## MEDICAL SUPPORT OF SPORTS COMPETITIONS IN RUSSIA: ISSUES OF LEGAL REGULATION

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#### Abstract

There is an imbalance in the normative regulation of the duties of the organizers of sports competitions in Russia. In particular, according to the current legislation, the organizer himself decides whether a medical officer is needed during the competition or whether a medical team is needed. There are several methodological approaches that help to make this decision, but discrepancies in the application of these often mean the absence of a full-fledged team of medical workers at the venue. In neither the current legislation, nor subordinate normative legal acts is there any clearly defined list of duties of organizers of sports competitions. In practice, this complicates the work of organizers and creates uncertainty as to limits of their legal responsibility, including an assessment of their actions in case of harm to life, health or property in the course of carrying out competitions and actions. The requirement for obtaining medical personnel is mandatory for all participants of popular races and marathons. In Russia, more than fifty such events took place in September 2019, and all participants were supposed to provide a medical report upon admission confirming good health. Many participants did not realize this. The organization of medical examinations for such reports is objectively difficult due to the large number of participants (sometimes several tens of thousands). Specialized medical institutions cannot cope with the volume of requests, and nonspecialized ones do not have the necessary specialists and medical equipment. The issue of the organizational control over the state of health of foreigners has not been resolved, the requirements for admission to certain sports in which the state of a potential participant is not threatened by increased physical activity (for example, chess) have not been differentiated. This article presents the results of discussion on the mentioned and some other problems.

Key words: regulations on sports competition, Russian national sports competition, medical support, medical report for admission, liability on sports competition.

#### Introduction

Russian Federal Law 329-FZ, dated 4 Dec. 2007, "On physical culture and sport" (hereinafter – the Law on Sports) (Russian Federal Law "On physical culture and sport", 2007) regulates several types of sports events including sports competitions and training events, as well as physical culture events.

The definition of a sports competition is listed in the norms of subparagraphs 18, 19 of article 2(1) of the Law on Sports.

"Sports competition is a competition (match) among athletes or teams of athletes in different sports (sports disciplines), which has an aim to identify the best participant of the competition (match), held in accordance with the regulations approved by its organizer" (subparagraph 18 of article 2(1) of the Law on Sports). The legislator has established the following definition of a sporting event: "(1) the existence of competition regulations; (2) the sport, in which the competition is held, is determined; (3) the event is held in order to identify the best participant; (4) athletes or teams of athletes compete. The regulations of the competition are approved by the organizer" (subparagraph 7.3 of article 2 (1) of the Law on Sports).

Sports events may have official status, as follows from subparagraph 9 of article 2(1) of the Law on Sports, if they are included in one of the three calendar plans: (1) a single calendar plan for inter-regional, all-Russian and international physical education and sports events; (2) a calendar of physical education and sports events of any of the constituent entities of the Russian Federation; (3) a schedule of physical education and sports events of

municipalities. It should be noted that the calendar plans include sporting events only for sports and sports disciplines included in the all-Russian register of sports.

Official sports competitions are characterized by special regulation of the medical support of participants:

- 1. In accordance with subparagraph 1.9 of article 20 (1) of the Law on Sports, liability for violation of safety rules during official sports competitions is borne by the organizers of such competitions, owners, users of sports facilities in accordance with the legislation of the Russian Federation. So, article 20.32 of the Code on Administrative offenses of the Russian Federation (Code on Administrative offenses of the Russian Federation, 2002) provides for administrative liability for violation of safety rules during official sporting events and for the same actions resulting in harm to human health or property if these actions do not contain a criminal offense.
- 2. Paragraph 10.2 of the General requirements for the content of regulations on inter-regional and all-Russian official physical culture events and sports competitions, providing for the features of individual sports, approved by the Order of the Ministry of Sports of Russia No. 504, dated 1 July 2013 (hereinafter the General requirements) (General requirements for the content of regulations on inter-regional and all-Russian official physical culture events and sports competitions, providing for the features of individual sports, approved by the Order of the Ministry of Sports of Russia, 2013) indicates that regulations should:
- "...contain the general principles of the distribution of rights and obligations between the organizers of sports competitions, including a reference to the need for distribution of such rights and obligations, responsibility for damage caused to participants of the event and (or) third parties between the all-Russian sports federation and other organizers of sports competitions in the agreement between them or in the regulations".
- 3. According to the Decree of the Government of the Russian Federation dated 18 Apr. 2014, No. 353 "On approval of the Rules for ensuring safety during official sports competitions" (hereinafter the Rules) (Decree of the Government of the Russian Federation "On approval of the Rules for ensuring safety during official sports competitions", 2014), "the infrastructure of venues for official competitions includes objects intended to

ensure public order and public safety during the competition, including a medical center" (paragraph 6 (d) of the Rules).

