



Australian Government
Civil Aviation Safety Authority

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CASA Surveillance Manual (EAP)

Annex 1 – Surveillance Standards and Protocols

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Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and the places to which we travel for work. We also acknowledge the Traditional Custodians' continuing connection to land, water and community. We pay our respects to Elders, past and present.

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This document contains guidance material intended to assist CASA officers, delegates and the aviation industry in understanding the operation of the aviation legislation. However, you should not rely on this document as a legal reference. Refer to the civil aviation legislation including the *Civil Aviation Act 1988* (Cth), its related regulations and any other legislative instruments—to ascertain the requirements of, and the obligations imposed by or under, the law.

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1 Overview

This annex defines the standards to be met and protocols to be followed by CASA officers, in relation to the conduct of surveillance, including:

- maintenance of competency and currency
- protocols for conducting surveillance activities
- note taking
- interviewing
- gathering evidence
- sampling
- desktop surveillance record review
- records management
- information capture protocols for findings
- surveillance summary
- occurrence management (including Australian Transport Safety Bureau (ATSB)/ Corporate Integrated Reporting and Risk Information System (CIRRIS), unsafe behaviour and low flying reports)
- safety assurance review (SAR).

2 Forms, reference documents and links

2.1 Forms

Table 1. List of Forms

Doc no.	Title
Form 1059	Property Receipt and Disposal Form (Not available on Document Catalogue)
CASA-04-7286	Surveillance roles and responsibilities – Managers
CASA-04-0603	Surveillance activity record of conversation
CASA-04-6546	Notice to surrender documents pursuant to CAR 301
CASA-04-6545	Notice to provide specified documents or information pursuant to CASR 11.075
CASA-04-1106	Statement of compliance
CASA-04-0679	Pilot Questionnaire and Response
CASA-04-4312	Safety Occurrence Information Request
CASA-04-5380	Occurrence Brief
CASA-05-5615	Terms of Reference (TOR) - Safety Assurance Review (SAR)
CASA-03-5168	Surveillance - RMS titling conventions

2.2 Reference documents and links

Table 2. List of reference documents and links

Doc no.	Title
CASA-03-7091	CASA Surveillance Manual (CSM)
CASA-03-6968	CSM Annex 23 – Multi-year surveillance planning
CASA-03-0190	Enforcement Manual
casa.gov.au	CASA website
casa.gov.au	Aircraft Register
casa.gov.au	Aviation safety – Report low flying aircraft, aviation accident or incident
CAA 1988	Civil Aviation Act 1988
CAR 1988	<i>Civil Aviation Regulations 1988</i> - Federal Register of Legislation
CASR 1998	<i>Civil Aviation Safety Regulations 1998</i> - Federal Register of Legislation
Crimes Act	Crimes Act 1914 - Federal Register of Legislation
CASA-04-7099	Surveillance Work Instructions
ATSB MOU	Working Arrangements between the CASA and the ATSB
PBI - DMNS	Delegate Management Reports
PBI – AH Profile	Authorisation Holder Profiles
PBI - ATSB Occurrences	Aviation and CIRRIS Occurrences and ASIR within radius of aerodrome
CLASS	CASA Learning Academy for Safe Skies
CASA-03-0153	Training and Quality Manual- People and Capability Branch
RMS link	On the Job Training Program Guide
ICAO Annex 13	ICAO Annex 13 – Aircraft Accident and Incident investigation
CASA and CAA NZ MOU	Mutual recognition of aviation-related certification between Australia and New Zealand
CASA and JCAB MOU	Arrangement on Aviation Maintenance with JCAB

3 Maintenance of competency and currency

Prior to undertaking surveillance-related tasks and using Enterprise Aviation Processing (EAP) —the approved IT surveillance management system—all CASA officers must complete training to ensure they have the required understanding and knowledge of the surveillance framework, their roles and responsibilities with regards to surveillance, and the supporting tools. CASA officers must also be familiar with the internal Surveillance Work Instructions (SWI) for reference.

Responsibility for developing and delivering this training is shared between the People and Capability Branch (PCB) and the following business areas:

- Regulatory Oversight Division (ROD)
- Information Technology Branch (ITB)
- applicable areas in the National Operations and Standards (NOS) Division
- Stakeholder Engagement Division (SED)
- Air Navigation Transformation and Risk (ANTR) Division.

Completion of all learning initiatives are captured within the internal CASA Learning Academy for Safe Skies ([CLASS](#)) managed by PCB. Further information is detailed within the internal [Training and Quality Manual - People and Capability Branch](#)

All CASA officers must achieve an acceptable level of competency to conduct surveillance before they are assigned surveillance tasks. To meet this requirement, CASA officers must have completed the following pre-requisite training:

- an external quality and safety lead auditor course (resulting in a lead auditor skill set)
- the Surveillance Framework course
- the Surveillance Enforcement course.

Following completion of formal training, CASA officers must complete a period of on-the-job training (OJT), conducted in accordance with (IAW) the internal [On the Job Training Program Guide](#) and be assessed as competent in [CLASS](#) against the following OJT:

- CASA001A Undertake regulatory and technical surveillance and audits.

In addition to training, an acceptable level of currency must be maintained through:

- attaining a satisfactory or higher level of assessment made during the performance review and evaluation through the Performance Appraisal and Communication Scheme (PACS) in regard to surveillance
- a requirement to participate in a minimum of 2 surveillance activities annually.

Note: Occasionally it may be pragmatic to use members of the inspectorate who do not conduct regular surveillance and who have not completed the required training. This can be done with the permission of the National Manager Surveillance (NMS). However, inspectors engaged under these circumstances must not be the surveillance lead.

All CASA officers associated with the management and conduct of surveillance are required to participate in regular surveillance activities, commensurate with their role, to maintain their competency. If an individual fails to maintain this level of competency, they are to inform their immediate manager so that action can be taken to ensure they regain competency to perform surveillance tasks.

All CASA officers associated with the management and conduct of surveillance are required to ensure that they do not participate in a surveillance activity on an authorisation holder (AH) if they have conducted a significant entry control task on the AH within the last 12 months.

To regain currency, and within each 12-month period, CASA officers are required to actively participate in and contribute under supervision to:

- two surveillance activities annually
and
- the next available recurrency training course.

If at any time a CASA officer considers they do not have the confidence to undertake their surveillance tasking, they should raise their concerns with their immediate manager to discuss options to assist them in reaching an appropriate level of competence.

Each CASA officer is responsible for monitoring and managing their own currency and competency requirements. Managers are responsible for overseeing relevant records of these requirements, as well as the results of training, qualifications, and any recurrent training needs. Relevant training records are to be recorded in [CLASS](#).

This requirement will be monitored, reported and included as part of the quality assurance program within PCB.

3.1 Surveillance roles and responsibilities – Surveillance Manager/Team Leader checklist

CASA officers performing the roles of NMS, Branch Manager (BM), Surveillance Manager/Team Leader (SM/TL) or Surveillance Lead (SL), through appointment or higher duties, are responsible for ensuring they are fully aware of the roles and responsibilities associated with the role they are performing and that they are confident to do so.

The NMS for ROD surveillance staff and the applicable non-ROD Branch Managers are responsible for monitoring and managing the recency and confidence requirements of CASA officers being appointed to a SM/TL role or performing higher duty roles. They are also responsible for keeping appropriate training records to demonstrate that they hold the required skills to do so.

A checklist of items to be addressed in any appointment or move to higher duties is to be recorded on [Surveillance roles and responsibilities \(Managers\)](#).

4 Protocols for conducting surveillance activities

4.1 Purpose

This section outlines the protocols applicable to the conduct of surveillance activities by CASA officers. It also provides guidance on key topics such as note taking and interviewing.

4.2 Introduction

Authorised CASA officers conduct surveillance activities to ensure AHs are complying with the aviation legislation.

CASA officers are authorised to conduct inspections under various regulatory provisions of the *Civil Aviation Regulations 1988* (CAR 1988) and the *Civil Aviation Safety Regulations 1998* (CASR 1998) (refer to the general procedures in the [CSM](#), this Annex, as well as the [Enforcement Manual](#)).

CASA officers should always determine whether they are authorised for these purposes. If there is any uncertainty in relation to the power to conduct an inspection of any organisation, CASA managers should contact Legal Division for advice.

Authorised CASA officers conducting routine inspections under the CAR 1988 do not need to seek consent to enter an airfield or facility. However, as a matter of policy and courtesy, CASA officers should contact the occupier or owner prior to entering the facility.

If CASA officers do not produce their identity card when asked to do so, they are not authorised to conduct an inspection, and any access may be denied by the occupier or owner.

As to whether consent is required for a CASA officer to take photographs or capture video footage during the conduct of an inspection, the matter depends on where the photographs or video are being taken.

If an aircraft is parked on premises which the CASA officer is lawfully entitled to access without requiring permission from the aircraft owner, (e.g. an accessible area at an aerodrome), then the CASA officer may photograph the aircraft without the need for the consent, provided the CASA officer does not otherwise interfere with the aircraft.

Where a CASA officer wishes to take a photograph of an aircraft or something else that is located inside a hangar or within other private premises, they are not required to expressly ask for permission to commence taking photographs. However, if the occupier of the premises asks them to stop, they should cease at that point.

4.3 Access

4.3.1 Access under CAR 305 – general principles

CAR 305 provides a general right of access to CASA officers who have been appointed as authorised persons under CAR 6 to enable them to carry out their authorised person functions. However, inspectors should be aware that this power is subject to a number of limitations.

Firstly, the power is subject to any aviation security requirements. Accordingly, if CASA officers need to have access to aerodromes or aircraft or premises on aerodromes, they need to ensure that they comply with any aviation security requirements that may be in place (e.g. Are security passes required?). These are matters that are dealt with by the Department of Infrastructure and Transport, Regional Development, Communications, Sports and the Arts and aerodrome operators.

Secondly, the access power under CAR 305 is only available to authorised persons appointed under CAR 6 and only for the purposes of CAR 305. Accordingly, CASA officers need to ensure that they have been appointed as authorised persons under CAR 6 and that the appointment is still current.

Note: Where doubt exists or further advice is required, please consult with [Legal](#)

4.3.2 Identification – produce an identity card

Subregulations 305(2) and (3) of CAR require that an authorised person produce their identity card (which is issued under regulation 6A) for inspection while acting as an authorised person when asked to do so by the occupier or person in charge of the place or thing to which access is sought.

