



CAR-PSMP

PSYCHOACTIVE SUBSTANCES MANAGEMENT PROGRAMME

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FOREWORD

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HIGHLIGHTS OF CHANGES

	Amended Paragraph	Amendment Details	Date of applicability
Issue 01 17 th June 2020	All	Not Applicable	1 st July 2021



SUBPART A - REQUIREMENTS FOR ORGANISATIONS AND AVIATION PERSONNEL

PSMP.ORO.001 - SCOPE

Without prejudice to other federal or local laws, regulations, or policies, this CAR sets the requirements and obligations of aviation personnel and organisations employing, contracting or using their service, in the implementation of a Psychoactive Substance Management Programme for the Prevention of Problematic Use of Psychoactive Substances in the Aviation Workplace.

GM to PSMP.ORO.001

It is important that organisations and aviation personnel to whom this CAR applies understand that the GCAA is only responsible for aviation safety and aviation security and as such, they may be required by other agencies or authorities to comply with additional requirements related to prevention or prohibition of psychoactive substances when in the workplace or when in the UAE. Consequently, it must be clear that compliance with this CAR does not preclude compliance with all legal frameworks in force in the UAE.

PSMP.ORO.002 – APPLICABILITY

This CAR applies to:

- a) The following aviation personnel:
 - 1) Flight Crew Licence Holders;
 - 2) Flight Engineers Licence Holders;
 - 3) Cabin Crew Licence or Attestation Holders;
 - 4) Flight Instructors & Examiners Certificate Holders;
 - 5) Air Traffic Controllers Licence Holders;
 - 6) Aircraft Maintenance Engineer Licence Holders;
 - 7) Flight Dispatcher Licence Holders;
 - 8) Student pilots, student air traffic controller and any other students while exercising Safety-Sensitive Aviation Activity (SSAA); and
 - 9) Any other aviation personnel who is exercising SSAA.
- b) Organisations whose principal of business is in the UAE and holding any of the following aviation documents:
 - 1) Air Operator Certificate or Private Operator Certificate;
 - 2) Flight Training Approval/Certificate;
 - 3) Air navigation service provider certificate; and
 - 4) Aircraft Maintenance Organisation approval.

GM to PSMP.ORO.002(a)(8)

It is the responsibility of organisations specified under PSMP.ORO.002 to identify other person whose aviation activities may be classified as safety sensitive activities and may endanger safety if exercised



improperly such as: load master, baggage handlers, fuel suppliers etc. However, it is important to note that the GCAA may not be in a position to take any deterrent action against such person if she/he is not issued with an aviation document.

GM to PSMP.ORO.002(b)

The GCAA will monitor situation across the whole aviation sector and will decide if there is a need to expand the scope of applicability of this CAR.

PSMP.ORO.003 – MEANS OF COMPLIANCE

- a) Alternative means of compliance to the AMC adopted by the GCAA may be used by an organisation to establish compliance with this CAR.
- b) When an organisation wishes to use an alternative means of compliance, it shall provide a full description of the alternative means of compliance in the PSMSP Manual. The description shall include any revisions to manuals or procedures that may be relevant, as well as an assessment demonstrating that the applicable provisions of this CAR are met.

PSMP.ORO.005 - DEFINITION AND ABBREVIATIONS

The following definitions and abbreviations apply to this CAR only:

- a) About to exercise: an aviation personnel is about to exercise his/her SSAA role when he/she has initiated all logistics and administrative tasks required by his/her organisation to start the SSAA roles specified in the aviation document issued to him/her by the GCAA. About to exercise requires evidences to testify that an aviation personnel intentionally started his/her commitment period.
- b) Available to exercise: an aviation personnel may be required to remain available to exercise his/her SSAA by being on standby duties provided he/she is notified by the organisation.
- c) Aviation document: a document issued by the GCAA to a person or organisation to permit aviation activities or grant privileges in support of aircraft operation, which –
 - 1) For aviation personnel, could be a licence, certificate or any other validation of foreign licence issued by the GCAA;
 - 2) For organisation, could be an approval, certificate or any other authorisation issued by the GCAA.
- d) Aviation personnel: individuals holding aviation document issued or rendered valid by the GCAA to exercise the privilege(s) granted by that document.
- e) CAL: Civil Aviation Law
- f) Chain of custody (CoC): refers to the procedure used to document and handle specimen (required for conducting of tests) from the time the aviation personnel donates the specimen to the collector until the specimen is destroyed or stored, hence assuring its integrity and traceability back to the aviation personnel. Certain screening tests, such as on-site oral fluid-based test for drugs of abuse or alcohol do not require a chain of custody procedure unless a blood confirmatory test is needed.
- g) Commitment period: a period which starts when a personnel is required by an organisation to exercise, is available to exercise or about to exercise a safety sensitive aviation activity. The start and finish point of the commitment period shall be defined in the organisation's manual and made available to the concerned personnel.



- h) Comprehensive assessment: a comprehensive assessment is to determine the extent of an aviation personnel's psychoactive substance use and recommend to the DER a suitable treatment options or to assess whether the person is fit to return to SSAA. It involves an examination of a person's physiological and psychosocial indicators by an SAP followed by an evaluation by an AME.
- i) Confirmation testing utilizes high complexity instrumentation that yields a definite and specific result. Best practice for confirmation testing involves using either a GC/MS or LC-MS/MS. The results of a confirmation test provide an absolute and definite result that indicates the specific drug/compound present in the urine or oral fluid sample. LC-MS/MS results are also defensible in court.
- j) DER: Designated Employer Representative
- k) Organisation: any organisation holding an aviation document issued by the GCAA which employs, contracts or uses the services of aviation personnel whose activities are safety-sensitive activities.
- l) Principal place of business: the head office or the registered office of the organisation within which the principal financial functions and operational control of the activities are exercised.
- m) Problematic use of substances or problematic substance use: the use of one or more psychoactive substances by an aviation personnel in a way that:
 - 1) Constitutes a hazard to flight safety or other aviation personnel or endangers the lives, health, or welfare of others; or
 - 2) Causes or worsens an occupational, social, mental, or physical order or disorder.
- n) PSMP: Psychoactive Substance Management Programme
- o) PSMP supervisor: a person who:
 - 1) Has had relevant training to form an opinion as to whether a person may be adversely affected by a testable psychoactive substance; and
 - 2) Is authorised by the organisation to do so.
- p) Psychoactive substances: substances or medications capable of causing dependency, alteration of mood or impairment of judgment, concentration or coordination including alcohol
- q) Safety-Sensitive Aviation Activities (SSAAs): activities that might endanger aviation safety if exercised improperly due to problematic use of substances or problematic substance use, including but not limited to:
 - 1) The maintenance of any of the following: aircraft; products; and components including the release to service of a maintenance task;
 - 2) Activities undertaken by a member of the crew of an aircraft in the course of his/her duties as a flight crew or cabin crew member or additional crew member;
 - 3) Activities undertaken by a holder of an air traffic controller licence in the course of his/her duties as a controller; or
 - 4) Activities undertaken by a person holding an aviation document granted by the GCAA.
- r) SAP: Substance Abuse Professional
- s) Screening refers to a preliminary test that yields a qualitative "Positive or Negative" result. Screening can be conducted with a rapid test or using laboratory instrumentation (EIA, EMIT). Both rapid tests



and lab screens use the same testing technology, called immunoassay technology. Screening technology is non-specific in that it does not differentiate among the drug class. A screening positive is equivalent to non-negative drug test result.

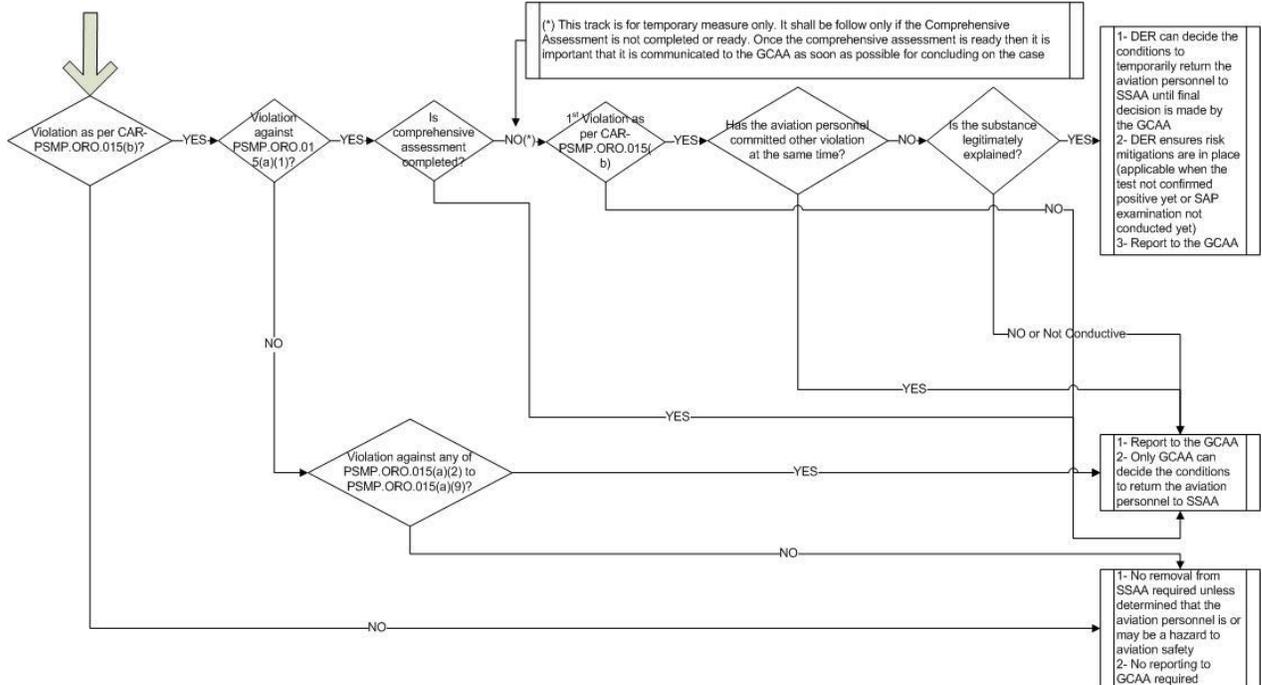
- t) Response Program: It is an action taken by the organization upon receipt of positive alcohol or confirmatory drug test positive. First the employee should be removed from SSAA and to be assessed by a SAP who will determine the course of action. Which may include:
- 1) Return to duty testing.
 - 2) Interventional program (Institutional treatment/ outpatient treatment).
 - 3) Follow up testing.
 - 4) alcoholic anonymous or narcotic anonymous whichever applicable to the case.

