

**IWF INDEPENDENT MEMBER FEDERATIONS SANCTIONING  
PANEL**

in the matter

**Pakistani Weightlifting Federation (“PWLF”)**

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**Final Decision**

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## **I. INTRODUCTION**

1. The present Decision is issued by the International Weightlifting Federation (the “IWF”)’s Independent Member Federation Sanctioning Panel (the “IWF Panel” or the “Panel”) in order to decide upon whether the Pakistani Weightlifting Federation (the “PWLF”) has committed a breach of Article 12.3.2 of the 2021 IWF Anti-Doping Rules (the “IWF ADR”) and the provisions of the IWF Qualification System for the Games of the XXXIII Olympiad, Paris 2024 (the “IWF OQS”), and if so, the consequences of such breach.

## **II. PARTIES**

### **A. THE INTERNATIONAL WEIGHTLIFTING FEDERATION**

2. The IWF is the international governing body for the Olympic sport of weightlifting. It has its registered seat in Lausanne, Switzerland.

### **B. THE PAKISTANI WEIGHTLIFTING FEDERATION**

3. The PWLF is the national governing body for the Olympic sport of weightlifting in Pakistan. The PWLF is a Member Federation of the IWF.

## **III. FACTS AND PROCEDURAL BACKGROUND**

4. Below is a summary of the relevant facts and allegations based on the Parties’ written submissions, pleadings and evidence adduced during the proceedings. Additional facts and allegations found in the Parties’ written submissions and evidence may be set out, where relevant, in connection with the legal discussion that follows. While the Panel has considered all the facts, allegations, legal arguments and evidence submitted by the Parties in the present proceedings, it refers in its Decision only to the submissions and evidence it considers necessary to explain its reasoning.

### **A. THE ANTI-DOPING RULE VIOLATIONS OF THE PWLF’S ATHLETES IN 2021**

5. Between 10 November 2021 and 10 December 2021 (i.e., over the course of the qualification period of the 2024 Paris Olympic Games from 23 July 2021 until 25 July 2024), six athletes affiliated to the PWLF committed Anti-Doping Rule Violations (“ADRVs”) under Article 2.1, 2.2, and/or 2.3 of the IWF ADR related to the presence and/or use of a prohibited substance and refusal to submit to sample collection. The athletes were subject to Out-of-Competition and In-Competition testing conducted by the International Testing Agency (“ITA”) under the authority of the IWF.

6. In summary, the ADRVs were as follows:

- **Mr. Talib Talha's** Out-of-Competition sample from 29 November 2021 and In-Competition sample from 10 December 2021 both revealed the presence of 19-norandrosterone, a substance prohibited at all times under class S1.1 Anabolic Androgenic Steroids ("AAS") of WADA's Prohibited List [2021 ed.]. The In-Competition sample was collected during the 2021 IWF World Championships in Tashkent, Uzbekistan. Mr. Talha made an Early Admission to have committed an ADRV under Article 2.1 of the IWF ADR. Consequently, he agreed to an Agreement on Consequences and was sanctioned with a three-year period of ineligibility pursuant to Article 10.2.1 and 10.8.1 of the IWF ADR, starting on 25 January 2022 and remaining in force and effect until 24 January 2025.
- **Mr. Abubakar Ghani's** In-Competition sample from 9 December 2021 revealed the presence of Tamoxifen metabolite 3-hydroxy-4methoxytamoxifen, a substance prohibited at all times under class S 4.2. specified Hormone and Metabolic Modulators. The sample was collected during the 2021 IWF World Championships in Tashkent, Uzbekistan. Mr. Ghani acknowledges to have committed an ADRV under Article 2.1 of the IWF ADR and agreed to an Agreement on Consequences. He was sanctioned with a two-year period of ineligibility pursuant to Article 10.2.2 of the IWF ADR, starting from 1 February 2022 and remaining in force and effect until 31 January 2024.
- **Four athletes, Mr. Muhammad Sharjeel Butt, Mr. Farhan Amjad, Mr. Abdur Rehman, and Mr. Ghulam Mustafa,** refused to provide samples during a doping control test conducted on 10 November 2021 at the Railways Academy training centre in Lahore, Pakistan. Despite being duly notified by the Doping Control Officer ("DCO"), Mr. Muhammad Awais Khan, the refusal was allegedly based on instructions from their coach, Mr. Mohammed Waqas Akbar, the Vice-President of the PWLF, Mr. Amjad Butt, and the Chairman of the Anti-Doping Organisation of Pakistan, Dr. Waqar Ahmad. The athletes rejected the ADRVs asserted against them and requested that the case be referred for adjudication to the CAS ADD. The ADD Award (2023/ADD/91) found that the athletes committed an ADRV pursuant to Article 2.3 of the IWF ADR. Consequently, each of the athletes was sanctioned with a four-year period of ineligibility starting from 10 March 2022.