- 4. The owner (user) of the sports facility must have a layout of medical centers (paragraph 11(d) of the Rules).
- 5. When conducting competitions outside sports facilities, an action plan, including a layout of medical centers, is developed and approved by the organizer of the competition in coordination with the territorial internal affairs bodies (paragraph 15 of the Rules).
- 6. In accordance with paragraph 19 (n) of the Rules, the organizer of the official competition is obliged, if necessary, to provide first aid to participants and organize the provision of emergency medical care.

In accordance with paragraph 35 of the Order of medical examination of persons wishing to receive training to be engaged in physical culture and sports organizations and (or) to perform standards tests (tests) all-Russian sports complex GTO, approved by Order of Ministry of health of Russia dated 1 March 2016 No. 134n (hereinafter – the Order of organization) (Order of medical examination of persons wishing to receive training to be engaged in physical culture and sports organizations and (or) to perform standards tests (tests) all-Russian sports complex GTO, approved by Order of Ministry of health of Russia, 2016), the basis for the admission of persons engaged in sports to sporting events is the presence of a medical report on the admission to participation in sports.

The only formal requirement for a medical report on admission to a sports competition is the presence of a signature of a sports medicine doctor and certification by the seal of a medical organization licensed to carry out medical activities providing work (services) in physical therapy and sports medicine.

Paragraph 10.3 (c) of the General requirements provides for the mandatory inclusion in the regulations of inter-regional and all-Russian official sports competitions of the section "Ensuring the safety of participants and spectators, medical support, anti-doping support for sports competitions" of the general requirements for medical support for participants in sports competitions, including medical examinations before and during the competition, the presence of medical reports, which confirm the state of health and participant's ability to participate in the competition.

Let us also pay attention to different approaches to determining the permissible date of a medical report for admission in the Regulations of interregional and all-Russian official sports competitions. For example, for taekwondo – no earlier than 14 days before the start of the competition (Regulations on the inter-regional and all-Russian official tennis competitions for 2016, 2016), for wrestling – no earlier than 7 days (Regulations on the inter-regional and all-Russian official competitions in wrestling (pankration) for 2016, 2016), and for orienteering such a period is not established (Regulations on interregional and all-Russian official orienteering competitions for 2019, 2019). Drawing an analogy, in the regulations on holding sports competitions that do not have an official status, one can assume that there is a limit to the length of time between the date on the medical report and the date of the competition.

# 1. Duties of the subjects participating in the organization of sports competitions concerning medical support of participants

1) The obligation of the organizer: (1) to appoint a medical officer in charge or (2) to appoint the chief doctor on the basis of the regulations on the competition or in accordance with the regulations of the sports federation. The organizer must make this choice, because it bears, in accordance with paragraph 24 (c) of the Order of Organization, the obligation to interact with a medical organization that provides appropriate medical care: ambulance, including specialized ambulance, primary health care and specialized medical care.

The choice between the two options, following the provision of paragraph 27 of the Order of Organization, should be made by the organizer depending on (1) "the level of competition", (2) "the requirements of the regulations on a particular competition", (3) "the requirements of the sports rules".

In accordance with Article 20 (11) of the Law on Sports, if the organizers of a sporting event are several persons, the distribution of rights and obligations between them in relation to such an event is carried out on the basis of an agreement and (or) regulations on such an event. Unless otherwise provided by the indicated documents, the organizers of a sports competition shall be jointly and severally liable for the harm caused to the participants. At the same time, the provision of paragraph 10.2 of the General requirements determines that the regulations of inter-regional and all-Russian sports competitions should provide general principles for the

distribution of rights and obligations between the organizers of sports competitions, while the liability for harm caused to the participants of the event and (or) third parties, the procedure for its determination and distribution between the all-Russian sports federation and other organizers of sports competitions should be presented in an agreement between them or in other regulations (acts or contracts on competitions, for example the contract between the Russian Football Union and the Russian Premier League).

In one of the cases presented in legal interpretation (the decision of the Romanovsky district court of Altai Region, dated 25 May 2016, in case No. 2-5, 2016), a man became ill during a sporting event and died on the way to the hospital. According to the plaintiff, during the competition, the medical staff was absent. This lack was due to negligence.

