

18 February 2025

**DECISION OF THE INTERNATIONAL TENNIS INTEGRITY AGENCY
PURSUANT TO ARTICLE 7.14 OF THE 2025 TENNIS ANTI-DOPING PROGRAMME**

I. Introduction

1. The International Tennis Integrity Agency (**ITIA**) is the delegated third party, under the World Anti-Doping Code (**Code**), of the International Tennis Federation (**ITF**), the international governing body for the sport of tennis and signatory of the Code. Under the delegation, the ITIA is responsible for the management and administration of anti-doping across professional tennis in accordance with the Tennis Anti-Doping Programme (the **TADP** or the **Programme**), which sets out Code-compliant anti-doping rules applicable to players competing in Covered Events.¹
2. Nicolas Zanellato (the **Player**) is a 23-year-old tennis player from Brazil. He has achieved a career-high ATP singles ranking of 458. By virtue of (among other things) his ATP ranking and participation in Covered Events in 2024, the Player was bound by and required to comply with the TADP at all relevant times.
3. Following the detection of the Prohibited Substance boldenone in a sample provided by the Player, the ITIA charged the Player with the commission of anti-doping rule violations under Article 2.1 and/or Article 2.2 of the TADP (copied below), and subsequently proposed certain Consequences based on its analysis of the degree of Fault that the Player bears for those violations:

“2.1 The presence of a Prohibited Substance or any of its Metabolites or Markers in a Player’s Sample, unless the Player establishes that such presence is consistent with a TUE granted in accordance with Article 4.4.”

“2.2 Use or Attempted Use by a Player of a Prohibited Substance or a Prohibited Method, unless the Player establishes that such Use or Attempted Use is consistent with a TUE granted in accordance with Article 4.4.”

4. The Player has admitted the anti-doping rule violations charged and acceded to the Consequences proposed by the ITIA.
5. In such circumstances, 2025 TADP Article 7.14 provides that:

“7.14.1 At any time prior to a final decision by the Independent Tribunal, the ITIA may invite the Player or other Person to admit the Anti-Doping Rule Violation(s) asserted and accede to specified Consequences [...]

¹ Unless specified otherwise, references in this decision to the TADP are to the 2024 edition. The substantive rules of the 2024 TADP and the procedural rules of the 2025 TADP apply to this case (see 2025 TADP Article 1.5). Any defined term denoted by an initial capital letter that is not otherwise defined in this decision has the meaning given to it in the applicable TADP.

7.14.2 *In the event that the Player or other Person admits the Anti-Doping Rule Violation(s) asserted and accedes to Consequences specified by the ITIA [...], the ITIA will promptly issue a reasoned decision confirming the commission of the Anti-Doping Rule Violation(s) and the imposition of the specified Consequences [...], will send notice of the decision to the Player or other Person and to each Interested Party, and will Publicly Disclose the decision in accordance with Article 8.6. [...]*

7.14.3 *Any decision issued by the ITIA in accordance with Article 7.14.2 that an Anti-Doping Rule Violation has been committed [...] will address and determine (without limitation): (1) the factual basis of the decision that an Anti-Doping Rule Violation was committed; and (2) all of the Consequences to be imposed for such Anti-Doping Rule Violation, including the reasons for imposing the Consequences specified, and in particular the reasons for exercising any discretion not to impose the full Consequences available under this Programme."*