## **B. THE IWF'S ANTI-DOPING PROCEDURE**

7. On 24 September 2024, the IWF notified the PWLF of the alleged breaches of Article 12.3.2 of the IWF ADR and the IWF OQS and granted PWLF an (extended)

deadline until 15 October 2024 to file written observations with respect to the alleged breaches.<sup>1</sup>

8. On 15 October 2024, the PWLF provided its observations, essentially PWLF requested leniency in any sanctions imposed on the following grounds:
  - i. that the political instability and interference from parallel organizations in Pakistan contributed to the four athletes' actions to refuse to give samples and
  - ii. that the PWLF as the federation should not be held responsible for the other two individual athletes' ADRVs. The PWLF requested leniency in any sanctions imposed.

### **C. THE PROCEEDINGS BEFORE THE IWF PANEL**

9. On 25 October 2024, the IWF referred the matter of the PWLF to the Chairman of the IWF Panel for adjudication (the "Referral"), reiterating that the PWLF had breached Article 12.3.2 of the IWF ADR and the IWF OQS and requested the Panel to confirm the breach and decide upon the applicable consequences.
10. On 29 October 2024, the Chairman of the IWF Panel, invited the PWLF to submit an answer to the IWF's Referral by 22 November 2024 and that he will take the necessary steps to constitute the Panel in the meantime.
11. On 20 November 2024, the Parties were informed of the composition of the IWF Panel as follows:
  - Mr. Antonio Rigozzi (Chairman);
  - Mr. Mario Vigna; and
  - Mr. Stephen Bock.
12. On the same day and with the same communication, the IWF Panel provided the Parties with the Acceptance and Statement of Independence forms duly signed by the members of the Panel and requested the Parties to inform the Panel without delay in the event they had any issue with its composition.
13. On 21 November 2024, the PWLF submitted its comments (the "Response") and requested that the Panel not announce its decision until after the Christmas and New Year holidays.

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<sup>1</sup> The Panel notes that there has been no challenge raised concerning the timeliness or propriety of the IWF's notification or its compliance with the procedural requirements as set out in Article 12.7. of the IWF ADR.

14. On 12 December 2024, the IWF Panel provided the IWF with an opportunity to file a rebuttal submission to the Response within 20 days of notification of this procedural order.
15. On 31 December 2024, the IWF informed the IWF Panel that it did not intend to file any further submissions as the Response did not raise any new matters.
16. On 3 January 2025, the Panel informed the parties that it would issue its final decision based on the record as it stands.
17. On 5 January 2025, Mr. Hafizimran Butt, the president of PWLF, requested a hearing to be held in this matter as this “would provide a fair opportunity to present the full context and facts surrounding this situation” and it would be “crucial to ensure justice for the four weightlifters altogether, who are facing sanctions for alleged refusal to provide samples”.
18. On 8 January 2025, the IWF Panel invited the IWF to provide its position on the PWLF’s request for a hearing.
19. On 10 January 2025, the IWF confirmed its previous position that “[t]his matter is fully capable of being dealt with on the papers, and no hearing is necessary”.
20. On 13 January 2025, the Panel informed the parties that it had carefully considered the materials on file and had determined that there are no exceptional circumstances in the present matter that would require the holding of a hearing according to Article 12.7.2 in fine of the IWF ADR.<sup>2</sup>
21. On 6 February 2025, Mr. Bin Salman, on behalf of the PWLF, informed the Panel of the election of a new leadership, stating that the newly elected officials were committed to leading the federation in a new direction, free from doping-related issues.
22. On the following day, the IWF Panel invited the IWF to provide its comments on whether, and to what extent, the election of a new leadership was relevant to the present proceedings.
23. On 13 February 2025, the IWF submitted its response, maintaining its request for appropriate sanctions as set out in the Referral of 25 October 2024. The IWF stated that

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<sup>2</sup> As a sidenote, the Panel notes that PWLF’s hearing request appears primarily directed at revisiting the merits of the four Article 2.3 violations for sample refusal. However, these ADRVs were definitively addressed in CAS 2023/ADD/61, where the tribunal specifically rejected the justifications now being reasserted. The present proceeding in front of the IWF Panel concerns the IWF’s liability for the established ADRVs, not the underlying violations themselves, which are final and binding.

the factual and legal position remained unchanged despite the election of new leadership and that this development was not relevant to the Panel’s consideration of the matter.<sup>3</sup>

#### **IV. THE RELEVANT PROVISIONS**

##### **A. SUBSTANTIVE RULES**

###### **1. The 2021 IWF ADR**

24. The IWF ADR<sup>4</sup> provide in Article 12.2 some general principles applicable to Member Federations Sanctioning:

Member Federations shall take all measures within the scope of their powers to implement these Anti-Doping Rules and ensure that their affiliated Athletes and other Persons comply with them. As a matter of principle, the Member Federations are liable for the conduct of their affiliated Athletes or other Persons. However, the Independent Panel should take into account the degree of fault or negligence of the Member Federation when determining the Member Consequences to be imposed in each case of a violation of this Article 12.