PSMP.ORO.010 – ACCOUNTABILITIES OF AN ORGANISATION

- a) An organisation contracting or employing aviation personnel engaged in safety sensitive aviation activities are responsible for the prevention of problematic use of psychoactive substances in the aviation workplace and shall develop a Psychoactive Substance Management Programme (PSMP) to prevent a direct hazard to flight safety due to the use of such substances. The PSMP shall be acceptable to the GCAA.
- b) The PSMP shall be commensurate with the size and complexity of the organisation and its activities.
- c) An organisation shall not allow an aviation personnel to start or continue his/her commitment period when:
 - 1) The aviation personnel was tested positive during a screening test for a psychoactive substance and the result of the confirmatory test has not been determined yet; or
 - 2) The aviation personnel is reasonably suspected by a PSMP supervisor to be under the influence of a psychoactive substance unless he/she has not undergone testing yet; or
 - 3) The aviation personnel is engaged in any problematic use of psychoactive substances and has not been rehabilitated yet; or
 - 4) The aviation personnel failed to comply with PSMP.ORO.015.
- d) An organisation shall ensure that an aviation personnel who failed to comply with PSMP.ORO.015 is returned to any SSAA only within the framework prescribed by the GCAA;
- e) The organisation shall, in case of immediate reaction to a safety concern, implement:
 - 1) appropriate safety measures required by PSMP.ORO.030(a)(6); and
 - 2) other safety measures mandated by the GCAA.
- f) An organization shall not allow a person who failed to comply with this CAR and the organisation's procedure to be involved in the implementation of the PSMP.



AMC to PSMP.ORO.010(d)





GM to PSMP.ORO.010(a)

The term “acceptable to the GCAA” means that the GCAA will not issue an “acceptance” or “approval” to certify that the PSMP is in compliance with this CAR. Compliance with this CAR will be the sole responsibility of the organisation, however the GCAA will carry out its obligations of oversight and resolution of safety concern as per Subpart B of this CAR. Oversight activities will both look at compliance with CAR-PSMP and effective implementation of the PSMP Programme. The GCAA will not raise any finding on the means the organisation has decided to implement; provided that the means is addressing the safety concern described by the requirement.

The GCAA recommends the use of ICAO Doc 9654-AN/945 ‘Manual of Problematic Use of Substances in the Aviation Workplace’ as guidance for the establishment of a PSMP since it contains additional guidance, in particular for areas with no or limited AMC or GM.

The main topics relevant to the prevention of problematic substance use are:

- a) Education of the workplace: education is the single most important tool in preventing problematic use of substances. Consequently, employees need to be fully aware of the effects that substance use may have on their lives, jobs, and public safety. A comprehensive educational programme would offer employees basic information on the physical, emotional, and social causes and consequences of substance use and the development of problematic use, raise awareness of the environmental pressures that encourage substance use in general, and provide the individual the opportunity to develop counter-arguments and skills to identify and resist pressure to use substances. It would also offer information on types of treatment and rehabilitation and on ways to return to the workplace.
- b) Response programme for identification, treatment and rehabilitation: Any programme designed to address problematic substance use in the workplace must also consider the individual user. To that end, there will be a need to give guidance on treatment and rehabilitation modalities.
 - 1) Identify employees with a substance use problem: One of the most important aspects of problematic substance use prevention is ensuring that those employees who are inappropriately using alcohol or other drugs are identified and limited to positions in which they cannot threaten aviation safety until it is determined that they no longer pose a risk.
 - 2) Treat and rehabilitate them: Treatment of psychoactive substance use disorders is the modality used in response to specific symptoms and behaviour. It can include pharmacology therapy, psychotherapy, and various social measures, depending on the presenting condition and the clinician's determination of the appropriate course of therapy; and
 - 3) Rehabilitate them: The goal of rehabilitation is to establish and maintain a new substance-free life in a normal social environment along with optimal health, mental functioning and social well-being. Treatment and rehabilitation often overlap in a way that makes differences difficult to realize for non-specialists, and sometimes the term "rehabilitation" is used about all therapeutic activities following detoxification.
 - 4) Employment consequences of problematic use of substances to establish policies with regard to returning employees to SSAA after treatment; and on how to manage the employment conditions



and the workplace requirements when a substance use problem has been identified. Generally, the employment consequences of any violation will be constrained by applicable labour relations law, labour-management agreements, disability laws and economic considerations. Depending on those constraints, the available options include any of the following:

- i) Immediate termination of employment
 - ii) Temporary suspension from SSAA pending evaluation
 - iii) Disciplinary action
 - iv) Treatment and rehabilitation
 - v) Conditional or unrestricted return to SSAA.
- c) Testing programme: it is a useful part of a prevention programme. The primary purpose is to identify employees who need assistance or treatment for alcohol or other drug abuse or dependence. An objective, scientifically based test result can be the critical element not only in disclosing to the organisation that the employee has a problem, but also in confronting the employee.

GM to PSMP.ORO.010(b)

Prior to the establishment of the PSMP, the organization should assess the risk entailed within the scope of its activities and should consider the nature of its operation, the diversity of its operations, the impact of alcohol and other drug use in conjunction with work, operational productivity, the complexity of its business, the number of employees and locations when assessing the risk.

Of equal importance is that the organization should be concerned about the liabilities associated with not taking appropriate action to prevent incidents and accidents. Both prevention/assistance and deterrence initiatives can be effectively addressed through a balanced approach and a comprehensive workplace policy.

In order to identify and mitigate the risks within its operations, an organization should design and implement procedures and processes enabling to:

- a) Identify all current practices, policies and services, including provisions in organization health and safety (OH & S) manuals, employee benefit programs etc.
- b) Look at external factors including recent legal decisions, trends and best practices, general information on use patterns, impacts and effective solutions.
- c) Identify gaps from previous experience and determine what can be improved and ensure the policy addresses this.
- d) Conduct internal surveys and encourage voluntary reporting.
- e) Monitor elements f) to l).
- f) Rate of pre-employment positive tests in prospective employees.
- g) Absenteeism in terms of incidence of unauthorized leave and lateness.



- h) Use of sick leave.
- i) Accident rates.
- j) Personnel behaviours and turnover.
- k) Driving under the influence (DUI) of alcohol reports.
- l) Alcohol consumption in the enterprise's canteen, cafeteria, or other facilities used by personnel (e.g. hotels).
- m) Collect opinions of supervisors and managers, workers and their representatives, safety personnel, and occupational health service personnel.

GM to PSMP.ORO.010(c)(7)

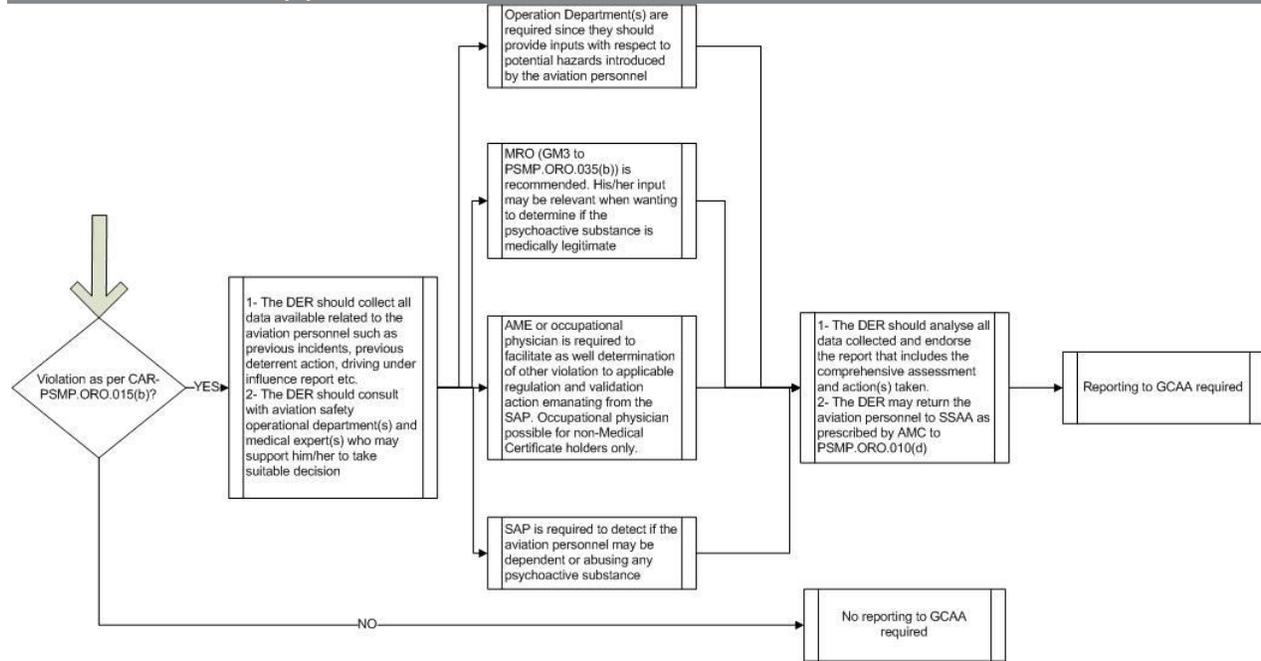
Organisations should take in consideration situations where the testing may not reveal that an aviation personnel is engaged in problematic use of psychoactive substances. It is their responsibilities to adapt the cut-off levels that would qualify to determine if “an aviation personnel is engaged in a problematic use of psychoactive substances” and adapt their testing programme (for example beyond commitment period or testing methodology like “hair” for drug) to ensure that those potentially hazardous aviation personnel are identified and rehabilitated prior to being found in violation to this CAR or involved into an occurrence. However, those situations do not qualify for reporting to the GCAA as per PSMP.ORO.025.

GM to PSMP.ORO.010(c)(4)

Organisations about to employ an aviation personnel already holding a GCAA Aviation Document should verify with his/her ex-employer(s) or GCAA the status of the same Aviation Document. Such verification process should allow the organisation to be aware of any violation history.



GM to PSMP.ORO.010(d)





PSMP.ORO.015 – ACCOUNTABILITIES OF AVIATION PERSONNEL

- a) Aviation personnel shall:
- 1) not be under the influence of any psychoactive substance specified under APPENDIX I during his/her commitment period;
 - 2) not refuse to submit to any test for psychoactive substances requested by his/her organisation or by the GCAA, while on commitment period;
 - 3) not adulterate or substitute or try to adulterate or substitute specimen taken for purposes of testing, while on commitment period;
 - 4) not interfere or try to interfere with the integrity of the test;
 - 5) not compromise safety due to the use of psychoactive substance;
 - 6) comply with any instruction issued by the GCAA;
 - 7) comply with any instruction issued by his or her organisation to ensure compliance with PSMP.ORO.010(c);
 - 8) not use any prescribed or non-prescribed medications, herbal substances and dietary substances that can interfere with SSAA; and
 - 9) declare the use of any prescribed or non-prescribed medication on the official declaration form before being subjected to a test. Such use shall be, on request by the DER, GCAA designated AME or the GCAA, substantiated by supply of any documentation justifying their use.
- b) An aviation personnel found in non-compliance with PSMP.ORO.015(a), shall be deemed as in violation of this CAR and shall not return to SSAA unless in accordance with PSMP.ORO.010(d).

