

17 September 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. Frederico Ferreira Silva (the **Player**) is a 30-year-old tennis player from Portugal. He has achieved a career-high ATP singles ranking of 168. By virtue of (among other things) his ATP ranking and participation in Covered Events in 2025, the Player was bound by and required to comply with the TADP at all relevant times.
3. 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, 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 [...]
 - 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

¹ Unless specified otherwise, references in this decision to the TADP are to the 2025 edition, the substantive and procedural rules of which apply to this case (see 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 TADP.

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. On 1 February 2025, whilst participating as part of the squad in the Davis Cup tie between Monaco and Portugal held in Monte-Carlo, Monaco (the **Event**), the Player was required to provide an In-Competition urine sample for drug testing pursuant to the TADP (the **Sample**). The sample he provided was given reference number 1542482 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 in sample A1542482 of trimetazidine (**TMZ**).
7. TMZ is a metabolic modulator prohibited at all times under Section S4.4 of the 2025 WADA Prohibited List. TMZ is not a Specified Substance.
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 these 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 19 March 2025 the ITIA sent the Player a formal pre-charge Notice, asserting that the Player had a case to answer for breach of TADP Articles 2.1 and/or 2.2.
10. Given that TMZ 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 19 March 2025.
11. On 28 March 2025, the Player responded to the pre-charge Notice, denying the charge and requesting analysis of the B sample.
12. The Laboratory subsequently analysed sample B1542482 and, on 15 April 2025, reported that it had detected TMZ in sample B1542482, i.e., the B sample analysis confirmed the Adverse Analytical Finding made in respect of the A sample.
13. On 28 March 2025, within the 10-day deadline set by the ITIA, the Player filed an application to lift the provisional suspension imposed on him with Sport Resolutions as the independent tribunal. In summary, he denied having deliberately or knowingly used TMZ and indicated the TMZ must have been inadvertently ingested through his use of a contaminated batch of Daflon

1000mg (the **Product**), a medication he used (in conjunction with a topical cream) to treat haemorrhoids in the days before and on the day of sample collection.

14. The Player submitted, along with his application to lift his provisional suspension, (i) WhatsApp communications between the national team physiotherapist and a specialist sports medicine doctor advising him to take the Product, in conjunction with a cream, for the treatment of haemorrhoids, (ii) a receipt from the pharmacy showing that the Portuguese Tennis Federation purchased the Product on 28 January 2025, (iii) a copy of the warning issued by the ANSM (*l'Agence nationale de sécurité du médicament et des produits de santé* of France), dated 12 August 2024, which informed that traces of TMZ were found as an undeclared substance in a batch of Daflon 500mg, and (iv) a list of supplements and medications taken in days before 1 February 2025 which included the Product.
15. On 3 April 2025, following discussion with the Player, the ITIA wrote to Sport Resolutions requesting an adjournment of the application while the Player had the Product, which he believed to be the source of the TMZ in his sample, analysed on an expedited basis. The ITIA noted that the results of this analysis would determine whether it opposed the lifting of the provisional suspension or not. The Player confirmed his agreement to this approach on 4 April 2025.
16. On 30 April 2025, the Player filed a report from the Laboratory setting out that the Laboratory had detected the presence of TMZ in the Product, roughly estimated at 28.5ng per tablet. The report also contained photographs showing intact blister packets with the batch number 6062294.
17. This report was accompanied by: (i) a declaration from the pharmacy confirming that the Daflon 1000mg purchased on behalf of the Player on 28 January 2025 was from batch number 6062294, and (ii) a declaration from the Player's specialist sports medicine doctor which confirmed that he verbally instructed the Player to take the Product three times a day for six days (from 28 January 2025) and that he was certain the medication would be safe and was unaware of any contamination reports in France.
18. On 2 May 2025, the ITIA submitted that: (i) the Laboratory had reported that there were no signs of tampering with the packages of the Product on arrival at the Laboratory, (ii) it had sought the scientific opinion of Professor Jean-Francois Naud, director of the Laboratory, who determined that the level of contamination detected in the tablets and the dosage taken by the Player was consistent with the urinary concentration detected in his sample, (iii) on the basis of the available information, it accepted that the Product had been contaminated with TMZ and that consumption of those tablets had caused the AAF, (iv) it was independently sourcing its own package of the Product (also with batch number 6062294) to be analysed but that, given the Laboratory's confirmations it was happy for the provisional suspension to be lifted under TADP Article 7.12.3.1(c)(iii).
19. On 8 May 2025, after considering the Player's response to the pre-charge Notice and the evidence submitted with his application to lift the provisional suspension (and subsequently), the ITIA sent the Player a formal Charge Letter asserting that the presence of TMZ in his sample collected on 1 February 2025 constitutes anti-doping rule violations under TADP Articles 2.1 and/or 2.2.
20. 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).