25. Article 12.3.2 of IWF ADR provides relevantly as follows:

Should four (4) or more violations of these Anti-Doping Rules sanctioned by IWF or Anti-Doping Organizations other than the Member Federation or its National Anti-Doping Organization have been committed by Athletes or other Persons affiliated to the Member Federation within a 12-month period [footnote omitted], the Independent Panel may, after taking into account both the seriousness of the underlying anti-doping rule violations and the gravity of the circumstances surrounding the case:

- a) impose Member Consequences on the Member Federation of a period of up to (4) years [footnote omitted]; and/or
- b) fine the Member Federation up to \$300,000 USD to be paid within 6 months from the receipt of the Independent Panel’s decision. If the Member Federation fails to pay the fine within such deadline, further Member Consequences for an additional period of up to two years, or, if earlier, until the fine is settled in full, may be imposed by the Independent Panel on the Member Federation concerned. For the avoidance of doubt, the fine remains due to IWF after the further Member Consequences have been fully served.

26. Comment to Article 12.3.2 reads as follows:

If the Independent Panel considers that a violation of this Article 12.3.2 is severe (due to the number of violations, the substances involved, the level of fault of the perpetrators, the fact that the violations were committed by Athlete Support Personnel, etc.), then appropriate Member Consequences (including the

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<sup>3</sup> But the Panel deliberately awaited the outcome of the election, recognizing that it could be relevant in determining the appropriate sanctions. Accordingly, the decision was not rendered prior to the election results being known.

<sup>4</sup> Pursuant to Article 24.7 of the IWF ADR 2024 version (“the 2024 version”), reference is in the following made to the IWF ADR approved by the IWF Executive Board on 15.12.2020, in effect from 01.01.2021 (“the 2021 version”), unless the Panel determines the principle of “lex mitior” appropriately applies under the circumstances of the case.

exclusion of the Member Federation's Athletes and Officials from participation in any IWF Events, or the possibility for the Athletes to participate exclusively in a neutral capacity) and/or a fine should be imposed, in order to promote behavioral change within the sanctioned Member Federation's sphere of influence, and to maintain public confidence in the integrity of the sport and that of IWF's Events.

27. Article 12.6 of the IWF ADR provides that:

12.6.1 At the discretion of the Independent Panel, an appropriate portion up to a maximum of fifty percent of the Member Consequences (including any fine) imposed upon the Member Federation may be conditionally lifted provided that the Member Federation undertakes to satisfy certain criteria aimed at assisting IWF in the fight against doping in sport defined at its discretion by the Independent Panel and meets them throughout the period of application of the Member Consequences imposed, or an appropriate period should a fine only have been imposed. For the avoidance of doubt, any lifted period of Member Consequences or ban on team officials shall be applied to the end of the relevant period of Member Consequences or ban on team officials.

12.6.2 The IWF shall appoint an Independent Monitoring Group, composed of no less than 4 members from outside of the organization of the IWF, to monitor and rule on the compliance of a sanctioned Member Federation with the terms stipulated by the Independent Panel, where any decision thereof sets out conditions for suspending, lifting or eliminating a period of Member Consequences or other sanction based on the fulfilment of specific conditions by the sanctioned Member Federation.

12.6.3 The decisions of the Independent Monitoring Group as to the fulfilment of the eventual specific conditions determined by the Independent Panel may be appealed exclusively to CAS within twenty-one days from the date of receipt of the decision by the appealing party.

## 2. The IWF OQS

28. Under the subheading "Consequences due to Anti-Doping Rule Violations" Section C.3 of the IWF OQS version as of 13 October 2023 reads as following:<sup>5</sup>

Without prejudice to the power of the Independent Panel per article 12.1 IWF ADR (the "Independent Panel") to impose any other consequences, such as Member Consequences, under article 12 IWF ADR, the following provisions shall apply:

- a) In the event that during the period from 23 July 2021 until 25 July 2024 a Member Federation (MF) is found to have breached an obligation under the IWF ADR, including, without limitation, under Article 18 (but excluding the violations under Article 12), or failed to comply with any directive or request on anti-doping matters issued by the IWF, the Independent Panel may withdraw some or all of the quota place(s) from that MF/NOC with regard to the Olympic Games Paris 2024 or the next ensuing Olympic Games.

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<sup>5</sup> The IWF OQS version 0.1 of 5 December 2021 contained no rules concerning the consequences of ADRVs. It merely provided a general reference to compliance requirements, stating: "Only those athletes who respect and comply with the Olympic Charter, the World Anti-Doping Code and the Olympic Movement Code on the Prevention of the Manipulation of Competitions, including the conditions of participation established by the IOC, plus the rules of IWF, may participate in the Olympic Games Paris 2024."; The Rules concerning the athlete eligibility also contain a reference to the IWF Anti-Doping policy; but this hyperlink expired and these OQS 2021 was also neither submitted nor was its applicability discussed by the parties.

- b) Should three (3) or more Anti-Doping Rule Violations sanctioned by IWF or Anti-Doping Organisations other than a Member Federation or its National Anti-Doping Organisation have been committed by Athletes and/or other Persons affiliated to such MF/NOC from 23 July 2021 until 25 July 2024, the Independent Panel may withdraw some or all of the quota place(s) from that MF/NOC with regard to the Olympic Games Paris 2024 or the next ensuing Olympic Games.[footnote omitted] In cases where three or more of the underlying violations involve periods of Ineligibility of four years or more, all quota places shall be withdrawn.
- c) When considering the application of point a) and b) above, the Independent Panel may refer to the principles set forth in Article 12.3.2 and 12.4 IWF ADR applicable to the imposition of Member Consequences. Similarly, the procedural rules of Article 12.7 of the IWF ADR apply by analogy to the process pertaining to the provisions above.
- d) Any quota places withdrawn pursuant to point a) and/or b) above shall be reallocated in accordance with the reallocation process as detailed in section F. Reallocation of Unused Places. [...]