II. The Player's commission of anti-doping rule violations

6. The Player participated in the ATP Challenger event held in Ibagué, Colombia, between 24 and 29 June 2024 (the **Event**). On 25 June 2024, following his first-round match in the singles competition, the Player was required to provide an In-Competition urine sample for drug testing pursuant to the TADP (the **Sample**). The Sample provided was given reference number 1427480 and was split into an A sample and a B sample, which were sealed in tamper-evident bottles and transported to the WADA-accredited laboratory in Montreal, Canada (the **Laboratory**) for analysis. The Laboratory detected the presence of exogenous boldenone in sample A1427480 at an estimated concentration of 5 ng/mL.
7. Boldenone is listed in section S1.1 of the 2024 WADA Prohibited List as an anabolic steroid that is banned at all times.
8. The Adverse Analytical Finding reported by the Laboratory in respect of the Sample was considered by an independent Review Board in accordance with TADP Article 7.4. The Review Board did not identify any apparent departures from the applicable sample collection and sample analysis procedures that could have caused the Adverse Analytical Finding. It therefore decided that the Player had a case to answer for breach of TADP Articles 2.1 and/or 2.2.
9. Accordingly, on 12 August 2024 the ITIA sent the Player a formal pre-charge Notice.
10. Given that boldenone is not classified as a Specified Substance under the TADP, the Player was subject to a mandatory provisional suspension under TADP Article 7.12.1, which came into effect on 12 August 2024.
11. On 20 August 2024, the Player filed an application to lift the provisional suspension imposed on him. In summary, he denied having deliberately or knowingly used boldenone and asserted that he must have ingested meat contaminated with boldenone while in Colombia, where use of boldenone as a growth promoter in cattle is common.
12. On 21 August 2024, the ITIA responded, opposing the Player's application on the basis that he had not, at that stage, adduced sufficient evidence to establish that the source of the boldenone in his Sample was contaminated meat (which is a threshold requirement for the application of the No Fault or Negligence provisions, which is also grounds to lift a provisional suspension). The

ITIA acknowledged that the Player might in due course obtain further evidence regarding his meat contamination theory and committed to consider such evidence in good faith.

13. On 23 August 2024, the Chair of the Independent Tribunal appointed to determine the Player's application issued a decision dismissing the Player's application. The Player subsequently filed an appeal with the Court of Arbitration for Sport (**CAS**) against the Independent Tribunal's decision to maintain the provisional suspension, however then elected to suspend those proceedings and remain provisionally suspended while he investigated the source of the boldenone.
14. The Laboratory subsequently analysed sample B1427480 and, on 21 August 2024, reported that it had detected exogenous boldenone in sample B1427480, i.e., the B sample analysis confirmed the Adverse Analytical Finding made in respect of the A sample.
15. On 9 September 2024, the Player responded to the pre-charge Notice, denying the charge, and requesting further time to obtain and file evidence regarding the source of the boldenone. The ITIA agreed to that request, and the parties subsequently agreed several further deadline extensions to permit the Player additional time to investigate and obtain further evidence in support of his meat contamination explanation. The Player provided that evidence in multiple submissions on 9 September 2024, 27 September 2024, 30 October 2024, 3 December 2024, 17 December 2024, 19 December 2024, and 1 February 2025, and he and two witnesses participated in interviews on 22 November 2024 and 16 January 2025. Further details of the evidence submitted by the Player are set out at paragraph 22 below.
16. In his submissions, the Player also asserted that a case involving similar facts between the International Testing Agency (**ITA**) and a weightlifter (Francisco Mosquera) had recently been resolved with a No Fault or Negligence finding after it was accepted that boldenone found in a urine sample collected in Colombia was more likely than not the result of the athlete's ingestion of meat (beef) contaminated with boldenone. On 7 February 2024, the ITIA received confirmation of the outcome in that case, that no appeal had been filed against the decision by WADA, and that the appeal deadline had passed.
17. On 11 February 2025, the ITIA sent the Player a formal Charge Letter, asserting that the Player had committed anti-doping rule violations in breach of TADP Articles 2.1 and/or 2.2.
18. TADP Article 2.1 is a strict liability offence that is established simply by proof that a Prohibited Substance was present in the Player's sample, i.e., the ITIA does not have to prove how the substance got into the Player's system or that the Player took the substance intentionally (or even knowingly).
19. On 12 February 2025, the Player filed a short response to the Charge Letter, accepting that boldenone was found in his Sample, but denying that he had committed the anti-doping rule violations with which he was charged and maintaining that the boldenone in his Sample was the result of his ingestion of contaminated meat (beef) with reference to his prior submissions and evidence.
20. As explained above and in more detail below, the ITIA considered the Player's explanation and evidence (including through a series of interviews and follow up enquiries and document requests) and ultimately proposed to the Player certain Consequences for the violations, which the Player acceded to.