21. On 9 May 2025 the Chair of the Independent Tribunal issued a decision lifting the Player's provisional suspension.
22. On 27 May 2025, the Player filed a short response to the Charge Letter, accepting that TMZ was present in his sample collected on 1 February 2025 and therefore admitting that he had committed the anti-doping rule violations with which he was charged. The Player confirmed that he disputed the applicable consequences and resubmitted his response to the pre-Charge letter.
23. On 3 July 2025, the Laboratory confirmed that the independently sourced Product (sent directly from the manufacturer to the Laboratory), from the same batch as that which the Player was taking at the time of sample collection, i.e., batch number 6062294, had been found to contain TMZ at a concentration of 15.9ng per tablet. The ITIA sought further confirmation from Professor Naud that the level of contamination of the medication and the dosage taken by the Player was consistent with the concentration of TMZ detected in the Player's urine sample. On 7 July 2025, Professor Naud confirmed that it was and that use of the Product could explain the AAF.

III. Consequences

A. Period of Ineligibility

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

24. The Player has asserted that he did not intend to cheat and did not knowingly ingest TMZ. He asserts that a doctor, an expert in sports medicine, recommended that he purchase and use the Product (in conjunction with a cream) to treat a medical condition he was suffering with, and that (unknown to him) the Product was contaminated with TMZ.
25. In support of his explanation, the Player provided (among other things):
 - 25.1 WhatsApp communication between the Player and a specialist sports medicine doctor advising him to take the Product for the treatment of haemorrhoids;
 - 25.2 a receipt from the pharmacy in France showing that the Portuguese Tennis Federation purchased the Product on 28 January 2025 on behalf of the Player;
 - 25.3 a copy of the warning issued by the ANSM;
 - 25.4 a list of all the supplements and medications taken by him on the days prior to sample collection which included the Product; and
 - 25.5 a declaration from the pharmacy in France, dated 1 April 2025, confirming that the box of the Product purchased on behalf of the Player on 28 January 2025 had batch number 6062294.
26. When the Player's urine sample was collected on 1 February 2025, he was asked to declare on the Doping Control Form, *"any prescription/non-prescription medications or supplements, including vitamins and minerals, taken over the past 7 days (include substance, dosage and when*

last taken)". While the ITIA considers the Player's omission of the Product from the Doping Control Form to be unsatisfactory, it accepts it was an oversight on behalf of the Player.

27. The independent analysis conducted by the Laboratory, on a packet of the Product (with batch number 6062294) sent directly from the manufacturer to the Laboratory, confirmed that the Product was contaminated with TMZ.
28. The ITIA consulted Professor Naud who confirmed that the Player's explanation is scientifically plausible, i.e., the dosage and ingestion schedule asserted by the Player is consistent with the Adverse Analytical Finding reported for the sample collected on 1 February 2025.
29. Given all the circumstances of this case, the ITIA accepts the Player has established that it is more likely than not that the TMZ found in his urine sample 1542482 was due to the presence of TMZ (an undisclosed contaminant) in tablets of the Product that he consumed in the days prior to and day of the collection of the sample. No other evidence undermines the evidence provided to demonstrate source.

(ii) TADP Article 10.2 – Analysis of Intent

30. This is the Player's first doping violation.
31. 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.² 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.³
32. As set out above, the ITIA has accepted that undisclosed contamination of the Product was more likely than not the source of the Player's positive test. In such circumstances, the ITIA considers that the Player did not manifestly disregard the significant risk that the medication contained a prohibited substance. Accordingly, 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.

² 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.

³ *ITF v Sharapova*, Independent Tribunal decision dated 6 June 2016, para 68, not challenged on appeal, *Sharapova v ITF*, CAS 2016/A/4643.

(iii) TADP Articles 10.5 and 10.6 – Analysis of No (and No Significant) Fault or Negligence