If the authorised person (the CASA officer) fails to produce their identify card when asked to do so, the CASA officer is not authorised to have access. Additionally, even if access has been given to the CASA officer and they fail to produce their identity card, then that access is terminated by operation of the law and the CASA officer must exit the premises. As a matter of practice, an inspector should produce their ID card at all times when seeking right of access under the legislation.

4.3.3 Limitation on access time

The times when access powers under CAR 305 are available are not unlimited. However, the Regulations provide different access times depending upon the purpose for which the access is sought.

- Firstly, CAR 305 authorises access to any place to which access is necessary for the purpose of carrying out any powers or functions vested in the authorised person under the Regulations. The reference to “any place” would include an office, a hangar, an aircraft or some part of an aircraft to which access is necessary in order to enable the inspector to exercise any power conferred on him or her under the Regulations. In these cases, access is available “at all reasonable times.” What is reasonable will depend upon the circumstances of each particular case. Access during normal working hours would generally be regarded as reasonable, whereas access late at night would probably not be reasonable, absent some special circumstances.
- Secondly, CAR 305 sets out different access times depending upon the place or thing to which access is required. These specific times override the general requirement above. The specific times are as follows:
 - An authorised person has access “at all times” to an aerodrome for the purpose of inspecting the aerodrome.
 - An authorised person has access at all times “during working hours” to premises where an aircraft is being constructed, assembled or maintained by the holder of a certificate of approval or an AME licence covering the construction, assembly or maintenance. In these circumstances the authorised person also has access to the drawings of the aircraft or any aircraft component that is, or is to be, installed in the aircraft and all documents associated with the construction, assembly or maintenance of the aircraft.
 - An authorised person has access “at all reasonable times” to any aircraft for the purpose of inspecting the aircraft.

4.3.4 Inspection of aircraft

If a CASA officer needs to inspect an aircraft in the field, the CASA officer should, where possible, carry out the inspection without requiring the opening of panels, dismantling or jacking. If a further internal inspection is required, then the CASA officer should obtain the consent of the owner, maintenance engineer in charge, or pilot-in-command of the aircraft. The person providing the consent should remove and replace any access panels. The CASA officer must not remove and replace panels.

4.3.5 Denial of access

Under [subregulation 305\(1A\) of CAR](#) it is an offence for a person to prevent, or hinder, access by an authorised person to any place to which the authorised person needs access to enable him or her to carry out any of his or her powers or functions under the Regulations.

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The following guidelines should assist inspectors in attempting to conduct their duties:

- Insisting on access under [CAR 305](#) requires tact, circumspection and perhaps some diplomacy, since an authorised person most certainly may not obtain access under [CAR 305](#) by force or threat of force.
- If a person continues to deny access, the inspector should withdraw.
- Inspectors should make detailed and accurate notes of the circumstances in which the access was denied or hindered (refer to Section 5 on note taking). If access is still required, the matter should then be referred in the first instance to the inspector's SM. If the matter still cannot be resolved, the matter should be referred to [Legal](#) to determine the most appropriate way to proceed.

5 Note taking

5.1.1 Purpose

This section outlines the importance of note taking, the reasons for undertaking it, and the procedures that should be followed. It should be read in conjunction with the [Gathering evidence and Handling exhibits](#) sections.

5.1.2 Introduction

When an event occurs, CASA officers must make a written note of the event. Previous events have shown the value of such records in subsequent proceedings or deliberations. When called to account for their actions, possibly a year or more after the event, the value of such notes becomes self-evident.

The purpose of making notes, either in an official notebook or as a file note, is to enable CASA officers to refresh their memory at some later date or justify their actions when called upon to relate a set of circumstances. Record management procedures require all CASA officers to document activities by making full and accurate records. CASA officers are required to make records of conversations or discussions using [Surveillance activity record of conversation](#) where these are part of an information-gathering process.

5.1.3 Terminology

5.1.3.1 Notes

Notes are used to make a contemporaneous record of a conversation, meeting, discussion or an event. In the case of a conversation, the [Surveillance activity record of conversation](#) is used to record a conversation between a CASA officer and at least one other person. That is, they are a CASA officer's notes made during the course of the discussion. Notes may be cryptic or 'keyword' in format but should be legible should they be required as evidence. CASA officers will be required to decipher their notes months after having recorded them. If the notes are to be accepted as a valid record of what occurred, they should have been made as soon as possible after the event, while still being clearly recalled by the CASA officer.

5.1.3.2 File notes

A file note is a record of some action undertaken by a CASA officer. For example, it may be a note of a meeting, a note of a conversation, or a note of a physical activity such as inspecting a document. A file note is usually more narrative in nature than 'notes' and may be made up from contemporaneous notes. While file notes are usually made after the event, their validity depends on their being made while events are still clearly recalled.

5.1.4 Procedures for note taking

5.1.4.1 When to make notes or file notes

It is not possible to provide an exhaustive list of circumstances in which CASA officers should make notes or file notes. However, officers should always consider the overall context and circumstances at the time.

The best approach is to ask:

"Is further action possible in connection with what I am doing?"

If the answer is "Yes", a CASA officer should make a record of what they have done.

Some examples of situations in which notes or file notes should be made include:

- where there is a possibility that there may be an objection to a finding in a surveillance activity.
- where a prosecution or the issue of an infringement notice may be a possibility.
- where a licence variation, suspension or cancellation may be considered.
- as a record of counselling (which must be followed up with a letter—see chapter in the [Enforcement Manual](#)).
- where the matter may need to be recalled in the future—for example, to compile an individual's history of compliance or non-compliance.
- when the matter relates to a complaint to CASA about an activity.
- where it is possible that a surveillance activity could result in a complaint to—for example, the Minister or Ombudsman, Industry Complaints Commissioner or other senior CASA officers.
- whenever confrontation, controversy or ill feeling is involved.
- if a CASA officer considers it important to keep a record of their actions.

5.1.4.2 General guidelines for note taking

When

CASA officers should make notebook or file notes at the time an event occurs or as soon as practicable after the event.

Legible notes

All notes, however brief or hastily made, should be legible.

Signatures, date and time

CASA officers should sign and record the date and the time of day at which the notes were made. Noting the time is important in establishing precisely when the notes were made relative to the matters that they cover.

Record conversations verbatim

CASA officers should record conversations or statements as close to verbatim as possible and in the first person. For example:

He said, "Yes I admit, I did it."

Avoid using the third person when recording notes. The above example should **not** be recorded as follows:

"He told me that I had made a correct assumption and that he had committed the said misdemeanour."

CASA officers should be careful not to imply that something is a direct quote by a person. For example, by putting it in inverted commas, unless the person actually spoke the words.

Accuracy

CASA officers should ensure that their notes or file notes are accurate and that they are confident of their accuracy. This is particularly important given that it is possible that they may have to rely on their accuracy well into the future when their independent recollection of the matter may be extremely cloudy.

If two CASA officers conduct an interview, or are present when something occurs, there is generally no objection to one CASA officer making the notes or file notes and for the other to read them and agree to their accuracy. However, both CASA officers should sign the note or file note. Equally, there is generally no objection to the two CASA officers conferring to ensure that the record is accurate.

Retain the original notes

If a CASA officer makes contemporaneous notes and subsequently prepares a more detailed typed account, they must retain the original handwritten notes. If the matter becomes the subject of evidence in a court, tribunal or inquest, it is the original notes that will validate the subsequent account.

Notebooks and diaries

CASA officers should observe the following guidelines when using notebooks and diaries:

- all entries must be legible
- entries must continue immediately below the preceding entry
- entries must not be erased
- any corrections must be crossed out with a single line and rewritten so that the original error can still be read
- correction fluid must not be used and
- pages must not be defaced.

Assumptions and opinions

Assumptions and opinions are often important and should not be omitted. However, CASA officers should not include assumptions or opinions unless they also include their reasons for them and they must be justified. It is unlikely that a CASA officer will be able to recall why they thought of something unless it is recorded.

6 Interviewing

6.1.1 Scope of interviews

Interviews undertaken during surveillance are intended to support information gathering and understanding of events and systems and are not investigative interviews unless conducted under separate legislative authority.

6.1.2 Authority to interview

As a general principle, a person is not required to speak with a CASA officer or to answer questions during a surveillance activity. CASA officers must respect a person's decision not to participate in an interview. Limited exceptions exist under the *Civil Aviation Act 1988* (the Act) and apply only to investigators exercising statutory powers; however, these exceptions are outside the scope of routine surveillance.

6.1.3 Approach to interviewing

CASA officers must conduct interviews impartially, professionally, and without preconceived views about the facts or outcomes. Interviews are to be conducted in a manner that is fair, respectful, and consistent with procedural fairness.

CASA officers must not use language, tone, or behaviour that could reasonably be perceived as coercive, intimidating, or accusatory. The interview process is intended to clarify information and understand circumstances, not to make determinations or apportion responsibility.

6.1.4 Conduct during interviews

CASA officers are responsible for ensuring interviews remain within the appropriate scope of surveillance activity. Where a person chooses not to participate in an interview, that decision must be respected and appropriately recorded.

CASA officers must be mindful of the limits of their role and authority. Where a matter appears likely to require formal investigation or the exercise of investigative powers, CASA officers must not extend enquiries beyond what is necessary to identify the issue and should refer the matter in accordance with CASA processes.

6.1.5 Referrals and escalation

Where information obtained during an interview indicates that further consideration, specialist advice, or formal investigation may be required, CASA officers must refer the matter through appropriate channels, including [Legal](#), IAW CASA policy.

CASA officers must seek guidance where they are uncertain about the appropriateness of continuing an interview or the correct next steps.

6.1.6 Recordkeeping

CASA officers must ensure that interviews and related interactions are appropriately documented in accordance with CASA records management requirements.

6.1.7 Further information

If CASA officers are in doubt about any particular procedure they need to follow, or need additional information, they should contact an investigator, through Legal, [Manager Investigations](#).

7 Gathering evidence

7.1 Purpose

This section outlines, in general terms, the different types of evidence, and the rules relating to evidence, and provides guidance for inspectors who are required to gather and handle evidence and preserve the integrity of exhibits (i.e. evidence that may be required in legal proceedings).

Note: The matter of evidence is extremely complex and cannot be adequately covered in a single section. This section should provide sufficient information to assist inspectors in their routine surveillance tasks. Inevitably, situations will arise which require additional explanation. If inspectors are confronted with a situation that they feel is not encompassed by the information provided here, they should seek further advice from Legal.