GM1 to PSMP.ORO.015(a)(1)

A non-compliance with this requirement will qualify for deterrent action as per PSMP.ARO.005 if the organisation demonstrates (with evidence) to the GCAA that the aviation personnel was, during his/her commitment period, under the influence of any psychoactive substance.

Test carried out by the organisation in circumstances other than “while on commitment period” will not qualify for deterrent action as per PSMP.ARO.005. However, such test constitutes an effective means to detect those aviation personnel who “deny” the misuse of psychoactive substances.

The GCAA will not hold the aviation personnel accountable for any presence of psychoactive substance if the detected substance has been taken in accordance with AME’s instructions. Any such case will lead to further investigation on the AME’s side.

GM2 to PSMP.ORO.015(a)(1)

“Under the influence of any psychoactive substance” means that the tested individual has reached or exceed the cut-off levels specified under APPENDIX I.



GM to PSMP.ORO.015(a)(2)

The aviation personnel remains responsible unless he/she consulted a GCAA designated AME who confirm the safe use of any OTC or prescribed medicine (it must be documented).

GM to PSMP.ORO.015 (a)(3)

Appendix III contains situations that are qualified as “refusal to test”.

GM to PSMP.ORO.015 (a)(6)

Instructions are generally those required to ensure that the aviation personnel can, without compromising safety, return to SSAA following any violations. If the aviation personnel changes organisation, it is his/her responsibility to provide his/her new organisation with information about his/her violation history prior to performing SSAA.

GM to PSMP.ORO.015(b)

Any violation needs to be reported as per PSMP.ORO.010(a)(2).

GM to PSMP.ORO.015(c)

The aviation personnel should follow all instructions provided by the organisation, its representative or the personnel designated at any part of the testing process.

Instructions could be, but not limited to:

- a) Appear for any test within a reasonable time as determined by the organisation (random, reasonable suspension, post-incident or follow up requirements), after being directed to do so by the organisation;
- b) Remain at the testing site until the testing process is complete;
- c) Cooperate with any part of the testing process and appear for second test when directed to do so;
- d) Undergo a medical evaluation if a person is unable to provide sufficient amount of urine for urine testing or breath for alcohol test;
- e) Appear before any person required to complete any confirmatory procedure;
- f) Follow the instructions of the persons at testing areas or collecting sites;
- g) Wait in the facilities for a period as required by the collecting site personnel or other personnel engaged in the PSMP;
- h) Not to eat, drink, put anything (e.g., cigarette, chewing gum) into his or her mouth, or belch.

PSMP.ORO.025 - REPORTING TO THE GCAA

- a) Without prejudice to other regulations related to reporting of accidents and serious incidents, organisations shall report to the GCAA:
 - 1) Any accident, serious incident and safety occurrence where the use of psychoactive substances by an aviation personnel has or may have endangered flight safety;
 - 2) Any violation as defined by PSMP.ORO.015(b);
 - 3) Any other hazardous situation associated with psychoactive substances in the aviation workplace, even if the situation did not result in an accident, serious incident, or other safety occurrence.



- b) Without prejudice to applicable accident and incident investigation and safety occurrence reporting regulations, the reports referred in paragraph (a) shall be made in a form and manner established by the GCAA and contain all pertinent information about the condition known to the organisation.
- c) The organisation shall produce a follow-up report to provide details of actions it intends to take to prevent similar occurrences in the future, as soon as these actions have been identified.

AMC to PSMP.ORO.025(b)

The report should be submitted within 15 calendar days from the date of positive confirmatory test and should contain the following:

- a) Two clear identification of the aviation personnel (e.g. Licence number);
- b) Reason of the testing (e.g. random, reasonable suspicion);
- c) If the case was based on reasonable suspicion (specific documentation will be required – Appendix IV refers);
- d) Confirm that the aviation personnel was on his/her commitment period;
- e) Date, time and location of the test;
- f) Type of test conducted;
- g) The number of times the aviation personnel was tested over last 12 months and the results of those tests;
- h) If the aviation personnel has ever reported a problematic use of psychoactive substance prior to the test;
- i) The psychoactive substances tested and the levels measured;
- j) The medical facilities that took samples and conducted analysis;
- k) Certification that:
 - 1) The tests were conducted in accordance with this CAR;
 - 2) The sample can be traced back to the concerned aviation personnel with no loss of integrity; and
 - 3) The chain of custody has been respected at all times; and
- l) Any other reason/explanation that could be seen as aggravating or attenuating factor that could play in favour or disfavour of the concerned aviation personnel.

The report should be made to the Aeromedical email address: reporting.psm@gcaa.gov.ae

GM to PSMP.ORO.025(a)

Other regulations related to reporting of accidents and serious incidents refers to any applicable specific operating regulations required by the aviation document(s) the organisation holds.

PSMP.ORO.030 - PSYCHOACTIVE SUBSTANCE MANAGEMENT PROGRAMME

- a) The PSMP shall include:
 - 1) Clearly defined lines of responsibility and accountability throughout the organisation, including a direct safety accountability of the accountable manager;



- 2) A description of the overall philosophies and principles of the organisation with regard to prevention of problematic use of psychoactive substances in the aviation workplace, referred to as the Psychoactive Substances policy. This policy shall be approved by the accountable manager, widely communicated and available to all aviation personnel and personnel required by PSMP.ORO.035 and shall ensure that the PSMP:
 - i) Complies with medical confidentiality requirements;
 - ii) Is non-discriminatory and fair towards aviation personnel;
 - iii) Includes an internal appeal system to deal with appeals lodged by aviation personnel who are subjected to the PSMP;
- 3) The identification of hazards entailed by the use of psychoactive substances in the aviation workplace, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;
- 4) Maintaining personnel involved in the PSMP trained and competent to exercise their tasks;
- 5) Documentation of all management system key processes in a PSMP Manual, including a process for:
 - i) Making aviation personnel and personnel involved in the PSMP aware of their responsibilities;
 - ii) Maintaining a psychoactive substances education programme including the means in which such programme is delivered;
 - iii) Maintaining a testing programme that ensures that:
 - A) Aviation personnel are tested against the substances specified under or required by Appendix I, and when the circumstances specified under paragraph PSMP.ORO.030 b) require it with due consideration of chain of custody principles. The cut-off levels that constitute a non-compliance by an aviation personnel with PSMP.ORO.015 (a) (1) shall not be lower than those included in Appendix I.
 - B) The result of any test is provided to the tested aviation personnel only after he/she signs a declaration form certifying:
 - 1) Positively his/her identity;
 - 2) He/she was in his/her commitment period at the time of the test;
 - 3) He/she doesn't have any concern on any aspect of the test carried out on him/her except those he/she has highlighted on the collection form; and
 - 4) Any medication he/she may have taken which could affect the result of the test.
 - C) The time between when an aviation personnel is required to submit himself/herself for a test and the time of collection of the sample is minimised in particular for alcohol test since level of alcohol may reduce with time;



- iv) Maintaining an employee assistance programme to prevent an aviation personnel from being a hazard to aviation safety and how it is promoted to aviation personnel;
 - v) Maintaining and activating the response programme when an aviation personnel has been tested or has been identified as a hazard to aviation safety because of his problematic use of psychoactive substance before he/she can be considered fit to resume safety-sensitive activities;
 - vi) Determining if an aviation personnel has committed a violation as defined by PSMP.ORO.015 (b).
 - vii) Reporting system as per PSMP.ORO.020;
 - viii) Deciding the internal sanction to be taken against an aviation personnel who failed to comply with this PSMP.ORO.015. This decision shall be based on the organisation's policy and shall be made before the case is reported to the GCAA;
 - ix) Returning an aviation personnel to any SSAA in accordance with PSMP.ORO.010(d);
 - x) Amending, authorising and communicating to any concerned personnel this documentation and its amendment; and
 - xi) Any other means established and implemented to comply with this CAR.
- 6) A function to monitor compliance of the organisation with this CAR. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary; and
- b) An aviation personnel shall be tested in the following circumstances:
- 1) Pre-employment;
 - 2) Post-accident or serious incident;
 - 3) Reasonable suspicion;
 - 4) Periodic testing;
 - 5) Return to SSAA or follow-up testing;
 - 6) Voluntary testing; and
 - 7) Random testing
- c) The PSMP shall facilitate self-referral for help from an aviation personnel with a substance problem and refer him/her to EAP.

AMC to PSMP.ORO.030(a)(2)(iii)

To ensure that the process provides a greater degree of independence, the organization's internal appeal process should include a clear, transparent and documented process accessible to the appellant with the following elements:



- a) All appeals should be submitted in writing or by email no more than a certain period (as defined by the organisation but not more than two months) following the date on which the decision made by the organisation was communicated and sent to the appellant.
- b) The appeal process should be fully independent and separate from the initial process that has resulted in the decision appealed against;
- c) A timely and correct execution of the process within specified timelines;
- d) Within one week after receipt of the appeal, a confirmation of receipt of the appeal should be sent, including information about the way the appeal will be dealt with, and the time-frame of the whole process.
- e) The appeal official should reassess the case on all its merits and, in case of unclear standpoints, consult the parties involved, including the appellant. If necessary the appeal official can ask for legal advice.
- f) Within two months after receipt of the appeal, a decision to the appellant must be sent. The decision must be supported by valid reasons.

Note: This process should not be confused with GCAA appeal process specified under PSMP.ARO.010.

AMC to PSMP.ORO.030(a)(5)

The PSMP Manual does not require approval or acceptance by the GCAA. At the time of change, it must be submitted to the GCAA and in return the GCAA will acknowledge receipt. However, the GCAA will conduct oversight activities to ensure it is compliant and effective.

The PSMP Manual should be designed around the following building blocks:

- a) Senior management's commitment to the management of safety;
- b) Applicability
- c) Comprehensive description of all necessary roles and responsibilities of the personnel engaged in the programme and also necessary procedures to control the programme;
- d) Disciplinary Action following a positive test result
- e) Responsibilities of the organisation
- f) Responsibilities of the DER
- g) Responsibilities of SSAA employees
- h) Effective implementation of Standard Operating Procedures (SOPs), including all elements of testing programme such as Substances that will be tested, how will Testing be conducted? Reason for Testing? Who will conduct the testing?
- i) circumstances when an aviation personnel must cease SSAA
- j) Returning to Safety Sensitive Aviation Activities
- k) Effective safety reporting which include reasonable suspicion testing;
- l) Continuous monitoring through systems to collect, analyse, and share positive reports arising from all types of testing;
- m) Investigation of safety occurrences related to alcohol or drugs with the objective of identifying systemic safety deficiencies rather than assigning blame;
- n) Sharing safety lessons learned and best practices through the active exchange of safety information in a de-identified manner;
- o) Integration of safety training for supervisors and aviation personnel;



- p) Continuous improvement of the overall level of safety;
- q) drug and alcohol response program;
- r) Appeal;
- s) Privacy;
- t) PSMP Review, Audit and Compliance; and
- u) PSMP Record Keeping.

