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**From:** Jacky Stickler [REDACTED]  
**Sent:** Tuesday, 21 May 2019 7:42 PM  
**To:** Civil Aviation Bill  
**Subject:** Submission: Civil Aviation Bill - Subpart 2 - Drug & Alcohol Management Plans & Testing

To whom it may concern,

Thank you for the opportunity to provide a submission of feedback on the recent Civil Aviation Bill Dated 9th May.

We are a Safety Management Organisation, with a footprint across New Zealand, Australia & throughout Asia Pacific.

We specialise in Drug & Alcohol Management Programs, to drive Safety, Culture & Productivity outcomes for Organisations. We have experience working with CASA & both Australian & International Airlines.

We enjoyed reviewing Subpart 2 - Drug & Alcohol Management Plans & Testing & noted many great inclusions like the definition of bodily samples enabling a full breadth of testing, which is most effective in driving the greatest program outcomes.

Below we outline some suggestions for inclusion in your review, with rationale.

Please feel free to give me a call if you have any questions.

## **Subpart 2 - Drug & Alcohol Management Plans & Testing**

### **107 DAMP Operator must develop DAMP**

Section (2)(d)

**Add a section:** (iv) complying with relevant New Zealand Standard ASNZS 4308:2008 & ASNZS 4760:2019.

**Commentary:** *This is to ensure that Drug testing complies with relevant International or New Zealand Drug & Alcohol Testing Standards & Procedures.*

### **108 Random Testing by DAMP Operator**

**Section (3)** The DAMP Operator must ensure that a person who carries out random testing is competent to carry out the testing, including by having any necessary experience or qualifications.

**Commentary:** *Update text to say operator must have necessary experience **and** qualifications. (As opposed to 'or')*

### **108 Random Testing by DAMP Operator**

**Section (4)** The person who carries out testing must-

**Add a section:** (d) and carry out testing in accordance with relevant International or New Zealand Drug & Alcohol testing standards.

**Commentary:** *This is to ensure that Drug testing complies with relevant International or New Zealand Drug & Alcohol Testing Standards & Procedures.*

### **109 Director Testing**

**Section (4)** The person who carries out testing must-

**Add a section:** (g) and carry out testing in accordance with relevant International or New Zealand Drug & Alcohol testing standards.

***Commentary:** This is to ensure that Drug testing complies with relevant International or New Zealand Drug & Alcohol Testing Standards & Procedures.*

*Kind Regards,*

*Jacky Stickler*

**Client Services Director**

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