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The Civil Aviation Authority of Thailand

CREW BAGGAGE CONTROL GUIDELINES FOR AOC HOLDERS

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Approved by

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Acronyms and Abbreviations

Acronym/Abbreviation	Full Term
ANA	Air Navigation Act B.E. 2497 (1954) and its amendments
AOC	Air Operator Certificate
AOSP	Aircraft Operator Security Programme
CAAT	Civil Aviation Authority of Thailand
CBC	Crew Baggage Control
CMS	Compliance Monitoring System
GL	Guideline(s)
HR	Human Resources
MoC	Management of Change
OM	Operations Manual
SMS	Safety Management System
SOP	Standard Operating Procedure

Record of Amendments

Issue	Revision	Date	Amendment Summary
01	00	21 Aug 2026	First Issue regarding the CAAT Notification

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1. INTRODUCTION

1.1 Purpose

These Guidelines are issued by the Civil Aviation Authority of Thailand (CAAT) to assist holders of an Air Operator Certificate (AOC) in implementing:

> *Notification of the Civil Aviation Authority of Thailand on Measures to Control the Acceptance for Safekeeping or Carriage of Items by Crew Members of Air Operator Certificate Holders, B.E. 2569 (2026)*

In these Guidelines, that instrument is referred to as the Notification. This term is used throughout; no other designation is used for the same instrument. The Guidelines focus on the operator's practical arrangements for fan effective, proportionate and traceable Crew Baggage Control (CBC) system.

The Notification is legally binding. These Guidelines do not replace or amend the Notification or other applicable law. If a difference arises, the Notification and applicable law take precedence.

These Guidelines are addressed to two readers. Chapter 1 to 11 and Appendices A to E are addressed to the AOC holder. The sections headed "CAAT Verification Guidance," together with Section 1.6 and Section 10.1, are addressed to CAAT oversight personnel and are published so that operators can see the basis on which compliance will be assessed. Publication of that material does not create any additional obligation on the operator beyond the Notification itself.

1.2 Applicability

The Notification applies to every AOC holder under the Air Navigation Act B.E. 2497 and its amendments. It applies to crew members and crew baggage as defined in Clause 3 (Definitions). Applicants for an initial AOC should establish the measures as part of their proposed management system because Clause 13 (CAAT Oversight) permits CAAT to assess compliance during AOC issuance.

Every applicable minimum element in Clauses 4 to 12 needs to be addressed. The operator determines how to meet those elements through an integrated, risk-based programme suited to its operation. The scale and complexity of the arrangements may reflect the operator’s size, routes, bases, fleet and risk exposure. Existing systems, personnel, training and records may be used; the Notification does not require a separate or prescriptive implementation model.

In particular, the Notification does not require a separate CBC manual, department, committee, database, confidential-reporting channel or standalone course. CBC may be integrated into the operator's existing controlled manuals, systems and processes, including:

- Operations Manual (OM), crew instructions and controlled notices;
- other relevant controlled manuals and procedures, including the Aircraft Operator Security Programme (AOSP) where affected;
- Safety Management System (SMS) and Compliance Monitoring System (CMS);
- Training, reporting, investigation and corrective-action processes;
- Work rules; and
- Electronic or paper record systems.

1.3 Risk-based and proportionate implementation

The Notification establishes minimum control elements but does not prescribe a single organisational model, personnel-qualification framework, training structure, screening percentage or equipment configuration. The operator's risk assessment determines how those elements are implemented and monitored within its existing systems.

The scale, detail and intensity of the operator’s arrangements may therefore vary according to factors such as:

- the size and complexity of the operation;
- the number of aircraft, crew members, flights, bases and outstations;
- the nature and frequency of domestic and international operations;
- routes, destinations and the security environment;
- crew-channel and airport-screening arrangements;
- reliance on contracted service providers;
- previous events, screening results, reports and investigations;
- information received from CAAT or another competent authority; and
- the demonstrated effectiveness of existing controls.

The risk assessment should provide a reasonable basis for the operator’s policies, procedures, screening arrangements and monitoring activities. Where the assessed risk increases, the operator should review whether the existing controls remain appropriate. Where the risk is lower, simpler arrangements may be used, provided that every applicable minimum element remains addressed and effectively implemented.

The risk-based approach is not determined by operator size alone. A small operator may have elevated exposure because of its routes, operating locations, crew-channel arrangements or other circumstances. Conversely, a larger operator may use existing management-system processes without establishing a separate CBC organisation, provided that the required controls are suitable and effective.

Example 1 — Lower-complexity operation

An operator uses one aircraft, has a small and stable crew group, conducts a limited number of flights from one principal base and has reliable screening arrangements. Its risk assessment identifies no significant events, intelligence or outstation exposure.

The operator may use relatively simple arrangements, such as incorporating CBC into existing manuals, training, reporting, screening and compliance-monitoring processes. Separate CBC departments, committees, databases or training courses would not normally be necessary solely because of the Notification.

The operator still needs to address every applicable requirement, including risk-based inspection, random screening, training, confidential reporting, investigation, annual risk assessment, annual audit, signed acknowledgement and record retention.

Example 2 — Higher-complexity operation

An operator conducts frequent domestic and international operations using multiple aircraft, bases and outstations, with a large crew population and significant reliance on contracted services.

The operator's risk assessment may indicate a need for broader screening coverage, stronger coordination between locations, closer monitoring of contracted activities or additional management oversight. These arrangements should be determined by the operator according to the risks identified rather than by a standard model prescribed in these Guidelines.

Where the operator's controls do not address the minimum requirements, do not reasonably reflect significant identified risks, or are not effectively implemented, the operator may be unable to demonstrate compliance during CAAT oversight.

1.4 Interpretation of mandatory and advisory terms

For the purposes of this GL:

- *"Shall" or "Must"* restates a mandatory obligation arising from the Notification or another applicable legal or regulatory requirement. The obligation arises from the cited requirement and is not created independently by this GL.
- *"Should"* indicates a recommended and proportionate means of implementation or good practice. An operator may adopt another suitable method, provided that the applicable legal or regulatory requirement and its intended outcome are achieved.
- *"May"* indicates permission, an available option, discretion or a possibility, depending on the context.

The phrase "The Notification requires" identifies an obligation expressly arising from the Notification. Other explanatory material, examples, suggested arrangements and implementation considerations in this GL are supporting guidance and are not intended to create additional obligations.

In the event of any inconsistency between this GL and an applicable legal or regulatory requirement, the applicable legal or regulatory requirement prevails.

1.5 Commencement and current application

The Notification was published on 4 July 2026 and was issued under Clause 7(11) of Regulation of the Civil Aviation Authority of Thailand No. 27 on Operations of the Air Operator. In accordance with Clause 2 (Commencement), the Notification took effect on 5 July 2026.

Clause 11 (Document Alignment) requires the affected Operations Manual, Aircraft Operator Security Programme, Standard Operating Procedures, other relevant controlled documents, and work rules or personnel-administration regulations to be reviewed, revised and brought into force no later than 4 August 2026.

Operators should apply the appropriate change process to each affected document. Where implementation is affected by an applicable approval, acceptance, acknowledgement, notification or consultation process, the operator should retain evidence of the actions taken and, where CAAT action or coordination is required, coordinate with CAAT promptly. Any outstanding document or implementation gap should be addressed through the relevant process.

1.6 Use of this document by CAAT

All sections headed "CAAT Verification Guidance", together with this section and Section 10.1, are OPS verification guidance. OPS inspectors shall use them only to verify whether the measures expressly required by the Notification have been established, implemented and maintained continuously and effectively.

Verification under this GL is limited to the Notification and does not extend to assessing compliance with separate national aviation-security programmes, personnel-qualification standards or training standards. The scope, depth and sampling should be adapted to the operator's size, complexity, operating model, activity volume and assessed risk, using existing evidence where sufficient.

The Notification does not prescribe a separate CBC manual, form, database, committee, function, register or evidence package. Inspectors may ask the operator to identify where each requirement is addressed and provide relevant supporting evidence. The absence of a dedicated item, or non-adoption of an illustrative or preferred method in these Guidelines, does not by itself establish non-compliance.

Link every finding to a specific provision of the Notification and to objective evidence showing that the required measure has not been established, implemented, or maintained continuously and effectively.