7.2 Definitions

7.2.1 Evidence

Evidence consists of facts, testimony, hearsay and exhibits which a court or tribunal will receive to prove or disprove a matter under inquiry.

7.2.2 Law of evidence

The law of evidence governs the means and manner in which a person may substantiate his or her case or refute his or her opponent's case.

7.2.3 Rules of evidence

The rules of evidence are the rules that regulate the manner in which questions of fact may be determined in judicial proceedings. The aim of most court proceedings is to determine two different types of issues:

- Firstly, a court has to determine whether the facts on which a charge is laid did actually happen. These are questions of fact.
- Secondly, the court has to determine, if they did happen, what their legal consequence is. These are questions of law.

The rules of evidence are generally divided into 3 parts:

1. What facts may or may not be proved?
2. What sort of evidence must be given by which a fact may be proved?
3. By whom, and in what manner, must the evidence be produced by which a fact is to be proved?

7.3 Types of evidence

There are different types of evidence:

- Direct evidence
- Real evidence
- Documentary evidence
- Expert evidence
- Circumstantial evidence
- Hearsay evidence.

7.3.1 Direct evidence

Evidence of something that has been directly perceived by a witness through one or more of their 5 senses.

For example, has been seen, heard, smelled, felt or tasted.

Direct evidence is given by the witness through oral testimony in court.

7.3.2 Real evidence

Material objects, other than documents, which are produced for inspection by a court, are commonly called real evidence. This, when available, is probably the most satisfactory kind of evidence because it generally does not require testimony or inference. Unless its genuineness is in dispute, the thing speaks for itself.

7.3.3 Documentary evidence

There are two types of documentary evidence:

- Primary documentary evidence is the production of the original document itself.
- Secondary documentary evidence is the production of a copy of the original document.

For example, photocopy or certified copy, etc. It can generally only be produced after it has been shown to the court that the original is either lost or destroyed, or that it is impracticable to produce the original document.

7.3.4 Expert evidence

Evidence of someone's opinion is generally inadmissible. An exception to that rule is the opinion of an expert. Such evidence is only accepted when it is in the witness's field of expertise. The witness must first prove to the satisfaction of the court that they are qualified in that field.

For example, a doctor giving evidence of a medical matter or a pilot giving evidence of the ramifications of low flying.

7.3.5 Circumstantial evidence

This is evidence from which a fact may be inferred as a natural or probable conclusion. It is usually made up of a series of items that point to the same conclusion.

7.3.6 Hearsay evidence

This is evidence of something of which the witness does not have direct knowledge but has been told about it by some other person. Under normal circumstances, hearsay evidence is not admissible in a court as evidence of the truth of what was said. (It may be admissible in the Coroner's Court or the AAT.)

There are numerous exceptions to the inadmissibility of hearsay evidence. Some of the exceptions include:

- business records and tags and labels.
- representations made about employment or authority.
- admissions.

For further explanation and assistance in any dealings relating to evidence, inspectors should seek advice from [Legal](#).

7.4 Importance of maintaining integrity of evidence

Inspectors involved at any stage of the surveillance process may be required to gather evidence in order to provide proof of a contravention of a safety rule. In the process of gathering evidence, they will handle various articles that may be required as evidence (in the form of exhibits) in various proceedings. (These articles may consist of documents or aircraft components or material.) It is important that the integrity of these potential exhibits be preserved.

Note: During a routine surveillance activity, inspectors may not be aware of any future developments that may lead to prosecution or other actions where evidence may be required. The failure to be aware of the correct procedures when gathering evidence may seriously jeopardise any future enforcement action. Where an inspector suspects that a breach of relevant legislation may have occurred, any evidence identified should be collected IAW proper evidence gathering procedures. Legal can assist with advice.

7.5 Obtaining evidence

7.5.1 Seizing evidence

Note: Inspectors generally have no power to seize evidence. That is, inspectors have no general statutory powers to obtain and retain documents or physical evidence simply on the basis that the documents or physical evidence may or will be required for court proceedings.

7.5.2 Statutory powers for obtaining real or documentary evidence

How then does an inspector obtain real or documentary evidence? There are some statutory powers in the [Civil Aviation Regulations 1988 \(CAR\)](#) and the [Civil Aviation Safety Regulations 1998 \(CASR\)](#) that may help.

- [CAR 53](#) empowers an authorised person to investigate defects in an Australian aircraft maintained under the CARs.
- [CASR 42.280](#) empowers an authorised person to investigate defects in an Australian aircraft maintained under the CASRs.
- [CAR 53\(3\)](#) further empowers the authorised person to require in writing the production of documents, aircraft components or other physical evidence and to retain these for the duration of the surveillance activity. (Once the surveillance activity is complete, the material must be returned to its owner unless alternative legal steps are taken to secure it as evidence).
- [CAR 301](#) requires a person to surrender any licence, certificate or other document issued or required to be kept under the Regulations if required to do so by CASA. This provision covers most documents that may be required in relation to a contravention.

Likewise, it includes aircraft logbooks, engine logbooks, propeller logbooks and maintenance releases because these documents are required to be kept pursuant to directions given under [CAR 50C](#).

Note: A [CAR 301](#) to surrender documents only covers documents that are required to be kept under the CARs and includes documents that are required to be kept under:

- (a) a Civil Aviation Order (CAO); or
- (b) a Manual of Standards (MOS); or
- (c) another document that is required to be kept under the CARs.

If an inspector wishes to obtain a document under [CAR 301](#), then it is important to note that the notice requiring a person to surrender the document must be in writing and if the inspector wishes to issue the notice, they must seek approval **prior** to issuing the notice from their SM.

- [CASR 61.365](#) requires the holder of a flight crew licence or certificate of validation to produce the holder's personal logbook for inspection by CASA (even though they are the personal property of the pilot) because they are required to be kept by CASR 61.345.
- [CASR 11.075](#) requires the holder of an authorisation to give CASA specified information, or a specified document, that relates to the activity, document or thing to which the authorisation relates. This provision covers most documents that may be required in relation to a contravention.

Likewise, it includes aircraft logbooks, engine logbooks, propeller logbooks and all other airworthiness records because these records are required to be kept pursuant to directions given under CASR 42.215.

There is no provision equivalent to [CAR 301](#) in relation to real evidence or documentation not issued or required to be kept under the Regulations. If an inspector believes that such an article may be required as evidence in possible future proceedings, they should ask the person concerned if they can take possession of the article. If this request is refused, the inspector should not pursue the matter.

A report should be prepared immediately identifying the evidence, its location, who has custody of it and why it is required. This report should be submitted via the NMS/SM to the [Manager Investigations](#). A decision will then be made as to whether to obtain a search warrant. This will be part of a Coordinated Enforcement meeting.

If an inspector is denied possession of documentary evidence, they should attempt to obtain a photocopy or photograph of it. If an inspector cannot make a photocopy for any reason, they should examine the document and describe it precisely in notes. The description should be sufficiently detailed to allow any changes to the document to be readily identified.

The inspector should then tell that person that the document may be required as evidence and must not therefore be destroyed or rendered illegible or indecipherable. It is vital that the inspector include in their notes the fact that the inspector informed the person to this effect. If the person disregards this advice, then they may be guilty of an offence under [section 39 of the Crimes Act 1914](#).

Additionally, [CAR 301\(2\)](#) makes it an offence for a person to destroy, mutilate or deface any document that they are required to surrender under [CAR 301](#), with the intention of evading the requirement to surrender the document.

If an inspector suspects something may afford evidence of the commission of an offence, they may also consider photographing the items as a means of recording the existence of such evidence, either documented or real. The photograph should be recorded and labelled in the same way that the actual article would be if it were retained as evidence.

Requesting licences

Inspectors should also be aware that there are a number of other provisions in the regulations under which persons may be required to produce licences, logbooks and medical certificates. In particular, inspectors should note the following:

- [CAR 5.56 and CASRs 61.340 and 61.365](#) confer powers on CASA to request a person to produce his or her licence, logbook or medical certificate. Each regulation states the timeframe within which a requested document must be produced. Such a request may be made orally but should be recorded in the inspector's notes.
- [CAR 302\(1\)](#) authorises CASA to require a person to produce his or her licence (which is not a flight crew licence) for inspection. This would cover, for example, AME licences and ATC licences.

- [CAR 302\(2\)](#) authorises CASA to require the owner or pilot in command of an aircraft to produce any certificates, licences or other documents related to the aircraft and any passengers or cargo.

7.6 Handling exhibits

7.6.1 Purpose

These procedures provide assistance for inspectors handling exhibits.

Note: At any time, where inspectors may be unsure of exhibit-handling procedures, advice should be sought from [Legal](#).

7.6.2 Procedures

At various times, inspectors will be required to handle articles that may be required as evidence (in the form of exhibits) in court or other proceedings. These articles may consist of documents or aircraft components or material. It is important that the integrity of these potential exhibits be preserved.

7.6.3 Preservation of exhibits

The general rule in handling any exhibit is to handle it as little as possible. It is important to retain the item in its original condition. This is especially true in the case of documents. The overriding rule is that if an inspector takes possession of an original article which the inspector believes has potential value as an exhibit, the inspector should notify the [Manager Investigations](#), immediately to seek advice and assistance on its treatment and the appropriate safe storage. The inspector, on taking possession of the article, should issue a receipt to the person from whom the article is taken, using the CASA [Property Receipt and Disposal Form](#).

The inspector should record details of such items in their notebook or diary, store the item securely and restrict access to the item, and retain the item until it is required for investigation or of no further value.

7.6.4 Continuity

The expression 'continuity of evidence' is used to describe the handling and whereabouts of an exhibit from the time it comes into the possession of CASA until the time it is produced in court. Continuity is also referred to as the 'chain of evidence'. Bearing in mind that a chain is only as strong as its weakest link, any weakness, such as not being able to confirm the retention of evidence for a period, leaves it open to suggestion that the evidence presented in court is not the same as the evidence originally obtained.

Inspectors need to be aware that they may be required to account, in court, for their involvement with an exhibit. Therefore, inspectors should record the following information about any exhibit that comes into their possession:

- a description of the exhibit and any identification details
- the date, time and place the exhibit came into their possession
- the person or entity from whom the exhibit was obtained
- the method by which the exhibit was obtained
- the date and time possession was relinquished
- the person or entity to whom possession was relinquished.