Considering the dispute, the court referred to article 5(5) of Russian Regional Law of the Altai region 68-ZS, dated 11 Sep. 2008, "On physical culture and sport in Altai region" (Russian Regional Law of the Altai region "On physical culture and sport in Altai region", 2008), according to which the administration of the Romanovskiy District of Altai region was obliged to organize medical support for the sporting event. However, in violation of the obligations laid down by law, emergency medical assistance on a sporting event was not organized.

At the same time, the examination indicated that exacerbation of coronary heart disease, even with prompt medical care, could result in an unfavorable outcome. Therefore, the court concluded that the plaintiff's reference to the defendant's inaction to organize medical support at the competitions and the timely assistance to the deceased was not viable, since it was established that the man's death was not related to these circumstances. That is, in the actions of the defendant, although there was a guilty behavior in not taking measures to organize medical support at the competition, the degree of this guilt was not a direct cause of these consequences.

2) The chief doctor (if he was appointed by the organizer) creates a medical team to service sports competitions in order to organize the provision of medical assistance during sports competitions (section 30 of the Order of organization).

The medical team of sports competitions organizes the work depending on (1) the number of participants in the competition, (2) the type

of sport, (3) the conditions of the competition, as well as (4) the number of predicted requests for medical care (incidence and sports injuries, types of alleged forms of diseases) (paragraph 31 of the Order of organization).

The chief doctor (medical officer in charge) has the right to recommend to the chief referee of the competition or to a sports referee authorized by the chief referee to exclude any athlete from participation in the competition for medical reasons.

3) Sports organizations that declare participants to sports competitions, apply with medical admission of participants (paragraph 35 of the Order of Organization).

### Summary:

- (1) The law enforcement bodies justifiably considers the responsibility of the organizer of a sports competition for medical support to be the presence of a medical professional for first aid, as confirmed by the decisions of the court of the Khanty-Mansiysk Autonomous Area-Ugra (The appeal decision of the Khanty-Mansiysk Autonomous Okrug-Ugra Court, dated 13 Nov. 2012, in case No. 33-4835) (Appeal decision of the Khanty-Mansiysk Autonomous Okrug-Ugra Court, 2012), Krasnoyarsk Regional Court (The appeal decision of the Krasnovarsk Regional Court, dated 14 Dec. 2015, in case No. 33-13820) (Appeal decision of the Krasnovarsk Regional Court, 2015), Romanovskiy District Court of Altai Region (The decision of the Romanovskiy district court of Altai Region, dated 25 May 2016, in case No. 2-5) (Decision of the Romanovskiy district court of Altai Region, 2016). However, failure to fulfill this obligation may not serve as the basis for the legal liability of the organizer when there is no causal relationship.
- (2) The duties of the organizer of a sports competition for medical support end with the appointment of a medical officer in charge or chief doctor. The number and composition of medical workers is determined by the chief doctor (if appointed by the organizer) or the competition is provided only by the medical officer in charge.
- (3) The responsibility for organizing the provision of medical care in a sports competition shall be assigned either to the chief doctor (if any) or to the medical officer in charge. At the same time, for the chief doctor (medical officer in charge) at the normative level there is no obligation to interact with the ambulance team.

#### 2. The location of the medical worker during the sports competition

The Order of Organization indicates that the organization of medical care at a sports competition is the responsibility of the chief doctor (medical officer in charge).

If the official sports competitions are held outside the sports facilities, the organizer of the official sports event is responsible for ensuring the provision of first aid and emergency medical care to the participants of the competitions, as well as for the development of the layout of medical points.

It should be noted that the approval by the public authority of the regulations or regulations on the competition does not mean the inclusion of this body among the organizers of the sporting event. This conclusion was made by the judge in the dispute considered by the Volgograd regional court (The appeal decision of the Volgograd Regional Court, dated 9 Nov. 2012, in case No. 33-11261) (Appeal decision of the Volgograd Regional Court, 2012). During the volleyball competitions held at the sports facility, a participant fell and was injured. No one gave him medical assistance at the sports ground, and he was forced to go to the emergency room on his own. Responsibility in accordance with the norms of article 20 (11) of the Law on Sports is assigned directly to the organizers of the competition.

The chief doctor (medical officer in charge) of a sports competition that does not have an official status is responsible for the plan of placement of medical workers in accordance with the requirements of the rules of the sport or the regulations of the competition.

