

Approval of Drug and Alcohol Management Plans (DAMP) – Operational Policy

1. Purpose

The purpose of this policy is to provide guidance on:

- what a drug and alcohol management plan (DAMP) is
- who assesses and approves a DAMP
- how Civil Aviation Authority (CAA) may use an AI assistant as a tool to support DAMP assessments, with human oversight and accountability retained by the delegated decision-maker
- principles that guide CAA assessments and approvals of DAMPs.

2. Scope

This policy applies to all DAMPs received by CAA, and CAA staff who contribute to the processing, assessment, or approval, of DAMPs.

The scope of this policy is limited to the assessment and approval of DAMPs between June 2026 and 4 April 2027. After this date DAMPs will become part of expositions, and relevant parts of this policy will be incorporated into the Certification and Licensing – Operational Policy.

For CAA staff, this policy should be read alongside the Approval of Drug and Alcohol Management Plans (DAMP) – Procedure.

3. Definitions

AI Copilot assistant (tool): a CAA approved AI assistant used to support DAMP assessment activities by identifying compliance indicators and areas of concern; it does not make approval decisions.

Assessment: the processes, methods, and activities CAA uses (which may include an AI assistant as a support tool) to determine whether a DAMP meets civil aviation legislation requirements.

Civil aviation legislation: the Civil Aviation Act 2023 (the CA Act 2023) and any secondary legislation (regulations, rules, transport instruments) made under this Act.

Current DAMP operator: section 5 defines current DAMP operator.

DAMP: a drug and alcohol management plan developed in accordance with section 114 of the CA Act 2023 and Civil Aviation Rules (CARs), particularly Part 99.

DAMP Operator: section 5 defines DAMP operator.

Delegation holder: a person who holds a relevant delegation (under s 460) from the Director to exercise powers under schedule 1 clause 27 of the CA Act 2023.

Director: the person who is the Director of Civil Aviation under section 31 of the CA Act 2023. It also includes an Acting Director appointed under section 33 and those delegated under section 460 of the CA Act 2023.

Safety-sensitive activity: an activity that could significantly affect the health or safety of any person on board an aircraft, including the person performing the activity and if it is not performed safely, could cause, or contribute to an accident or incident involving an aircraft (s 113 of the CA Act 2023).

Safety-sensitive worker: an individual employed or engaged by a DAMP operator in a role that involves the individual performing a safety-sensitive activity, including the DAMP operator, if the DAMP operator is an individual (s 113 of the CA Act 2023).

4. What DAMPs are

4.1 A DAMP is a drug and alcohol management plan developed in accordance with section 114 of the CA Act 2023 and CARs, particularly Part 99.

4.1.1 The CA Act 2023 requires organisations, identified as DAMP operators, to implement a DAMP for the purpose of managing the risks arising from drug or alcohol use by the operator's safety-sensitive workers when performing safety-sensitive activities related to their operation (s 114(1)).

4.1.2 Under section 114 of the CA Act 2023 and CAR Part 99, a DAMP:

- must identify all of the operator's safety-sensitive activities
- must specify which drugs will be tested for (including those required by the rules)
- may specify any permissible levels of alcohol or testable drug
- must explain how random testing will be done and what procedures will be used
- must include a response plan
- must provide for appropriate record keeping and routine reporting to CAA of test results
- must provide appropriate procedures for maintaining the accuracy and currency of the DAMP

- must be clearly endorsed by the Chief Executive (CE) of the organisation
- 4.2 A current DAMP operator must submit a DAMP for approval by the Director, or delegation holder, under Schedule 1 clause 26(1) of the CA Act 2023.
- 4.2.1 Operators can contract a third-party to prepare the DAMP, however the operator must be the one to submit the DAMP to CAA for approval.
- for current DAMP operators, include a proposed date of implementation as required under schedule 1 clause 26(2) of the CA Act 2023.
- 4.3 A DAMP will be a mandatory part of an organisation's exposition from 5 April 2027.

5. Who is a DAMP operator and a 'current DAMP Operator'

- 5.1 A DAMP operator is a person, including an organisation, that:
- conducts an operation involving one or more safety-sensitive activities
 - is required under the rules to hold an aviation document for that operation
 - holds any of the certificates listed in rule 99.5(a).
- 5.2 A current DAMP operator is a person or organisation who, on 5 April 2025, holds any of the certificates listed in rule 99.5 and conducts an operation that involves one or more safety-sensitive activities.

