



Annex 18

Drug and Alcohol Management Plans (DAMP)

Introduction

This annex is an integral part of the CASA Surveillance Manual (CSM), which should be always referenced. To allow for more frequent revisions, this annex can be updated independent of the CSM and other annexes. The process of updating this annex requires verification and approval from its owners and sponsors, as well as from Coordination and Safety Systems (CSS). An updated version can only be published once CSS has finalised the format, with the latest revision history data included in the revision table.

Revision history

Revisions to this annex are recorded below in order of the most recent first.

Version Nº.	Date	Parts / sections	Details
5.3	November 2022	1.2	Update to DAMP Training Modules
5.2	December 2021	1.1	Authorisation Type Part 143 added. Removed Part 142
5.1	July 2021	4.0	
5.0	December 2019	Nil change	Health Check mandatory element section not requiring update in this annex
4.0	April 2019	Inclusion of Introduction and Revision history.	These inclusions allow for updates and revisions independent of the CSM and other annexes.
4.0	April 2019	Section 1.1	Authorisation types FAAO and Part 143 removed as Part 99 not applicable.
4.0	April 2019	Section 4	Addition of third-party audits.

1 Overview

This Annex provides instructions for conducting surveillance of an authorisation holder's requirements under Part 99 of CASR Drug and Alcohol Management Plans (DAMP). The requirement to develop and implement a DAMP applies across multiple authorisation types.

The annex contains information relating to the following:

- Systems and Elements
- Surveillance Guide
- Information Sources.

1.1 DAMP organisations

This annex provides direction for the inclusion of system and element questions and prompts related to a Drug and Alcohol Management Plan (DAMP), when preparing for a surveillance event in accordance with CASR Part 99.B.

A DAMP must be implemented when a relevant authorisation holder [as listed under [CASR 99.030\(2\)](#)] employs and/or contracts personnel to perform safety-sensitive aviation activities (SSAAs) [refer to [CASR 99.015\(2\) for full list of SSAAs](#)].

As listed under CASR 99.30(2), the DAMP is not in itself an authorisation type but is a required system across several authorisation types.

Table 1: Relevant authorisation type

Authorisation Type
AMO
AOC
Aerodromes
AP Design
COA Design
DG
Manuf. Org
Part 139H
Part 171
Part 172
Part 141
Part 143

For the level and frequency of surveillance to be conducted, the inspector should refer to the currency guide in the annex relative to the authorisation type for which surveillance is being conducted.

1.2 Further guidance for inspectors

Prior to inclusion of DAMP into a surveillance scope, inspectors should undertake CASA's DAMP training available via the CLASS eLearning module and/or via classroom-based training CASR Part 99 DAMP for CASA Inspectors course. The training demonstrates how an inspector may apply their Part 99 Delegation through the use of DAMP surveillance checklists, [Form 1462 Review of Drug and Alcohol Management Plan \(DAMP\)](#) and [Form 1458 DAMP Verification Checklist](#). These forms are for use at entry control or during surveillance and are available on the CASA Intranet under [Forms](#)

1.3 Micro-business DAMP

For surveillance of a micro-business DAMP, the inspector may use [Form 1464 Micro-business DAMP Verification Checklist](#), which is also found in the CASA Intranet document catalogue. If an inspector is conducting surveillance of this type of DAMP organisation, the Form 1464 is used to verify that the organisation has met its obligations under exemption CASA EX81/20 of ensuring all employees have completed the CASA DAMP eLearning, evidenced by a copy of each employee's CASA eLearning completion certificate. Form 1464 will also be used to verify there are records of any required DAMP testing in accordance with their adopted micro-business DAMP as published by CASA. If the organisation has followed the correct steps initially when submitting its micro-business DAMP to CASA, the organisation will be able to evidence a [Form 1479 Letter of Acknowledgement](#). This letter would have been issued by a CASA Regulatory Service Officer at the time of initial or subsequent application.

1.4 DAMP surveillance questions

DAMP specific surveillance questions and prompts are accessible in Sky Sentinel under the system DAMP and its four elements.

DAMP questions or prompts in Sky Sentinel may be used, or the inspector may choose to instead utilise the surveillance Forms referenced above (i.e. Form 1462 and Form 1458), as well as the resources and guidance on the CASA [DAMP webpage](#). This webpage contains guidance on several topics which an inspector may also use for reference, including DAMP requirements for industry and CASA standard exemptions for Part 99.

