are fully funded by the government. Every year, the
8 government allocates special funds to CHINADA for drug screening and anti-doping
9 education (Interviewee H). The official added, 'when we began in 1990, we tested a
10 little more than 160 samples. The numbers have gone up to about 8000 samples every
11 year. These tests were all funded by the government'. To ensure national athletes were
12 doping-free, all first-string and second-string members of Chinese national teams,
13 which amounted to more than 4000 athletes, were gathered and tested. According to
14 some officials from individual sport associations, the national weightlifting team was
15 tested most frequently, at an interval of once per week. Coming next were the swimming
16 and track and field teams which were tested once or twice per month (Interviewees I, P,
17 Q, U). This supports the GAS official's suggestion that China has stepped up anti-
18 doping and now conducts multiple tests each month (Interviewee G). Meanwhile,
19 screenings seemed to be cascading down from the elite sports system, to cover sports
20 schools at the provincial level. A GAS official revealed, 'by doing so, we can ensure
21 that student athletes do not dope, and that our national teams are safe' (Interviewee H).
22 Testing expenses for preparation for the Olympics are met with additional funding. The
23 official stressed, 'to ensure that no Chinese athletes competing overseas generate any
24 negative news, we spent an additional 10 million yuan just for the 2012 London
25 Olympics alone'. Understandably, drug test funding for the 2016 Rio Olympics was
26 inevitably higher. Due to the enormous costs of drug tests, in addition to the 8000
27 samples funded by the central government each year, GAS is developing a system of
28 bottom-up supervision. It holds provincial and municipal governments responsible for
29 the costs of testing their athletes in order to expand the scope of screening (Interviewees
30 G, H). According to the DSE official, 'Anti-doping is gaining a lot of momentum in
31 China with the leadership's backing. In particular, this coincides with China's bid for
32 the 2022 Winter Olympics, so we are expecting a great leap forward' (Interviewee G).
33 To cope with the expansion of test subjects (including sports school test takers, elite
34 athletes and professional athletes) and growing drug test expenses, GAS reached an
35 agreement with Shanghai city government to establish China's second anti-doping
36 laboratory funded by the city government. As well as carrying out more drug tests on
37 professional athletes, the new laboratory would also perform drug tests during
38 admission exams for college-level sports training programs with full funding from the

1 Ministry of Education (Interviewee G). Eventually China's second anti-doping
2 laboratory was established in Shanghai city on 3rd April, 2018 (Zhu & Gao, 2018).

3
4 **(6) Making Anti-Doping Commitment an Entry Criterion for National Sports**
5 **Teams as a Measure to Promote Anti-Doping Education**
6

7 When Yuan Weimin took the helm of GAS in the late 1990s, GAS began
8 demanding that athletes, coaches, sport administrative centers and sports event
9 organizers sign an anti-doping commitment statement, which later evolved into a
10 twofold system: an anti-doping commitment statement signed by sports administrative
11 bodies and the athletes' commitment to anti-doping as an entry criterion for national
12 teams. In the *Notice on Chinese Delegation's Anti-doping Work at Multi-sport Events*
13 *in 2014* (hereinafter referred to as 'the Notice'), it is stressed that 'GAS will sign a
14 *Responsibility Statement of the Chinese Delegation's Commitment to Anti-doping,*
15 *Sports Culture and Sports Ethics* with pertinent sports authorities and enact the "Rules
16 regarding Anti-doping and Medical Work for the Chinese Delegation", clearly
17 designating the leading official of each sports body as the person in charge of its anti-
18 doping responsibilities and that the team leaders are directly responsible for their team's
19 anti-doping work' (DSE, GAS, 2013). Simply put, when dividing administrative
20 responsibilities for anti-doping, GAS is holding the leading officials of sports bodies
21 directly responsible. According to the **GAS officials**, if a doping incident occurs, those
22 leading officials who have signed a commitment statement would not only be severely
23 punished but would also be likely to be excluded from any promotion in the future. This
24 is because the national leadership takes anti-doping very seriously (Interviewees G, N,
25 O).