It should be borne in mind that if emergency medical personnel are present at the venue (arena) of a sports competition, this is a prerequisite for immediate medical care, and therefore increases the chances of preventing adverse consequences for the life and health of participants. For example, in case of need of resuscitation, specialized medical care should be carried out in stationary conditions as in other conditions successful resuscitation is improbable. In the absence of emergency medical personnel, it is difficult to carry out medical evacuation to assist in the hospital.

#### Summary:

(1) In a situation where an official sports competition is held outside the sports venue, the organizer shall be responsible for ensuring that first aid and emergency medical assistance are provided to the competitors, as well as for developing the layout of medical facilities.

(2) The responsibility for the organization and operation of the medical aid points at the competition rests with the doctor.

# 3. Medical report as a condition of admission of participants to sports competitions

The norms of part 3 of article 39 of the Law on Sports **indicate two duties** of the organizers of a sports competition:

- 1) To create conditions for check by the medical worker of adequacy of physical well-being of each participant before the beginning of sports competition;
- 2) To create conditions for the provision of medical care by a medical offic**er** during the event as a form of systematic monitoring of the health of participants.

The presence of a medical report as a condition for the participation of a person in a sports competition norm of article 39 of the Law on Sports is not established.

Nevertheless, as follows from the provisions of paragraphs 34, 35 of the Order of Organization, the basis for admission to participate in a sports competition is the presence of a medical report. At the same time, the current regulatory regulation does not establish the procedure for passing a medical examination to obtain a medical opinion on admission and, as a consequence, does not regulate the procedure for passing such an examination.

An interesting case was considered by the Krasnoarmeyskiy district court of Volgograd (The decision of the Krasnoarmeyskiy District Court of Volgograd, dated 18 Nov. 2014, in case No. 2-3244) (Decision of the Krasnoarmeyskiy District Court of Volgograd, 2014). A man who knew about his diseases and contraindications, participated in a sports competition. He collapsed on the field and died before the arrival of the ambulance, the stadium was attended by staff with knowledge in the field of first aid, but the medical officer was confused and could not provide first aid to the person. There was no ambulance in the stadium.

As the judge noted, the organizer of mass sports competitions did not take the necessary measures to protect the health of their participants, allowing a person with contraindications to sports to participate in these competitions, which led to his death. There was therefore the presence of a

causal relationship between the actions of the organizer and the death of the man.

So, the responsibility for improperly issued admission of athletes to competitions is assigned to the organizer of competition. A similar conclusion is presented in the decision of the Krasnoyarsk regional court (The appeal decision of the Krasnoyarsk Regional Court, dated 14 Dec. 2015, in case No. 33-13820) (Appeal decision of the Krasnoyarsk Regional Court, 2015).

## Summary:

- (1) A medical report is the basis for admission to participate in sports competitions.
- (2) It is the responsibility of the organizer of a sporting event to verify the proper medical report of admission.

#### 3.1. Medical examination of participants before sports competitions

Referring to the rules of paragraph 38 of the Order of Organization, you can pay attention to the possibility of a medical examination immediately before the competition in some sports in accordance with (1) the rules approved by the all-Russian sports federations, (2) the rules of the relevant sports, (3) the regulations on sports competitions. Without this inspection athletes can be not admitted to participation in competition, in cases of existence of a state of health which is defined as interfering with participation norms of the sports competition.

Therefore, the organizer of a competition has the right to fix in regulations the requirement for medical examinations of participants directly before competition together with the list of deviations in a state of health which are the basis for non-admission to the competition.

The organizer responsible for the medical support of the competition provides for a medical examination immediately before the competition as an additional guarantee, along with a medical report, to monitor the health of the participant.

#### Summary:

(1) By default, at the regulatory level, a medical report of admission to participate and a medical examination directly before a sports competition are considered as different conditions for participation in the relevant activities for persons engaged in physical culture and sports.

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(2) If the inspection directly before sports competition concludes with the issuance of the medical reports of admission, which will be the signature of the doctor on sports medicine, certified by the seal of the medical organizations having the license for implementation of medical activities, providing work (services) in physical therapy and sports medicine, the norms of the p. p. 34, 35 of the Order of organization of medical report are met.

# 3.2. Legality of use of the waiver of the participant as the bases of release of the organizer of sports competition from responsibility for the harm caused to life, health of the participant

Waiver as an agreement according to which the participant refuses to exercise his / her right will not release the organizer from civil liability to the injured participant, since, in essence, it does not entail such a legal consequence as a waiver of the right to claim compensation for damage to life and health.