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III. Consequences

A. Period of Ineligibility

(i) How boldenone got into the Player's system

21. The Player has asserted that he did not intend to cheat and did not knowingly ingest boldenone. He asserts that the boldenone in his urine sample came from portions of beef that he ate in the days and hours before collection of the Sample and that – unknown to him – that beef was likely to have contained residues of boldenone injected into the cow as a growth promoter prior to slaughter.
22. The Player has provided the following evidence in support of his meat contamination explanation:
 - 22.1 Flight documentation, hotel reservations, and other evidence to establish that the Player was present in Colombia between 21 and 27 June 2024 in order to compete at the Event.
 - 22.2 Statements from the Player, including a record of the Player's movements while in Colombia (supported by his Uber receipts and credit card statement) and a record of the meals and food that he ate while in Colombia. The Player ate at his hotel for breakfast each day, as well as lunch on one occasion and dinner on one occasion. The Player ate his other meals at two restaurants located in a shopping mall. On one occasion, on 23 June 2024, the Player had dinner at a grill restaurant and ate a 370-gram *churrasco* (grilled steak). For his other meals (including lunch and dinner on 24 June 2024, and lunch on 25 June 2024), the Player ate the *punta de anca* dish (a circa 259-gram grilled rump cap steak) at a 'fast food' grill restaurant (the **Restaurant**). Each of the restaurants was outside of the tournament environment and the Player did not dine with any other players who were subjected to anti-doping controls during the Event.
 - 22.3 The Player's assertions (in writing and at interview) were corroborated by evidence including the payments recorded on his credit card statement, photographs of the Restaurant and its menu (including prices), the Player's disclosure on the Doping Control Form that he had eaten 'red meat' in the days prior to sample collection, and the statements of his coach and a tennis player who was also participating in the Event and ate meals with the Player (both the coach and tennis player were also independently interviewed by the ITIA on 16 January 2025). This tennis player, as noted, was not subjected to anti-doping controls during the Event.
 - 22.4 A statement from the manager of the Restaurant (the Player managed to obtain the statement from the manager by agreeing to a non-disclosure agreement) (1) identifying the Colombian company that operates as a slaughterhouse and meat supplier (the **Meat Supplier**) based in a city close to Bogotá from which the Restaurant purchases meat of Colombian origin, and (2) listing the meat products that the Restaurant purchased from the Meat Supplier in June 2024 (including the rump cap meat used in the *punta de anca* dish). Regulatory documents issued in 2024 by the Colombian Instituto Nacional de Vigilancia de Medicamentos y Alimentos (**INVIMA**) (the Colombian regulatory body responsible for, among other things, overseeing the safety and quality of food products) identified the Meat Supplier as authorised to sell meat only within Colombia (and not abroad).