1.5 Post surveillances follow up or verification

Some DAMP-related evidence may be observed by inspectors during onsite surveillance which may fall beyond the scope of the surveillance event, or beyond the scope of delegations held by the inspector or authorisation management team members. If this occurs the team member should consider liaising with the CASA DAMP team to obtain further guidance, or the CASA Investigations Team (working under CASR Part 99.C) for their input.

The CASA Investigations Team has approved testers to conduct testing under CASR 99.C Drug and Alcohol Testing by CASA. This is separate to the oversight function of inspectors under CASR 99.B Drug and alcohol management plans.

2 Systems and Elements: DAMP

The audit technique involves assessing the documented system and comparing it against the actual system processes. The system is assessed for compliance and sampling conducted as appropriate. The assessment of the system and its risks is achieved by a questioning technique using the four attributes (12 components) of Management System Model (MSM), see CSM Sections 3. System attributes – Management System Model and Systems attributes (table).

The CASA description of a DAMP consists of one system incorporating four elements.

Table 2: System and Elements

Systems	Elements
DAMP	Implementation of DAMP
	Drug and alcohol education program
	Drug and alcohol testing program
	Drug and alcohol response program

Table 3: DAMP Elements

SYSTEM: Drug and Alcohol Management Plans (DAMP)	
Reference: Form 1462 and Form 1458	
ELEMENT: Implementation of DAMP	
This element contains the systems and processes that ensure effective governance to support the DAMP that is in place, including processes for the implementation, review and update of the authorisation holder's DAMP and its policy. Implemented with controlled document processes and containing clear organisational policy regarding alcohol and other drugs, as well as information about the organisation's drug and alcohol education program, testing program, and response program.	
Prompts:	
Drug and alcohol policy	Key personnel (DAMP contact officer; DAMP supervisors)
Document control	Continuous improvement
Assurance	
ELEMENT: Drug and alcohol education program	
This element contains the systems and processes to ensure that personnel have adequate knowledge of the organisation's drug and alcohol policy, testing program, response program, and any support services, by implementation of the drug and alcohol education program.	
Prompts:	
DAMP policy	Risks associated with alcohol and drug use
Alcohol and drug testing program	Support and assistance services
Safety promotion and communication	Method of training delivery
Recurrency	Training records management
ELEMENT: Drug and alcohol testing program	
This element contains the systems and processes for ensuring that personnel are appropriately tested under the alcohol and drug testing program, and there is a robust system for records management.	
Prompts:	
Testing Standards	Circumstances for testing
Ceasing SSAA	Records management
ELEMENT: Drug and alcohol response program	
This element contains the systems and processes for ensuring there is adequate process that follows the drug and alcohol drug testing program, including an adequate process for determining when personnel may be deemed as fit for duty and returned to SSAA (if applicable).	
Prompts:	
Medical Review Officer (MRO)	Ceasing SSAA
Intervention program	Return to SSAA

3 Surveillance Currency Guide: DAMP

DAMP is not an authorisation type. It is one system that is required across a range of different authorisation types (refer to Table below).

If a Level 1 or Level 2 surveillance is to be conducted, the DAMP system and elements should be considered as one of the systems and elements designated for each authorisation type. I.e., The inspector should consider the DAMP system together with the systems and elements designated in the annex of the authorisation type for which surveillance is being conducted.

Table 4: Systems and Elements

Surveillance Level	Type	Elements
Level 1	Systems Audit	Systems, Risks and Compliance
	Post-authorisation review	Observation of evidence that DAMP has been effectively implemented
Level 2	Operational Check (or Desktop Review; or Other)	e.g. desktop review of DAMP; Observation of evidence of DAMP education program; Observation of alcohol and drug testing compliance and records management.

Note: Health Checks have not been included in the above table as they have not yet been determined by Safety Systems Branch.

4 Information Sources

The following is a non-exhaustive list of information sources that can be accessed to support the assessment of an authorisation holder:

- regulatory history, findings (Safety Findings and Safety Observations)
- third-party audits
- past Surveillance Reports and findings (Safety Findings and Safety Observations)
- EAP information
- authorisation holder's DAMP
- information gathered by the authorisation holder
- external information gathered from industry or other government agencies
- CASA Technical Operations Team (DAMP SMEs; DAMP inbox)
- CASA Investigations team (matters related to alcohol and drug testing conducted by CASA)
- Enforcement action
- post-accident / serious incident history
- risk management plans provided by the authorisation holder.

A large portion of this information is available to the surveillance team and authorisation management team via the Data Warehouse using PowerBI.

Note: For advice on where and how to access required information, refer to CSM Chapter 5 – Information Capture and Access.