AMC to PSMP.ORO.030(a)(5)(ii)

The education programme should cover the elements complemented by ICAO Doc 9654 -Manual on Prevention of Problematic Use of Substances in the Aviation Workplace:

- a) The potential effects of psychoactive substances;
- b) The early recognition, treatment and rehabilitation of aviation personnel with a psychoactive substances problem; a peer intervention programme may be considered in this context;
- c) Medication use (prescribed or over the counter) to ensure the safe exercise of safety sensitive activities whilst taking medication;
- d) All employees should be aware about the consequences of violation against the company's policy and the GCAA regulation. Appendix II provides information about the legislative framework prescribed in the UAE.
- e) Other relevant treatments, drug counselling, rehabilitation, employee assistance programs and confidentiality issues may be included in the training, if applicable.
- f) Self-referral for help from an aviation personnel with an psychoactive substances problem; and
- g) Aviation personnel's liability in case of positive testing, incidents and accidents along with the violations as per UAE Laws and deterrent action the GCAA may decide.

AMC to PSMP.ORO.030(a)(5)(iii)

Before each test the following should be verified:

- a) any testing methods, devices and equipment to conduct accurately, effectively and efficiently testing are included in the PSMP Manual or procedures;
 - 1) Those devices and equipment must be used in a way that is consistent with the instructions of the manufacturers and are maintained as per published manufacturer's standards;
 - 2) Facilities are appropriate for the collection and to ensure chain of custody;
- b) Psychoactive substances and cut-off levels are documented and known to the concerned aviation personnel and person conducting the test;
- c) The persons involved in the process are qualified, competent and authorised before they exercise their duties; and
- d) Any other requirement of this CAR essential to ensure accurate and reliable testing is complied with.

AMC to PSMP.ORO.030(a)(5)(ix)

Every return to SSAA should be decided by the DER based on a comprehensive assessment conducted by an SAP and a subsequent evaluation by an AME.



Generally, the SAP is a person who evaluates individuals who have violated the provisions of PSMP and who makes recommendations concerning education, treatment, follow-up testing, and aftercare. The SAP represents the major decision point (and in some cases the only decision point) an organisation may have in determining whether or not an aviation personnel can return to safety sensitive activities. The SAP's function is also to protect the public interest in safety by professionally evaluating the aviation personnel. It is important for a SAP to fully understand and comply with GCAA regulations while paying particular attention to the organization PSMP's system.

More information could be found at:
<https://himsprogram.com/>

Certified SAPs are listed hereafter:
https://eservices.gcaa.gov.ae:444/eMedical/Pages/AD_ListView.aspx?AMERole=Specialist

If the aviation personnel does not hold a Medical certificate, the aviation personnel may choose any the above listed SAP.

AMC to PSMP.ORO.030(a)(6)

Procedures for monitoring the compliance and effectiveness of the PSMP should be documented and should include measures to ensure:

- a) Reduction of Psychoactive substances-related problems within the organisation through proper personnel management, good employment practices, improved working conditions, proper arrangement of work, and consultation between management and concerned staff;
- b) Prohibition or restriction of the availability of Psychoactive substances in the workplace;
- c) Identification, assessment and referral to a substance abuse professional for those who have Psychoactive substances-related problems;
- d) Treatment and rehabilitation of aviation personnel with Psychoactive substances-related problems;
- e) Application of the disciplinary sanctions in case of violation; and
- f) Establishment and maintenance of an effective and fair Psychoactive substances testing programme that focus on preventing use of psychoactive substance in the workplace with due respect to the confidentiality principles.

GM to PSMP.ORO.030(a)(2)

POLICY STATEMENT

Each PSMP should reflect the unique corporate culture and values of the company, the fundamental aspects of the business it is in, the regulatory environment within which it must operate, and most important, the specific program needs. However, there are a number of key areas that policies must address, and several difficult decisions that need to be undertaken

There are four cornerstones that underlie the various policy details:



- a) Awareness and education programs, both at “roll out” and ongoing;
- b) Access to assistance, through a contracted employee assistance program, or as appropriate, community resources;
- c) Training for supervisors on their role under the policy, including both performance management for early identification of potential problems, and appropriate steps to take to investigate a possible policy violation; and
- d) A variety of tools to investigate if someone may be in violation of the policy.

The policy must:

- a) Be written down and broadly communicated to all employees;
- b) State each category of aviation personnel covered by the PSMP;
- c) Provide a clear definition of substance abuse and prohibited activities and also addresses the use of substances (whether prescribed or over-the-counter) for appropriate medical purposes, if the use of such substances in the workplace poses a risk to aviation safety, to the employee himself or to his co-workers;
- d) Describe the system for dealing with any violation and address any matters; and
- e) Outline the applicable rules and responsibilities, including any higher standards for risk or safety-sensitive positions;
- f) Identify, and provide the contact details for each person in the organization appointed as per PSMP.ORO.035(b) ;
- g) Clarify opportunities to access assistance, reinforce the importance of obtaining assistance for a problem before it impacts the workplace, and outline conditions for return to SSAA, including aftercare provisions on a case by case basis;
- h) Set out the principles which will be followed to investigate a possible policy violation, (e.g. investigation and escort procedures if someone is unfit for work, accident investigation, alcohol and drug testing); and
- i) Set out consequences for a policy violation and any conditions for continued employment, including provisions for a substance abuse professional assessment to determine whether the individual has a problem in need of accommodation.
- j) A provision that all information, interviews, reports, statements, memoranda, and test results are confidential unless requested within the framework of the regulation.

GM to PSMP.ORO.030(a)(3)

According to the European Monitoring Centre for Drugs and Drug Addiction (EMCDDA), the speed of innovation of new synthetic drugs is increasing over the last years. Consequently, the GCAA considers that organisations are best placed to define any other substances to be tested, and adapt their policy to the actual threats and prevalence of new drugs, including synthetic drugs that aviation personnel are exposed to.

Using medical or law enforcement sources, decision makers should first assess what psychoactive substances are commonly available and used in society. Next, the hazard potential of the substances should be assessed in consultation with medical personnel. These advisers to the decision makers should determine the acute and chronic effects of the substance on safety-critical functions and behaviour,



including: cognitive processes (concentration, judgment, memory); sensitivity to and ability to respond properly to stimuli; motor functions; physiological impairment; and mood/emotional state. In addressing illegal alcohol or other drug use, decision-makers should take into account not only the drug effects per se but also the psychosocial factors that would lead an individual to use them. Finally, the degree to which the effects of such substances could influence safety-sensitive duties must be assessed. Factors relevant to this determination are:

— The likelihood of dependence occurring.

Substances with high potential for dependence are more likely to pose a threat to aviation safety. Once a user becomes dependent on a substance, the urge to repeat its pleasurable effects or to avoid the intensely unpleasant feelings of withdrawal may affect the user's ability to limit the use to times that would not affect the safe performance of his duties.

— *The perceived usefulness of the substance in mitigating negative aspects of the job.*

The evidence linking adverse working conditions to alcohol and drug abuse is becoming stronger. The potential exists for use of marijuana in attempt to relieve boredom or the use of stimulants to maintain alertness. Employees may also abuse alcohol, tranquilizers, or other central nervous system depressants to manage stress and anxiety.

— *The degree to which the substance distorts the perception of its effects.*

If the effects of use of a substance include an increase in feelings of confidence and the illusion that mental and physical performance is enhanced, the likelihood increases that individuals will perform SSAA duties while affected by the substance. Persons using cocaine, for example, may feel sharper and more energetic, while persons using alcohol may feel calmer and more able to manage stressful situations.

— *The potential for spontaneous recurrence of the drug's effects.*

This is primarily an issue for hallucinogens stored in body tissues. Research indicates that with some of these drugs, there may be a recurrence of the effects of the drugs for up to several months after the initial dose. Because the user cannot control the recurrence, use of such drugs is clearly incompatible with aviation duties.

— *The likelihood and severity of adverse physiological and psychological sequelae*

Use of psycho-active substances can cause adverse effects that last even after the dose has been metabolized. These effects include, for example, short-term memory impairment (marijuana), cardiovascular impairment (alcohol, cocaine and others), and psychosis (amphetamines, marijuana, hallucinogens). The degree to which such effects are inconsistent with the safe performance of aviation duties must be considered.

There are no absolute rules in determining whether particular substances have a hazard potential significant enough to warrant the institution of prevention efforts. If the available substances have significant effects on safety-critical behaviour and functions, they may be considered to be a potential



hazard to aviation even if the likelihood of such drugs affecting the aviation workplace is low. It is considered a threat to aviation safety simply that alcohol or other drugs are present in the population at large. The most important aspect of conducting a hazard potential assessment is the willingness to obtain and review objectively the relevant information, without presuppositions regarding the outcome.



HAZARD POTENTIAL ASSESSMENT

1. Identify available psychoactive substances:

For each substance, complete the following:

2. Is non-therapeutic use of the substance illegal?

YES NO

3. Acute (*) and chronic (+) effects on safety-critical behaviour and functions:

	None	Mild	Moderate	Severe
Cognitive processes				
Stimuli response/sensitivity				
Motor functions				
Physiological impairment				
Mood/Emotions				

4. Potential for adverse effects influencing performance of safety-related duties:

	None	Low	Medium	High
Likelihood of dependence (see table on next page)				
Perceived utility in mitigating negative aspects of job				
Degree of distortion of perception of substance's effects				
Potential for spontaneous recurrence of effects				
Likelihood of adverse sequelae				
Severity of adverse sequelae				



5. Determination of hazard potential

All information should be taken into consideration when determining to what degree substance use poses a potential hazard to aviation safety. Organisation should determine whether substances with the potential for abuse are available, have effects that are incompatible with the safe performance of aviation duties, or may be used in a manner that could affect such duties. Additionally, if non-therapeutic use of the available substances is illegal, the determination should include consideration of the dangers posed by the psychological factors that might predispose someone to engage in unlawful conduct.