The fewer persons who handle any exhibit, the safer the evidence will be.

Note: The inspector who initially takes possession of the exhibit is usually the person who will be required to produce it in court.

7.6.5 Receipts for exhibits handed to other parties

If, for any reason, an inspector relinquishes an exhibit to a party outside CASA, it is essential to obtain a receipt for that exhibit. The exhibit movement should be documented on the CASA [Property Receipt and Disposal Form](#). This a hard copy form only with pages in triplicate.

7.6.6 Handling of documentary exhibits

Inspectors should ensure that documents such as logbooks, flight plans, maintenance releases or other documents that may be required as exhibits in court are handled carefully so as to ensure that they are not changed in any way. In particular:

- Inspectors should ensure that such documentary exhibits are not:
 - written on, stapled, torn, folded, pinned or mutilated in any way.
 - placed in a position where impressions from writing on overlaying paper, will be left on the documentary exhibit.

For example, writing on an envelope after the document has been placed inside. The impressions on a document can be an important part of forensic document examination.

- When an inspector becomes aware that a document may be required in some later court proceeding, the inspector should arrange for it to be placed in an envelope as soon as possible. There are two reasons for this:
 - It prevents damage to the document itself.
 - In the unlikely event that it may be necessary, it preserves any fingerprints that may be on the document.
- As soon as an inspector obtains a documentary exhibit, they should collect it in accordance with exhibit handling procedures and notify the [Manager Investigations](#) if the document may be an exhibit relating to a Part IIIA investigation.
- If an inspector needs to work from a document, they should take a photocopy of it and work from the copy.
- Inspectors should make every effort to retain possession of original documents. If it is not possible to take possession of original documents, it is important that inspectors arrange for them to be photocopied. If a document is photocopied:
 - sign and date the photocopy, preferably on the back of the photocopy
 - wherever possible, try to arrange for the person retaining the original document to sign the photocopy as being a true copy of the original
 - treat the photocopy as an original (see the first two points in this section)
 - Inspectors should identify in their notes or file notes, who has possession of the original. This will enable an investigator to obtain the originals if required.

7.6.7 Handling physical exhibits

Physical exhibits can be either moveable or immovable. Moveable exhibits include items such as small aircraft parts, non-hazardous cargo etc. Immovable exhibits include large items such as large aircraft parts, for example, wings and rotor blades, and hazardous material such as fuel samples.

The main difficulty with immovable items is the ability of CASA to take possession of the original article. In this situation secondary evidence, such as a photograph, copy, drawing, sketch or video footage may need to be obtained to assist in proving the existence of the article or thing.

Inspectors should notify the [Manager Investigations](#), as soon as an immovable exhibit is identified to enable appropriate evidence collection measures to be arranged, if the exhibit is required as part of an investigation.

7.6.8 Collection and handing of fluid samples

For evidence, fuel and other fluid samples may require special consideration. If inspectors are required to obtain fluid samples, they should only do so with the consent of the aircraft owner or pilot-in-command or, if the aircraft is undergoing maintenance, the approval of the person carrying out the maintenance.

If there is any likelihood of the fluid samples being required as evidence, they should be obtained in accordance with exhibit handling procedures. Advice and assistance on obtaining evidence should always be sought from the [Legal](#) and the [Dangerous Goods](#) team.

7.6.9 Access to exhibits

CASA officers must not provide access to any exhibit, except to those authorised and required to access such exhibits. In the instance that access is provided, CASA officers must maintain comprehensive records and maintain strict continuity requirements, in line with rules governing exhibits. Further advice may be obtained from [Legal](#).

7.6.10 Return of exhibits

Exhibits should be returned to their source as soon as possible after it is determined that there is no longer any need for their retention. This should not occur until after the relevant investigator has confirmed that the exhibit is no longer required for an investigation or for court proceedings or has notified that the court proceedings have been finalised. It is the responsibility of the relevant investigator to return exhibits used in court.

8 Sampling

8.1 Overview

Sampling is a process that helps an inspector gain confidence that a system, process or procedure under review is in control and producing the desired output. This is done by examining a representative portion of the total population of items available for review. Following this review, it would be possible to make a reliable conclusion regarding the overall level of conformance of the applicable system, process or procedure. This conclusion is based on the probability that all items that may, or may not, conform have an equal chance of being selected.

8.2 Random sampling

While random sampling is typically used, various other sampling techniques may also be used. In a random sample, each item in the population has a specified probability of being selected.

Samples may be selected based on (this list is not exhaustive):

- numerical sequence (e.g. every tenth record)
- computer generated selection
- a record being produced on a particular day of the week and/or
- letters of the alphabet.

For sampling to be truly independent, and free from potential conflict, samples must be selected by the inspector and not the AH. This includes AH personnel selected for interviews as well as records selected to be reviewed.

Inspectors can use this information to determine if a system, process or procedure is effective. The number and severity of any deficiencies found can be analysed to determine the degree of conformance of that system, process or procedure and whether a finding will be issued.

9 Desktop surveillance record review

9.1 Overview

A review of the documentation listed below may be considered when conducting a desktop surveillance activity and is not intended to be an exhaustive list nor a list whereby all documents should be reviewed. Discretion should be used where more documentation may be required.

This is also an opportunity to undertake an audit of existing information available to CASA and reviewing information within the preceding 12-month period will provide appropriate background for this activity type (e.g. regulatory services, ATSB/CIRRIIS occurrences).

Utilisation of the [Power BI - Authorisation Holder Profile](#) should also be used as part of the review. These reports consolidate data from various internal CASA systems in one location.

9.2 Documents, manuals and reports

The following documents apply to most authorisations/approvals where available:

- current manual suites if applicable reference located on EAP and the manual itself within the Records Management System (RMS) (e.g. aerodrome manual and wildlife hazard management plan, operations manual suite)
- key personnel (continued compliance and/or changes to positions) (e.g. accountable manager, responsible manager, quality assurance manager and safety manager, DAMP officer)
- third-party audits
- internal audits
- CASA surveillance reports/summaries, safety findings pending verification, safety observation responses
- self-reported deficiencies
- EAP Case jobs.

9.2.1 Arrangements

Airworthiness Technical Arrangements

9.2.1.1 ANZA requirements

The arrangement between the Australian and New Zealand governments on Mutual Recognition of Aviation-Related Certification (ANZA Mutual Recognition Arrangements) provide for the reciprocal recognition by Australia and New Zealand of Air Operator's Certificates authorising operation of aircraft with a capacity of 30 seats or more or has a maximum certificated take-off weight greater than 15,000kg. Such certifications are issued by the respective aviation safety authorities under the Australia New Zealand Aviation (ANZA) Mutual Recognition Principle set out in those agreements. CASA issues AOCs with ANZA privileges under Section 27 of the Act. (General provisions in relation to mutual recognition under the ANZA Mutual Recognition Agreements are set out in Part III of the Act).

Safety oversight of authorisation holders with ANZA privileges is the responsibility of the host regulator. CASA oversees and conducts surveillance of Australian registered authorisation holders with ANZA privileges in New Zealand territory. There is no requirement for CASA to conduct surveillance or international ramp checks of New Zealand authorisation holders with ANZA privileges, but it may choose to do so.

9.2.1.2 Technical Arrangement on Aviation Maintenance Between CASA and JCAB (TA-M)

Refer AC 145-06

On 25 March 2022, CASA entered into a [Technical Arrangement on Aviation Maintenance with JCAB](#) (the TA-M). Currently, the TA-M is limited to maintenance of aeronautical products.

The TA-M allows maintenance organisations, recognised under the provisions of the TA-M, to perform maintenance on Australian or Japanese aeronautical products in accordance with the maintenance regulations of the territory where the organisation performing the work is located.

Notification

Each Authority will notify the other Authority of any instance of unsatisfactory compliance with any regulations or any matters set forth in this Technical Arrangement that affects the ability of an approved organisation to comply with the matters of this Technical Arrangement.

The Overseeing authority will promptly notify the other Authority of any investigations or enforcement action, including revocation or suspension taken against a maintenance organisation that it has approved to participate in this Technical Arrangement.

Note: Ensure LIRA is consulted prior to notifying JCAB of any matters set forth in the TA-M.

9.2.2 Air Operator's Certificate (AOC)

Prior to commencing the review, the surveillance lead should ensure current versions of all applicable manuals are references in the returned surveillance request for information (RFI) and match EAP and RMS or obtained from the AH and subsequently submitted to Regservices@casa.gov.au by the AH as a significant change. Additionally, an appropriate number of records should be obtained to ensure adequate sampling is conducted.

- organisational structure
- operational personnel
- key personnel
- training and checking organisation and systems
- training and checking manual
- personnel (including logbooks)
- training and checking records
- approved training and checking system
- safety management
- drug and alcohol management plan (DAMP)
- accident and incident reporting
- Fatigue Risk Management System (FRMS) (flight and duty records)
- change management
- fuel policy
- flight check systems
- AH specific approvals (e.g. PBN, LVO, EDTO)
- load control
- operations manual

- operational activity (including time flown in each activity type)
- meeting records
- list of online aircraft.

9.2.3 Air Operator's Certificate (AOC) with an Ops Spec 142

- current exposition
- compliance statement
- organisation and personnel
- certificates, permissions, approvals, and exemptions
- key personnel
- familiarisation training
- instructors and examiners
- change management
- training management
- safety management
- fatigue management
- internal training and checking including human factors and non-technical skills training system (HFNTS)
- personnel and student logs and records.

9.2.4 Continuing Airworthiness Management Organisations (CAMO) / AOC (Airworthiness)

- approved maintenance programs (AMP) / system of maintenance (SOM) review
- maintenance systems (approval employee, SOM/AMP/reliability)
- exposition review
- items tracked and the intervals from software program for a sample aircraft type(s)
- Airworthiness Directive (AD) compliance records
- approval and training of CAMO employees
- airworthiness review work pack
- sample of flight tech logs and base maintenance certificate of release to service (CRS) / maintenance release (MR)
- Sample of minimum equipment list (MEL) items invoked
- Instructions for Continuing Airworthiness (ICA) review
- investigation of defects via request
- airworthiness control (access to relevant approved data, maintenance records, logbook entries)
- airworthiness reviews (including review employee)
- maintenance contracts with Part 145 or other organisations.

9.2.5 Delegates

- delegate work packs
- [Power BI - Delegate Management Reports](#) report

- Delegate Management Notification System (DMNS) (activity report, aircraft types)
- documents supplied to CASA within prescribed timeframes
- compliance with instrument conditions
- weight and balance charts issued.