- 22.5 Statements and supporting evidence from two registered Colombian lawyers instructed by the Player detailing the practical and legal steps taken to attempt to obtain evidence regarding potential meat (beef) contamination, including from the Restaurant and its manager regarding the source of the meat used in the Restaurant. One lawyer explained in his statement dated 31 January 2025 how he had visited the Restaurant in August 2024 and requested that an employee show him the raw meat used by the Restaurant. The employee showed the lawyer a package of raw meat that bore the logo and other identifying information of the Meat Supplier. While at the Restaurant, the lawyer recorded audiovisual footage and took photographs of the packaged raw meat. The package was stated to weigh 1,036 grams and contain four steaks, meaning that each steak and portion of meat would be approximately 259 grams, before cooking.
- 22.6 Documents, reports, studies, and responses to enquiries (including from the European Commission, INVIMA, the Instituto Colombiano Agropecuario (ICA), and others) that (variously) support the position that (1) veterinarian boldenone products are widely available for sale in Colombia, (2) there is no legal mechanism to ensure that boldenone concentration levels in beef sold for human consumption remain below a certain level, and there are no consequences for individuals or companies that produce or sell beef for human consumption that still contains boldenone residue, and (3) analysis of meat from cattle slaughtered for human consumption has been found to contain boldenone residues (in a 2011 European Commission study and in 23% of samples collected for a 2015-2016 ICA and INVIMA study). In addition, a study recently conducted by the Laboratory on the prevalence of boldenone in 201 samples of beef sold commercially all over Colombia found that approximately 25% of samples contained boldenone (albeit that (1) in 95% of all the samples, boldenone was either absent or present in a concentration lower than 1.5 ng/g, which is insufficient to cause an Adverse Analytical Finding, and (2) because boldenone is produced endogenously in cattle, its presence in low concentrations in beef may not be the result of a prior injection of exogenous boldenone, and the beef samples that contained traces of boldenone were not analysed to determine the endogenous/exogenous origin of the boldenone).
23. The ITIA consulted Prof Christiane Ayotte, retired Director of the Laboratory, who confirmed that (1) the presence of exogenous boldenone in the Sample indicates a prior ingestion of boldenone and it is not possible to determine from the science alone whether the boldenone was deliberately or inadvertently ingested, and (2) the Player's explanation is scientifically plausible, i.e., the Adverse Analytical Finding reported for the Sample is consistent with the timing and frequency of the Player's consumption of beef in the days prior to sample collection and the concentrations of boldenone that may be found in Colombian beef.
24. While not decisive, the ITIA further notes that there are no additional factors (such as, for example, the presence of multiple prohibited substances in the Player's sample and/or other intelligence) that would undermine or otherwise reduce the cogency or plausibility of the Player's explanation that the source of boldenone in his sample was the result of his consumption of contaminated beef.
25. Given all of the circumstances of this case, and considering cases involving comparable facts (i.e., the detection of boldenone only, in a low concentration that can plausibly be explained by the ingestion of contaminated beef, and in circumstances where the athlete has established that he

ingested one or multiple portions of Colombian beef shortly before sample collection),² the ITIA accepts the Player has established that it is more likely than not that the boldenone found in his urine sample 1427480 was due to the presence of boldenone residues in the beef that he consumed in the days and/or hours prior to collection of the Sample. No other evidence, including from the ITIA's investigations and detailed interviews with the Player and two witnesses, undermines the evidence provided to demonstrate source.

(ii) TADP Article 10.2 – Analysis of Intent

26. This is the Player's first doping violation.
27. TADP Article 10.2.1 mandates a four-year ban for a TADP Article 2.1 and/or 2.2 violation that is “intentional” and is a first violation.³ If the prohibited substance in question is not classified as a Specified Substance (as here), the Player has the burden of proving that the violation was not “intentional”. If the Player can do so, TADP Article 10.2.2 provides for a two-year period of ineligibility, subject to potential further mitigation. TADP Article 10.2.3 explains that in this context “the term ‘intentional’ is meant to identify those Players or other Persons who engage in conduct that they knew constituted an Anti-Doping Rule Violation or knew that there was a significant risk that the conduct might constitute or result in an Anti-Doping Rule Violation and manifestly disregarded that risk”. The jurisprudence is clear that what counts in this context is what the Player actually knew, not what he should have known.⁴
28. As set out above, the ITIA has accepted that the Player’s ingestion of meat that, unknown to him, was contaminated with boldenone was more likely than not the source of his positive test. Accordingly, and in line with the jurisprudence on meat contamination, the ITIA accepts that the Player has met his burden of demonstrating that his commission of the violation was not “intentional” within the meaning of TADP Articles 10.2.1 and 10.2.3, and so the two-year period of ineligibility set out in TADP Article 10.2.2 applies.