33. 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 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"*.
34. TADP Article 10.6.1.2 provides that where a player can establish that they bear No Significant Fault or Negligence and that the prohibited substance came from a Contaminated Product, then the otherwise applicable two-year period of Ineligibility may be reduced by up to 100% (in which case there would be a reprimand only). A 'Contaminated Product' is defined in the TADP as a *"product that contains a Prohibited Substance that is not disclosed on the product label or in information available in a reasonable Internet search"*. The definition of 'No Significant Fault or Negligence' is: *"The Player or other Person establishing that their Fault or Negligence, when viewed in the totality of the circumstances and taking into account the criteria for No Fault or Negligence, was not significant in relation to the Anti-Doping Rule Violation"*. Where No Significant Fault or Negligence is found, the amount of reduction to be applied depends upon the player's degree of Fault.
35. A plea of No Fault or Negligence or No Significant Fault or Negligence is assessed by considering how far the player departed from their duty under the TADP to use *"utmost caution"* to ensure that they would not ingest any prohibited substances or otherwise do anything that might constitute or result in the commission of an anti-doping rule violation.⁴ *"The difference between the two [...] is one of degree: to establish No Fault or Negligence, the athlete must show that he took every step available to him to avoid the violation, and could not have done any more; whereas to establish No Significant Fault or Negligence, he must show that, to the extent he failed to take certain steps that were available to him to avoid the violation, the circumstances were exceptional and therefore that failure was not significant"*.⁵ The TADP definition of 'Fault'⁶ makes clear that the first question is how far the player departed from the duty of utmost caution

⁴ See, e.g., *Kutrovsky v ITF*, CAS 2012/A/2804, para 9.49 (*"the athlete's fault is measured against the fundamental duty that he or she owes under the Programme and the WADC to do everything in his or her power to avoid ingesting any prohibited substance"*); *FIFA & WADA*, CAS 2005/C/976 & 986, paras 73-75 (*"The WADC imposes on the athlete a duty of utmost caution to avoid that a prohibited substance enters his or her body. [...] It is this standard of utmost care against which the behaviour of an athlete is measured if an anti-doping violation has been identified"*).

⁵ *IBAF v Luque*, IBAF Anti-Doping Tribunal decision dated 13 December 2010, para 6.10.

⁶ *"Fault is any breach of duty or any lack of care appropriate to a particular situation. Factors to be taken into consideration in assessing a Player's or other Person's degree of Fault include, for example, the Player's or other Person's experience, whether the Player or other Person is a Protected Person, special considerations such as impairment, the degree of risk that should have been perceived by the Player and the level of care and investigation exercised by the Player in relation to what should have been the perceived level of risk. In assessing the Player's or other Person's degree of Fault, the circumstances considered must be specific and relevant to explain the Player's or other Person's departure from the expected standard of behaviour. Thus, for example, the fact that a Player would lose the opportunity to earn large sums of money during a period of Ineligibility, or the fact that the Player only has a short time left in their career, or the timing of the sporting calendar, would not be relevant factors to be considered in reducing the period of Ineligibility under Article 10.6.1 or 10.6.2"*.

(objective fault) and the second question is whether there is any acceptable explanation for that failure (subjective fault).

36. The standard of “*utmost caution*” is very onerous and requires a player to show that they “*made every conceivable effort to avoid taking a prohibited substance*”.⁷ It follows that “*even in cases of inadvertent use of a Prohibited Substance, the principle of the Athlete’s personal responsibility will usually result in a conclusion that there has been some degree of fault or negligence*”.⁸
37. The ITIA considers that the Player bears No Significant Fault or Negligence, and that a period of ineligibility of significantly less than two years should be imposed, because:
- 37.1 he consulted a doctor with expertise in sports medicine and only took the Product because it was recommended and necessary to treat a medical condition;
 - 37.2 the doctor knew that he was a professional tennis player subject to anti-doping rules and confirmed the Product ingredient list did not contain prohibited substances;
 - 37.3 the Product was purchased from a reputable local pharmacy on behalf of the Player by a member of the Portuguese Tennis Federation;
 - 37.4 the Product was manufactured by a reputable local pharmaceutical company regulated in a European Union country;
 - 37.5 he used the Product (alongside a topical cream) responsibly as prescribed to treat a medical condition;
 - 37.6 the Product is considered to be a medication, and the Player regarded it as a medication (and objectively, medications – especially, like here, those made by reputable manufacturers in the European Union – are significantly less likely than supplements or other products to contain Prohibited Substances as undisclosed ingredients or contaminants because they are regulated products); and
 - 37.7 save for reviewing the ANSM warning in French online, there is very little else that he could have done to avoid ingesting a prohibited substance given the unexpected contamination of a pharmaceutical product in France.
38. The ITIA accepts that these factors weigh in the Player’s favour. However:
- 38.1 TADP Article 1.3.1 states that it is the “*personal responsibility*” of each player bound by the TADP to “*be knowledgeable of and comply with this Programme at all times*”, “*take responsibility for what they use*”, “*carry out research regarding any products or substance that they intend to Use to ensure that Using them will not constitute or result in an Anti-*

⁷ Knauss v FIS, CAS 2005/A/847, para 7.3.1; WADA v NSAM et al, CAS 2007/A/1395, para 80 (“*The burden is therefore shifted to the athlete to establish that he/she has done all that is possible to avoid a positive testing result*”).