9.2.6 Approved Maintenance Organisation (AMO)

- exposition/maintenance manual review
- approved supplier assessments
- shelf-life intervals register (verify)
- change management process review
- sample of SMS reports, corresponding actions, meeting minutes
- aircraft logbooks
- facility photos (particularly if CASA holds previous photos – review for changes)
- list of instructions for continuing airworthiness
- aircraft or aeronautical product work packs
- current calibrated tooling list
- Part 145 induction records
- employee authorisation records (including assessment)
- DAMP reports.

9.2.7 Safety Management Systems (SMS) (Low Capacity (Part 135) / High Capacity RPT (Part 119/121), Part 142 and Part 145)

- current SMS manual
- safety meeting minutes (6 months)
- SMS training records
- human factors (HF)/ non-technical skills (NTS) training records (if applicable)
- number of change management activity
- sample of change management docs
- audit plan (12 months)
- sample action outcomes (internal audits, meetings, occurrences and investigations)
- number of reported occurrences/hazards
- sample of occurrence management
- number of investigations
- sample of investigations
- review risk assessment practices within occurrence reporting, change management and investigation activities
- number of risk assessments
- sample of risk assessments
- newsletters (6 months) if applicable

- Flight Data Analysis Program (FDAP) documentation (i.e. meeting minutes, briefing docs, etc, if applicable)
- ERP training and information on conducted exercises.

9.2.8 Part 141

- compliance statement
- organisation and personnel
- certificates, permissions, approvals, and exemptions
- key personnel
- familiarisation training
- instructors
- change management
- training management
- quality system
- fatigue management
- exposition/operations manual
- personnel and student logs and records
- copy of the current register of aircraft used for flight training (Form 4B12 in SOM)
- sample of training records if possible.
- accident/incident reports
- current status of head of operations qualifications, i.e. dates of most recent IPC, FPC, EPC and flight review (as applicable)
- number of flight tests conducted by the head of operations in the required time period
- student pass rate.

9.2.9 Dangerous goods (non-AOC holders)

- current instrument/exemption
- current manuals
- current forms
- for shippers:
 - request copies of recent dangerous goods transport documents
 - safety data sheets
 - dangerous goods process and procedure documents
 - obtain details of United Nations (UN) specification packaging used, test reports or user reports.
- review website (if applicable).

9.2.10 Dangerous goods training

- review current Instrument
- request copies of documents, (e.g. current forms, training materials, course certificate, training record for recent course, copies of current exams), to see if they have been kept up to date
- review training provider website (if they have one) for accuracy of course information
- consider requesting access to log in to an online training course to complete the course and review the course material.

9.2.11 AOC – dangerous goods

- review operations specification (OPSPEC) for dangerous goods
- review compliance statement relative to CAR 1988 section 23 and CAR Part 92
- review operations/dangerous goods manual
- review AH dangerous goods acceptance checklists for radioactive materials and for other dangerous goods, dangerous forms, etc.
- request copies of recent internal/third-party audits if they are willing to share them
- consider sending a self-audit form to the operator specific to dangerous goods
- review AH's website for dangerous information relative to cargo and relative to passengers.

9.2.12 Part 171

- meteorological (MET) reports
- technical certification reports
- Airservices team meeting minutes (Previous 3 months)
- current organisational chart.

9.2.13 Part 172

- local instructions
- letter of agreement
- business continuity plan
- contingency plan
- training manual
- instructor guides
- temporary local instructions
- circulars
- directives
- manual of air traffic standards supplements
- licencing and training – assessment folders
- operational risk assessment (ORA) provide.

9.2.14 Part 139

- completed serviceability inspection outcomes (defined date range to be given to the AH)
- permanent notice to airmen (NOTAM) requests
- temporary NOTAM requests
- technical inspection reports (where available)
- SMS reviews (where available)
- aerodrome emergency plan (AEP) committee meeting minutes (where available)
- wildlife hazard management data (where available).

9.2.15 Manufacturing

- list of Form 001s issued in the preceding period since last surveillance
- samples of job/work packs including but not limited to:
 - job traveller/worksheet
 - material certificates
 - test reports
 - heat tapes
 - NDT reports
 - Form 001 issued
 - calibration records
 - applicable to the tooling utilised in the subject job/work packs
 - authorised persons records
 - task authorisations
 - training and qualification records
 - specimen signatures
 - stamp records.

9.2.16 Subpart 21.M IOA

- approval documents including engineering orders, [Statement of compliance](#), technical data, flight manual supplements.

9.2.17 Subpart 21.J

- approval documents including engineering orders, [Statement of compliance](#), technical data, flight manual supplements
- training plans and training records
- authorised persons' interview and appointment records
- documents related to appointment of subcontractors.

10 Records management

Surveillance records must be maintained in a clear, succinct manner and provide a chronological history of surveillance activities and are recorded within RMS. It is important that all relevant surveillance documents are appropriately filed and in most instances by the sender of the document or email.

Surveillance records include background documents, forms, files, notes and reports that relate to surveillance activities with all such documentation saved to the RMS. Documentation may originate from all phases of a surveillance activity and be saved throughout the activity's duration.

Examples include documented decisions from surveillance planning meetings, surveillance team planning meetings, certificates, scoping formation, preparation checklists, worksheets, surveillance notification, correspondence from an AH, emails sent to the AH, third-party audits, notes from an inspector, entry/exit meeting records, surveillance summaries, findings and the evidence relating to that finding and documentation relating to the follow up of findings.

All documentation should be saved to RMS.

As per the CASA guidelines on Information management it is the senders responsibility to save sent emails into RMS. It is also the direct receivers responsibility to save received emails into RMS. When multiple recipients are involved, the first recipient on the receiving list is responsible for saving to RMS.

11 Findings

11.1 Findings – Deficiency Details

To make the deficiency details as clear as possible, ensure they:

- State the requirement that was not met.
- Describe the specific non-compliance observed.
- Clearly link the non-compliance to the regulatory requirement, showing how the breach occurred.
- Avoid unnecessary background or narrative.

Recommended format:

"[Requirement] was not met as observed by [specific observation]. As a result, [entity/person] failed to comply with the regulatory requirements.

Example:

"Required reviews were not completed within the prescribed timeframe, resulting in records remaining unverified. This constitutes a breach of the regulatory requirement, which requires reviews to be completed within the specified period."

This approach keeps the deficiency concise while clearly demonstrating how the regulatory breach occurred.

11.2 Findings - Regulatory References

Finding regulatory references are prepopulated by the system and will refer to an accompanying CAO or MOS reference (if applicable) when a finding is raised.

Note: Safety findings will not include the criteria of the applicable regulation, CAO or MOS.

12 Surveillance summary

Surveillance summaries are created in template form from EAP.

Table 3. Surveillance summary contents

Surveillance summary contents	
Title page	• AH name • ARN • Certificate name • Certificate number • Authorisation type • Dates of surveillance
Summary	Summary produced within EAP which contains the start and finish dates of the surveillance and lists the number of findings resulting from the surveillance activity.
Statement of confidential nature of the contents	Generic statement relating to the confidentiality of the report.
Surveillance objective	The objective of the surveillance is to assess the ability and willingness of an AH to comply with all applicable legislative obligations.
Surveillance team	Identification of the surveillance lead and team members, including those in attendance at the entry/exit meeting.
Places	Lists the location of the surveillance activity.
Summary of surveillance findings	List of findings, including the finding number, finding type, finding subject/title, Regulation reference and, where applicable, the due date.
Documents used as standards and reference	List of all documents that were reviewed or used while conducting the activity. These documents are added to the EAP surveillance activity field. They should include the title, document reference, number/version. Document examples: Third-party audit reports, work packs, CAR/CASR and CAOs etc.
Surveillance participants	List of the people who were interviewed during the activity, including their name, position interviewed. This list is taken from the EAP surveillance activity fields.

12.1.1 Surveillance summary example

Figure 1. Surveillance summary example

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Surveillance Summary

<Authorisation Holder>[TR1]
ARN: <ARN>[TR2]
<Certificate name>[TR3]
<Certificate number>[TR4]
<Aerodrome>[TR15a]

Surveillance Date[s]:[TR5]
<Start date>[TR6] [to <Finish date>] [TR7]

CASA Ref: <CASA ref>[TR32]
Surveillance Activity Number: <event number>[TR33]

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Acknowledgement of country
The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to elders past, present and emerging.
Inside front cover artwork: James Baban.

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Summary

This Surveillance Summary details findings of a surveillance activity conducted on the authorisation holder. The surveillance activity was conducted from <Start date>[TR6] to <Finish date>[TR7] [TR8] and this surveillance activity identified 0[TR20] finding(s).

<Inspector Name>[TR9]
Surveillance Lead
<Issue DATE>[TR10]

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Statement of confidential nature of the contents

This Surveillance Summary is a confidential document between CASA and the authorisation holder. CASA will not disclose this report or its content to any third person except, in pursuance of its functions, with the express permission of the authorisation holder or as required by law.

Surveillance objective

The objective of the surveillance is to assess the ability and willingness of an authorisation holder to comply with all applicable legislative obligations.

Surveillance team

Name	Discipline
<Authority personnel>[TR11] (Lead)[TR12]	<Function>[TR13]

Places

Location
<Location>[TR15]
<Facility>[TR15a]
<Aerodrome> [TR15b]
<FSTDQC> [TR15c]

Summary of surveillance findings

Surveillance finding(s) are the result of the evaluation of the collected surveillance evidence against the surveillance criteria.
[TR16]

Finding no.	Subject	Regulation ref	Due date
<Number>[TR17]	• <Subject>[TR18]	• <Reg ref>[TR18a]	<Due date> [TR19]

A total of 0[TR20] Finding(s) have been issued as a result of this surveillance. [The above table outlines applicable due dates for Finding(s) requiring a response] [TR21]

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Documents used as standards and reference

Document Name
<Exposition/Manual>[TR24]
<Reference>[TR24a]

Surveillance participants

Name	Position	Deputy
<Customer>[TR25]	<Position>[TR26]	<OS>[TR26a]

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Surveillance Summary | V 1.3 | CASA-04-8958 | 08/2026

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12.1.2 Safety finding example

Figure 2. Safety finding example

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Australian Government

Civil Aviation Safety Authority

Safety Finding

Authorisation Holder	<Authorisation holder>[TR1]
ARN	<ARN>[TR2]
CASA reference	<CASA Ref>[TR3]
Activity No.	<Event number>[TR11]
Safety Finding No.	<Finding Number>[TR4]
Subject	• <Subject>[TR5]
Regulatory reference	• <Reg reference>[TR6]

Note: In applying the principles of procedural fairness, CASA approaches its regulatory functions in a consultative and collaborative manner.