26 On making an anti-doping commitment a criterion for entering national teams, the
27 Notice dictates '[we] need to uphold the principle of "prevention first, education as
28 fundamental". Prior to every sports event, all pertinent authorities must mobilize their
29 athletes and support personnel to study anti-doping knowledge, take joint exams and
30 sign anti-doping statements. Athletes and support personnel must attend classes and
31 pass exams as demanded to qualify for the Chinese delegation'. The Notice also
32 emphasizes, 'pertinent authorities should designate personnel to be in charge of these
33 affairs, fully implementing anti-doping education, examination, signing of anti-doping
34 statements and promotion. They should utilize this system as an effective measure to
35 strengthen anti-doping education and must not treat it perfunctorily or simply as a
36 matter of formality' (DSE, GAS, 2013). Interviews with China's swimming,
37 weightlifting, track and field, table tennis and football associations revealed that the
38 anti-doping entry criterion has now been fully adopted in the selection of national

1 athletes in these sports (Interviewees C, D, E, P, Q and U). An official from the Chinese
2 Weightlifting Association pointed out, ‘all weightlifters and their coaches must attend
3 anti-doping classes, pass exams and re-sign a commitment statement before they can
4 compete abroad’ (Interviewee I). The official admitted that the entry criterion has
5 greater declaratory significance than actual effects. Nevertheless, he stressed, ‘after
6 signing the commitment statement, those who violate the rules shall take punishment
7 voluntarily’. In other words, the system deters and prevents athletes and coaches from
8 violating anti-doping rules.

9 Additionally, to ensure the fairness of the admission exams for college-level sports
10 programs, China has begun running drug test sites for examinees; these are fully funded
11 by the Ministry of Education, supervised by the DSE and implemented by CHINADA
12 and the school authorities (DSE, GAS, 2014). According to the DSE official, the test
13 sites were set up due to growing concerns on the part of central government and
14 education officials following several incidents in which examinees died during skill
15 tests due to doping (Interviewees G, T).

16 17 **(7) Maintaining Good Relations with WADA, IOC and UNESCO** 18

19 In 1997, China began participating in the Monitoring Group of the Anti-Doping
20 Convention as an observer. Since WADA’s formation in 1999, as a major Asian country,
21 China has been represented on WADA’s foundation board by a GAS Deputy Director
22 who manages China’s elite sports (GAS, 2015, p. 18). Furthermore, the Chinese
23 government sets aside 240,000 US dollars annually for funding WADA’s operations
24 (Interviewees H, S). It should be noted again that WADA’s founding President Dick
25 Pound spoke highly of China’s anti-doping organizations after his inspection tours in
26 China in 2007. Ironically, however, following the Beijing Olympics, the then WADA
27 President John Fahey and Director General David Howman said publicly in 2013 that
28 China produced 99% of the world’s illegal substances (Sun, 2013). This claim
29 disgruntled the Chinese leadership, even prompting the then GAS Deputy Director
30 Duan Shijie, who served on the WADA Foundation Board at the time, to lodge a protest
31 in writing (Duan, 2013). Despite the row, the incident eventually led to cooperation
32 between China and WADA, combating the production, selling and trade of illegal
33 substances (WADA, 2015a). Howman believed this was ‘a step forward in
34 collaboration’ between China and WADA (Ma, 2015). A GAS official also pointed out
35 that the WADA-China relationship is at its best stage of constructive interaction
36 wherein both sides support and understand the work that needs to be done. As a great
37 power but also a major producer of raw materials for illegal substances, China needs to
38 close the loophole (Interviewee G).