1.7 Key definitions

Term	Meaning under the Notification
AOC holder	A holder of an AOC under the Air Navigation Act B.E. 2497 and its amendments.
Crew member	A person assigned by the AOC holder to perform duties on board an aircraft during a flight duty period. Clause 3 (Definitions) includes pilots, engineers, flight operations officers and cabin crew members as examples.
Crew baggage	Baggage and items taken on board an aircraft or through a channel designated for crew members, including carry-on and checked baggage.
The Office	The Civil Aviation Authority of Thailand.
Secondary Screening	Screening of a crew member or of crew baggage additional to the normal screening conducted by the aerodrome operator, carried out on the basis of risk-based screening, random screening or, where reasonable suspicion exists, targeted screening.
Work rules	For the purposes of this GL, a collective reference to the work rules or personnel administration regulations referred to in Clauses 10 (Work Rules) and 11 (Document Alignment) of the Notification, as applicable to the operator.

The crew-role list is illustrative. Crew baggage includes loose items and is not limited to a conventional suitcase. Operators should also consider a consistent risk-based policy for positioning, deadheading, standby, training travel or other movement in which crew status or a crew channel is used. This recommended extension does not alter the Clause 3 definition.

1.8 Relationship with other requirements

CBC may interface with dangerous goods, aviation security, customs, immigration, quarantine, occurrence reporting, employment law and personal data requirements. Completion of one process does not automatically satisfy another applicable process.

For example, discovery of an undeclared dangerous good carried for another person may require immediate operational control, dangerous-goods reporting, a Clause 9 (Response to Suspicion) report to CAAT, coordination with security or law-enforcement authorities, a CBC fact-finding investigation and review of organisational controls. Operators may connect related actions through cross-references or a common case number while retaining appropriate access restrictions.

1.9 Core decision questions

When a crew member proposes to carry an item, the operator should consider:

1. Ownership: Whose item is it, and who requested carriage?
2. Purpose: Is it a reasonable personal effect, necessary for duty, or another person's item?
3. Assignment: Has an authorised operator representative genuinely assigned carriage as an official duty?
4. Limits: Is the item within the operator's permitted categories and applicable quantity, weight, size or value control?
5. Special permission: If outside a category or limit, is permission available and appropriate under Clause 4(4) (Special Permission)? Permission cannot override the Clause 4(3) prohibition or another legal restriction.
6. Traceability: Can the decision and any conditions be verified later?

Where information is incomplete, inconsistent or not credible, carriage should be refused or escalated under the operator's procedure.

1.10 Clause titles used in this GL

The official Thai text of the Notification does not assign titles to individual clauses or sub-clauses. For ease of reference and navigation, this GL uses short descriptive titles after certain clause references, for example, Clause 6(2) (Random Screening).

These titles are provided solely as reference aids. They do not form part of the Notification, create any additional requirement, or alter, limit or extend the meaning of the provision cited. In the event of any difference between a descriptive title and the text of the Notification, the text of the Notification prevails.

Clauses 1 and 2 are not assigned descriptive titles because they concern the title and commencement of the Notification rather than continuing operator compliance requirements.

Main Clauses

Clause	Title
3	Definitions
4	Control Measures
5	Management System Integration
6	Inspection System
7	Risk Management
8	Monitoring and Evaluation
9	Response to Suspicion
10	Work Rules
11	Document Alignment
12	Record Retention
13	CAAT Oversight

Sub Clauses

Sub-clause	Title
4(1)	Permitted Categories
4(2)	Baggage Limits
4(3)	Prohibition
4(4)	Special Permission
4(5)	Duty to Cooperate
4(6)	Inspection and Records
4(7)	Investigation and Discipline
6(1)	Pre- or Post-Duty Search
6(2)	Random Screening
6(3)	Secondary Screening
6(4)	Detection Equipment
6(5)	Search Personnel
6(6)	Provenance Check
7(1)	Risk Assessment
7(2)	Crew Training
7(3)	Confidential Reporting
7(4)	Fact-Finding Investigation
8(1)	Internal Audit
8(2)	Corrective Action
8(3)	Retention of Results
8(4)	Reporting of Results
9(1)	Risk Measures
9(2)	Reporting to CAAT
9(3)	Cooperation with Authorities

2. Crew Baggage Control Policy and Limits - Clause 4

2.1 Overall control objective

The Notification requires: The AOC holder shall establish CBC measures to prevent a crew member from using crew status or privileges to accept, carry, hand-carry, deliver or facilitate the carriage of another person's items, goods or property for personal benefit or the benefit of another person when the carriage is unrelated to the operator's duties or has not been assigned by the operator.

The operator may implement its CBC policy through one or more existing controlled documents and processes across relevant departments. A standalone CBC policy is not required, provided that the applicable measures are clear, consistent, accessible to relevant personnel and communicated in language understood by crew members.

The control objective is wider than dangerous goods. An item may be ordinary and safe but still be prohibited because it belongs to another person and is carried through the crew member's status or access privileges outside assigned company duties.

2.2 Permitted categories

The Notification requires: The operator shall define the categories of items that a crew member may take with the aircraft and limit them to:

- items necessary for the performance of assigned duties; or
- reasonable personal-use items.

The policy should distinguish at least:

- personal clothing, toiletries and ordinary personal effects for the duty or trip;
- company-issued operational equipment and documents;
- personal electronic devices and medically necessary items;
- crew food or other personal consumables, subject to customs, quarantine and security requirements;
- company material specifically assigned for carriage under an approved company process; and
- items outside the normal categories that require special permission.

An item does not become a personal item merely because it is in a crew member's bag. Ownership, purpose, quantity, value, packaging, route and the crew member's explanation should be considered together.

2.3 Weight, quantity, size and value limits

The Notification requires: The operator shall establish limits for the weight, quantity and maximum size of baggage, or the maximum value of items that a crew member may take with the aircraft. The operator shall also establish criteria and conditions for exceptional permission.

The Notification does not prescribe numerical limits, and CAAT does not prescribe a kilogram allowance for crew baggage. Each operator shall establish measurable limits appropriate to its operations and risk exposure.

The operator may use or adapt its existing crew-baggage policy and may apply common or different controls to carry-on and checked baggage, as appropriate. Additional route-, station-, item- or value-specific controls need only be established where identified through the operator's risk assessment.

Where an operator-established limit is exceeded, the item may be carried only after completion of the operator's exceptional-permission process, unless its carriage is prohibited by another applicable requirement.

2.4 Prohibition

The Notification requires: The operator shall prohibit a crew member from using crew status or privileges to accept, carry, hand-carry, deliver or facilitate the carriage of goods, parcels or items for another person, whether or not compensation is received, unless the carriage is part of a duty assigned by the operator.

The prohibition should expressly cover:

- requests made by relatives, friends, colleagues, customers or unknown persons;
- paid and unpaid carriage;
- carriage described as a favour, gift, urgent delivery or temporary custody;
- items placed in checked baggage, carry-on baggage, company stores or aircraft stowage;
- acceptance at the crew member's home, hotel, airport, station or any other location;
- the use of crew channels, staff access or reduced inspection to facilitate carriage; and
- breaking a consignment into smaller quantities or using more than one crew member.

Crew should be instructed not to accept an item when its contents, ownership, origin or purpose cannot be confidently established. The crew member should never open, repackage or dispose of a suspicious item merely to make it appear acceptable.

2.5 Special permission

The Notification requires: The operator shall establish criteria and a procedure for authorising an item outside the permitted categories or limits. The procedure shall identify the authorised decision-maker, the assessment method and the records that permit later verification.

Special permission should be exceptional and documented before carriage. A proportionate record would normally identify the crew member and item, the owner and purpose, applicable operational and legal checks, the decision and conditions, the authorised person, and the date and traceable reference. Operators may add further detail where the risk warrants it.

No CBC permission overrides another legal prohibition or the authority of a competent authority.

2.6 Cooperation, inspection and follow-up

The Notification requires: Crew members shall be required to cooperate with baggage inspection and to disclose, declare or open baggage when requested by the operator or its authorised representative. The operator shall inspect crew baggage and items on a risk basis in accordance with Clause 6 (Inspection System) and retain the inspection result as evidence.

The operator's procedure should state who may request and perform an inspection, where it may take place, what methods may be used, how privacy and dignity will be protected, how refusal will be handled and how discovered items will be secured or transferred to the competent authority.

The Notification requires: When a breach of the measures is found or reasonably suspected, the operator shall conduct an investigation and apply disciplinary measures, and shall report the result of that action to CAAT when CAAT so requests. Any final disciplinary action should be based on the established facts and applied in accordance with Clause 10 (Work Rules) and the operator's valid process.

The operator should therefore be able to retrieve and submit the outcome of an investigation or disciplinary case on request, in a form that identifies the allegation, the facts established, the action taken and the date of closure. The Clause 4(7) (Investigation and Discipline) reporting duty arises on CAAT's request and is separate from the Clause 9 (Response to Suspicion) duty to report without delay.