COMMONLY USED SUBSTANCES WITH POTENTIAL FOR DEPENDENCE

Drug	Physical dependence	Psychical dependence	Tolerance
CNS DEPRESSANTS			
Opioids	++++	++++	++++
Synthetic narcotics	++++	++++	++++
Barbiturates	+++	+++	++
Glutethimide	+++	+++	++
Methyprylon	+++	+++	++
Ethchlorvynol	+++	+++	++
Methaqualone	+++	+++	++
Alcohol	+++	+++	++
ANXIOLYTICS			
Diazepam, chlordiazepoxide (long-acting)	+	+++	++
Alprazolam, oxazepam, temazepam (short-acting)	++	+++	++
STIMULANTS			
Amphetamine	?	+++	+
Methamphetamine	?	+++	+
Cocaine	0	+++	+



LSD = lysergic acid diethylamide
THC = tetrahydrocannabinol

Excerpt from "The Merck Manual of Diagnosis and Therapy". Sixteenth Edition. Merck Research Laboratories. Rahway, New Jersey, 1992; page 1550.

GM to PSMP.ORO.030(a)(5)(ii)

ICAO Doc. 9654 contains educational materials (use and effects of psychoactive substances and additional information sheets).

GM to PSMP.ORO.030(a)(5)(iv)

A properly developed Employee Assistance Programme (EAP) can include a range of valuable prevention tools. The choice of any of the following services may be made based on the organisation and employee needs and the availability of resources.

Programme development

- a) Needs assessment
- b) Programme design
- c) Development of policies and procedures
- d) Labour integration
- e) Facilitation of programme initiation

Clinical services (may include family)

- a) Assessment, counselling and referral services
- b) 24-hour response
- c) Rapid scheduling of appointments
- d) Telephone and in-person follow-up

Training

- a) Employee education
- b) Supervisor training
- c) Refresher courses
- d) Written guides for employees and supervisors

Consultation

- a) Programme consultation with key managers
- b) Advice to supervisors in specific cases

Reports

- a) Performance evaluations



b) Recommendations to management

EAP promotion

- a) Health promotion activities
- b) Workplace posters

GM to PSMP.ORO.030(a)(5)(v)

The response programme should be able to address cases that do not qualify for deterrent action as per PSMP.ARO.005 and it should declare the cut-off levels that should qualify for activation of the response programme provided the aviation personnel has not violated this CAR.

Example to illustrate above situation: A license holder tested with an alcohol level of 0.011% is not in violation with this CAR, however since the PSMP is meant to detect individuals with problematic use of psychoactive substance and resolve resurgence of such hazard in the workplace, the GCAA, with prejudice to the employee contract, expects that the organisation will enrol him/her in its response programme to facilitate treatment and rehabilitation, if required.

GM to PSMP.ORO.030(a)(5)(vi)

An aviation personnel has violated this CAR when found not in compliance with PSMP.ORO.015. However, the GCAA would like to highlight that the GCAA's responsibilities and liability may be compromised by a wrong judgment. The GCAA cannot be held accountable nor liable for a "false positive" case (i.e. the organisation determined that the aviation personnel committed a violation when he/she actually has not) and a "false negative" case (i.e. the organisation determined that the aviation personnel has not committed a violation when he/she actually has). For the latter, the organisation's liability and safety's consequences will worsen if the aviation personnel has been found exercising a SSAA.

The conclusive determination of a positive test must include review of the complete case and ensure that the testing process, chain of custody and control, testing results generated by the testing programme and evaluating medical explanations for certain psychoactive substance test results conform to what the GCAA requires. During this process, it is not allowed to seek advice, support or any form of information from the GCAA to avoid putting the GCAA in any future conflict of interest situation between an organisation and its aviation personnel.

GM to PSMP.ORO.030(a)(5)(ix)

The term "permission" refers to circumstances specified under PSMP.ORO.010(d) which requires permission by the GCAA, even if the DER has determined based on the comprehensive assessment whether the aviation personnel is fit to return to SSAA.

GM to PSMP.ORO.030(b)

DEFINITION OF EACH TYPE OF TEST

- a) Pre-employment:



This type of testing is designed to identify applicants for employment or for transfer to a SSAA position who engage in use of psychoactive substances. The consequences of a test indicating the presence of such a substance at or above the designated cut-off levels could include refusal of employment or transfer or an offer of employment or transfer conditioned on an agreement to submit to monitoring (follow-up) testing.

Note. - In general, unless a zero-tolerance standard is applied, pre-employment alcohol testing provides little additional information to help an organisation judge an applicant objectively.

b) Post-accident or serious incident:

Tests of this type should generally be performed on aviation personnel whose conduct could have contributed to the accident or serious incident. The testing should be conducted as soon as possible and within the timeframes required by the investigating authorities.

c) Reasonable suspicion:

This testing is based on indicators that aviation personnel is, during his/her commitment period, impaired by a psychoactive substance. Many PSMP supervisors hesitate to identify an individual for suspicion-based testing for fear that the aviation personnel would claim to have been defamed by the suspicion. The key to effective inclusion of reasonable suspicion testing in any programme rests in ensuring that the bases for testing are fully defined and that responsible PSMP supervisors are adequately trained.

d) Periodic testing:

This type of testing is conducted on a regular, announced basis (during medical renewal) and it is another way to check aviation personnel who have problematic use of psychoactive substance and not necessarily captured during random testing. It is designed to deter aviation personnel from using psychoactive substance, but has the primary effect of identifying those too dependent to abstain from use proximate to the time of the test.

e) Return to SSAA/follow-up testing:

These tests are necessary when an aviation personnel returns to work following an instance of problematic substance use. Such an aviation personnel should be required to demonstrate being abstinent in order to return to work, and should demonstrate continued abstinence through frequent or unannounced follow-up testing.

f) Voluntary testing:

In addition to required testing, organisation may permit voluntary submission to testing. Volunteers can include individuals seeking assistance for a substance use problem, or management officials not otherwise subject to testing who submit to demonstrate their faith in the programme. Generally, such test is under the Employee Assistance Programme.

g) Random testing



Random testing is unannounced and does not presume that any particular individual has engaged in or will engage in problematic substance use, but it does presume that the threat of such use exists in the relevant environment. The primary purpose of unannounced random testing is to detect and deter illegal drug use and alcohol misuse. Another purpose of random testing is to remove aviation personnel engaged in such use from the performance of safety-sensitive activities.

Aviation personnel must be fully advised of the details of the programme and know that that the process of selection is random and fair

- i) **Aviation Personnel Selection.** The selection of employees for random testing can be made by a scientifically valid method such as random number table or a computer based random number generator that is matched with employees' payroll identification number or other comparable identifying numbers. It is the Employer's responsibility to find the best fair, and transparent method to perform the random testing.
- ii) **Annual Percentage Rate for random testing.** The minimum annual percentage rate for random testing is determined based on organization risk assessment. The decision to increase or decrease the minimum annual percentage rate for testing is based on the reported positive rate or other risks. The new minimum annual percentage rate for random drug testing will be applicable starting January 1 of the calendar year following the new calculated minima. Reduction on this minimum annual percentage rate should be based on representative calendar years of an effective PSMP.

VIOLATION: Even if tested positive at one of these circumstances, a person will not be deemed in violation of this CAR since the person must also be holder of a GCAA aviation document and, as well, must be within his/her commitment period before a type of test is conducted.

PSMP.ORO.035 – PSMP PERSONNEL REQUIREMENTS

- a) The accountable manager appointed by the organisation under the applicable specific operating regulation shall be ultimately responsible for establishing and maintaining an effective PSMP.
- b) A person or group of persons shall be appointed by the accountable manager, with the responsibility of ensuring that the organisation remains in compliance with the applicable requirements. Such person(s) shall be ultimately responsible to the accountable manager.
- c) The organisation shall have sufficient qualified personnel for the planned tasks and activities to be performed in accordance with this CAR.
- d) The organisation shall maintain appropriate experience, qualification and training records to show compliance with requirements of paragraph (c).
- e) The organisation shall ensure that all personnel engaged in the PSMP are aware of the rules and procedures relevant to the exercise of their duties.



AMC to PSMP.ORO.035(b)

The organisation should identify a person who fulfils the role of Designated Employer Representative (DER). The DER should act as the focal point to the GCAA and be responsible for the development, administration and maintenance of the PSMP.

The functions of the DER should be to:

- a) Facilitate hazard identification, risk analysis and management due to the presence of psychoactive substances within the aviation workplace;
- b) Monitor the implementation of actions taken to mitigate risks;
- c) Provide periodic reports on the PSMP performance;
- d) Ensure maintenance of PSMP documentation;
- e) Ensure that there is adequate training to prevent presence and use of psychoactive substance in the aviation workplace is available and that it meets acceptable standards;
- f) Provide advice on safety matters related to PSMP;
- g) Ensure initiation and follow-up of investigations of non-compliance, non-conformance and positive reports;
- h) Nominate the PSMP Supervisors to ensure compliance with PSMP.ORO.010(c)(6);
- i) Take immediate action(s) when he/she is (made) aware of something that could affect or pose a hazard to aviation safety including removal of an aviation personnel from any safety sensitive activities when his/her capacity could compromise safety;
- j) Seek for medical advice as and when necessary to fulfil effectively his/her role in accordance with this CAR. The GCAA recommends the use of the services of an MRO to interpret the results and assure the accuracy of tests related to psychoactive substances other than alcohol. Reference to the MRO roles is found under GM3 to PSMP.ORO.035 to understand the importance of involving a MRO in the decision making since the MRO is able to evaluate the aviation risk. However, the DER and the organisation must understand that the MRO cannot be held accountable for the final decision he/she will make;
- k) Take appropriate decisions in the testing and evaluation processes, also receive test results and other communications for the organisation, consistent with the requirements of this CAR;
- l) Determine as soon as possible if an aviation personnel or any other information could compromise flight safety;
- m) Return to SSAA in accordance with PSMP.ORO.010(d);
- n) Report to the GCAA as per PSMP.ORO.025, including actions taken by the organisation;
- o) Ensure that any violation of this CAR is addressed as per the organisation's policy, manual and procedures while maintaining the level of fairness, consistency and equality in applying any penalty within the organisation.



GM to PSMP.ORO.035(a)

For example the Accountable Manager of an AOC Holder is the person designated under CAR-OPS 1 or CAR-OPS 3 as applicable, found acceptable to the GCAA at the time of certification for an AOC.

GM1 to PSMP.ORO.035(b)

Organisation and the appointed person(s) accepting any accountabilities mentioned under the PSMP.ORO.035 (b):

- a) Are ultimately and collectively liable for any decisions made; that shall not compromise safety; and
- b) Must understand that the GCAA may take the necessary action against violators to this CAR.

The number of appointed person(s) should be commensurate with the size and complexity of the organisation. Before appointing a person to fulfill an accountability of the PSMP, the organisation should ensure that:

- a) The assigned accountabilities do not compromise the effectivity of the PSMP; and
- b) The assigned accountability remains compatible with any other roles or accountabilities he/she is assigned to.