## **B. PROCEDURAL RULES**

29. Article 12.7 of the IWF ADR governs the procedure in this case and provides relevantly as follows:

12.7.1 If IWF is satisfied that a breach of Article 12 has occurred, it shall promptly notify the Member Federation.

12.7.2 The notice shall include details of the alleged breach and shall give the Member Federation a reasonable deadline to respond. IWF will then transfer the file to the Independent Panel for adjudication. The Independent Panel will render a decision on the basis of the written file, unless it considers in its entire discretion that exceptional circumstances require the holding of a hearing.

## **V. THE PARTIES' POSITIONS**

30. The IWF Panel has taken into consideration all of the Parties' written submissions with enclosures and has weighed the arguments made by the Parties in light of all the evidence presented. In the following, the Panel summarises the positions of the parties relevant to this decision.

### **A. SUMMARY OF THE IWF'S POSITION**

31. In its Referral, the IWF submitted that it was satisfied that the PWLF had breached Article 12.3.2 of the IWF ADR and that the preconditions for the impositions of Consequences due to ADRVs under the IWF OQS were met.
32. More specifically, the IWF argued that the requirements of Article 12.3.2 of the IWF ADR and the IWF OQS were met insofar as:
- Over the course of the Qualification Period, six athletes affiliated with the PWFL committed ADRVs according to Article 2.1, 2.2 and/or 2.3 of the IWF ADR.

- Two out of six ADRVs were sanctioned by the IWF through ITA on its behalf with Agreements on Consequences. Four athletes were sanctioned following a hearing before the CAS ADD.
  - The conditions of Article 12.3.2 of the IWF ADR have been met:
    - i. *“Three (3) or more violations of these Anti-Doping Rules [...] committed by Athletes or other Persons affiliated to the Member Federation”* – in fact, six ADRVs have been committed by athletes affiliated with the PWLF;
    - ii. *“Sanctioned by IWF or Anti-Doping Organizations other than the Member Federation or its National Anti-Doping Organization”* – all six ADRVs stem from tests conducted under the Testing Authority and Results Management Authority of the IWF and all six athletes were indeed sanctioned by the ITA on behalf of the IWF;
    - iii. *“Within a 12-month period”* – the six ADRVs occurred between 10 November 2021 and 10 December 2021.
33. Similarly, and for the same reasons, the conditions of the IWF OQS were met.
34. The IWF noted specific factors relevant to the Panel’s assessment:
- Only one of the six Athletes sanctioned for breaches of the IWF ADR was deemed to be unintentional.
  - Both ADRVs for the presence of prohibited substances involved substances which are highly potent in bodybuilding and weightlifting, viz. tamoxifen and 19-norandosterone.
  - Four of the Athletes refused to provide samples when requested by a DCO at their training facility.
  - The four Athletes’ refusal was on instructions from their coach (Mr. Mohammed Waqas Akbar), the Vice-President of the PWLF (Mr. Anjad Butt), and the Chairman of the Anti-Doping Organisation of Pakistan (Dr. Waqar Ahmad).
  - The four Athletes who refused to provide samples to the DCO were each sanctioned by the Sole Arbitrator of the CAS Anti-Doping Division with a four (4) year period of Ineligibility following a full hearing.
  - As per the letter from the PWLF explaining the ADRVs relating to the four Athletes who refused to provide samples, the PWLF maintained that the political turmoil amongst competing anti-doping organisations in Pakistan was a reason for the instructed refusal to comply with the DCO’s requests, notwithstanding this explanation being rejected by the CAS.
  - The PWLF acknowledged in their response to the Notification of Breach that the ADRVs in relation to the presence of prohibited substances that the PWLF cannot

keep vigilance over the athletes in their home clubs. To the IWF, this is very concerning, as it is incumbent upon the National Federation to ensure the adherence and education of athletes within their sphere of influence.

35. The IWF pointed out in a footnote to its Referral that beyond the six established ADRVs, anti-doping proceedings have been initiated against several PWLF officials.<sup>6</sup>
36. With respect to the consequences for the PWLF's breach, the IWF highlighted the following potential sanctions as set out in the relevant rules:
  - Imposing Member Consequences for a period of up to four years.
  - A fine of up to \$500,000 and/or
  - Withdrawal of some or all quota places for the Olympic Games, Los Angeles 2028.<sup>7</sup>
37. The IWF emphasized that the level of consequences should take into account the seriousness of the underlying ADRVs and the gravity of the circumstances. The IWF cited Article 12.2 of the IWF ADR, which holds Member Federations liable for the conduct of their affiliated athletes or other persons. However, the IWF Panel should consider the degree of fault or negligence of the Member Federation when determining Member Consequences. The principle of strict liability applies, but mitigating factors, such as attenuated degrees of fault or negligence, should be considered.
38. With specific reference to the IWF OQS sanction, the IWF submitted that the fact that the PWLF did not have any quota places for the Paris 2024 Olympic Games does not hinder the withdrawal of quota places in accordance with the IWF OQS. The non-application of this provision on the grounds that the Referral was submitted after the conclusion of the Paris 2024 Olympic Games would not give effect to the sanctioning regime as set out in the IWF OQS.
39. The IWF did not propose any particular consequences to be applied as a result of the PWLF's alleged breach and stated that it is a matter for the IWF Panel to adjudicate on the sanctions applicable.