2.7 Distinguishing normal personal use from third-party carriage

The classification should be based on the overall circumstances rather than one factor. The following indicators may assist:

Factor	More consistent with reasonable personal use	May indicate third-party or commercial carriage
Ownership	Purchased, used or clearly owned by the crew member.	Belongs to another person or ownership cannot be established.
Purpose	Reasonably connected with the crew member's trip, health, comfort or ordinary personal needs.	Intended for delivery, resale, transfer or another person's benefit.
Quantity	Consistent with trip duration and ordinary personal consumption.	Repeated items, commercial quantities, multiple identical products or unusual packaging.
Value	Consistent with the operator's declared limit and the crew member's explanation.	High-value item without a credible reason or declared source.
Request	No one has asked the crew member to transport the item.	A relative, friend, colleague, customer or unknown person requested carriage.
Benefit	No payment, reward or other advantage; however, absence of payment alone is not decisive.	Payment, commission, gift, favour, reciprocal service or other benefit.
Control route	Item will undergo all normal declarations and controls.	Crew channel, staff privilege or reduced inspection is used to avoid a normal process.
Pattern	Isolated, ordinary and readily explained.	Repeated carriage, linked crew members, split consignments or inconsistent explanations.

- Examples of items that may normally be accepted within established limits include a crew member's clothing, toiletries, personal electronic devices, prescribed medicine, ordinary gifts purchased and owned by the crew member, and company equipment assigned through an official process.
- Examples requiring refusal or escalation include a sealed parcel from an unknown person; several mobile phones belonging to a friend; merchandise carried repeatedly for resale; an item whose contents the crew member cannot identify; cash or high-value goods for delivery to another person; and any item intended to pass through a crew channel to avoid normal customs or security controls.

2.8 Company-assigned carriage

Clause 4(3) (Prohibition) permits carriage performed as a duty assigned by the operator. The operator should ensure that "company-assigned" is not used as an informal label to legitimise a private request.

A defensible company assignment should:

- serve a legitimate operational or organisational purpose;
- be issued by a person with defined authority;
- identify the item, origin, destination, custodian and intended recipient;
- complete all applicable dangerous-goods, security, customs, loading and other checks;
- use an approved transport route and custody process;
- be recorded before carriage; and
- be capable of verification at the departure station, on board and at destination.

Company material should ordinarily be transported through the operator's established logistics, stores, cargo or courier arrangements. Use of a crew member should be justified where those arrangements are unavailable or inappropriate, and should not transfer responsibilities that belong to a formal acceptance or security process.

2.9 Additional permission controls

To support an impartial decision, the requester should not approve the request. The procedure should identify any item for which permission is unavailable, the approval's validity, any additional screening or other condition, and how the relevant station is informed. If an urgent situation requires an initial verbal decision, a traceable written record should follow promptly.

2.10 Practical red flags

The following indicators do not, by themselves, establish that a breach has occurred. They should be assessed objectively and in context. The presence of several indicators, a materially inconsistent explanation or credible information may justify closer review, additional questioning or secondary screening.

(a) Indicators requiring closer attention

The following indicators may warrant further observation or clarification:

- a crew member appears unusually nervous, restless or distracted when approaching or undergoing screening;
- a crew member repeatedly avoids eye contact when answering questions about baggage or items;
- a crew member appears unusually eager to complete the screening process or attempts to pressure personnel to expedite it;
- a crew member repeatedly looks around, observes search personnel or monitors screening activities, equipment or personnel movements;
- a crew member changes queues, routes or entry points after observing screening activity;
- a crew member attempts to engage screening personnel in unnecessary conversation or otherwise distract them from the inspection;
- a crew member is reluctant to identify the owner, contents, origin, destination or intended recipient of an item;
- an explanation is vague, unnecessarily complicated or inconsistent with the item presented;
- an item is inconsistent with the duration or purpose of the trip, the destination, the crew member’s role or reasonable personal use;
- the quantity, value or type of goods appears unusual for personal use;

- several identical or newly packaged items are carried without a clear personal or operational reason;
- an item described as a gift remains sealed, addressed or packaged for delivery to another person;
- a crew member makes frequent special-permission requests or repeatedly carries similar goods;
- baggage appears unusually heavy, bulky or tightly packed in relation to the crew member's explanation;
- a crew member appears unusually protective of particular baggage or attempts to keep it outside the normal screening process;
- a crew member asks whether a particular flight, station, crew channel or time of day is subject to screening;
- screening selection is followed by an unexplained request for a roster change, reassignment, delay or withdrawal from duty;
- a third person is observed waiting near a crew channel, screening point or staff access area without an apparent operational reason; or
- an irregular or recurring pattern of duty swaps, roster changes or voluntary assignments involves routes, flights, stations or operating periods identified by the operator's risk assessment as higher risk, without a clear operational or personal explanation.

(b) Higher-concern indicators

The following indicators may warrant prompt case-specific assessment, escalation, secondary screening or other proportionate action under the operator's procedures:

- a crew member's explanation changes materially across the declaration, screening, questioning or interview stages;
- a crew member denies knowledge of an item found in baggage under the crew member's control;
- the contents do not correspond with the declaration, permission record, receipt or stated purpose;
- packaging, compartments or modifications appear designed to conceal an item's identity, quantity, value or contents;
- an item is hidden within clothing, food, electronic equipment, duty equipment or another object;
- baggage contains an unusual number of identical, high-value, restricted or commercially packaged items;
- several crew members carry separate portions of what appears to be a common consignment;
- an item is transferred between crew members immediately before screening or after one person is selected;
- a person meets a crew member near a crew channel or controlled area to hand over or collect an item;
- a crew member attempts to bypass X-ray screening, declaration requirements, customs or security controls, or another normal control;
- a crew member attempts to use operational urgency, rank, seniority or crew status to prevent or limit screening;
- a crew member refuses to declare, present or open baggage when properly requested;
- a crew member attempts to abandon, conceal, transfer, repackage or dispose of an item after screening has been initiated;
- a receipt, company-assignment record, special permission or other supporting document appears altered, duplicated, incomplete or inconsistent;
- the stated owner, origin, destination or intended recipient cannot be verified;
- an item is linked to payment, commission, reward, reciprocal benefit or an unexplained financial arrangement;
- a crew member provides a rehearsed explanation or an explanation identical to that given by another person involved;

- observed behaviour suggests counter-surveillance, such as repeated monitoring of search personnel, screening patterns, shift changes or equipment availability;
- a confidential report, credible intelligence, law-enforcement information or an authority request identifies the crew member, item, route or related activity;
- screening identifies a prohibited article, undeclared dangerous good, suspected narcotic substance, cash that is inconsistent with a required declaration or other applicable legal requirements, or another item that may involve unlawful conduct; or
- there is evidence of repeated conduct, coordination with another person, or an attempt to interfere with screening, reporting, evidence or an investigation.

Where one or more higher-concern indicators are present and supported by objective information, the operator should assess the circumstances and determine whether proportionate action—such as clarification, secondary screening, verification of provenance or preservation of relevant evidence—is appropriate. Where the information gives rise to reasonable suspicion, the Notification requires the operator to conduct fact-finding in accordance with Clause 7(4) (Fact-Finding Investigation). Where the conditions in Clause 9 (Response to Suspicion) are met, the Notification requires the operator to assess the risk, consider appropriate risk-control measures and report to CAAT without delay where the act or behaviour may affect aviation safety or aviation security, or constitute a contravention of law.

The indicators in this section are illustrative and do not create a presumption that a breach has occurred. The presence of one or more indicators—including nervousness, limited eye contact, urgency, apparent monitoring of screening activity or irregular roster changes—may have a legitimate explanation and should not, by itself, be treated as proof of misconduct or unlawful activity. Any response should be based on the totality of the circumstances, objective and reasonably verifiable information, and a proportionate assessment conducted under the operator's procedures. The indicators may support closer observation, clarification or secondary screening; however, any conclusion that a breach occurred or any disciplinary decision should be supported by evidence obtained through the applicable process. The indicators should be applied consistently and should not be used as a basis for discrimination or arbitrary treatment.