1

2 During the 2014 Nanjing Youth Olympics, Liu Yandong, a Chinese Politburo
3 member and Vice Premier, met with WADA’s newly-elected President and IOC Vice
4 President Sir Craig Reedie, assuring him of the Chinese government’s full support for
5 Agenda 2020, an anti-doping strategic roadmap proposed by IOC Chairman Thomas
6 Bach. Like Japan, China pledged one million US dollars to the IOC Anti-doping
7 Research Fund to strengthen its collaboration with the IOC (GAS, 2015, p.34).
8 Furthermore, in 2005, China was among the first countries to sign the UNESCO-
9 initiated International Convention against Doping in Sport as a move to recognize the
10 effectiveness of the Code. According to a leading official of CHINADA, China
11 regularly sends representatives to attend UNESCO-held Convention meetings and
12 serve vice chairmen at the Convention’s executive committee. It also donates annually
13 to UNESCO-affiliated foundations, which provides funding to countries to start their
14 anti-doping programs (Interviewee H).

15

16

17 **2. The Main Drivers and the Significance of China’s Compliance Strategies**

18

19 From the above analysis of the seven dimensions of China’s compliance strategies,
20 which was based on the seven dimensions identified in compliance theories, one can
21 infer that China’s signing of the Code and its compliance were driven by both external
22 and internal factors. Externally, it was mainly motivated by the international realities of
23 the time and especially by the fact that Chinese athletes were to compete with athletes
24 from other countries (Interviewees A, G, T). From the 1980s to early 1990s, China’s
25 officials were heavily influenced by Soviet and East European sports culture and did
26 not believe doping was wrong. On the contrary, China saw doping as an application of
27 high-tech products, leading to the three principles of doping: usefulness, harmlessness
28 and undetectability. That thinking was increasingly challenged when the IOC and the
29 European Union began to address the threat of doping and the issue of fairness in sports
30 competitions. A wind of change blew through the international community as more and
31 more countries came to believe that sending doping athletes to compete was deceitful,
32 unethical and seriously violated the IOC’s firmly held principle of fair play. As the IOC
33 toughened anti-doping drug tests and worldwide public opinion began to notice and
34 condemn doping countries and athletes, China found itself in the storm center of a series
35 of doping scandals in the late 1990s when Chinese athletes competing abroad were
36 caught doping collectively. Those incidents were viewed as international scandals
37 involving state-directed systematic doping in order to give athletes an unfair advantage
38 over others. The severity of the scandals led to diplomatic incidents, tainting China’s

1 image and reputation in the world. International pressure forced the then Chinese leader
2 Jiang Zemin to publicly declare that China's sports community 'would rather not take
3 gold medals than resort to doping' (Yuan, 2009, p. 20). The cost of taking the anti-
4 doping path for China was enormous, not least because it could undermine the country's
5 performance in international competition. However, China was capable of choosing to
6 comply with the IOC's anti-doping policy at the time and with the Code that followed.
7 It should be noted that China's strength and performance in elite sports did not decline
8 significantly as a consequence of its anti-doping efforts. In fact, at the 2008 Beijing
9 Olympics, China overtook the United States to top the medal table and became the new
10 superpower in sports. Even at the 2012 London Olympics, Chinese athletes finished
11 with their best performance at an Olympics held outside of China.