(iii) TADP Article 10.5 – Analysis of No Fault or Negligence

29. TADP Article 10.5 provides that if a player establishes that they bear No Fault or Negligence for the anti-doping rule violation in question, the otherwise applicable period of ineligibility will be eliminated. ‘No Fault or Negligence’ is defined in the TADP as follows: “The Player or other Person establishing that they did not know or suspect, and could not reasonably have known or suspected

² ITF v Farah, ITF decision dated 10 February 2020, in which the ITF accepted that the presence of 1.2 ng/mL of boldenone and 1.8 ng/mL of boldenone metabolite in Mr Farah’s sample was more likely than not the result of his consumption of contaminated beef; and ITA v Mosquera, ITA decision dated November 2024, which the ITA has confirmed was based on its acceptance that the presence of 10.1 ng/mL of boldenone in Mr Mosquera’s sample was more likely than not the result of his consumption of contaminated beef.

³ In accordance with TADP Article 10.9.4.1, for the purposes of imposing consequences under the TADP, the anti-doping rule violations will be “considered together as one single first Anti-Doping Rule Violation, and the sanction imposed will be based on the Anti-Doping Rule Violation that carries the more severe sanction” if (as here) the Player did not commit the second anti-doping rule violation after he received notice of the first.

⁴ ITF v Sharapova, Independent Tribunal decision dated 6 June 2016, para 68, not challenged on appeal, Sharapova v ITF, CAS 2016/A/4643.

even with the exercise of utmost caution, that they had Used or been administered the Prohibited Substance or Prohibited Method or otherwise violated an anti-doping rule”.

30. The WADA Technical Letter 23 and the accompanying WADA Stakeholder Notice set out rules for the treatment and assessment of findings of specific Prohibited Substances used as growth promoters in specific countries. A finding of a specific Prohibited Substance below a certain concentration will be treated as an Atypical Finding and subject to further investigation to determine whether or not the cause might have been the athlete’s ingestion of contaminated meat. If so, no further action will be taken. If not, an Adverse Analytical Finding is reported and a charge is brought (in which case the athlete may assert that the finding was the result of ingestion of contaminated meat and the athlete acted with No Fault or Negligence, and the evidence adduced in support of those assertions will be judged against the standard of proof). Boldenone does not at present fall within the scope of that Technical Letter.
31. Over the years, athletes in tennis and other sports have been advised to exercise caution when in Central or South America due to the possible risk of contamination caused by consuming Central or South American meat.⁵ However, while the ITIA guidance recommends players consider other sources of protein where possible, neither tennis players nor athletes in other sports are required to refrain entirely from the consumption of meat or to have meat pre-tested for anabolic steroid residues before consumption. Nor is the risk of boldenone contamination in Colombia so high that WADA has addressed this in Technical Letter 23 or issued any official warning, as it has done in the past for other potential meat contaminants (and in particular for clenbuterol in Mexico and Guatemala).⁶
32. The Player does not dispute that he completed an ITIA training module in which he correctly identified the risk of meat contamination, nor that he stated on his Doping Control Form that he had consumed ‘red meat’. However, the Player has credibly explained that (1) he did not properly understand the risk of consuming beef in Colombia (as opposed to meat in countries such as Mexico) prior to providing the doping control sample on 25 June 2024, (2) he received a warning (in relation to clenbuterol) by email from the Event organisers only after having provided his Sample, and (3) he only referred to ‘red meat’ on the Doping Control Form because he was advised at the time of sample collection to do so (and at that point it was already too late to modify his consumption habits because he had been eating meat since his arrival in Colombia). The Player’s evidence is supported, among other things, by witness testimony from his coach and another tennis player who was also participating in the Event.
33. In these circumstances, and consistent with other decisions where it has been accepted that Colombian beef contaminated with boldenone was the likely cause of the positive test, the ITIA therefore considers the Player acted with No Fault or Negligence, in that he did not know or

⁵ For example, the guidance provided by the ITIA can be found on its website: www.itia.tennis/news/itia-news/meat-contamination-warning/?q=meat.