2.11 CAAT Verification Guidance

- ✓ Verify that the operator has defined the types of items crew members may carry and limited them to items necessary for duty or reasonable personal use.
- ✓ Verify that the operator has established the required baggage or item limits and the conditions for special permission.
- ✓ Verify that the prohibition covers accepting, carrying, delivering or facilitating another person's items, whether or not payment is received, except as an assigned operator duty.
- ✓ Verify that the special-permission arrangements identify the approving authority, method of consideration and retention of approval evidence.
- ✓ Verify that crew members are required to cooperate with screening and to disclose, declare or open baggage when requested.
- ✓ Verify that baggage inspections are conducted according to the operator's risk-based arrangements and that inspection results are recorded.
- ✓ Verify that investigation and disciplinary arrangements apply when a breach is found or reasonably suspected.
- ✓ Verify that investigation or disciplinary results can be provided to CAAT when requested.
- ✓ Interview a proportionate sample of crew members and responsible personnel.
- ✓ Sample existing permission, inspection or case records where such records are available.
- ✓ Use a walkthrough where no special permission or suspected-breach case has occurred.
- ✓ The Notification does not prescribe a standalone CBC document or require a simulated case solely for inspection purposes. Inspectors may review existing records or use interviews and walkthroughs where no relevant case has occurred.

3. Integration into the Management System - Clause 5

The Notification requires: CBC measures shall form part of the operator's management system. At minimum, they shall be incorporated into the Compliance Monitoring System (CMS), the Safety Management System (SMS) and appropriate aviation-security measures so that risk assessment, monitoring, corrective action and follow-up operate continuously.

3.1 Governance and accountability

The operator should allocate CBC responsibilities within its existing organisation. Coordination or implementation may be assigned to one or more persons from any appropriate department, and no separate CBC function is required. The allocation should be clear and supported by authority appropriate to the operator's risk-based programme.

The operator may allocate the required CBC activities through its existing organisation and procedures. A separate responsibility matrix is not required where responsibilities, authority and interfaces are already clear.

Resource allocation and the level of management control should reflect the current CBC risk assessment. The operator should ensure that the documented controls are practicable for its operation and are supported by sufficient competent personnel, screening arrangements, facilities, training and assurance resources. Where the operating context becomes more complex or the assessed risk increases, the operator should strengthen the controls and resources accordingly. Conversely, simpler arrangements may be used where justified by the assessed risk, provided that every applicable minimum element of the Notification remains effectively implemented.

Coordination and allocation of responsibilities

The Notification does not prescribe a particular department or function to manage the operator’s crew baggage control arrangements. Each operator should establish a governance arrangement appropriate to its organisational structure, operating context and management system.

The operator may assign coordination to any existing person or function able to support effective implementation. No particular function title or departmental location is prescribed, and duties may be shared among departments through the operator's existing arrangements.

Where the operator designates a coordinating person or function, its duties may be limited to maintaining effective interfaces, overseeing implementation and escalating matters requiring action. The duties may be distributed among existing functions.

The coordinating function is not expected to perform every crew baggage control activity or assume responsibilities that properly belong to another department. Operational implementation may remain with the relevant functions, including flight operations, cabin operations, engineering and maintenance, dispatch, station operations, ground operations, training, human resources and contracted service providers, as applicable.

Assigning administrative responsibility to a flight crew or cabin crew department does not, by itself, ensure organisation-wide coverage. Where such a department performs part of the coordination or implementation, the operator should establish suitable interfaces with the function responsible for broader safety, security or compliance oversight and ensure that all personnel and activities within the scope of the Notification are addressed.

Where Compliance Monitoring performs a coordinating or advisory role, the operator should preserve sufficient independence for the audits required by Clause 8 (Monitoring and Evaluation). This may be achieved through separate reporting lines, different personnel or another suitably independent audit arrangement.

A smaller operator may combine roles or assign coordination to an existing manager. A separate department, committee or permanent project team is not required, provided that authority and responsibilities are clear, organisation-wide coordination is effective, and the arrangements remain proportionate to the operator’s activities and assessed risks. The operator should nevertheless preserve the objectivity and impartiality of audits conducted under Clause 8 (Monitoring and Evaluation). Where practicable, a person should not audit activities for which that person is directly responsible. Where complete separation is not reasonably practicable, the operator may use proportionate safeguards, such as review by another suitably competent manager, cross-functional review or external support.

3.2 Compliance monitoring

The CMS should include CBC in its audit programme. Monitoring should address both documented arrangements and actual implementation at locations selected on the basis of risk.

Monitoring should verify whether:

- policies and manuals remain aligned;
- screening planned under the risk assessment is actually performed;
- random selection is genuinely unpredictable and cannot be routinely avoided;
- special approvals are properly justified and authorised;
- crew understand the prohibition and reporting routes;
- reports and suspicions are investigated;
- corrective actions address root causes and are closed with evidence;
- records remain complete, protected and retrievable for the applicable retention period, and
- the CBC system, taken as a whole, remains compliant with the Notification.

3.3 Safety management and security interface

The SMS should capture aviation-safety hazards arising from unauthorised items, dangerous goods, improper loading, crew distraction, criminal interference and failed controls. CBC risk information should be considered in hazard identification, risk assessment, safety assurance and management review.

Existing aviation-security arrangements may support CBC where relevant, including access, screening, escalation and aerodrome coordination. For CBC oversight, OPS verifies only that the operator's arrangements required by the Notification are in place and effective; it does not assess conformity with separate aviation-security programme requirements.

Confidential reporting for suspected unlawful carriage may interface with the SMS reporting system, but the operator should apply access controls and clear handling rules. Information needed for safety action may be shared on a need-to-know basis while the reporter's identity remains protected. Confidentiality does not prevent a fair investigation of the reported conduct.

3.4 Suggested allocation of responsibilities

The following allocation is illustrative. Operators may use another arrangement if authority, accountability, coordination and independence remain clear.

Function	Typical CBC responsibilities
Accountable Manager	Ensure appropriate resources and organisational authority; review significant risks, events, recurring weaknesses and overdue actions.
Responsible coordinating person or function	Coordinate the CBC arrangements through the operator’s existing organisation; facilitate document alignment, implementation monitoring, information exchange and cross-functional action.
Flight/cabin operations	Communicate crew responsibilities; oversee operational compliance with CBC requirements; support screening and operational response; and ensure implementation at applicable stations.
Assigned screening personnel / supporting function	Conduct or support CBC inspections using the operator's assigned personnel and methods; escalate findings; and coordinate with relevant internal functions, aerodrome operators or authorities when needed.
Safety management	Assess aviation-safety risks; maintain hazard links; coordinate safety action and relevant management review.
Compliance monitoring	Include CBC within the applicable monitoring programme; assess implementation; raise findings and follow up corrective action.
Human resources/legal	Maintain applicable work rules and acknowledgement arrangements; support lawful fact-finding and disciplinary processes; advise on privacy and disclosure.
Training	Develop and control crew training and any briefing or training provided to other personnel; maintain completion records and revision traceability.
Station management	Implement applicable local arrangements; protect screening-selection information; provide necessary facilities; report screening non-completion and relevant events.
Records/data owner	Maintain appropriate access, integrity, retention, retrieval, disclosure and disposal arrangements.

The operator should ensure that any function required to take prompt operational, security or reporting action is available or can be contacted when needed. Responsibilities should not be assigned only to a committee without clear individual or functional authority to make the necessary decisions.

3.5 Contracted activities

An operator may rely on an aerodrome operator, ground handler or security contractor for supporting activities, but should not assume that normal airport screening alone satisfies Clause 6 (Inspection System). Secondary screening is expressly additional to the normal screening performed by the aerodrome operator.

The operator's existing written or operational arrangement should be sufficient to identify who performs the activity, where it applies, how findings, escalation and records are handled, and how the operator maintains oversight.

Under the management-system framework for contracted activities, the operator should verify continuing compliance and effectiveness. A contract or service-level agreement is not, by itself, evidence that the activity was performed.

3.6 Management of Change (MoC)

CBC arrangements should be reviewed whenever a change may alter exposure or control effectiveness.

Examples include:

- opening or closing a base or line station;
- adding a route, country, aircraft type or crew category;
- changing the aerodrome crew-channel or screening arrangement;
- appointing a new security or ground-service contractor;
- changing baggage allowances or staff travel procedures;
- reorganising operations, security, safety, compliance or HR responsibilities;
- receiving significant intelligence, audit findings or event information; or
- changing relevant aviation, customs, security, employment or data requirements.

Changes affecting CBC may be addressed through the operator's existing management-of-change, document-control or risk-review process. A separate CBC change assessment is not required but may trigger an early review of the assessment.

3.7 CAAT Verification Guidance

- ✓ Verify that CBC measures are incorporated into the operator’s management system.
- ✓ Verify that the measures are addressed through compliance monitoring, the safety management system and appropriate security measures, without assessing separate national aviation-security requirements.
- ✓ Review existing evidence of risk assessment, monitoring, corrective action and follow-up.
- ✓ Assess whether responsibilities are sufficiently identified for the operator’s organisational structure.
- ✓ Trace a proportionate sample of identified weaknesses to the related corrective action and follow-up.
- ✓ Accept combined responsibilities and existing management-system arrangements where they operate effectively.
- ✓ The Notification does not prescribe a dedicated CBC department, coordinator, committee or management-review format. Inspectors may assess how the relevant responsibilities and management review are addressed within the operator’s existing arrangements.