## **B. SUMMARY OF THE PWLF'S POSITION**

40. The PWLF has submitted its position through its initial observations to the IWF and the subsequent Response to the Panel, along with additional documentation including a

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<sup>6</sup> According to the ITA press releases cited by the IWF, proceedings have been commenced against Mr. Mohammed Waqas Akbar (Coach) and Mr. Amjad Amin Butt (Vice-President of the PWLF) for ADRVs allegedly committed in November 2021 in connection with the sample collection refusals. Additionally, separate proceedings have been initiated against Mr. Hafiz Imran Butt (President of the PWLF) and his son Mr. Irfan Butt (Coach) for ADRVs allegedly committed between September 2014 and November 2016.

<sup>7</sup> The possibility to impose a sanction with respect to the Paris Games became moot.

response letter from its President addressing a separate anti-doping proceeding commenced against him.<sup>8</sup> While the PWLF does not explicitly contest the existence of six ADRVs within a twelve-month period, it argues that these violations occurred due to circumstances beyond its control and oversight.

41. In its initial observations, repeated in its Response, the PWLF emphasized several contextual factors:

- Pakistan’s political and institutional systems are unstable, with successive governments making sweeping changes and prioritizing loyalty over merit.
- The existence of parallel organizations, including a rival weightlifting federation and an unauthorized national anti-doping organization (NADO), has disrupted the functioning of legitimate institutions.
- The PWLF operates under significant financial constraints, lacking government support and relying on international development grants from IWF and Asian Weightlifting Federation (AWF) to sustain its activities.
- The ADRVs occurred shortly after a change in leadership, as the current administration was elected for the first time in July 2021.<sup>9</sup>

42. With respect to the ADRVs at issue in these proceedings, the PWLF’s presented the following arguments:

**1. Case No. 1 (Mr. Talha Talib)**

- Talib had a clean anti-doping record throughout his 7-8 years career with multiple tests.
- He trained independently in his hometown and participated directly in the Commonwealth Games 2022 qualification event.
- He has accepted responsibility and served his sanction.

**2. Case No. 2 (Abubakar Ghani)**

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<sup>8</sup> On 2 August 2024, the ITA notified two athlete support personnel from the PWLF, coach Irfan Butt and President Hafiz Imran Butt, of apparent ADRVs. President Hafiz Imran Butt has been notified of apparent ADRVs under Article 2.6 (Possession of Prohibited Substances), Article 2.8 (Administration of Prohibited Substances) and Article 2.9 (Complicity) of the IWF ADR, allegedly committed during 2014-2016. In his response letter submitted by the PWLF, President Butt denies these allegations, characterizing them as politically motivated claims by individuals associated with a parallel powerlifting federation following the formation of an ad-hoc committee by the Pakistan Sports Board in 2022. The anti-doping proceedings are currently pending before CAS.

<sup>9</sup> Current administration referring to the time of PWLF’s submission.

- After his victory in the national championships, Mr. Ghani tested negative in October 2021.
- He trained independently at his hometown club until departing for the international event.
- He unknowingly consumed his grandfather's pain medication to treat knee pain.
- He has completed his two-year suspension and is now cleared by ITA.

### **3. Cases No. 3-6 (Refusal to Submit Samples)**

- The four athletes' refusal occurred due to confusion between the recognized Anti-Doping Organization Pakistan (ADOP) and the parallel NADO.
  - The sample collection party (DCO) failed to provide proper identification when requested.
  - Dr. Waqar Ahmed, Chairman of ADOP, after speaking with the collection party leader Mr. Khan, instructed the athletes to avoid the process.
  - The incident occurred at a club, not within a national training camp organized by the federation.
  - The athletes' inability to afford legal representation and properly explain their situation in English hindered their defence before CAS ADD.
43. The PWLF requests that no sanctions be imposed, arguing that the ADRVs were rooted in systemic issues outside its control. If sanctions are deemed necessary, the PWLF proposes that:
- Penalties should be limited to a manageable level, considering the federation's financial constraints and lack of government support.
  - The federation's Chairman has offered to step aside, allowing new elections for the leadership position under NOC Pakistan's supervision.
44. The PWLF has also undertaken to satisfy criteria aimed at assisting IWF in the fight against doping, as per Article 12.6.1, and commits to collaborating with IWF to combat doping.

## **VI. JURISDICTION AND APPLICABLE LAW**

45. At the outset, the Panel notes that the PWLF does not dispute that the IWF Panel has jurisdiction over the present matter.
46. In view of the above, the IWF Panel has jurisdiction to decide on the present dispute.

47. With respect to the applicable rule of law, the IWF has alleged that the IWF OQS and the IWF ADR apply to the case at hand. The PWLF has not disputed this position and has also argued within the framework of these provisions. The Panel holds that the presented proceedings will be adjudicated in application of the IWF OQS and the IWF ADR.