12 The internal drivers for China's compliance can be linked to China's status as a
13 bidder and/or host of international sports events and as a rising power. Bidding for and
14 hosting sports mega-events, especially the Summer and Winter Olympics, had been
15 China's century-old dream. By hosting the Olympics, China hoped to remove the
16 stigma of 'the sick man of East Asia' that had haunted people since the Opium Wars in
17 the mid-19th century. For this reason, anything that could potentially derail China's
18 Olympics bidding or hosting prospects had to be eradicated. It is unsurprising that
19 former GAS Director Yuan Weimin called doping a 'political' problem, since doping
20 could have jeopardized Beijing's 2008 Olympic bid and China was obliged to carry the
21 anti-doping banner. In its response to the IOC and the Code, China was clearly aware
22 of the great cost involved in compliance. In particular, the response called for regulatory
23 changes, the establishment of anti-doping institutions, and large subsidies and input of
24 manpower from the central government. Despite the high cost, however, China has
25 gradually displayed its strength as a great power with the successful hosting of the 2008
26 Beijing Olympics and winning the bid for the 2022 Winter Olympics. Furthermore,
27 after becoming leader of China, President Xi Jinping unveiled the China Dream, which
28 called on the country to ascend from being a sporting power to a sporting superpower
29 (Tan, & Houlihan, 2013; Tan, Huang, Bairner & Chen, 2016). While treating sport as a
30 platform upon which to demonstrate and export its culture and use soft power, China
31 spared no effort to demand a clean image from its athletes, safeguard its national
32 reputation and pursue the China Dream of becoming a sporting superpower. In
33 complying with the Code, China has shown zero tolerance for mistakes despite the
34 enormous cost.

35

36 **Conclusion**

37

38 In terms of compliance strategies, China has responded to the international anti-

1 doping regime in each of these seven dimensions separately: *monitoring*, *verification*,
2 *horizontal linkages*, *nesting*, *capacity building*, *national concern* and *institutional*
3 *profile*. In *monitoring*, China has enacted and amended the Anti-doping Regulations
4 and the Measures for the Administration of Anti-doping in accordance with the 2015
5 edition of the Code. In terms of *Verification*, China is set to establish its second WADA-
6 accredited laboratory in Shanghai after Beijing's. As regards creating *horizontal*
7 *linkages*, China has collaborated closely with Norway and has assisted Kenya by
8 providing technical training and guidance for its anti-doping institution. With reference
9 to *nesting*, China has demanded that Chinese athletes, coaches, sports administrative
10 centers and sports event organizers sign an 'anti-doping commitment statement'. In the
11 interests of *capacity building*, the Chinese government has not only provided full
12 funding support to domestic anti-doping campaigns but has also donated one million
13 US dollars to the IOC Anti-Doping Research Fund, which has worked closely with
14 WADA. By raising *national concern*, the Chinese government has developed anti-
15 doping teaching materials, provided anti-doping education and set up drug test sites for
16 sports school test takers. Finally, by strengthening its *institutional profile*, China has
17 actively participated in UNESCO events and was one of the initiators of the
18 International Convention against Doping in Sport.

19 China's signing of and compliance with the Code were driven by a combination
20 of external and internal factors. Externally, these actions were linked to China's doping
21 scandals in the 1990s, media exposure and diplomatic pressure that came with the
22 scandals, and the fear that Chinese athletes could be barred from competing at the
23 Olympics. Internally, China was influenced by its desire to bid for Winter and Summer
24 Olympics. The implication of China's compliance is that the Chinese government has
25 attained a level of compliance in terms of willingness and capability. Houlihan (2014)
26 and Hanstad & Houlihan (2015), who have long paid attention to anti-doping policy,
27 point out that the level of 'commitment' to compliance cannot be easily measured.
28 However, our evidence suggests that China is willing to pay a high price to comply with
29 the Code. This study, thus, concludes that if the Chinese leadership continues to believe
30 that participation in, bidding for and hosting mega-sporting events (especially the
31 Olympics) are important to the country's development, China will continue to pay a
32 high price to comply with the Code. In terms of theoretical applicability, this study
33 shows that, in the WADA Code, the provisions relating to compliance can be
34 categorized as comprising seven factors, and that the response strategies of national
35 agencies can also be broken into seven factors. More importantly, our theoretical
36 framework helps us understand how international organizations bring national agencies
37 into compliance, and how states respond to the seven factors of compliance. This
38 confirms Robert K. Yin's claim that 'articulating "theory" about what is being studied

1 helps to operationalize case study designs and make them more explicit' (Yin, 2003:
2 19).

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