4. Crew Baggage Inspection System - Clause 6

The Notification requires: The operator shall establish an appropriate risk-based crew baggage inspection system containing all minimum elements stated in Clause 6.

4.1 Required screening elements

Clause 6 element	Implementation consideration
Before- or after-duty search	Define when pre-duty, post-duty or both are used; locations; scope; authorised screeners; and actions following a result or refusal.
Unannounced random screening	Use an unpredictable selection method, protect selection information and record the population, selections, completed screenings and justified non-completions.
Secondary screening on reasonable suspicion	Define indicators, authority, scope, privacy safeguards, evidence handling and escalation.
Inspection methods and equipment (Clause 6(4))	Initial inspection may use visual inspection, a manual hand search and a flashlight. The operator should consider X-ray or other appropriate detection equipment where higher risk or the circumstances warrant it.
Search by operator-assigned person(s) (Clause 6(5))	The operator may assign one or more persons from its security department, another department or other operator personnel. Solely for this CBC assignment, the Notification does not require national aviation-security personnel qualifications. Assigned persons should receive relevant instruction on the Notification, security awareness and the operator's applicable procedures and training requirements.
Provenance verification	When reasonable suspicion exists, verify receipts, ownership records, company assignment, customs documents or other credible evidence of origin and purpose.

The Notification does not prescribe a universal screening percentage. The operator should determine and record the frequency, coverage, locations, timing and methods through its risk assessment. Clause 6(4) (Detection Equipment) does not require an operator to own X-ray equipment or place equipment at every station; an appropriate available or contracted arrangement may be used. Normal airport screening alone is not the secondary screening required by Clause 6(3) (Secondary Screening).

4.2 Screening programme design

The documented programme should specify:

- the screening population and whether selection is by crew member, duty, flight, station, route or another defensible unit;
- the baseline screening approach and the factors that increase or reduce coverage;
- controls preventing crew, rostering staff and operational managers from predicting or bypassing random selection;
- how selected screenings are completed when schedules or irregular operations change;
- when a routine or random screening becomes secondary or targeted screening;
- how searches of persons, carry-on baggage and checked baggage are coordinated;
- how personal data are handled;
- immediate action for prohibited, suspicious or unlawful items; and
- quality assurance, performance monitoring and review.

Random selection should use an impartial method that makes selections unpredictable. Selecting only volunteers, conducting inspections at routine fixed times, or inspecting only crew who happen to be available at an office does not, by itself, demonstrate random selection.

4.3 Reasonable suspicion and provenance

Reasonable suspicion should be based on objective information or observed circumstances, not discrimination or personal disagreement. Possible indicators include inconsistent explanations, unusual quantity or packaging, an item apparently belonging to another person, tampering, repeated exceptional requests, concealment, intelligence from a credible source or a mismatch between the item and the stated trip purpose.

The assigned person should record the basis for Secondary Screening sufficiently to support later review. Evidence of origin should be assessed for credibility, not merely collected. A receipt may establish purchase but not necessarily ownership, lawful import or the purpose of carriage.

4.4 Suggested inspection record

Clause 4(6) (Inspection and Records) requires the inspection result to be recorded as evidence. An existing log or system may be used. A proportionate record need only identify the screening sufficiently, the person assigned by the operator, the result and any action taken, with further detail added when a finding, non-completion or referral warrants it.

Existing aggregate records may be used to compare selections and completed screenings. A separate reconciliation report is not required where implementation can otherwise be demonstrated.

4.5 Pre-duty and post-duty screening

Clause 6(1) (Pre- or Post-Duty Search) refers to a search before or after duty. The operator should determine the balance according to the risks present:

- Pre-duty screening can detect an item being introduced into the crew channel, aircraft or outbound operation.
- Post-duty screening can detect an item brought from an aircraft, foreign station or inbound operation.
- Combined coverage may be appropriate where both outbound and inbound risks are material.

The programme should define when duty begins and ends for this purpose, how connecting duties are treated, and how screening is performed without creating unsafe fatigue, unreasonable delay or interference with minimum rest.

Screening after duty should occur before the crew member has an opportunity to transfer, abandon or remove the item from the controlled process. Screening before duty should be completed early enough to permit secondary action without disrupting safe flight preparation.

4.6 Designing the random-selection method

The operator may use any simple and impartial selection method that makes individual selections unannounced and unpredictable. Selection may be by crew member, flight, duty, station or another suitable unit, with different coverage according to risk. Existing roster, scheduling, audit or electronic tools may be used. Records need only be sufficient to show that selections were unpredictable, screenings were performed and material non-completions were addressed; a separate reconciliation system is not required.

4.7 Scope and conduct of a search

The operator may use one or more of the following inspection methods according to its risk assessment:

- checking documents or declarations;
- visually inspecting an item, using a flashlight where useful;
- manually searching baggage;
- using X-ray or other appropriate equipment where the assessed risk or circumstances warrant;
- conducting additional or targeted screening; and
- inspecting onboard stowage areas used for crew items, where relevant.

The operator should identify the person(s) assigned to authorise or conduct each method. Assigned persons may come from the security department, another department or other operator personnel. A crew member should not screen his or her own baggage. The screening should be conducted by another assigned person who is not the subject of the screening, so that the result is impartial and capable of later verification. The procedure should also address privacy and allow the crew member to explain the item being checked.

The inspection should be limited to what is necessary to resolve the concern. A more intrusive method should be used only when a less intrusive method is insufficient. However, screening should be escalated where necessary.

4.8 Refusal, obstruction and inability to complete screening

Crew work rules and procedures should explain the consequences of refusal to declare, open or present baggage. The immediate response should prioritise risk containment. Depending on the circumstances, the operator may:

- prevent the item from proceeding;
- remove the crew member from the assigned duty;
- notify the commander, operations control, security or station management;
- preserve access, roster and screening evidence;
- initiate a fact-finding investigation;
- assess the Clause 9 (Response to Suspicion) reporting trigger; and
- refer the matter to a competent authority.

The record should distinguish an intentional refusal from a screening that could not be completed because of equipment failure, lack of assigned personnel, medical limitation, emergency or another operational reason.

When screening cannot be completed, the responsible manager should determine an alternative control or refuse carriage. A missed screening should not be closed solely because the flight has departed.

4.9 Discovery and evidence handling

The operator should establish immediate instructions for a suspicious or prohibited item. Personnel should not unnecessarily handle, open, test, smell, destroy or return an item where doing so may create safety, security, health or evidential risk.

When a suspicious or prohibited item is found, personnel should contain the immediate risk, notify the appropriate internal function or competent authority, and preserve relevant information to the extent necessary and lawful. The operator may use its existing incident or investigation procedures. Detailed chain-of-custody controls are needed only when the operator retains an item or evidence, or when required by a competent authority.

The operator should avoid conducting an internal examination that could compromise a police, customs, security or other authority investigation.

4.10 Bases, outstations and irregular operations

The CBC system should cover every location at which crew baggage enters or leaves the operator's operational control, according to risk. The operator should not limit implementation to the main base when crew operate from or through other stations.

For each relevant station, the operator should understand the normal crew channel and screening arrangement, available assigned personnel and methods, local escalation contacts and a proportionate contingency for disruption or equipment failure.

Where the planned control is unavailable during irregular operations, the operator should perform and record a real-time risk assessment and apply an alternative control. A standing statement that operational necessity always permits carriage would not demonstrate a risk-based control.

4.11 CAAT Verification Guidance

- ✓ Verify that the operator has established a risk-based crew baggage screening system.
- ✓ Verify that the system provides for screening before or after duty, as determined by the operator’s arrangements. The Notification does not prescribe screening at both stages for every operation.
- ✓ Verify that random screening is conducted without prior notice.
- ✓ Verify that secondary screening is conducted when reasonable suspicion exists.
- ✓ Verify that the operator uses inspection methods appropriate to its assessed risk. Visual inspection, a manual hand search and a flashlight may be used as an initial method; X-ray or other appropriate detection equipment should be considered for higher risks or where circumstances warrant.
- ✓ Verify that screening is conducted by person(s) assigned by the operator and that those persons have received relevant instruction on the Notification, security awareness and the operator's procedures. Do not assess national aviation-security qualifications or training standards solely for this CBC assignment.
- ✓ Verify that documents or evidence showing the origin of an item are checked when reasonable suspicion exists.
- ✓ Sample existing screening records to confirm that inspection results are recorded.
- ✓ Observe a screening activity where practicable or conduct a walkthrough where live observation is unavailable or inappropriate.
- ✓ Assess screening coverage against the operator’s documented risks.
- ✓ The Notification does not prescribe a universal screening percentage, fixed sample size or separate reconciliation report. Inspectors may assess whether the operator’s sampling arrangements and records are appropriate to its assessed risks and effectively demonstrate implementation.