It should also be noted that issue of a Safety Finding does not in any way prejudice CASA's prerogative to take at any time such regulatory or other legal action as may be appropriate in the circumstances.

Details of deficiency	
<Finding text>[TR7]	
Inspector name	<Issuing inspector>[TR8]
Date issued	<Date issued>[TR9]
Due date	<Due date>[TR10]

Please complete the **Safety Finding response page** (attached) and respond by the due date.

Civil Aviation Safety Authority
 Safety Finding | V 1.2 | CASA-04-6960 | 02/2026
 CASA Ref: <CASA Ref>[TR3] | Surveillance Activity Number: <Event number>[TR11]

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12.1.3 Safety observation example

Figure 3. Safety observation example

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Australian Government

Civil Aviation Safety Authority

Safety Observation

Authorisation Holder	<Authorisation holder>[TR1]
ARN	<ARN>[TR2]
CASA reference	<CASA Ref>[TR3]
Activity No.	<Event number>[TR9]
Safety Observation No.	<Number>[TR4]
Subject	<Subject>[TR6]

Safety Observation details	
<Finding text>[TR7]	

Inspector name	<Issuing inspector>[TR8]
Date issued	<Date issued>[TR5]

A Safety Observation is used to advise an authorisation holder:

- of latent conditions resulting in system deficiencies that, while not constituting a legislative or procedural breach, have the potential to result in a breach if not addressed; or
- to put in place measures to mitigate potential regulatory breaches and risks to aviation safety.

Civil Aviation Safety Authority

Safety Observation | V 1.2 | CASA-04-6569 | 02/2026

CASA Ref: <CASA Ref>[TR3] | Surveillance Activity Number: <Event number>[TR9]

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12.1.4 Safety alert example

Figure 4. Safety alert example

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Australian Government
Civil Aviation Safety Authority

Safety Alert

Closing Action

Authorisation Holder	<Authorisation holder>[TR1]
ARN	<ARN>[TR2]
CASA reference	<CASA Ref>[TR3]
Activity No.	<Event number>[TR11]
Safety Alert No.	<Finding Number>[TR4]
Subject	<Subject>[TR5]
Regulatory reference	<Reg reference>[TR6]

This Safety Alert was issued to raise an immediate safety concern regarding a serious legislative breach by the authorisation holder. As the holder of a certificate, licence, approval or authority, it is expected that you took immediate action to ensure the potential breach was rectified before:

- the continued operation of the aircraft concerned, or
- continuing any activity carried out under the certificate, licence, approval or authority held by you that is the subject of the breach.

Note: In applying the principles of procedural fairness, CASA approaches its regulatory functions in a consultative and collaborative manner.

Issue of a Safety Alert does not in any way prejudice CASA's prerogative to take at any time such regulatory or other legal action as may be appropriate in the circumstances.

Details of deficiency	
<Finding text>[TR7]	
Inspector name	<Issuing inspector>[TR8]
Date issued	<Date issued>[TR9]
Due date	<Due date>[TR10]

Please complete the **Safety Alert response page (Closing Action required)** attached.

Civil Aviation Safety Authority
 Safety Alert - Closing Action | V 1.1 | CASA-04-7202 | 02/2026
 CASA Ref: <CASA Ref>[TR3] | Surveillance Activity Number: <Event number>[TR11]

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12.2 Aircraft survey report (ASR) example

ASRs are not issued with a surveillance summary.

Figure 5. Aircraft survey report example (EAP version)

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Australian Government
Civil Aviation Safety Authority

Aircraft Survey Report

Registered Operator	<Registered Operator> [TR1]		
ARN	<ARN> [TR2]	Activity number	<Activity number> [TR3]
A survey of the mentioned aircraft and/or associated records has been carried out and the following directions and/or non-compliances are brought to your attention. This survey was not a complete inspection of the aircraft and defects; damage or non-compliances other than those noted may exist.			
Registration mark	<Registration> [TR4]	Manufacturer	<Manufacturer> [TR5]
Serial No.	<Serial> [TR6]	Model	<Model> [TR7]

Code A: Pursuant to regulation 11.245 of the Civil Aviation Safety Regulations 1998 you are hereby advised this directive takes immediate effect and you are directed to have the following maintenance carried out **PRIOR TO FURTHER FLIGHT**.

Code B: Pursuant to regulation 11.245 of the Civil Aviation Safety Regulations 1998 you are hereby directed to have these items assessed and rectified as necessary. An endorsement on the Maintenance Release in accordance with regulation 50 of the Civil Aviation Regulations 1988 and/or the Technical Log in accordance with regulation 42.355 of the Civil Aviation Safety Regulations 1998 may be required.

Code C: These items may be in contravention of requirements imposed under the Civil Aviation Regulations 1988 and/or the Civil Aviation Safety Regulations 1998. Assess and rectify as necessary.

ASR Item	ASR Code	Brief details of deficiency, defect or damage and where applicable the maintenance or assessment action	Regulatory reference
<ASR item> [TR8]	<ASR code> [TR9]	<Deficiency> [TR10]	<Reg ref> [TR11]

If an item above is marked as Code A or Code B, pursuant to regulation 11.245 of the Civil Aviation Safety Regulations 1998, you are also hereby directed to provide a response to this ASR once any required maintenance or assessment (and any necessary rectification) is performed.

Inspector name	<Issuing inspector> [TR12]	Date	<Issue date> [TR13]
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The **Response page** for this ASR will be provided via email, please return to surveillance@casa.gov.au.

Response due date: <Due date> [TR14]

Civil Aviation Safety Authority
Aircraft Survey Report | V 1.0 | CASA-04-7082 | 05/2026
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Figure 6. Aircraft survey report example (paper form)

 Australian Government Civil Aviation Safety Authority		Aircraft Survey Report	
Registered Operator			
ARN			
A survey of the mentioned aircraft and/or associated records has been carried out and the following directions and/or non-compliances are brought to your attention. This survey was not a complete inspection of the aircraft and defects; damage or non-compliances other than those noted may exist.			
Registration mark		Manufacturer	
Serial No.		Model	
Code A: Pursuant to regulation 11.245 of the Civil Aviation Safety Regulations 1998 you are hereby advised this directive takes immediate effect and you are directed to have the following maintenance carried out PRIOR TO FURTHER FLIGHT. Code B: Pursuant to regulation 11.245 of the Civil Aviation Safety Regulations 1998 you are hereby directed to have these items assessed and rectified as necessary. An endorsement on the Maintenance Release in accordance with regulation 50 of the Civil Aviation Regulations 1988 and/or the Technical Log in accordance with regulation 42.355 of the Civil Aviation Safety Regulations 1998 may be required. Code C: These items may be in contravention of requirements imposed under the Civil Aviation Regulations 1988 and/or the Civil Aviation Safety Regulations 1998. Assess and rectify as necessary.			
ASR Item	ASR Code	Brief details of deficiency, defect or damage and where applicable the maintenance or assessment action	Regulatory reference
1238401			
1238402			
If an item above is marked as Code A or Code B, pursuant to regulation 11.245 of the Civil Aviation Safety Regulations 1998, you are directed to provide a response to this ASR once any required maintenance or assessment (and any necessary rectification) is performed.			
Inspector's signature		Inspector name	Date
Response due date: _____		Response page overleaf	
White (Recipient)		Yellow (Other)	Pink (CASA)
Aircraft Survey Report V 2.5 CASA-04-0676 04/2026			

13 Occurrence management

13.1 Overview

Safety occurrence data (intelligence) relates to an aviation safety event which involves the holder of a civil aviation authorisation.

[Section 9\(1\) of the Civil Aviation Act 1988 \(the Act\)](#) assigns the following as part of CASA's functions:

- g. conducting regular reviews of the system of civil aviation safety in order to monitor the safety performance of the aviation industry, to identify safety-related trends and risk factors and to promote the development and improvement of the system.

The [CSM](#) details the surveillance methods by which CASA carries out certain functions under the Act.

Surveillance is conducted as:

- Scheduled
- Post-authorisation review
- Unscheduled
- Campaign
- Response.

One aspect of CASA's surveillance activities is the review of safety occurrence data to determine whether a potential safety issue exists, and action needs to be taken by CASA. The occurrence management process requires the surveillance of safety occurrences at various levels, including a safety occurrence desktop review.

The Monitoring and Response team conduct response surveillance activities or provide approval for other branches to use response activity types in EAP.

As outlined in the Section [Applied surveillance methodology](#) of the CSM, should a surveillance activity be approved arising from an ATSB report, the [Accident Liaison Office \(ALO\)](#) must be advised before commencement.

This section provides guidelines for surveillance on occurrences with regard to the:

- occurrence management accountabilities
- requirements for conducting an unscheduled surveillance activity of a safety occurrence in terms of:
 - What is a safety occurrence desktop review?
 - How is the safety occurrence information accessed?
 - How is the safety occurrence data assessed, analysed, prioritised and categorised?
 - What surveillance activity method is required to be conducted?
 - What follow-up action is required by CASA?

13.2 Occurrence criticality definitions

Each safety occurrence must be assessed for criticality to assist in determining the scope and priority of any follow up activity. Likelihood has not been considered as the occurrence would have already taken place.

Critical occurrences fall into 4 classification types:

- catastrophic occurrence
- critical occurrence
- serious occurrence
- minor occurrence.

Table 4. Criticality definitions

Classification	Description
Catastrophic occurrence	An occurrence with fatalities.
Critical occurrence	A complete loss/failure of the aviation system(s), or a destructive failure, impacting directly on the safe operation of the aircraft.
Serious occurrence	A partial loss/failure of the aviation system(s), potentially impacting on the safe operation of the aircraft.
Minor Occurrence	Degradation of the aviation system(s) or part thereof, not impacting directly on the safe operation of the aircraft.