⁶ Similarly, the general advice on the ITIA’s website concerns those substances (clenbuterol, ractopamine, zeranol, and zilpaterol) and countries (China, Mexico and Guatemala) referred to in Technical Letter 23 and the Stakeholder Notice: www.itia.tennis/anti-doping/supplements/.

suspect, and could not have known or suspected even with the utmost caution, that he had ingested boldenone.⁷

34. For the sake of clarity, following this finding of No Fault or Negligence:

34.1 TADP Article 10.5 provides that any otherwise applicable period of Ineligibility shall be eliminated entirely. Therefore, the Player's provisional suspension is lifted with immediate effect, and he will not serve any further period of Ineligibility for his violation. Instead, the Player is eligible to resume competition with immediate effect.

34.2 TADP Article 10.9.3 provides that this anti-doping rule violation shall not be considered a prior anti-doping rule violation for purposes of Article 10.9, i.e., if the Player commits another anti-doping rule violation, that second violation would be considered his first violation for sanctioning purposes.

B. Disqualification of results

35. The Player's singles results at the Event are automatically disqualified in accordance with TADP Article 9.1, and the Player's doubles results at the Event are disqualified in accordance with Article 10.1, in each case with all resulting consequences including forfeiture of any medals, titles, ranking points, and prize money received.

36. TADP Article 10.10 states that *'[u]nless fairness requires otherwise, in addition to the Disqualification of results under Articles 9.1 and 10.1, any other results obtained by the Player in Competitions taking place in the period starting on the date the Sample in question was collected or other Anti-Doping Rule Violation occurred and ending on the commencement of any Provisional Suspension or Ineligibility period, will be Disqualified, with all of the resulting consequences, including forfeiture of any medals, titles, ranking points and Prize Money'*.

37. Considering, in particular that (1) the Player would not have been exposed to boldenone again after 25 June 2024 (because he departed Colombia soon afterwards), (2) expert evidence confirms that the boldenone in the Player's system on 25 June 2024 would have left his body before he next played fifteen days later, and (3) he provided another sample for doping control purposes on 30 July 2024, which did not contain any Prohibited Substances, the ITIA accepts that fairness under TADP Article 10.10 requires that the Player's results in the four tournaments in which he participated after 25 June 2024, but before the date he was provisionally suspended (12 August 2024), are not disqualified.

C. Costs

38. Each party shall bear its own costs of dealing with this matter.

⁷ For the sake of clarity, the ITIA notes that it is not automatic that a case of meat contamination (with Colombian beef or otherwise) will lead to a No Fault or Negligence finding, and that with further and more specific education it may be increasingly difficult for players (and other athletes) to assert that they did not know or suspect and could not have reasonably have known or suspected even with the exercise of utmost caution that there is a significant risk that the consumption of Colombian beef may contain boldenone and lead to an anti-doping rule violation.

D. Publication

39. In accordance with 2025 TADP Article 8.6, this decision will be publicly reported by being posted (in full and/or summary form) on the ITIA's website.

E. Acceptance by the Player

40. The Player has accepted the consequences proposed above by the ITIA for his anti-doping rule violations and has expressly waived his right to have those consequences determined by the Independent Tribunal at a hearing.

IV. Rights of appeal

41. This decision constitutes the final decision of the ITIA, resolving this matter pursuant to 2025 TADP Article 7.14.
42. Further to 2025 TADP Article 13.2.1, each of WADA and Autoridade Brasileira de Controle de Dopagem (**ABCD**) has a right to appeal against this decision to the CAS in Lausanne, Switzerland, in accordance with the procedure set out at 2025 TADP Articles 13.8 and 13.9.
43. As part of the resolution of this matter, the Player has waived his right to appeal against or otherwise challenge any aspect of this decision (both as to the finding that the Player has committed anti-doping rule violations and as to the imposition of the consequences set out above), whether pursuant to 2025 TADP Article 13.2.1 or otherwise. However, if an appeal is filed with the CAS against this decision either by WADA or ABCD, the Player will be entitled (if so advised) to exercise his right of cross-appeal in accordance with 2025 TADP Article 13.9.4.

Issued Decision of the ITIA

London, 18 February 2025

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