5. Risk Management, Training, Reporting and Investigation - Clause 7

The Notification requires: The operator shall establish a risk management system to prevent the acceptance for safekeeping, hand-carrying or carriage of another person's items by a crew member. That system shall comprise at least the four elements set out in Clause 7 (Risk Management) and addressed in this Section: annual risk assessment with appropriate control and mitigation measures; crew awareness training; a confidential reporting system with protection for good-faith reporters; and fact-finding investigation with retention of the result.

5.1 Risk assessment

The Notification requires: The operator shall assess the risk of improper acceptance, hand-carrying or carriage of another person's items at least once each year. It shall establish appropriate controls and mitigation based on the assessment and review them when the risk level changes or a related event occurs.

The assessment should consider, as applicable:

- routes, countries, customs and narcotics exposure;
- bases, outstations and crew-channel arrangements;
- crew scheduling, positioning and overnight patterns;
- known events, confidential reports, inspection results and disciplinary cases;
- item type, value, concealability and potential safety or security consequence;
- company culture, financial or external pressure and insider-threat indicators;
- screening resources, contractor performance and equipment availability;
- gaps identified by audit, investigation or authority information; and
- the effectiveness of existing controls.

The assessment should identify a risk owner, existing controls, further action, due date and residual risk. Significant changes should be reflected promptly in the screening programme, training, procedures and management review.

5.2 Crew awareness training

The Notification requires: Crew members shall be trained to understand the prohibition and measures in the Notification, legal and disciplinary liability, aviation-security risks and the possible consequences of a breach.

Training may be integrated into the operator's existing security-awareness course, other training or a controlled briefing. Existing security-awareness training is considered adequate for the security-awareness element. If existing content does not cover the Notification-specific prohibition, measures, liabilities and consequences, the operator may close the gap through a concise module, briefing or update rather than a standalone CBC course.

The operator may use existing security-awareness training, other existing training or a controlled briefing. Any supplementary content need cover only gaps against Clause 7(2): the prohibition and applicable CBC measures, legal and disciplinary liability, aviation-security risks and possible consequences. A separate syllabus, course or additional training hours are not required.

Training completion may be demonstrated through attendance records. Questions, scenarios or another suitable method may also be considered to support and reinforce understanding.

5.3 Confidential reporting

The Notification requires: The operator shall provide a confidential reporting system through which crew can report improper carriage or suspicious behaviour. The system shall protect confidentiality and protect a good-faith reporter from adverse impact or retaliation.

The operator may use an existing confidential reporting route if it provides appropriate access controls, protection of identity, conflict-of-interest handling, initial assessment and prioritisation of reports, investigation referral and a record of action. A separate CBC channel is not required. Anonymous reports may be accepted where practicable, while recognising that anonymity can limit follow-up.

The operator should state that deliberate false or malicious reporting is not protected, while an unsubstantiated good-faith report remains protected.

5.4 Fact-finding investigation

The Notification requires: When reasonable suspicion exists or information is received that a crew member may have breached the measures, the operator shall conduct a fact-finding investigation. The process shall address evidence collection, interviews, risk assessment, risk-containment measures, corrective or disciplinary action and retention of investigation results.

The operator may use its existing investigation and disciplinary procedures. For CBC cases, those procedures need only be capable of addressing the elements expressly required by Clause 7(4): evidence collection, interviews of relevant persons, risk assessment, risk-containment measures, corrective or disciplinary action, and retention of the investigation result. Other investigation controls may be applied according to the case and applicable law.

The standard of evidence and employment action needs to comply with applicable Thai law and the operator's valid work rules. The CBC investigation does not replace a criminal investigation by a competent authority.

5.5 Risk-assessment method and review

The Notification does not prescribe one risk methodology. The operator may use its existing SMS or enterprise risk method if the output clearly addresses CBC exposure and produces usable controls.

The operator may use its existing SMS, security, compliance or enterprise risk-assessment format and methodology. No separate CBC template, scoring matrix or prescribed data set is required. The record need only identify the relevant CBC risk, the controls or mitigations adopted, and evidence of the annual review and any earlier review triggered by a risk change or related event.

5.6 Training governance and records

All crew members shall receive the awareness training required by Clause 7(2) (Crew Training), which may be integrated into existing training. Person(s) assigned by the operator to perform CBC inspections should receive relevant instruction on the Notification, security awareness and the operator's applicable procedures and other training requirements. Existing security-awareness training is adequate for the security-awareness element, and no separate national aviation-security qualification is created solely by the CBC assignment.

Existing training records may be used. The record should be sufficient to identify the participant, the applicable course, module or briefing, and the completion date. Additional assessment or remedial information is needed only where it forms part of the operator's existing programme.

The operator should control translations and electronic learning so that the content remains aligned with the current Notification and the operator’s procedures. Material changes affecting crew responsibilities, limits, reporting arrangements or disciplinary consequences should be communicated or trained through an appropriate controlled method before affected personnel are expected to apply them.

5.7 CAAT Verification Guidance

(a) Risk assessment

- ✓ Verify that the operator has conducted a CBC risk assessment and established appropriate control and mitigation measures.
- ✓ Verify that a CBC risk assessment is conducted at least annually.
- ✓ Verify that the measures are reviewed when the risk level changes or a relevant event occurs.
- ✓ Trace the principal identified risks to the controls adopted by the operator.
- ✓ The Notification does not require risk assessments predating its effective date. Inspectors may review earlier relevant assessments where available.

(b) Training

- ✓ Verify that crew members have received awareness training on the prohibition and measures under the Notification, using existing security-awareness or other training arrangements where these cover the required content.
- ✓ Verify that the training covers legal responsibility, disciplinary responsibility, aviation-security risks and the potential consequences of non-compliance.
- ✓ Review existing security-awareness, training, briefing or communication evidence.
- ✓ Interview a proportionate sample of crew members to confirm awareness.
- ✓ The Notification does not prescribe a standalone, initial, recurrent, examination-based or role-specific CBC course. Existing security-awareness training is adequate for the security-awareness element; a concise briefing or module may address any Notification-specific content not already covered.

(c) Confidential reporting

- ✓ Verify that crew members have access to a confidential means of reporting relevant information or suspicious conduct.
- ✓ Verify that confidentiality protections have been established.
- ✓ Verify that good-faith reporters are protected from adverse treatment or retaliation.
- ✓ Review a limited sample of existing case evidence where a report has been received.
- ✓ Use a walkthrough where no report has been received.
- ✓ The Notification does not prescribe a separate case register or fictional report. Inspectors may review existing case records or use interviews and walkthroughs where no relevant case has occurred.

(d) Fact-finding investigation

- ✓ Verify that the operator has established procedures for investigation when reasonable suspicion or relevant information is received.
- ✓ Verify that the procedure covers evidence collection, interviews, risk assessment, risk-control measures and corrective or disciplinary action.
- ✓ Verify that investigation results are retained for inspection.
- ✓ Trace an actual case where one exists.
- ✓ Use a walkthrough where no CBC investigation has occurred.
- ✓ Verify consideration of the Clause 9 (Response to Suspicion) reporting requirement where the facts of a case reach that threshold.
- ✓ The Notification does not prescribe a specific investigation form, committee composition or approval structure. Inspectors may assess whether the operator’s arrangements effectively meet the applicable requirements.

6. Monitoring, Evaluation and Corrective Action - Clause 8

The Notification requires: The operator shall continuously monitor and evaluate whether the CBC measures are implemented and effective.

At minimum, the system must include:

- an internal audit at least once each year and when there is reasonable suspicion of a breach;
- determination and follow-up of corrective action;
- retention of audit results and related evidence for CAAT inspection; and
- reporting of internal audit results to the operator's management and provision of audit results, reports, documents or evidence to CAAT when requested.

6.1 Audit scope and sampling

The audit should cover policy, limits, exceptional approvals, training, signed acknowledgements, screening design and performance, confidential reporting, investigations, disciplinary interfaces, CAAT reporting, corrective action and records. Sampling should extend to relevant stations and contractors where the activity or risk is located.

The auditor should reconcile source records rather than rely only on summary statistics. Useful tests include:

1. compare the eligible population, random selections and completed screenings;
2. trace a sample from selection through inspection, result and retention;
3. trace a suspected event through risk assessment, investigation, reporting and closure;
4. interview crew and responsible personnel; and
5. retrieve an applicable Clause 12 (Record Retention) record created during the sampled period or since the Notification took effect.