13.3 Accountability

CASA policy requires that safety occurrences be assessed and considered for any potential follow-up action. The Manager Monitoring and Response Surveillance (MMRS) acts on behalf of ROD SMs/TLs other branches outside of ROD conduct a similar process and are accountable for complying with the following standards:

- monitor the ATSB Aviation messaging system via SMS
- provide an [Occurrence Brief](#) to NMS for any catastrophic occurrences that occur in their area of responsibility
- the automated daily occurrence information report is to be reviewed daily and recorded.

Note: Non-AOC operators – occurrences involving operations not authorised by CASA will also be assessed using the process and support forms.

13.4 Safety occurrence review

A safety occurrence desktop review is a process carried out by the Monitoring and Response Surveillance Team (MRST) and other branches within CASA. The process ensures that safety occurrence data is accessed, reviewed, assessed for criticality and assigned for follow-up (if required). Safety occurrence data is currently sourced as set out in the following table.

Table 5. Safety occurrence sources

Report name	Source
Short Message Service (SMS) ATSB Aviation Message	ATSB
ASIR (Air Safety Incident Report) – Daily Occurrence Notifications	ATSB
CIRRIS (Corporate Integrated Reporting and Risk Information System)	Airservices Australia
Unsafe Behaviour Reporting	ROD Corro
Low Flying Aircraft Reporting	ROD Corro
Internal Reports	All of CASA
Self-reported Deficiency	Authorisation Holder

Note: The daily safety occurrence information received from the ATSB and Airservices has not been verified. This is a key point to note for CASA officers when contacting the AH to establish if the details, facts and circumstances are a true reflection of the occurrence. In addition, as ATSB and Airservices occurrence information may be dated, when the occurrence occurred should be considered when reviewing such information.

13.5 Accessing information

Access to the ATSB Aviation messaging system (SMS) is controlled by the ATSB Liaison Office (ALO). Accident or incident messages are received by the NMS and MMRS and are assessed for follow-up action upon receipt.

ASIR and CIRRIS occurrence data is stored in CASA's data warehouse. The allocated inspectors must review occurrence reports daily. Access to the report is by:

- automatic distribution – a daily email is automatically sent to a nominated email account. Management of internal distribution is the responsibility of the MMRS. (optional) direct access to the [Aviation Occurrences Power BI](#) app – this allows the inspector to extract the information directly. The direct access option provides the user more filtering options.

Unsafe behaviour and low flying aircraft reports are processed by the correspondence team in the Stakeholder Engagement Division and where follow up action on these reports is required, managed by the MRST.

13.6 Assessing a safety occurrence

SMS (text message) – ATSB Aviation Messaging System

Upon receipt of an ATSB occurrence SMS, the MMRS will assess the occurrence to establish whether it meets the catastrophic occurrence category, and should it be deemed to meet this category, will carry out the following:

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- establish who the registered operator is by conducting an aircraft registration search using the aircraft registration module in EAP. Also available is the [Civil aircraft register | Civil Aviation Safety Authority \(casa.gov.au\)](https://casa.gov.au/civil-aircraft-register)
- determine whether the registered operator is an AOC or operating certificate holder
- if the registered operator is an AOC or operating certificate holder; carry out an EAP search to obtain the organisation's key position holders contact details
- where appropriate contact the AH key position holder and request information on the incident
- as soon as practicable email the NMS, with a brief description of the information on hand at that stage
- within 48 hours provide an [Occurrence Brief](#) to the EMROD.

Upon receipt of an ATSB occurrence SMS the MMRS will assess the occurrence to establish whether it meets the critical or serious occurrence category or that the occurrence may become a newsworthy item. The manager will carry out the following:

- establish who the registered operator is by conducting an aircraft registration search using the aircraft registration module in EAP. Also available is [Civil aircraft register | Civil Aviation Safety Authority \(casa.gov.au\)](https://casa.gov.au/civil-aircraft-register)
- determine whether the registered operator is an AOC or operating certificate holder
- if the registered operator is an AOC or operating certificate holder; carry out an EAP search to obtain the organisation's key position holders contact details
- where appropriate contact the AH key position holder and request information on the incident.

The ATSB does not use the same classification designation as CASA. The ATSB classify events as:

- accident
- serious incident or
- incident.

Serious incidents are further broken into:

- high
- medium or
- low.

The ATSB's classification is determined on ICAO Annex 13, and this applied to every aviation occurrence reported. A set of rules provides the framework for rating the worst credible accident outcome for an occurrence (in terms of injuries to people and aircraft damage), along with the effectiveness of the remaining defences or barriers between the actual occurrence and the rated worst credible accident outcome.

Therefore, the ATSB's classification does not align directly with CASA's. The correlation is shown in the table below.

Table 6. ATSB vs. CASA classifications table

ATSB	CASA
Accident	Catastrophic, Critical, Class A or B. Note: an accident can have fatalities, or can be minor in nature, such as taxiing into an object.
Serious incident	Class A or B.
Incident	Class C

Refer to Section on [Follow up](#) action in this Annex.

Daily occurrence reports

Occurrences in the report from ATSB have not been confirmed or validated by CASA and are for information purposes only. The content of the daily occurrence reports is brief, and each occurrence is to be considered on its individual merits. The MMRS on behalf of the NMS must ensure that all safety occurrences are assessed to determine:

- the criticality of the occurrence has been determined
- what occurrences, if any, should be assigned follow-up surveillance activity type and a Case and activity created in EAP, if appropriate
- the ALO have been notified that a follow-up surveillance activity has been raised IAW the [CASA/ATSB MOU Section 6.3](#).
- that all accountabilities have been met.

Note: MMRS must follow up on all Loss of Separation (LOS) occurrences involving or related to a scheduled air transport aircraft where the assessment indicates the occurrence was caused by pilot error if it meets the A or B occurrence classification.

13.7 Unsafe behaviour and low flying aircraft reports

Client Service Centre's safety reporting team manages incoming low flying and aviation safety reports using the ServiceNow portal.

They send automated acknowledgement and closing response to the reporter, where appropriate.

If it is ascertained that a CASA response is required, they will email the to the MMRS for appropriate surveillance response.

The MMRS manages incoming reports and must ensure that all reports received are assessed to determine:

- that all reports have been allocated correctly by the safety reporting team
- the criticality of the reported aviation safety or low flying report
- which reports, if any, should be assigned a follow-up review and/or a surveillance activity, if appropriate, and the Reporting Tracking Register (RTR) updated that all accountabilities have been met.
- if no further action is required, updates the RTR with appropriate commentary and ensures documents are filed on RMS.
- returns by email to the safety reporting team advice when appropriate, if required noting if and when a specific response is required.

Note: Low flying and aviation safety concern reports, if received directly, should be re-directed to response.surveillance@casa.gov.au. For advice, refer to [Aviation safety | Aviation complaints](#).

13.8 Assessing an occurrence criticality

Each safety occurrence must be assessed for criticality to assist in determining the scope and priority of any follow up activity. Likelihood has not been considered as the event would have already taken place.

The table below provides guidance on the criticality, follow-up classification and follow-up action required. All assessed safety occurrences that require more detailed follow-up are considered to be surveillance activities, with a Class A, B or C surveillance type (as detailed in the table below), definitions included in the table are mapped to 4 classification types:

1. catastrophic
2. critical
3. serious
4. minor.

Table 7. Occurrence critically determination

Criticality description	Surveillance activity type	Review action type
Catastrophic An occurrence with fatalities.	Create: Subfile in RMS • Activity Type - Response • Method – Desktop/Onsite or combined	As a rule, CASA does not conduct an onsite field investigation following a fatal aircraft accident. However, in accordance with the CASA/ATSB Memorandum of Understanding (MoU), CASA officers may be involved in aviation safety investigations as an observer, appointed as a special investigator, or technical advisor to an ATSB investigation team. If CASA does elect to initiate a safety and regulatory review it shall do so for the purposes of identifying and rectifying any pertinent safety issues. ATSB, Coronial and other investigations are governed by their respective legislation and are outside the scope of the CSM and this Annex. CASA will monitor the outcomes of any such investigations. All CASA activities associated with Catastrophic occurrences must be coordinated through the, ATSB Liaison Officer (ALO).
Critical Complete loss/failure of the aviation system(s), or a destructive failure, impacting directly on the safe operation of the aircraft	Class A Create: Subfile in RMS • Activity Type - Response • Method – Desktop/Onsite or combined	For details of follow up action see Section on – Follow-up action – Class A
Note: The NMS should consider that the ATSB may investigate a safety occurrence. If CASA elects to conduct a surveillance activity, notification must be sent to the ATSB as per the section 6.3 of the CASA/ATSB MoU. When a parallel investigation occurs, be aware the ATSB generally places a protection order on certain records or equipment relating to the occurrence. In all circumstances, notify (by email) CASA's ATSB Liaison Officer (ALO) whenever a follow-up is considered necessary, and a comment entered against the certificate in EAP.		

Criticality description	Surveillance activity type	Review action type
Serious A partial loss/failure of the aviation system(s), potentially impacting on the safe operation of the aircraft	Class B Create: Subfile in RMS - Activity Type - Response - Method – Desktop/Onsite or combined	Independent desktop and/or site visit may be required depending on the history of the operator A CASA inspector may contact the AH and complete a Safety Occurrence information request to establish the circumstance of the occurrence, before making any further judgement For details of follow up action see Section on – Follow-up action – Class B
Minor Degradation of the aviation system(s) or part thereof, not impacting directly on the safe operation of the aircraft.	Class C (If follow up action is to be taken) Create: Subfile in RMS: Subfile in RMS Activity Type - Response Method – Desktop/Onsite or combined	Generally, no further action is required due to the nature of the occurrence. However, a CASA inspector may contact the AH and complete a Safety Occurrence information request or Pilot Questionnaire and Response for private AHs to establish the circumstance of the occurrence, before making any further judgement. For details of follow up action see Section on Follow-up action – Class C.

When determining if follow-up of an occurrence is required, the MMRS and MRST must consider the AH's history including any recent compliance history. This may determine if follow-up action is required. For example, an event classified as class A or B may not be followed up once the following factors have been reviewed:

- the effectiveness of the AH's safety management system (SMS)
- the AH's recent accident and incident history
- any recent history of non-compliance for the AH
- recent significant organisational or operational changes (as reflected in EAP)
- available surveillance and intelligence information relating to the AH and its operations
- enforcement history
- outstanding safety findings and findings history
- the severity of the occurrence being reported
- the time since the last surveillance activity, particularly in comparison with the recommended surveillance frequency specified in [Annex 23](#) – Multi-year surveillance planning.
- the timing of the next scheduled surveillance activity.