GM2 to PSMP.ORO.035(b)

Before their nomination, PSMP Supervisors should receive a training covering:

- a) Aviation personnel education curriculum
- b) Supervisors' responsibilities
 - i) Management of employees
 - ii) Workplace safety
 - iii) Identification, documentation, and resolution of employee performance problems
- c) Management of suspected problematic substance use
 - i) Signs and symptoms (observation/documentation)
 - ii) Removal from duties
 - iii) Referral for assistance
 - iv) Confidentiality
 - v) Involvement of law enforcement personnel
 - 1) Criminal misconduct (e.g. drug trafficking)
 - 2) Dangerous or combative employee
- d) Conflict resolution skills
- e) Re-entry issues
 - 1) Fitness for SSAA



- 2) Confidentiality
- 3) Peer involvement

GM3 to PSMP.ORO.035(b)

MEDICAL REVIEW OFFICER (MRO)

The use of MRO is recommended and is meant to protect the organisation in terms of making impartial decisions revolving around the drug test results.

An MRO is the person who is a licenced physician, has knowledge regarding the pharmacology and toxicology of illicit drugs, and has clinical experience in controlled substances abuse disorders, including detailed knowledge of alternative medical explanations following a confirmatory positive test.

An MRO should have knowledge in the following subjects:

- a) Collection procedures for urine specimens;
- b) Chain of custody, reporting, and recordkeeping;
- c) Interpretation of drug and validity tests results;
- d) The role and responsibilities of the MRO in the alcohol & drug testing;
- e) The interaction with other participants in the program (e.g., DERs and SAPs); and
- f) Provisions of current GCAA regulations, rules and guidelines applying to organisations for whom he reviews the test results, including changes and updates to the rules, guidance, interpretations, and policies affecting the performance of MRO functions, as well as issues that MROs confront in carrying out their duties.

A MRO generally performs the following duties and responsibilities:

- a) Act as an independent and impartial “gatekeeper” and advocate for the accuracy and integrity of the drug testing process who receives all confirmatory positive test results for interpretation.
- b) Provide a quality assurance review of the drug testing process for the specimens under his preview by ensuring the review of the Custody and Control Form (CCF) on all positive specimen collections for the purposes of determining whether there is a problem that may cause a test to be cancelled.
- c) Determine whether there is a legitimate medical explanation for confirmatory positive test, adulterated, substituted, and invalid drug tests results from the laboratory.
- d) Conduct a medical evaluation of the donor when a collector reports that the donor was unable to provide a breath or urine specimen.
- e) Conduct an interview with the donor for the purpose of verification of the results for cases of positive testing, refusal to test or adulterated sample.

PSMP.ORO.040 - CONTRACTED ACTIVITIES

When an organisation contracts any part of its activity required by this CAR, the contracted organisation shall work under the approval of the contracting organisation granted by the aviation documented issued by the GCAA. The contracting organisation shall ensure that the GCAA is given access to the contracted organisation, to determine continued compliance with this CAR.



AMC to PSMP.ORO.040

RESPONSIBILITY WHEN CONTRACTING ACTIVITIES

- a) The organisation may decide to contract certain activities to external organisations, provided the organisation's PSMP manual lists them and describes their selection process.
- b) A written agreement should exist between the organisation and the contracted organisation clearly defining the contracted activities and the applicable requirements.
- c) The contracted related activities relevant to the agreement should be included in the organisation's safety management and compliance monitoring programmes.
- d) The organisation should ensure that the contracted organisation has the necessary authorisation or approval when required, and commands the resources and competence to undertake the task.
- e) When dealing with medical service providers, as a minimum, they should hold the local health authority's appropriate authorisation.

GM to PSMP.ORO.040

A contracted organization must comply with requirements and procedures adopted by the national health authority of its principal place of business.

PSMP.ORO.045 - FACILITY REQUIREMENTS

The organisation shall have facilities allowing the performance and management of all planned tasks and activities in accordance with this CAR, in particular dedicated collection site that has the capability to accommodate the personnel, materials, equipment, and necessary supervision to provide the sample collection, temporary storage, and shipping of urine specimens to a laboratory, and an adequate and controlled workplace environment.

AMC to PSMP.ORO.045

COLLECTION SITE

- a) The collection site should include a facility for urination which may include a single toilet room, having a full-length privacy door, within which urination can occur or the second type where facility for urination may include in a multi-stall restroom.
- b) The collection site should be secured from any water sources, and the water in the toilet bowl should be blue; also there should be no soap, disinfectants, cleaning agents, or other possible adulterants present.
- c) The collection site should be appropriate to ensure chain of custody is maintained from the time the specimen is collected.
- d) The collection site should allow appropriate handling of all specimen and containers required for confirmatory procedure.
- e) The collection site should permit verification of the validity of the specimen collected.
- f) The collection site should allow collection of urine under supervisions when required by the PSMP Manual.



- g) Collection of samples should be conducted by collecting officers who have undergone training and hold certificates by an accredited toxicologist.

PSMP.ORO.050 - RECORD-KEEPING

- a) The organisation shall establish a system of record-keeping that allows adequate storage and reliable traceability of all activities carried out, covering in particular all the elements indicated in PSMP.ORO.030.
- b) The format of the records shall be specified in the organisation's procedures.
- c) Records shall be stored in a manner that ensures protection from damage, alteration and theft for a minimum of 5 years.
- d) All test results, and other aviation personnel health records shall be handled in a manner that respects the privacy and confidentiality requirement imposed by the national medical authorities.

AMC to PSMP.ORO.050(a)

The minimum records to keep are listed below:

- a) Records of all tests conducted regardless if positive or negative;
- b) Documentation of refusals to take required alcohol and/or drug tests (including substituted or adulterated drug test results);
- c) Annual statistical Report structured in a manner to demonstrate to the GCAA the effective implementation of the PSMP;
- d) All follow-up tests and schedules for follow-up tests;
- e) Equipment and devices maintenance records;
- f) Records relating to the collection process (CCF);
- g) Records of cancelled test results;
- h) Records of training of personnel implementing PSMP;
- i) Records of all appeals handled.

GM to PSMP.ORO.050(d)

In order to comply with privacy and confidentiality of records, the results of a test may not be disclosed without the prior written consent of the concerned aviation personnel, unless the disclosure is to:

- a) The Medical Review Officer or SAP, as applicable; or
- b) The GCAA official personnel; or
- c) Any supervisory or management official within the organisation having authority to take disciplinary action against such employee, ;or



- d) Any person(s) designated by the organisation to conduct data collection and other activities necessary to comply with this CAR; or
- e) Any person pursuant to a court order issued an UAE court; or
- f) The aviation personnel who is the subject of alcohol and drug test, who is entitled, upon written request, but not later than 20 days after any drug or alcohol test.

PSMP.ORO.055 - LABORATORY REQUIREMENTS

- a) The organisation shall ensure that it utilises a laboratory whose personnel employed or contracted in the testing programme are:
 - 1) For laboratory in the UAE Territory: licensed by the Federal or local Health authority to conduct the psychoactive substance testing;
 - 2) For laboratory outside the UAE Territory Licenced by national health authority of their principal place of business to conduct the psychoactive substance testing.
- b) The organisation shall only utilise a laboratory that has established key processes to ensure that:
 - 1) any devices and equipment to conduct accurate testing are controlled, used and maintained as per the manufacturer data and approved by the national health authority for that purpose ;
 - 2) the medical confidentiality requirements are respected;
 - 3) the testing methodology(ies) are evidence-based, highly sensitive and specific to detect the psychoactive substances and cut-off levels as specified under Appendix I.
 - 4) the chain of custody and integrity of the test are assured at all times and any defect reported;
 - 5) a prompt mechanism of reporting of testing results to the organisation responsible for the aviation personnel; and
 - 6) records keeping system is secured and assures privacy and confidentiality of all test results, and other aviation personnel health records.

AMC to PSMP.ORO.055(a)(2)

The laboratory should be accredited by CAP, NLCP, and ISO/IEC 17025 along with the ISO/IEC 17011 accreditation.

GM to PSMP.ORO.055(a)(2)

- a) National Laboratory Certification Program

The Substance Abuse and Mental Health Services Administration (SAMHSA) within Health & Human Services (HHS) establishes the scientific and technical guidelines to be used by US federal agencies and drug-testing laboratories for federally regulated drug testing. Testing must be performed at laboratories accredited by Health & Human Services (HHS) under the National Laboratory Certification Program (NLCP).

- b) College of American Pathologists

The College of American Pathologists (CAP) is a medical society whose members are board-certified pathologists. CAP's laboratory accreditation programs include a general program for clinical laboratories,



a program for reproductive laboratories, and a forensic urine drug-testing (FUDT) program for laboratories performing testing for nonmedical purposes, including workplace drug testing.

c) International Organization for Standardization

- 1) **ISO/IEC 17025:** The ISO/IEC standard that is applicable to workplace testing laboratory ties is ISO/IEC 17025, General requirements for the competence of testing and calibration of laboratories. This standard is applicable to a wide range of testing and calibration laboratories, and provides general requirements related to laboratory management and administration, as well as technical requirements.
- 2) **ISO/IEC 17011:** This standard specifies general requirements for the assessment of accreditation bodies (i.e., the independent third parties) that, in turn, assess and accredit laboratories. National, regional, and international organizations who grant recognition to accreditation bodies may use ISO/IEC 17011, along with sector-specific technical criteria, to evaluate the competence of an accreditation body.

GM to PSMP.ORO.055(b)(3)(ii)

Evidential testing methodologies are:

a) Urine: Urine drug testing should include:

- 1) **Screening test:** Screening tests alone are not sufficient for most legal purposes. On-site urine screening tests by Enzyme Immunoassay (EIA) procedure provide immediate results which, is very sensitive even to very minute quantities of a drug but can have significant instances of false positive test results. The screening test lacks the specificity, allowing only a class of substances to be identified, not one particular substance. Specimens that yield an EIA response below the specified cut-off level are reported as "negative." Any specimen that shows an EIA response at or above the specified cut-off level is considered "Screening Positive" for a particular drug or drug class; and based on GCAA requirements the Screening Positive specimen requires a confirmatory test.
- 2) **Confirmatory testing:** It should use an analytical procedure that provides a quantified result. The analytical methods of confirmation include gas chromatography (GC), gas chromatography-mass spectrometry (GC-MS) or liquid chromatography-mass spectrometry/mass spectrometry (LC-MS/MS).

b) Blood

- 1) It is for forensic purposes; it can be collected from a severely injured, intoxicated or dead person and therefore favoured for post-accident investigation.
- 2) Almost all drugs can be tested in blood.
- 3) It is not recommended to detect chronic use of any drugs.

c) Hair test

- 1) It should be used only if clinically indicated.