Turning to the practice of sports competitions, one can pay attention to the waiver. Thus, in section 4 of the Regulations on holding a festival of Cycling "VILOLET-2018" (stated in the Position as a sporting event) (Regulations on holding a festival of Cycling "VILOLET-2018", 2018) contains the following requirement: "the day of the competition the participant (or a parent of the participant) is obliged to give a waiver about accepting responsibility for your life and child's life, health and property". The waiver for the championship and Cup of the Nizhny Novgorod region in orienteering (Regulations on championship and Cup of the Nizhny Novgorod region in orienteering, 2019) contains the following statement: "I take full responsibility for my life, health, possible injuries and accidents that may happen to me during the above competitions, I refuse any material claims to the organizers about the state of my health."

Is it lawful for a participant to waive the right of claim against the organizers of a sporting event, expressed in the "waiver"? According to the doctrine of renunciation, it is not permissible to renounce a material right that may only arise in the future. This rule is based on the fact that the waiver entails serious legal consequences for persons possessing such a right, therefore, public authorities must meet strict requirements for such administrative transaction, namely, one needs a clear understanding of the consequences of the waiver of rights and an unambiguous reference to a law,

which the person refuses, that is, at the time of the refusal the person should already possess this information.

As noted in the legal literature (Boyko, 2012), the waiver of a right must be distinguished from the conclusion of an agreement under which one party undertakes to refrain from exercising certain rights in exchange for any counter-provision by the other party. The conclusion of such a contract gives rise to a civil obligation to refrain from exercising a right, and this obligation is usually limited in time. From the norm of article 9 (2) of the Civil code of the Russian Federation (Civil code of the Russian Federation, 1995) does not imply the prohibition to enter into agreements about refraining from the exercise of certain civil rights or from committing certain actions to implement such rights.

Therefore, there is a question of the legality of the conclusion of such agreement according to which the participant refuses realization of the right to compensation by the organizer of the harm caused to life, health owing to participation in an event, and the organizer of sports competition counter grants him the right to take part in competition. Legal practice does not give an answer, because it considers agreements, the subject of which are not a waiver of the right to compensation for harm.

Summary:

"Refusal to exercise the right" on the basis of an agreement between the organizer and the participant of the competition is not a waiver of the right itself, but only a waiver of the opportunities and does not terminate the right for the future, not being a waiver of the right to apply to the court with a claim for compensation for damage to life, health.

## 4. Providing first aid to other participants and informing the organizers about the accident

According to the Law on Sports examined earlier in this article, it follows that if another participant in the competition needs medical assistance, a participant in a sports competition, with the appropriate training or skills, and in their absence, is not obliged to provide first aid.

Norms of article 125 of the Criminal Code of the Russian Federation establishes criminal responsibility for leaving in danger, which refers to deliberate abandonment without help of a person in a life-threatening or health condition and depriving of opportunities to take action for self-preservation because of helplessness, in cases of the guilty having the

knowledge needed to assist this person and was obliged to have about it care or itself has put it in a life-threatening condition (Criminal Code of the Russian Federation, 1996). Since the provisions of the Law on Sports do not impose on the participant of a sports competition the obligation to provide first aid or other type of medical care, the above offense can be established only in a situation when the actions of the participant put another participant in a dangerous state for life or health.

If the participant provided first aid, and it led to adverse consequences, in this case, he bears all the risks associated with causing harm to the life and health of another participant.

While the administrative and criminal legislation of the Russian Federation does not recognize the offence caused harm to legally protected interests in a state of extreme necessity, i.e. to eliminate the danger directly threatening the personality or rights of the persons, if this danger could not be eliminated by other means. Extreme necessity applies if the harm caused by the action is less than the harm prevented by such action.

It should be noted that the current legal regulation does not impose on a participant of a sports competition the obligation to inform the organizers about an accident that occurred with another participant.

Summary:

- (1) A competitor, both in the presence of special training in first aid and in the absence of it, is not obliged to provide first aid, and is not obliged to inform the organizers of an accident that occurred with another participant.
- (2) A participant, both in the presence of special training in first aid, and in the absence, if the existence of extreme necessity is proved, will not be liable for an unintentional mistake that caused adverse consequences for the life and health of another participant, if thereby he prevented greater harm to the latter.

#### Conclusion

Organizers of sports events are obliged to provide for the possibility of medical care by medical organizations. Formally, it is not difficult to observe this rule: if it is not a large-scale and status event, and the competition venue has the opportunity to call an ambulance, then this is enough. However, in the absence of representatives of the medical organization directly during the event, the risks of untimely provision of medical care to participants objectively increase.