6. What is required during the transition period

- 6.1 There is a two-year transition period, 5 April 2025 to 4 April 2027, for the DAMP provisions in the CA Act 2023.
- 6.2 Current DAMP operators must submit a DAMP for approval by the Director of the CAA (Schedule 1 clause (26)(1)). The two submission deadlines for current DAMP operators are determined by operating certificate type which are set out in rule 99.9. The submission dates for each group are:
- Group 1 must submit their DAMPs to CAA before, or on, 30 September 2025.
 - Group 2 must submit their DAMPs before or on 30 June 2026.
- 6.2.1 If an organisation holds more than one certificate on 5 April 2025, the earlier of the submission dates applies.
- 6.3 The CA Act 2023 requires new applicants, who apply or are approved for an operating certificate, from 6 April 2025 to be DAMP operators if they meet the requirements in rule 99.5. These DAMP operators are not subject to the submission dates for current DAMP operators but must have their DAMP approved on or before 4 April 2027.

7. Who assesses and approves a DAMP

- 7.1 A DAMP is assessed by the team that corresponds to the certificate held by the operator. For example, a DAMP submitted by an operator who holds a Part 121 certificate is directed to Certification and Monitoring for assessment.
- 7.2 The relevant Operational Manager appoints an inspector to assess the DAMP, who is then responsible for determining if it meets the requirements in the CA Act 2023 and CAR Part 99.
- 7.3 The assessment process may include use of an AI Copilot assistant as a tool to support assessment triage, but the Inspector remains responsible for evaluating sufficiency and making the decision under delegation.
- 7.4 Where a DAMP satisfies the requirements, the inspector must approve the DAMP on behalf of the Director, as the designated delegation holder.
 - 7.4.1 Approval decisions must be made by the inspector as delegation holder. AI-assisted outputs may inform but must not replace the inspector's judgement.
 - 7.4.2 If the DAMP doesn't satisfy the requirements, the inspector must either request additional information or return the DAMP to the operator to complete further work on it.

8. Principles that guide assessments and approvals

- 8.1 The following five principles must be considered when assessing DAMPs and making decisions.
 - 8.1.1 If a DAMP complies with the requirements under section 114 of the CA Act and CAR Part 99 (as defined in [4.1.2](#)).
 - 8.1.2 If the DAMP is organised in a way that makes it clear:
 - what its scope is
 - how it works in practice
 - what legal requirements it is meeting.
 - 8.1.3 If the procedures included in the DAMP are comprehensive and fair and can be applied consistently to all safety-sensitive workers, with fairness in interpretation and consequences.
 - 8.1.4 If the DAMP respects an individual's rights and includes provisions for maintaining confidentiality throughout the random testing process.
 - 8.1.5 The Director or delegation holder ensures they have enough information to make informed, evidence-based, balanced, and lawful decisions.
- 8.2 The CAA is committed to ensuring decisions are made in a timely manner and a consistent, robust assessment process is applied.

- 8.3 Human oversight is mandatory and decision-making is not delegated to AI.
- 8.4 Any AI-assisted assessment is conducted using existing CAA information only and handled securely, with deletion of temporary AI content after assessment as required.
- 8.5 CAA applies assurance controls such as regular randomised sampling of AI-assisted assessments to ensure ongoing accuracy.

9. Cost recovery

- 9.1 The CAA recovers costs associated with the assessment and approval of DAMPs in accordance with the published CAA standard hourly rate and CAA cost recovery policies and procedures.
- 9.2 All time spent on the assessment of an application for the approval or amendment of a DAMP is chargeable at the standard hourly rate (eg, time spent assessing the DAMP or coordinating with the operator to submit further or missing information).

10. Document control

Title	Approval of Drug and Alcohol Management Plans (DAMP) – Operational Policy
Effective date	02/07/2026
Author	Madi O'Neill, Senior Advisor Planning and Support
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Revision	Date	Description of change
1.0	05/04/2025	New policy to reflect the CA Act 2023.
2.0	09/06/2025	Updated restructured unit names and role titles and removed links to related documents.
3.0	7/05/2026	Updated to reflect use of AI tool for assessments.