In all cases when determining the type of surveillance required, the MMRS must consider the effectiveness of the AH's internal investigation and their willingness to share the results with CASA. The CASA officer should also allow the AH reasonable time to complete a thorough investigation before deciding if further action is warranted.

Note: To be read in conjunction with Working Arrangements between the CASA and the ATSB facilitate timely access to certain documents.

These broad categories do not correspond with current or projected CASA classification of operations categories. Rather, they are broad categories using well understood language to help quickly understand the magnitude of and likely CASA response to a particular event.

There will be exceptions to these general guidelines. CASA's response will, in part, be a function of the significance of potential safety issues.

There will be exceptions to these guidelines. ATSB's selective investigation policy concentrates the ATSB's resources on investigations most likely to enhance aviation safety for the travelling public.

13.9 Scope

It is important that for each safety occurrence assigned for surveillance there is a clear understanding of the impact of any potential safety issues, regulatory breaches and the corrective actions put in place or that will be required. For each occurrence assigned for surveillance, the scope must be determined.

The scope defines the boundaries within which the surveillance activity is to be carried out and defines the activities to be examined.

When determining the scope, consider the type of surveillance activity required this could be one or a combination of the following:

- on-site surveillance activity - desktop review and/or site visit, or
- monitoring the AH's internal audit/safety investigation.

Schedule a new surveillance activity with any relevant comments as necessary if follow-up action to the occurrence findings is required.

Note: On-site in this context does not mean a field investigation involving an assessment of the impact zone and associated wreckage. On-site relates to attending an operator's or other applicable entities' premises where evidential material may be obtained.

13.10 Follow-up action

13.10.1 Catastrophic

When an occurrence meets the catastrophic criteria, and it has been determined follow-up action is required, the following actions take place:

- the NMS, or the MMRS contacts the Accident Liaison Office (ALO) to discuss the level of accident or incident if required
- the MMRS requests a surveillance activity.

The ATSB Liaison Officer:

- provides specialist accident investigation advice, including as a member of the critical occurrence management group
- assists investigative teams as directed by CASA
- provides regulatory based support to ATSB's accident investigations as required
- works in collaboration with other specialists within CASA

- coordinates CASA's examination of, and responses to, ATSB reports including monitoring CASA's actions in relation to established action plans.

13.10.2 Critical (Class A) or Serious (Class B)

When an occurrence meets the Class A or B criteria, the MMRS determines the level of follow-up action required.

Action can either be:

1. No further action is required, or
2. Request for further action.

If the result of the surveillance activity is not satisfactory, the MMRS, in consultation with the relevant SM/TL decides on the next steps IAW the CSM.

Where it is identified that the AH is a private operator, then in addition to the above procedures for assessing the criticality of the occurrence once relevant information received and assessed, the AH is sent a CASA education letter or is referred to coordinated enforcement. An education letter can only be used for non-commercial authorisation holders (AH).

When assessing the use of an education letter the following factors need to be considered once the criticality has been established:

- currency and qualifications of the pilot-in-command
- recent accident and incident history
- recent history of non-compliance by the AH
- the severity of the occurrence being reported
- the availability of evidence to support the alleged breach
- the availability of witnesses
- the safety implications of the occurrence being reported
- the requirements of the CASA [Enforcement Manual](#) for referrals
- CASA's regulatory philosophy if the assessment reveals that an education letter is not appropriate, then referral to enforcement needs to be considered IAW the CASA [Surveillance](#) and [Enforcement Manuals](#).

If an education letter is deemed appropriate this is emailed to the non-commercial AH.

If it is determined that coordinated enforcement is required, then the matter is referred to coordinated enforcement of which the procedures are contained within the CSM.

If no further action is required, the MMRS or inspector notifies the AH that CASA considers the matter closed unless further information emerges.

13.10.3 Class C

Generally, no further action is required on a Class C occurrence.

When an occurrence meets the Class C criteria, the MRST determines whether follow-up action may be warranted and either:

- takes no action but continues to monitor the AH, or
- contacts the AH and requests the AH to investigate the occurrence and provide a report detailing the outcome of the initial investigation within 28 calendar days of the request being made, or
- send a [Safety Occurrence information request](#) or if it relates to a private AH [Pilot Questionnaire and Response](#) assesses the AH's response
- if a surveillance activity is to be conducted, prepare as per the requirements of CSM.

13.11 Reporting guidelines

It is important when a surveillance activity is initiated by CASA that results are captured clearly and concisely. The following is a guide to assist the level of summary necessary:

The ALO does not currently conduct on-site surveillance activities. For a critical occurrence, the ALO will facilitate CASA interaction with the ATSB investigation. If CASA elects to conduct a parallel surveillance activity for the purposes of taking safety-related regulatory actions, the ALO will aid in conducting the surveillance activity with the surveillance team as required. There is currently no prescribed format for compiling the surveillance summary, but [ICAO Annex 13](#) provides a framework for the types of information that are commonly collected and analysed for a desktop review or a site visit, of a Class B (serious) occurrence, a summary is required in accordance with the CSM Section on surveillance activity requirements

A surveillance summary is not necessarily required for a Class A, B or C occurrence if it is decided that no follow-up action is required once all the information has been gathered and reviewed. However, if further action is taken, a report must be compiled as per the requirements of the CSM with all documentation relating to the occurrence stored in RMS.

In all cases, the MMRS or the SM/TL should determine the scope and objective and monitor the AH's internal investigations. If during the course of any of the surveillance options, including the assessment and review processes, it is determined that a breach has occurred, then consideration must be given to issuing a safety finding for commercial AHs in accordance with the CSM or consider using the coordinated enforcement process.

All surveillance summaries (CASA summaries and/or copies of the AH's investigation reports) and any other documents relating to surveillance must be stored in RMS using the [standard titling conventions](#).

14 Safety assurance review (SAR)

Notes: Any branch involved in a SAR are to keep Accident Liaison Office informed in recognition and compliance with the following paragraphs in the ATSB/CASA MOU.

Clause 6.3: If CASA commences an audit, surveillance operation or investigation that relates directly to a matter the ATSB is known to be investigating or an unresolved safety issue identified by the ATSB in an investigation and notified to CASA, CASA will inform the ATSB as soon as reasonably practicable.

Clause 8.3: If CASA has information which CASA reasonably believes could assist the ATSB in the performance of its investigative functions in relation to a particular matter, CASA will undertake to advise the ATSB of the existence of that information as soon as reasonably practicable.

In the event of an accident, a serious incident or other aviation-related occurrence where accident/incident or occurrence is assessed as having potentially significant implications for CASA regulatory functions, the EM involved may direct that a Safety Assurance Review (SAR) be conducted.

The purpose of a SAR is to enable CASA to determine, as quickly as possible in the circumstances, and on the basis of the best available evidence, whether any urgent safety-related action needs to be taken by CASA in order to eliminate or minimise the likelihood of a recurrence of a similar or related event.

14.1 Terms of reference

In identifying such action as may be necessary or appropriate for CASA to take in the interests of safety, [Terms of Reference \(TOR\) - Safety Assurance Review \(SAR\)](#) will have particular regard to:

CASA's regulatory posture with regard to the operator(s) at the time of the accident/incident or occurrence including recent surveillance, regulatory services and enforcement activity any immediate action CASA might consider necessary in the interest of aviation safety any significant learnings for CASA from the specific accident/incident or occurrence any further matters that might be considered relevant by the EMROD given the circumstances of an accident/incident or occurrence.

14.1.1 Scope

The ROD SAR is commissioned as an element of ROD's business as usual approach to national oversight. The SAR will focus on CASA's interactions with an organisation prior to an accident/incident or occurrence as well as a review of the factual information relating to the accident/incident or occurrence. If during the conduct of the SAR information identifies a significant regulatory breach or risk to flight safety, the matter will be referred to coordinated enforcement.

14.1.2 Methodology

The EMROD will assign the task to NMS, who may seek the assistance of other CASA officers as required.

The methodology of the review will include, but not be limited to:

- review of documentation
- interviews with relevant CASA officers
- interviews with relevant industry participants.

Recommendations and observations from an SAR will be managed by the NMS.

14.1.3 Raising concerns about the review process

Should a CASA officer have concerns about the conduct of an SAR, they are encouraged to raise the concern with the NMS in the first instance. If the CASA officer is not satisfied with the response or has a concern about the conduct of the NMS, they should contact EMROD.

14.1.4 Review timeframe

It is anticipated the SARs will be completed within 28 calendar days of commissioning; this may be varied with the approval of the EMROD.

15 Foreign Air Transport AOC (FATAOC) Holders – Part 129

15.1 Overview

15.1.1 Ramp Inspections

Ramp inspections are the primary form of surveillance on foreign operators.

CASA has a working arrangement with the European Aviation Safety Agency (EASA) to participate in the European (EU) Safety Assessment of Foreign Aircraft (SAFA) Programme and as such CASA has adopted the EU SAFA Programme for the surveillance of foreign operators.

The working arrangement requires that CASA complies with the EU SAFA Technical Requirements as laid out in Annex 1 of the Working arrangement. These include:

- use of the Inspection Instructions on the Categorisation of Ramp Inspection (SAFA/SACA) Findings
- use of the EASA Ramp Inspection manual
- use of the EASA managed centralised database
- inspector qualification and training
- attendance at the RICS meetings
- participation in working groups and inspector exchanges.

Procedures from the EASA Ramp Inspection Manual have been incorporated into [Foreign Aircraft Ramp Inspection Procedures Manual](#) available on the CASA intranet under Foreign Operators.

Information relating to the working arrangement can be found at:

<https://www.easa.europa.eu/document-library/working-arrangements/wa-between-casa-australia-and-easa-cooperation-eu-safa>

Information relating to the EU Ramp Inspection programme can be found at:

<http://www.easa.europa.eu/node/15629>

15.1.2 Other

Under certain circumstances, and with the cooperation of the relevant National Aviation Authority, CASA may conduct a line operational safety audit.

If required, CASA may conduct a Special Purpose Audit either desktop or on site as part of an entry control or continuous monitoring activity.

15.1.3 Information sources

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

- International Civil Aviation Organisation (ICAO)
- National Aviation Authorities
- International Air Transport Association (IATA)
- EASA EU SAFA Database and Regular Analysis
- Australian government agencies (ATSB, ASA)
- General public (complaints, reports)
- aviation industry

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- open-source information (news, media and aviation publications)
- third-party audits.