## **VII. MERITS**

48. The questions that the IWF Panel needs to rule on in the present proceedings are the following:

- Has the PWLF breached Article 12.3.2 of the IWF ADR and the provisions of the IWF OQS?
- If so, what sanctions should be imposed on the PWLF?

### **A. HAS THE PWLF BREACHED ARTICLE 12.3.2 OF THE IWF ADR AND THE IWF OQS?**

49. As a reminder, Article 12.3.2 of the IWF ADR in its applicable 2021 version provides that a Member Federation may be sanctioned in the event that four or more ADRVs, which are sanctioned by the IWF, are committed by athletes affiliated to the Member Federation within a 12-month period.<sup>10</sup>

50. The Panel notes in this respect that IWF OQS contained in Section C.3 (“Athlete Eligibility”) under “Consequences due to Anti-Doping Rule Violations” provides in lit. b slightly differently that the three or more ADRVs have to be committed both within a 12-month period and from 23 July 2021 until 25 July 2024 and as a consequence quota place(s) may be withdrawn.

51. On the basis of the evidence on file, the IWF Panel is satisfied (i) that six athletes affiliated to the PWLF committed and were sanctioned by the IWF for ADRVs;<sup>11</sup> and (ii) that such offences were committed between 23 July 2021 and 25 July 2024, and within a 12-month period. Hence, consequences can be applied under both Article 12.3.2 of the IWF ADR and the IWF OQS.

52. The IWF Panel, thus, needs to determine the relevant sanction for this breach.

### **B. WHAT SANCTION SHOULD BE IMPOSED ON THE PWLF?**

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<sup>10</sup> While the IWF cited in its submissions the 2024 version of the IWF ADR (requiring three or more ADRVs), the 2021 version (requiring four or more ADRVs) is applicable to the present case according to Article 24.7.2 of the IWF ADR version 2024. The Panel notes that this distinction does not affect the outcome as six ADRVs were committed.

<sup>11</sup> Six ADRVs fulfill the threshold of the version 2021 and version 2024 of four or three ADRVs.

## 1. Sanction under the IWF ADR

53. According to Article 12.2 of the IWF ADR, the Panel “should take into account the degree of fault or negligence of the Member Federation” when determining consequences.
54. Moreover, Comment to Article 12.2 of the IWF ADR provides that whilst Article 12 is based on the principle of “strict liability” whereby it is not necessary that intent, fault, negligence or other culpable oversight of the Member Federation be demonstrated by the IWF in order to establish a violation, the Member Federation may, as part of the proceedings before the Independent Panel, submit evidence to establish that the Member Federation’s degree of fault or negligence was not significant in relation to the circumstances surrounding the underlying ADRVs. In such case, the Independent Panel should consider and appreciate any such attenuated degree of fault or negligence as a mitigating factor when determining the applicable Member Consequences. For the avoidance of doubt, the Member Federation shall bear the burden of establishing any attenuating circumstance in relation to the Member Federation’s degree of fault or negligence.
55. In deciding on any sanction, the comment to Article 12.3.2 of the IWF ADR further indicates that the Panel should take into account “the number of violations, the substances involved, the level of fault of the perpetrators, the fact that the violations were committed by Athlete Support Personnel, etc.”
56. As noted, the IWF did not make any specific request on the consequences, which is suboptimal even though the ambit of the potential sanctions to be imposed is clearly identifiable from the rules and thus not come as a surprise to the PWLF.
57. The IWF Panel will thus exercise its discretion to decide on the appropriate sanctions imposed and be guided by its precedent rulings, which none of the parties argued, addressed or distinguished.
58. The PWLF did not take issue with the lack of specificity of the IWF’s Referral with respect to sanctions and simply requested that no sanctions be imposed. If sanctions are deemed necessary, the PWLF requests they be limited to a manageable level, acknowledging its financial constraints and lack of government support. The PWLF has also offered that its “Chairman” step aside to allow new elections under Pakistani NOC ‘s supervision.
59. As in previous decisions, the Panel will first consider the seriousness of the underlying ADRVs and the gravity of the circumstances surrounding the case. In the present matter, the Panel notes as follows:
- The number of ADRVs (six) exceeds the threshold set by Article 12.3.2 of the IWF ADR, even though it is at the lower end of the scale set out in the IWF ADR (which

starts from “four or more”). However, this represents a substantial number of violations within an extremely condensed timeframe of approximately one month (November-December 2021).

