



Government of **Western Australia**
Combat Sports Commission

Submission to the Joint Committee of Public Accounts and Audit

Inquiry into Sport Integrity Australia's Management of the National Anti-Doping Scheme

Submitted by: Combat Sports Commission of Western Australia

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Executive Summary

The Combat Sports Commission of Western Australia (CSC) is a statutory regulator responsible for ensuring the safety, fairness and integrity of combat sports in Western Australia, including Mixed Martial Arts (MMA), Boxing and Muay Thai, under the *Combat Sports Act 1987* and *Combat Sports Regulations 2004*. While CSC aligns its integrity program with Sport Integrity Australia (SIA) National Integrity Framework (NIF) and the World Anti-Doping Code, CSC is not eligible to become a NIF signatory because it is a state regulatory body rather than a National Sporting Organisation. This exclusion leaves a material integrity gap: CSC-registered athletes and events cannot access SIA's anti-doping program on a standing basis, despite Western Australia's escalating profile as a host of international combat sport events, recognised title fights and as a training hub for elite contestants.

CSC acknowledges the significant achievements of SIA since its establishment in 2020, including Australia-wide education, testing, and intelligence functions; however, the current framework does not provide a clear pathway for state regulators to obtain SIA services or to integrate fully into the National Anti-Doping Scheme (NADS). This impedes consistent, risk-based testing across high-exposure combat sports events in Australia and creates uneven athlete protections.

Recommendations

1. Create an inclusion pathway under NADS for state/territory regulatory authorities (e.g. CSC) to become eligible participants or formal partners for anti-doping services and information-sharing with SIA.
2. Establish a fee-for-service and MOU template enabling SIA to deliver targeted collections (e.g. 5–10 priority events annually) and education to non-NIF regulators with appropriate case management support.
3. Enable delegated collections, intelligence sharing and case management via controlled accreditation of state-based Sample Collection Personnel, operating under SIA governance and WADA standards.

About the Commission

CSC regulates combat sports competitions in WA, including registration of contestants and industry participants; contest permits and approvals; compliance monitoring; and safeguarding.

The Commission's remit includes promoting fair competition and preventing the use of prohibited substances and methods, consistent with the World Anti-Doping Code.

Response to Terms of Reference

ToR (a): Effectiveness of SIA's operating, governance and risk frameworks

Gaps affecting state regulators and combat sports in WA

1. Participation barrier for non-NIF regulators: CSC cannot become a NIF signatory due to its regulator status, which effectively precludes standing access to SIA's test distribution planning, collections, and results management services for CSC-regulated athletes and events.
2. Limited fee-for-service pathways: While collaborative discussions have occurred, there is no standardised contractual mechanism for a state regulator to enable SIA to conduct in-competition and out-of-competition testing.
3. Laboratory and Prohibited List access: CSC must rely on SIA to access WADA-accredited labs and the full Prohibited List framework for results management consistency; without a formal arrangement, this access is uncertain or ad hoc, if any.
4. Surge capacity for major events: WA has hosted and is scheduled to host high-profile UFC cards and other events; under current arrangements CSC cannot match SIA's surge testing and intelligence capability to match elevated risk profiles.
5. Information-sharing constraints: Intelligence, Test Distribution Plans and atypical findings benefit from national sharing; state regulators outside NIF need clear legal gateways and secrecy/confidentiality controls to receive and contribute relevant information.

Impacts

- Integrity and safety risk: Without consistent anti-doping coverage, high-risk events may proceed with limited deterrence, undermining fairness and athlete welfare.
- Reputational risk: Western Australia's increasing international exposure as a combat sports destination heightens the consequences of any doping incident in local events.
- Inequity: Athletes under national NSOs receive structured SIA coverage, while CSC-registered athletes do not.

Suggested reforms

- Introduce a "Regulatory Participant" class under NADS, enabling state/territory regulators to engage formally with SIA for testing, education, intelligence and results management support.
- Develop model MOU/fee-for-service templates (scope, cost recovery, privacy/records, sample custody/chain-of-custody, ADRV process alignment).
- Expand state integrity staffing and surge testing pools and formalise delegations to allow SIA-governed sample collection by locally accredited personnel when appropriate.

ToR (b): SIA's success in promoting the standing and integrity of Australian sport

Opportunities to strengthen outcomes for combat sports

- Targeted education for combat sports ecosystems: Promote safe-use guidance on supplements (with certification pathways), weight-cutting risks, and out-of-competition vulnerabilities among small and mid-tier promoters and gyms.
- Risk-based test distribution in WA: Prioritise high-visibility events (e.g. professional MMA/boxing cards with international pathways) and bolster out-of-competition capacity for elite contestants based in WA.
- Unified communications: Joint SIA-CSC messaging at events and online to reinforce deterrence and signal consistent national standards across all disciplines and jurisdictions.

Risks and Mitigations

- **Legal gateway uncertainty:** Address via explicit legislative/Policy instrument authorising SIA to contract with and share information with state regulators for anti-doping purposes.
- **Quality assurance for delegated collections:** Mitigate through SIA accreditation, supervision, audits, and KPI-linked contracts.
- **Public confidence and transparency:** Publish high-level testing statistics and education reach for WA combat sports, maintaining confidentiality of individuals.

Conclusion

The Commission supports the objectives of the National Anti-Doping Scheme and the work of SIA. To ensure that combat sports in Western Australia receive consistent, code-aligned protection, the Committee's recommendations should establish a practical inclusion pathway for state regulators, backed by fee-for-service access, delegated collections, robust information sharing and targeted education. These changes will close an identifiable integrity gap and strengthen public confidence in Australian sport during a period of heightened international attention on WA's combat sports.