2) Specification for hair testing

- i) Where the hair testing is able to detect a pattern of repetitive drug use for up to 90 days, the urine testing is well suited to detect recent drug use for post-incident or reasonable suspicion testing. Hair test is the most effective way to evaluate long-term patterns of use.
 - ii) Hair testing is considered a relatively un-intrusive method of drug testing;
 - iii) Effectively, detects substance use over a longer period.
 - iv) Do not usually detect use within the past week.
 - v) Require a sample of hair about the diameter of a pencil and 1.5 inches long from the root. This test cannot be done with a single hair strand.
 - vi) Are not significantly affected by brief periods of abstinence from drugs.
- 3) Can sometimes be used to determine when use occurred and if it has been discontinued. Drugs, such as opiates (codeine, morphine, heroin) lay down on the hair shaft very tightly and are shown not to migrate along the shaft, thus, if a long segment of hair is available one can draw some "relative" conclusions about when the use occurred. However cocaine, although very easy to detect, is able to migrate along the shaft; making it very difficult to determine when the drug was used and for how long.



APPENDIX I: LIST OF PSYCHOACTIVE SUBSTANCES TO BE TESTED

- a) The following table contains the psychoactive substances to be tested with their associated cut-off levels that constitute a positive test.

	Substance	Screening Cut-off (ng/mg) used in the POC	Confirmatory test cut-off (ng/mg) used by Confirmatory Laboratory
1	Cannabis (Marijuana) and its metabolites / THC	50	15
2	Cocaine and its metabolites	300	150
3	Amphetamines (Including methamphetamine)	1000	500
4	Opiates with Morphine and metabolites.	2000	2000
5	Methadone	300	300
6	Barbiturates	300	150
7	Benzodiazepines	300	100
8	MDMA	500	250
	Alcohol	Alcohol 0.2 promille (90µg/L=9 µg/100ml /0.02 %BAC)	Alcohol 0.2 promille (90µg/L=9 µg/100ml /0.02 %BAC)

Note 1: It is known that the level of Alcohol in the body is based on the capacity of each aviation personnel's metabolism to gradually absorb it. This is why it is important to ensure that sample collections are sufficient and enough spaced to ensure that the cut-off level of alcohol is never breached. It is recommended that even for a negative report a second confirmatory test is conducted to verify the negative result. In case of ascending trend, additional screening test(s) may be required until the trend becomes descending or steady. In case of descending trend or steady, the person is confirmed negative if legal levels are not breached. A minimum time between tests shall be 20 minutes.

Note 2: A test will be positive only when those limits are exceeded. If an organisation decides lesser cut-off levels, then the test will not be positive as far as this CAR is concerned.

- b) Without prejudice to the above list, an organisation shall define any other psychoactive substances that have to be tested with predefined cut-off levels provided the psychoactive substances and associated cut-off levels are documented in the PSMP Manual.



APPENDIX II: RELEVANT LEGISLATION

Aviation personnel should be aware of the following legal provisions:

The Federal Act 20 of 1991 promulgating the UAE Civil Aviation Law (CAL) contains several provisions that could be imposed on any person when a case is reported as positive:

- a) ARTICLE 24(7) states that the “No person shall pilot an aircraft or act as a member of its flight crew while drunk or under the influence of a narcotic drug or any other substance which may impair his capacity to effectively exercise his duties. In all circumstances, he shall not use any such substances while on commitment period.”
- b) ARTICLE 26(2) states that the GCAA may “refuse to issue, renew or extend the validity of any licence, and may revoke or suspend any licence if the applicant for such licence or the holder thereof fails to meet the appropriate requirements or contravenes any of the provisions of this Law”;
- c) Article 38 states that, “No person shall commit any of the following acts:
 - 1) Use a certificate, license, approval, permission or any other document issued by the Competent Authority, which has been revoked, suspended or altered or if the holder is not entitled thereto,
 - 2) Lend a certificate, license, approval, permission or any other document issued by the Competent Authority to any other person, or allow its use by any other person,
 - 3) Make false representation for the purpose of obtaining, renewing or altering a certificate, license, permission or any other document, either for himself or on account of any other person,
 - 4) Destroy or distort any record the use of which is required under this Law, or alter, render illegible or delete any data from, or make false entries in, any such record during the period required for its retention, or assist in committing any such act,
- d) ARTICLE 55(6) states that “A person commits an offence against the safety of an aircraft if he intentionally and unlawfully commits, or attempts to commit, or is an accomplice of a person who...communicates information which he knows to be false, thereby endangering the safety of an aircraft in flight”.
- e) ARTICLE 68(1) states that “in the case of any contravention of a provision of this Law or the rules, regulations or decisions relating to the implementation thereof,” the GCAA may “revoke or suspend for a specified period of time the flying licence or any other licence” or “forbid the pilot-in-command of the aircraft from flying in the territory of the State for a specified period of time or permanently.”;
- f) ARTICLE 69(3) states that “a term of imprisonment not exceeding one year and a fine not exceeding fifty thousand Dirhams, or either penalty, shall be imposed on... any person who has piloted an aircraft when drunk to such an extent as to impair his capacity to pilot the aircraft;
- g) ARTICLE 74 states that the court of the UAE has “jurisdiction to consider all offences committed in contravention of the CAL or the decisions, rules and regulations issued in implementation thereof, if such offences have been committed in the territory of the State or in the airspace above it, or on board a national aircraft in flight over the high seas or over territories of undetermined jurisdiction”.



APPENDIX III: REFUSAL TO TEST

Refusals are determined by the DER. Decision must be based on evidenced based criteria and NOT on personal opinions about whether the aviation personnel is a long-time reliable worker; has ever tested positive or refused a test; was correctly selected for the test; or claims to have misunderstood the collector's instructions to remain at a collection site, among others.

Following is a non-exhaustive list of refusals and the instructions for handling them. Organisations may supplement this list provided that the event triggering a "refusal to test" is evidenced based – in all cases burden of proof of refusal to test lies with the organisation.

Event	Instructions
Fail to appear at a collection site when directed to report or failure to appear for a screening or confirmatory test when directed to report	If the aviation personnel did not get to the site or spent too much time getting there without valid reason, it is a refusal.
Fail to remain at the urine collection site	If the collector reports that the individual left the collection site before the testing process was complete although a clear instruction was given, it is a refusal.
Fail to provide a urine specimen	If the collector reports that the aviation personnel left the collection site before providing a required specimen or was unable to provide the required quantity without valid reason, it is a refusal.
Fail to permit a monitored or observed urine collection	If the organisation ordered an observed collection or if the collector required the collection to be monitored or observed, it is a refusal if the aviation personnel does not permit it to occur provided the organisation has taken all privacy measures in consideration.
Fail to provide a sufficient amount of urine	If the organisation employing or contracting the aviation personnel finds that there was no medical or justifiable reason for the aviation personnel to provide an insufficient amount of specimen, it is a refusal.



APPENDIX IV: REASONABLE SUSPICION TESTING FORM

Please record the following information to document your reasonable suspicion test determination.

Aviation personnel 's Name: _____	Aviation personnel 's ID: _____
Job Title: _____	
Location of Incident: _____	Date: _____ Time Observed: _____
Name & Signature of the person who had reasonable suspicion: _____	

Name & Signature of the person confirming the suspicion:

Observations (Please check all that apply, and include descriptions of any *changes* in behaviour.)

Appearance:

- | | | | |
|--|--|--|--------------------------------------|
| <input type="checkbox"/> Normal Pupils | <input type="checkbox"/> Tremors/ Twitches | <input type="checkbox"/> Flushed or Pale | <input type="checkbox"/> Dilated |
| <input type="checkbox"/> Sleepy eyes | <input type="checkbox"/> Sores/ Puncture Marks | <input type="checkbox"/> Heavy Eyelids | <input type="checkbox"/> Bloodshot |
| <input type="checkbox"/> Dishevelled | <input type="checkbox"/> Excessive Sweating | <input type="checkbox"/> | <input type="checkbox"/> Cleanliness |

Other (explain below)

Description/Notes: _____

Behaviour/ Demeanour:

- | | | | |
|--|------------------------------------|--|------------------------------------|
| <input type="checkbox"/> Nervous | <input type="checkbox"/> Erratic | <input type="checkbox"/> Mood Swings | <input type="checkbox"/> Lethargic |
| <input type="checkbox"/> Irritable Excited | <input type="checkbox"/> Paranoid | <input type="checkbox"/> Verbally/Physically Abusive | <input type="checkbox"/> Highly |
| <input type="checkbox"/> Confusion/Inattentive | <input type="checkbox"/> Combative | <input type="checkbox"/> Fatigue/ Sleeping/ Drowsiness | |

Other (explain below)

Description/Notes: _____



Motor Skills:

- | | | | | | | | | |
|--|--------------------------|----------------------|--------------------------|---------|--------------------------|------------|--------------------------|-------|
| <input type="checkbox"/> Normal
(explain below) | <input type="checkbox"/> | Swaying | <input type="checkbox"/> | Falling | <input type="checkbox"/> | Unbalanced | <input type="checkbox"/> | Other |
| <input type="checkbox"/> Unsteady | <input type="checkbox"/> | Lack of Coordination | <input type="checkbox"/> | Fidgety | <input type="checkbox"/> | Stumbling | | |

Description/Notes: _____

Speech:

- | | | | | | | |
|--|--------------------------|-------------|--------------------------|---------------------|--------------------------|-------|
| <input type="checkbox"/> Normal
(explain below) | <input type="checkbox"/> | Slurred | <input type="checkbox"/> | Loud | <input type="checkbox"/> | Other |
| <input type="checkbox"/> Incoherent | <input type="checkbox"/> | Exaggerated | <input type="checkbox"/> | Talking Excessively | | |

Description/Notes: _____

Odour:

- | | | | | |
|-------------------------------------|--------------------------|--------------------|--------------------------|-----------------------|
| <input type="checkbox"/> Normal | <input type="checkbox"/> | Smell of Alcohol | <input type="checkbox"/> | Excessive Cologne |
| <input type="checkbox"/> Body Odour | <input type="checkbox"/> | Smell of Marijuana | <input type="checkbox"/> | Other (explain below) |

Description/Notes: _____

Test Conducted: Yes No

Comments: _____



SUBPART B - GCAA REQUIREMENTS

PSMP.ARO.001 - RESPONSIBILITIES OF THE GCAA

- a) The GCAA shall be responsible for:
- 1) The oversight of the PSMP, with full access to data, records, facilities and equipment including those to service providers such as, but limited to, psychoactive substance collectors or testers;
 - 2) Taking any immediate action to any safety concern identified during any oversight activities;
- b) The GCAA shall not be responsible for any deficiency, error, mistake, violation committed by organisations, their service providers, or their personnel and for any wrong, incomplete, or false information or declaration provided by aviation personnel. The GCAA will only take decision based on evidence provided by the organisation or collected by the GCAA.