- Two cases involved Adverse Analytical Findings (AAFs). Mr. Talha tested positive for 19-norandrosterone (a steroid that is a non-specified substance) twice. Even if this resulted in only one ADRV, the Panel considers the fact that he provided two positive samples, one out-of-competition and one in-competition tests as relevant to assess the seriousness of the offence. Mr. Ghani tested positive for tamoxifen (a specified substance) in-competition. The remaining four violations (under Article 2.3 of the IWF ADR) relate to refusals to provide samples during out-of-competition controls and were confirmed by CAS ADD upon appeal.
  - Mr. Ghani’s case involving a specified substance resulted in a reduced two-year sanction due to his explanation of inadvertent use. Mr. Talha received a three-year sanction after making an Early Admission. While admitting an offence was relevant for the imposition of the individual sanction on the athlete, it has no bearing on the federation, whose main responsibility was to make sure that the offence did not happen in the first place. The four athletes who refused to provide samples each received the maximum four-year sanctions following CAS hearings, with CAS explicitly rejecting their justification attempts. Only one of the six athletes sanctioned for breaches of the IWF ADR was deemed to be unintentional.
  - The PWLF has demonstrated significant governance failures. It has admitted an inability to monitor athletes in their home clubs and failed to implement adequate anti-doping education programs.
  - Most concerning is the direct involvement of PWLF officials in the ADRVs committed by the four athletes refusing to provide samples. The Vice-President of the PWLF (Mr. Amjad Butt) personally instructed athletes to refuse sample collection. The athletes’ coach (Mr. Mohammed Waqas Akbar), as athletes support personnel, directed athletes to refuse testing. The Chairman of the Anti-Doping Organisation of Pakistan (Dr. Waqar Ahmad) was involved in the coordinated refusal. Anti-doping proceedings are currently pending against multiple PWLF officials. There are systematic failures in ensuring compliance with anti-doping obligations, and leadership actively participated in ADRVs rather than preventing them.
60. Prior to determining the appropriate sanction for the PWLF’s breaches, the IWF Panel has to address the PWLF’s arguments which constitute an indirect attempt to establish the existence of mitigating circumstances. In particular, the PWLF put forward that:

- The PWLF faces financial constraints and governance issues. The federation operates under immense financial and structural limitations, lacking government support and relying on international development grants to sustain its activities.
  - The PWLF has expressed a willingness to implement stringent measures to prevent future occurrences and has allegedly already taken first steps such as suspending participation in competitions and banning clubs and coaches involved in ADRVs of their athletes.
61. With respect to the first point raised by PWLF, the IWF Panel does not accept the PWLF's reasoning. Indeed, what is relevant is not whether the PWFL is (financially) able to sustain an effective organisation and is able take actions for a clean sport but rather whether PWLF has taken the necessary measures to avoid that its athletes would and can use prohibited substances.
62. In this respect, while the PWLF claims that it is willing to implement stringent measures aimed at assisting IWF in the fight against doping and already has taken first steps in view of non-participation in the IWF/AWF youth, junior or senior competitions during 2023 and 2024, the IWF Panel notes that the PWLF has produced no particular evidence to establish, concretely: (i) the specific measures, if any, that were taken to educate athletes and personal; (ii) the content of the information that was provided; and (iii) the names and identity of coaches and clubs which were banned due to non-compliance with anti-doping rules of their respective athletes.
63. However, based on the above, the IWF Panel is not satisfied that the measures taken by the PWLF to fight against doping are sufficient and in place to constitute a mitigating circumstance that should be taken into account in determining the relevant sanction.
64. Given the above considerations, the IWF Panel must balance the need for sanctions that promote behavioural change and maintain public confidence in the integrity of the sport with the financial and operational realities faced by the PWLF.
65. In light of the PWLF's reported financial constraints of the PWLF, a fine does not appear to be an appropriate sanction. Also, it would detract resources that could and should be used to fix the systemic doping issue within the federation. Hence, the Panel considers that a suspension of the PWLF is an effective sanction in this case.
66. The Panel finds that, in light of the seriousness of the PWLF's breach and the absence of any mitigation circumstances, a proportional sanction to be imposed on the PWLF is a suspension from participating in any activities for a period of one (1) year.

67. The sole remaining question is therefore whether the PWLF should benefit from a conditional suspension of its sanction. The IWF Panel notes that such a possibility is enshrined in Article 12.6 of the 2021 IWF ADR, which provides that:

*At the discretion of the Independent Panel, an appropriate portion up to a maximum of fifty percent of the Member Consequences (including any fine) imposed upon the Member Federation may be conditionally lifted provided that the Member Federation undertakes to satisfy certain criteria aimed at assisting IWF in the fight against doping in sport defined at its discretion by the Independent Panel and meets them throughout the period of application of the Member Consequences imposed, or an appropriate period should a fine only have been imposed. For the avoidance of doubt, any lifted period of Member Consequences or ban on team officials shall be applied to the end of the relevant period of Member Consequences or ban on team officials.*

68. While a conditional suspension is up to the discretion of the IWF Panel, neither party provided a list of criteria that it would consider sufficient as “assisting the IWF in the fight against doping”. This is not ideal from a procedural standpoint, as it is difficult for the IWF Panel to contemplate *in abstracto* what would or could be of assistance, let alone identify meaningful and easily verifiable conditions in context.
69. Be that as it may, after having considered all of the circumstances of the present case, the Panel is of the view that there is nothing tangible on the record suggesting that actual change is effectively ongoing and that only a non-suspended ban would be meaningful.