⁸ Adams v CCES, CAS 2007/A/131, para 155.

Doping Rule Violation”, and “ensure that any medical treatment they receive does not violate this Programme”.

- 38.2 TADP Article 4.2.1.5(a) specifically reminds players that *“[m]any Prohibited Substances may appear (either as listed ingredients or otherwise, e.g., as unlisted contaminants) within supplements and/or medications that may be available with or without a physician's prescription. Since Players are strictly liable for any Prohibited Substances present in Samples collected from them (see Article 2.1.1), they are responsible for ensuring that Prohibited Substances do not enter or come to be present in their bodies by any means and that Prohibited Methods are not Used”.*
- 38.3 In any event, it has long been known that products may contain substances that are not listed as a named ingredient. The comment to Code Article 10.5 is clear that a plea of No Fault or Negligence cannot succeed in the case of *“a positive test resulting from a mislabelled or contaminated vitamin or nutritional supplement (Athletes are responsible for what they ingest (Article 2.1.1) and have been warned against the possibility of supplement contamination)”.*
39. As a result of the foregoing, the Player knew, and is deemed to have been on specific notice that, there is a significant risk that products may contain prohibited substances that are not listed as ingredients. In addition, while there were not many steps available to the Player to avoid the violation, he could have performed a thorough internet search of the medication before taking, which would have highlighted that the manufacturer had had previous issues with contamination with TMZ.
40. However, the Code comment to Article 10.5 that is quoted above goes on to say: *“depending on the unique facts of a particular case, any of the referenced illustrations could result in a reduced sanction under Article 10.6 based on No Significant Fault or Negligence”.* The ITIA accepts that, in the specific circumstances of this case, the Player's Fault was not ‘significant’ within the meaning of TADP Article 10.6.1, justifying a reduction from the two-year starting point. The ITIA also accepts that the Player has shown that the prohibited substance in his sample came from a Contaminated Product, in that TMZ was not disclosed on the label of the Product. Therefore, discretion arises to reduce the two-year ban applicable under TADP Article 10.2.2 by up to 24 months, depending on the Player’s level of objective and subjective Fault.
41. Anti-doping cases involving genuine contamination of regulated medications are extremely rare. Taking the foregoing and the specific facts of this case into account, the ITIA has proposed, and the Player has acceded to, a period of Ineligibility of one month – this is less than the time already served by the Player as part of his Provisional Suspension before it was successfully lifted by the Chair of the Independent Tribunal. The ITIA, therefore, does not consider that there should be any further period of Ineligibility. That period of Ineligibility is comparable to the recent case of ITIA v Swiatek, in which the player also received a one-month sanction following testing positive for TMZ after consuming a contaminated medication.⁹

⁹ ITIA v Swiatek, ITIA issued Decision dated 27 November 2024

42. The Player's period of Ineligibility is also shorter than the period of Ineligibility imposed by the ITIA in another recent case involving TMZ contamination¹⁰ because the source of the Player's violation was a contaminated medication (as opposed to a contaminated supplement) and the Player reasonably perceived a lower degree of risk of contamination due to the higher regulatory standards for medicines in the European Union (as compared to supplements).

B. Disqualification of results

43. Given that the Player's violation arose from an In-Competition sample collection, results from the Event would ordinarily be disqualified in accordance with TADP Articles 9 or 10.1. However, as the Player did not actually compete in a match at the Davis Cup tie (but rather was a non-playing team member), the ITIA is content that the Portuguese Davis Cup team should not lose its results.
44. 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'*.
45. The ITIA has sought advice from Professor Naud in relation to when the TMZ would have likely cleared the Player's system and, as such, when any potential benefit the Player would have received would cease to exist. Accordingly, the Player's results at competitions subsequent to the Event but before he was provisionally suspended will be maintained.

C. Costs

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

D. Publication

47. In accordance with 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

48. 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

49. This decision constitutes the final decision of the ITIA, resolving this matter pursuant to TADP Article 7.14.

¹⁰ ITIA v Bartunkova, ITIA Issued Decision dated 11 November 2024.

50. Further to TADP Article 13.2.1, each of WADA and the Portuguese Anti-Doping Agency (**ADoP**) has a right to appeal against this decision to the CAS in Lausanne, Switzerland, in accordance with the procedure set out at TADP Articles 13.8 and 13.9.
51. 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 TADP Article 13.2.1 or otherwise. However, if an appeal is filed with the CAS against this decision either by WADA or ADoP, the Player will be entitled (if so advised) to exercise his right of cross-appeal in accordance with TADP Article 13.9.4.

Issued Decision of the ITIA

London, 17 September 2025