PSMP.ARO.005 - DETERRENT ACTIONS THAT COULD BE UNDERTAKEN BY THE GCAA

In cases where an aviation personnel committed a violation or an organization fails to comply with its responsibilities prescribed in Subpart A, the GCAA shall have the right to:

- a) Suspend temporary any aviation document issued by the GCAA;
- b) Revoke any aviation document issued by the GCAA; or
- c) Prosecute aviation personnel, organisation or personnel required by PSMP.ORO.035 in front of any UAE court of justice in addition to any action already taken under paragraph a) to d).

AMC to PSMP.ARO.005(c) and (d)

The flowchart contained in Appendix I to this Subpart describes when suspension or revocation will be decided.

GM to PSMP.ARO.005(c) and (d)

Refer to definition of “aviation document”. The GCAA may decide to suspend or revoke all aviation document hold by the aviation personnel to ensure he/she will not be engaged in SSAA anymore.

GM1 to PSMP.ARO.005

A suspended aviation document means aviation document holder cannot legally exercise the privileges of that aviation document.

A revoked aviation document means, the aviation document has been fully void and cannot be reinstated. In order to get an aviation document again, the person or organisation will have to request a new aviation document. If the person or organisation complies with the requirement of the sought aviation document, a new aviation document will be issued the old one will not be reinstated. Finally, depending on his/her history, the GCAA may render, on top of the revocation of an aviation document, a person or an organisation non-eligible temporary or permanently for any GCAA aviation document.



GM2 to PSMP.ARO.005

If an aviation personnel or organization holds more than one aviation document, the deterrent action that the GCAA will determine may be applicable to all aviation documents the organisation or aviation personnel holds.

GM3 to PSMP.ARO.005

Following the receipt of the alleged violation by an aviation personnel, the GCAA will verify, against the provisions of this CAR or Civil Aviation Law, the conclusions provided by the organisation (i.e. DER) along with any medical evaluation provided to ensure that these are consistent with this CAR or Civil Aviation Law. If the violation is legitimate then the GCAA will impose the appropriate deterrent action. The neutrality of the GCAA in the decision-making of this verification is mainly assured by the documentation and evidences provided by the organisation.

The verification conducted by the GCAA will not include any aspects of the process of collecting, securing and analysing the sample provided since this part is under the sole responsibility of the organisation. It is therefore the onus of the aviation personnel to prove to his/her organisation any flaw that he/she deems that led to conclude to a positive report

During this verification process the GCAA may interview the concerned aviation personnel and/or organisation or its representatives;

If the aviation personnel possesses any additional medical fact that could assist in determining the appropriate course of action, the aviation personnel must provide it to his/her organization. Such evidence should be provided within a reasonable time.

The GCAA will not assume any liability if an aviation personnel or organisation fails to surrender his/her aviation document(s) when requested to do so by the GCAA.

In the case of identification of non-compliance by an organisation or personnel required by PSMP.035, the GCAA will conduct an investigation to determine the type of deterrent action to enforce or may address the concern under the provision of PSMP.ORO.010(e)(2).

GM4 to PSMP.ARO.005

These provisions should apply in cases, but not limited to, where:

- a) The organisation or the aviation personnel or a person engaged in any element of the PSMP no longer complies with applicable requirements;
- b) Deficiency of record-keeping or submission of incorrect data or information;
- c) Falsification of records, certificates or documentation;
- d) Concealment of facts appertaining to an application for, or holder of, a medical certificate or false or fraudulent statements or representations to the GCAA; and
- e) Failure to correct findings.



PSMP.ARO.010 - APPEAL TO THE GCAA

- a) An aviation personnel or organisation may appeal against any deterrent action taken by the GCAA under PSMP.ARO.005. The appeal shall be lodged to the GCAA in accordance with the provisions of paragraph (b) below.
- b) The GCAA may consider to process the appeal if:
 - 1) The appeal is lodged within fifteen (15) working days of date of notification of the deterrent action issued by the GCAA, in a form and manner established by the GCAA; and
 - 2) Substantial and tangible evidence is provided in the appeal request.
- c) In relation to a deterrent action based on a decision made by the organisation, in addition to paragraph b), the GCAA may request an aviation personnel to lodge an appeal request related to the same matter with his/her organisation.
- d) An appeal lodged under this provision does not suspend the deterrent action which is appealed against.

AMC to PSMP.ARO.010(a)

PURPOSE OF THE APPEAL

This appeal process is intended to assure that decisions taken by the GCAA were fair, equitable, and in compliance with the provisions of the CAR.

The appeal is not intended to question or reverse any internal sanction taken by the organisation and is purely limited to issues related to the deterrent action taken under PSMP.ARO.005.

This appeals procedure is administrative rather than judicial in nature, and does not provide for a judicial review or for further levels of appeal. The decisions of the appeals official are final and not subject to challenge.

This procedure is intended to protect the rights of all affected parties and, therefore, neither the procedure nor the GCAA may be subject to negotiation, arbitration, or agreements with any one of the parties.

BASIS FOR APPEAL

An appeal must be based on the allegation that the deterrent action taken by the GCAA is either unfair, unjustifiable or materially wrong. Appeals to the GCAA must not be based on other factors such as contractual, commercial factors, employee relations or personal aspects.

This appeals procedure must be used only to resolve questions of the determination between this CAR, PSMP Manual and associated procedure and in-house performance of the organisation when implementing its PSMP, and shall not apply to other questions.

FORM AND MANNER OF FILING AN APPEAL.

The appeal should be lodged in writing to the GCAA with a copy to the person who issued the deterrent action and within the specified time frame. It is important to realise that a request of appeal under this section does not suspend or abrogate the initial deterrent action.



ACTION BY THE GCAA APPEAL OFFICIAL

Upon receipt of an appeal, an appeal official will be designated by the GCAA to process the appeal request. The appeal official will promptly register the appeal and send copies of the notice of appeal to the appellant and any other involved GCAA's officials

PROCESSING THE APPEAL

The appeals official may arrange for consultation with the concerned parties as are necessary, including (if requested by the appellant) an oral presentation. The organisation may be requested to attend.

The appeals official may require either party to submit any additional documents, oral or written testimony, or other items of evidence which they consider necessary for a complete review of the initial decision made.

DECISION OF THE APPEAL OFFICIAL

Within 30 working days after receipt of an appeal request, the appeal official will issue a written decision, either affirming or denying the appeal. This decision is final, with no further avenue of appeal within GCAA.

If it proves impracticable to issue a decision within the prescribed 30 working days, the appeals official may extend this period, notifying all concerned parties of the anticipated decision date.

GM to PSMP.ARO.010

Any appeal by the aviation personnel against any decision made by his or her organisation must not be submitted to the GCAA under this provision. This provision deals with appeals against a decision taken by the GCAA to issue a deterrent action.

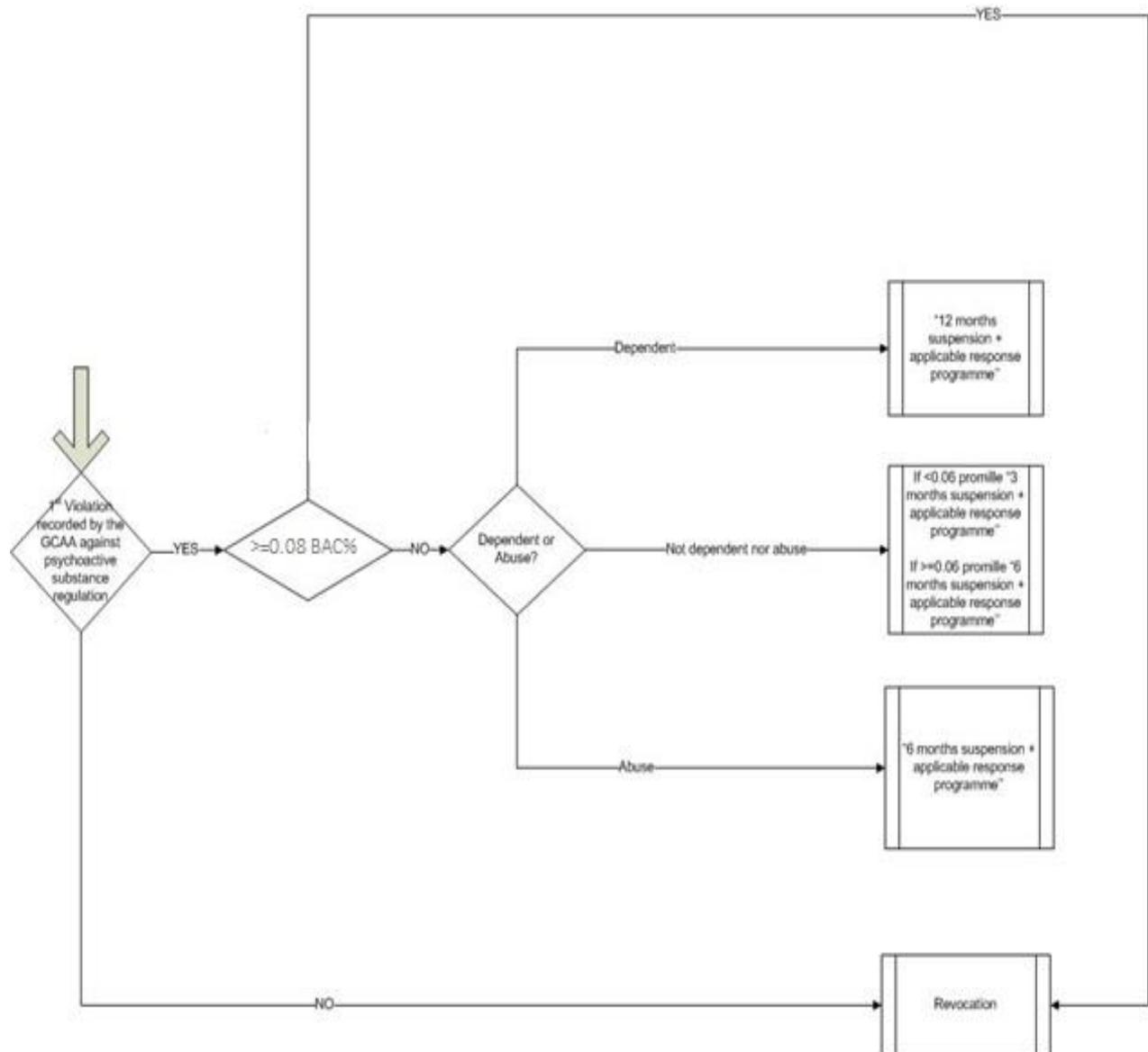
Organisations must have their own internal appeal process to deal with appeals by aviation personnel against decisions made by the organisation.



APPENDIX I: SUSPENSION AND REVOCATION CONDITIONS

Note 1: Violation will be as per GCAA records and only records issued after 1st January 2020 should be considered.

Alcohol Positive





Psychoactive substance other than alcohol