## **2. Sanction under the IWF OQS**

70. The IWF OQS, in its version as of 13 October 2023, provides for an automatic withdrawal of all quota places in case where three or more of the underlying violations involve periods of ineligibility of four years or more (lit. b last sentence of the IWF OQS). On its face, this sanction could potentially apply to the quota places for the Olympic Games Los Angeles 2028. It reads as following in its lit. b:

*Should three (3) or more Anti-Doping Rule Violations sanctioned by IWF or Anti-Doping Organisations other than a Member Federation or its National Anti-Doping Organisation have been committed by Athletes and/or other Persons affiliated to such MF/NOC from 23 July 2021 until 25 July 2024, the Independent Panel may withdraw some or all of the quota place(s) from that MF/NOC with regard to the Olympic Games Paris 2024 or the next ensuing Olympic Games.[footnote: Quota reduction with respect to the next ensuing Olympic Games may be justified eg. where the third Anti-Doping Rules Violation is only reported after the Olympic Games Paris 2024] In cases where three or more of the underlying violations involve periods of Ineligibility of four years or more, all quota places shall be withdrawn.<sup>12</sup>*

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<sup>12</sup> Emphasis added.

71. The automatic withdrawal provision under the IWF OQS raises two critical issues:<sup>13</sup> (i) whether it applies retroactively to violations committed before its adoption and (ii) whether the reference to the “next ensuing Olympic Games” means that quota places for the Olympic Games Los Angeles 2028 must be withdrawn in this specific case.
72. At the time when the four relevant ADRVs (each resulting in a four-year period of ineligibility) were committed in November 2021, no version of the IWF OQS was in place. The IWF OQS version of 5 December 2021, which was the first version to come into effect, also did not contain any provisions regarding the withdrawal of quota places. The principle of legality (*nulla poena sine lege*) suggests that sanctions cannot be imposed retroactively unless expressly provided for, which is not even argued by the parties.
73. Even assuming the 13 October 2023 version of the IWF OQS applies,<sup>14</sup> its wording clearly refers to the Olympic Games Paris 2024 or the next ensuing Olympic Games. In this case, however, PWLF did not hold any quota places for Paris 2024. The provision’s wording suggests that where an NOC or Member Federation has quota places for the current Olympic cycle (here: Paris 2024), the sanction applies to those quota places first and foremost. The possibility of withdrawing quota places for the “next ensuing Olympic Games” is explicitly addressed in the footnote, which states that such an approach *may* be justified *only in cases where a third Anti-Doping Rule Violation is reported after Paris 2024*—a scenario not applicable here, as all violations were committed and reported before that event.<sup>15</sup>
74. In light of the above, the Panel is not prepared to withdraw quota places for the Olympic Games Los Angeles 2028. The four ADRVs that would theoretically trigger an automatic withdrawal of all quota places were:
- Committed on 10 November 2021, approximately three years before these proceedings were initiated on 25 October 2024; and
  - Reported before the Olympic Games Paris 2024, at the latest with the Arbitral Award of the ADD of 1 March 2024, meaning that any sanction should have primarily impacted the Paris 2024 quota places, not the next Olympic cycle.
75. While the time lapse in enforcing sanctions resulted from proceedings before the ADD, the IWF Panel finds that withdrawing quota places for the Olympic Games Los Angeles

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<sup>13</sup> The IWF has not asserted that the automatic withdrawal of quota places applies in this case. However, since four of the six ADRVs committed by PWLF athletes meet the threshold, the automatic consequences would have applied – had the PWLF held quota places for the Olympic Games Paris 2024.

<sup>14</sup> The question of which version of the IWF OQS and which consequences should be applicable remains open but does not alter the outcome in this case.

<sup>15</sup> The term “reported” in lit. b of the IWF OQS must be understood in light of its purpose, which is to ensure that quota place withdrawal primarily applies to the Olympic cycle in which the relevant ADRVs became known and could have been acted upon. In the present case, there is no doubt that the four ADRVs were reported under any reasonable interpretation of the term well before the Paris 2024 Olympic Games, at the latest with the binding decision of the ADD dated 1 March 2024.

2028—rather than for Paris 2024—would be legally questionable and disproportionate. This is particularly relevant given that:

- The IWF OQS itself does not mandate an automatic withdrawal for the next Olympic Games unless certain conditions are met, which are not present here.
- The PWLF has recently elected a new leadership, signaling a potential shift in its anti-doping governance structure and meaning the individuals now in charge were not responsible for the violations in 2021.
- The sanction must remain proportionate to the purpose of Article 12 of the IWF ADR, ensuring it is appropriate in light of the IWF’s current structure and efforts towards compliance.

76. Accordingly, the IWF Panel declines to withdraw quota place(s) for the Olympic Games Los Angeles 2028 at this stage. The IWF Panel is prepared to reconsider such a measure only if the one-year suspension imposed in this decision should turn out to be ineffective.

\* \* \* \*

## VIII. DECISION

77. In light of the above the Panel rules as follows:

- 1. The Pakistani Weightlifting Federation has committed a breach of Article 12.3.2 of the IWF ADR and of the provisions of the IWF OQS, Paris 2024.**
- 2. The Pakistani Weightlifting Federation is suspended from participating in any activities for a period of one (1) year, starting on the date of the present decision (i.e. 20.06.2025).**
- 3. Each party bears its own costs.**

Date: 20 June 2025

**The IWF Panel:**



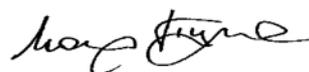
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Antonio Rigozzi  
Chair



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Stephen Bock



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Mario Vigna