6.2 Event-triggered audit

Clause 8 (Monitoring and Evaluation) requires internal audit when there is reasonable suspicion of a breach. This audit is distinct from the fact-finding investigation under Clause 7(4) (Fact-Finding Investigation):

- the investigation determines facts and action concerning the particular event or person; and
- the audit assesses whether the relevant organisational controls were adequate, implemented and effective, and whether the weakness extends beyond the event.

The audit may examine training, supervision, screening selection, permissions, contractor performance, reporting, previous similar cases and management action. Auditor independence should be protected, particularly when management decisions or the compliance function itself may form part of the control failure.

6.3 Corrective action and management review

Corrective action should address the cause and extent of the problem, not only the sampled case. It should have a responsible owner, target date, implementation evidence and effectiveness review.

Management reporting should identify significant events, screening performance, missed selections, trends, repeat issues, overdue actions, resource constraints and decisions required. Any significant issue requiring prompt management attention should be escalated without waiting for the next scheduled annual review.

6.4 Performance indicators

Indicators should be interpreted together. A high number of screenings may coexist with poor targeting, predictable selection or unresolved findings.

Indicator	Management question
Screening completion rate	Were selected screenings completed, and are non-completions justified?
Randomness/selection distribution	Is the same group repeatedly selected or excluded? Can the method be independently tested?
Positive findings and red flags	What types, routes or circumstances recur, and do they require increased control?
Exceptional permissions	Are volumes, approvers, items or reasons unusual? Are refused or cancelled requests recorded?
Training/acknowledgement completion	Are any active crew untrained, overdue or missing acknowledgement?
Reports and investigations	Are cases triaged, protected, investigated and closed within controlled timeframes?
Corrective-action ageing	Are significant or repeat actions overdue, extended or closed without effectiveness evidence?

Operators should avoid setting numerical targets that create pressure to conceal missed screenings, discourage reporting or close investigations prematurely. Measures should support effective control, not only favourable statistics.

6.5 Retention of monitoring results

The Notification requires: The operator shall retain monitoring results and related evidence so that CAAT is able to inspect them.

The operator should hold audit reports, working papers, corrective-action records and supporting evidence in a controlled location with defined access, and should be able to retrieve a nominated record without reconstructing it. Existing compliance-monitoring or document-control arrangements may be used. This requirement is separate from the five-year retention period in Clause 12 (Record Retention), which applies to the records that clause names.

6.6 CAAT Verification Guidance

- ✓ Verify that CBC is included in the operator’s internal monitoring and evaluation system.
- ✓ Verify that an internal audit is planned and conducted at least annually.
- ✓ Verify that an additional internal audit is conducted when reasonable suspicion of a breach arises.
- ✓ Review the most recent applicable audit when one has become due.
- ✓ Verify that identified deficiencies are assigned corrective action and followed up.
- ✓ Verify that audit results and related evidence are retained for CAAT inspection.
- ✓ Verify that internal-audit results are reported to management.
- ✓ Verify that audit reports and supporting evidence are provided to CAAT when requested.
- ✓ Use the operator’s existing compliance-monitoring arrangements where they adequately cover CBC.
- ✓ The Notification does not prescribe a separate CBC audit department, working-paper format or audit database. Assess whether the operator’s existing audit arrangements adequately demonstrate compliance with Clause 8 (Monitoring and Evaluation).

During the first annual cycle, verify that CBC is incorporated into the audit programme and scheduled within the applicable annual period. A completed annual audit may not yet be available. This does not affect the requirement for an additional audit where reasonable suspicion has arisen.

7. Response to Suspected Breaches and Unlawful Acts - Clause 9

The Notification requires: When there are reasonable grounds to believe that a crew member may have breached the Notification, or that the crew member's conduct may constitute an offence under aviation, customs, narcotics, anti-money-laundering or other applicable law, the operator shall take the actions in Clause 9.

7.1 Immediate risk action

The operator shall assess the risk and consider appropriate measures to prevent or mitigate risks to aviation safety or aviation security and to address any potential contravention of law. Measures may include temporary removal of the crew member from duty while fact finding is conducted.

The decision should be proportionate to the identified risk and documented. Other possible controls may include preventing access to an item or aircraft, preserving evidence, increasing screening, changing duties, notifying security personnel or seeking direction from a competent authority.

Temporary removal from duty is a preventive risk measure and should not be presented as a final disciplinary finding before the facts and applicable process have been considered.

7.2 Reporting to CAAT without delay

The Notification requires: The operator shall report to CAAT without delay when the act or behaviour may affect aviation safety or aviation security, or constitute a contravention of law.

The operator should not postpone the initial report until the investigation is complete. When facts are incomplete, the initial report may be identified as preliminary and updated as information becomes available. It should include, to the extent known and lawful:

- operator and contact details;
- date, time, location, flight or duty;
- concise description of the allegation or event;
- safety, security and legal significance;
- immediate risk assessment and interim action;
- status of the crew member and item;
- authority notifications already made;
- evidence preserved; and
- planned next steps and update arrangements.

The report should use CAAT's current official channel for the matter. Urgent safety or security information should be communicated through the established urgent channel. A Clause 9 report is separate from any additional occurrence, dangerous-goods, security or statutory report required under another instrument.

7.3 Initial and follow-up reporting

The initial report should communicate the material risk quickly and accurately. It need not contain a final finding. The operator should distinguish verified facts, allegations and information still being checked.

A reporting sequence may include:

1. immediate verbal or urgent notification where required by the seriousness of the event;
2. a traceable preliminary written report;
3. updates when the risk, status of the person/item, authority involvement or material facts change;
4. submission of investigation or disciplinary outcome when requested by CAAT; and
5. a closure or corrective-action update where appropriate.

The operator should record the time the triggering information became known, who assessed it, when CAAT was contacted, the receiving CAAT function and any reason for delay. Internal management approval should not create unnecessary delay in an urgent report.

7.4 Cooperation with authorities

The Notification requires: The operator shall cooperate with CAAT and relevant Thai and foreign State authorities in fact finding, evidence collection and legal action.

The operator should nominate a coordination point, preserve original records, maintain an action and disclosure log, protect personal data and legal privilege where applicable, and avoid actions that could compromise an authority's investigation. Items suspected to be unlawful should be handled only in accordance with the direction of authorised personnel.

7.5 Examples of Clause 9 triggers

The following normally warrant immediate assessment of the Clause 9 reporting duty:

- suspected carriage of narcotics, prohibited articles, weapons, undeclared dangerous goods or unlawfully imported/exported items;
- deliberate use of a crew channel to avoid customs or security controls;
- concealment, false declaration or suspected organised activity involving more than one person;
- an item or conduct that may endanger an aircraft, crew, passengers or ground personnel;
- arrest, detention or formal inquiry by a Thai or foreign authority connected with crew baggage;
- credible intelligence or a confidential report indicating continuing exposure;
- repeated conduct or a management/contractor control failure affecting multiple operations; or
- interference with screening, evidence, reporting or an investigation.

This list is not exhaustive. The operator should report whenever the facts meet the Clause 9 threshold, even if the example is not listed.

7.6 CAAT Verification Guidance

- ✓ Verify that the operator has a procedure for responding when there are reasonable grounds to believe that a crew member may have breached the Notification or applicable law.
- ✓ Verify that the procedure requires a risk assessment and consideration of appropriate protective measures.
- ✓ Verify that temporary suspension is treated as a possible measure, not an automatic requirement in every case.
- ✓ Verify that the operator reports to CAAT without delay where the conduct may affect aviation safety, aviation security or involve a violation of law.
- ✓ Verify that the operator cooperates with CAAT and relevant Thai or foreign authorities.
- ✓ Trace an actual case using existing records where one exists.
- ✓ Assess timeliness from the facts and information reasonably available to the operator at the relevant time.
- ✓ Use a walkthrough where no reportable event has occurred.
- ✓ The Notification does not prescribe a separate CAAT reporting form or require a simulated notification solely for inspection purposes. Inspectors may review actual reports or assess the reporting process through interviews and walkthroughs where no reportable event has occurred.

8. Work Rules, Acknowledgement and Discipline - Clause 10

The Notification requires: The operator shall incorporate the Notification's measures into its work rules. Every crew member shall be informed and shall sign an acknowledgement. A breach shall be classified as a serious disciplinary offence under the operator's rules, with strict and immediate disciplinary action proportionate to the seriousness of the conduct.