In general, the requirement of a medical report is a paternalistic dimension of state law policy. Concerning professional sports, the state has to control the sphere of medical care in aim to protect the life and health of a sportsman, taking a high pressure, and the medical report as a requirement is justified. In the case of amateur sport or physical training events, such a paternalistic condition is not obvious.

Since not all sports events are held at compact sports facilities, it is quite difficult to organize medical care on routes of great length (arena), for example, at orienteering competitions (where there are additional difficulties associated with the fact that the route of the participants is not exactly known, and medical care may be required in the forest in a place inaccessible to conventional vehicles), cross-country, ski and bicycle races and marathons.

To obtain medical report to certain types of sports competitions (for example, boxing), it is necessary to undergo an in-depth medical examination: laboratory tests, examinations of specialists (therapist, cardiologist, neurologist, ENT, oculist, trauma specialist, sports doctor), ECG, ultrasound of the heart. The list may vary depending on the level and type of competition, age and condition of the athlete, it always requires not only time, but also significant financial investments.

Some organizers require a waiver from the participant on the acceptance of personal responsibility, considering it as a basis for exemption from legal liability for harm caused to his life or health. The legal significance of such a document from the point of view of civil legislation and law enforcement practice is uncertain, so this issue requires updating of legal regulation.

#### **Bibliography**

- Boyko, T. S. (2012). Denial of law and abstention from the exercise of law: Russian and Anglo-American approaches. *ZAKON*, 3, 133-145.
- Criminal code of the Russian Federation (1996). Retrieved from http://www.pravo.gov.ru/
- Federal Law 329-FZ, dated 4 Dec. 2007, "On physical culture and sport" (2007). Retrieved from http://www.pravo.gov.ru/
- General requirements for the content of regulations on inter-regional and all-Russian official physical culture events and sports competitions,

- providing for the features of individual sports, approved by the Order of the Ministry of Sports of Russia No. 504, dated 1 July 2013 (2013). Retrieved from http://www.pravo.gov.ru/
- Regional Law of the Altai region 68-ZS, dated 11 Sep. 2008, "On physical culture and sport in Altai region" (2008). Retrieved from http://www.pravo.gov.ru/
- Order of medical examination of persons wishing to receive training to be engaged in physical culture and sports organizations and (or) to perform standards tests (tests) all-Russian sports complex GTO, approved by Order of Ministry of health of Russia dated 1 March 2016 No. 134n (2016). Retrieved from http://www.pravo.gov.ru/
- Regulations on holding a festival of Cycling "VILOLET-2018" (2018). Retrieved from http://velosuzdal.ru/
- Regulations on interregional and all-Russian official orienteering competitions for 2019 (2019). Retrieved from http://www.pravo.gov.ru/
- Regulations on the inter-regional and all-Russian official competitions in wrestling (pankration) for 2016 (2016). Retrieved from http://www.pravo.gov.ru/
- Regulations on the inter-regional and all-Russian official tennis competitions for 2016 (2016). Retrieved from http://www.pravo.gov.ru/
- Rules for ensuring safety during official sports competitions, approved by Decree of the Government of the Russian Federation dated 18 Apr. 2014 No. 353 "On approval of the Rules for ensuring safety during official sports competitions" (2014). Retrieved from http://www.pravo.gov.ru/
- The appeal decision of the Khanty-Mansiysk Autonomous Okrug-Ugra Court, dated 13 Nov. 2012, in case No. 33-4835 (2012). Retrieved from http://www.pravo.gov.ru/
- The appeal decision of the Krasnoyarsk Regional Court, dated 14 Dec. 2015, in case No. 33-13820 (2015). Retrieved from http://www.pravo.gov.ru/
- The appeal decision of the Volgograd Regional Court, dated 9 Nov. 2012, in case No. 33-11261 (2012). Retrieved from http://www.pravo.gov.ru/
- The decision of the Krasnoarmeyskiy District Court of Volgograd, dated 18 Nov. 2014, in case No. 2-3244 (2014). Retrieved from http://www.pravo.gov.ru/
- The decision of the Romanovskiy district court of Altai Region, dated 25 May 2016, in case No. 2-5 (2016). Retrieved from http://www.pravo.gov.ru/

The receipt for the championship, championship and Cup of the Nizhny Novgorod region in orienteering (2016). Retrieved from http://orienteering.nn.ru/