The operator should coordinate amendments with human resources and legal personnel to ensure consistency with applicable labour law, collective arrangements and due process. The work rules should align with the operational manuals and should not use different definitions, thresholds or approval routes.

The signed acknowledgement should identify the applicable policy or document and revision, confirm that the crew member understands the prohibition, cooperation and reporting duties, and record the date and identity of the signatory. Electronic acknowledgement may be used where it is attributable to the crew member, protected against alteration and retrievable for the period set by applicable law and the operator's record policy.

The disciplinary process should consider intent, knowledge, item type, concealment, compensation, scale, repetition, cooperation, safety or security impact and relevant mitigating or aggravating factors. It should not weaken the Notification's classification of a breach as a serious disciplinary offence.

Disciplinary action does not prevent criminal proceedings, other legal action or CAAT's exercise of criminal or administrative powers under aviation law.

8.1 Suggested content of the acknowledgement

The acknowledgement should confirm that the crew member has received or can access the current controlled requirements and understands:

- the prohibition on paid and unpaid carriage for another person;
- the permitted categories and company limits;
- the special-permission process;
- the duty to declare, cooperate and present or open baggage;
- the confidential reporting route;
- the possibility of screening, investigation, interim removal from duty and authority referral;
- the classification of a breach as a serious disciplinary offence; and
- the continuing application of criminal, administrative and other legal action.

An acknowledgement is evidence of communication; it does not replace training or competence assessment. Operators should obtain a new or updated acknowledgement when a material revision changes crew obligations or consequences.

8.2 Consistency and proportionality in discipline

The Notification requires strict and immediate disciplinary action according to seriousness. The operator should ensure that "immediate" does not bypass necessary fact finding and lawful due process. Interim risk action can be taken promptly while the final disciplinary decision follows the valid process.

Similar cases should be treated consistently, while taking account of relevant facts. Management status, operational need, seniority or commercial pressure should never be used to shield any person from the established process.

The disciplinary outcome should be communicated to functions that need it for risk control, while personal details remain limited to those with authorised need.

8.3 CAAT Verification Guidance

- ✓ Verify that the CBC measures are incorporated into the operator’s work rules or personnel-administration regulations.
- ✓ Verify that every applicable crew member has been informed and has signed an acknowledgement.
- ✓ Verify that a breach is classified as a serious disciplinary offence.
- ✓ Verify that disciplinary action is undertaken promptly and according to the seriousness of the conduct.
- ✓ Compare the applicable crew population with existing acknowledgement records.
- ✓ Review all relevant records when the volume is sufficiently small for a complete review to be practical.
- ✓ Use a proportionate sample and completion report for a larger population, expanding the sample only if discrepancies are found.
- ✓ Sample an actual disciplinary case where one exists.
- ✓ Use a walkthrough where no case has occurred.
- ✓ The Notification does not prescribe a particular paper or electronic acknowledgement format. Assess whether the acknowledgement is attributable to the crew member, appropriately controlled and retrievable.

9. Document Alignment and Records - Clauses 11 and 12

9.1 Document alignment

The Notification requires: Clause 11 (Document Alignment) required the operator, within 30 days from the effective date of the Notification, to review, revise and bring into force the Operations Manual (OM), Aircraft Operator Security Programme (AOSP), Standard Operating Procedures (SOPs), other relevant controlled documents, and work rules or personnel-administration regulations so that they conform to the Notification.

Operators should confirm that the current versions of all affected documents now reflect the applicable CBC measures and are consistent with the arrangements implemented in practice. Any outstanding gap should be addressed through the operator's applicable document-control or change process.

The operator may use its existing document-control system, compliance review, implementation action plan or another controlled method covering:

Document or system	Typical CBC content
OM, SOPs and relevant operating manuals	CBC policy and scope; crew duties; prohibited conduct; baggage and item limits; special-permission criteria, process and authority; reporting duties; and command, operational and station responsibilities.
Other relevant controlled manuals and procedures, including the AOSP where affected	CBC content relevant to the purpose of the document, where the operator determines that amendment is needed. The AOSP is one of the manuals to consider and is not the prescribed primary location for CBC measures.
SMS and risk-management documentation	Hazard identification; risk assessment; risk controls; event-driven review; safety-reporting interface; and monitoring of safety risks and trends.
CMS documentation	Internal-audit programme; risk-based sampling; findings; corrective actions; follow-up; effectiveness verification; and management reporting.
Confidential-reporting and investigation procedures	Reporting channels; protection of identity and good-faith reporters; access controls; conflict-of-interest handling; initial assessment and referral; evidence collection; interviews; risk-control measures; investigation outcomes; and corrective or disciplinary referral.
Training programme and material	Awareness of the prohibition and CBC measures; legal and disciplinary liability; security risks; arrangements for training following a material change; and training records.
HR work rules and personnel procedures	Signed acknowledgement; classification of contravention as a serious disciplinary offence; and applicable investigation and disciplinary arrangements.
Forms and records	Special-permission approvals; random-selection and screening records; confidential reports and action taken; investigation results; internal-audit records; and reports or evidence provided to CAAT, where applicable.

Note: The table indicates possible locations only. The operator determines which existing manuals or systems need amendment and may place CBC content elsewhere, provided that the Notification is addressed and the implemented arrangements remain consistent.

Each revision should follow the applicable document-control or change procedure and any required approval, acceptance, acknowledgement, notification or consultation process.

Current compliance may be demonstrated through existing controlled documents and change records. The Notification does not prescribe a separate CBC implementation register or retrospective transition report.

9.2 Record retention

The Notification requires: Records, reports, documents and evidence related to searches, random screening, fact-finding investigations and disciplinary action shall be retained for at least five years from the date each record is created and shall be ready for presentation or delivery to CAAT upon request.

Other CBC records should follow any retention period stated in another applicable requirement or the operator's approved record policy. Clause 12 (Record Retention)'s five-year minimum does not automatically extend to every supporting record.

Existing record-management arrangements may be used. A separate CBC record-control procedure or repository is not required, provided that the records within Clause 12 can be identified, protected, retained for at least five years and produced to CAAT on request.

Personal data should be limited to what is necessary, kept accurate, protected according to sensitivity and processed in accordance with applicable personal-data law. Restricted reporter identities, investigation evidence and disciplinary records should not be placed in broadly accessible operational folders.

9.3 Document revision and implementation control

The operator may demonstrate document alignment through existing controlled documents and normal change records. A separate CBC compliance register, approval tracker or implementation file is not required.

Existing document-control and change records may be used to demonstrate this. They should identify the current revision and effective status and any outstanding action material to CBC implementation; a separate CBC document-control record is not required.

Whether a revision requires prior approval or another form of submission depends on the applicable regulation, the type and status of the document, the nature of the change and the operator’s approved procedure. Operators should therefore apply the appropriate change process to each affected document.

The Notification does not require a separate CBC register or a retrospective record created solely to reconstruct the Clause 11 (Document Alignment) transition period.

9.4 Suggested record categories

Record category	Examples	Access consideration
Policy and governance	Approved policy, responsibility allocation, authority lists and relevant management decisions.	Controlled management access.
Risk and change	Annual/event risk assessments, management of change, station assessments.	Safety, security and responsible management access.
Permission	Requests, supporting evidence, approval or refusal decisions, conditions and permission records.	Operations or security access; personal and commercial information protected.
Screening	Selection records, inspection results, X-ray or equipment outputs and screening non-completions.	Restricted security and compliance-monitoring access.
Training	Controlled course or briefing revisions, training completion records and crew acknowledgements.	Training, human resources and authorised oversight access.
Reporting and investigation	Confidential reports, identities, evidence, interviews, conclusions and authority communications.	Strict case-based access; reporter identity separately protected.
Audit and corrective action	Audit programme, reports, supporting evidence, corrective actions and follow-up records.	Compliance-monitoring and appropriate management access.
CAAT and authority communication	Initial and updated reports, requests, submissions and relevant correspondence.	Controlled regulatory or legal access.

Where different retention requirements apply to linked records, the operator should ensure that disposal of one record does not make a retained record unintelligible or untraceable.

9.5 CAAT Verification Guidance

(a) Current document alignment

- ✓ Verify that the operator's current controlled documents, including the OM, SOPs, work rules or personnel-administration regulations and the AOSP where affected, address the applicable requirements of the Notification.
- ✓ Verify that the applicable documents have been brought into force and remain accessible to the personnel who use them.
- ✓ Cross-check the principal documents for material consistency.
- ✓ Confirm that the documented measures correspond with the arrangements implemented in practice.
- ✓ Review the operator’s existing document-control and change records where needed to establish the status and control of the current revision.
- ✓ For CBC verification, confirm only that the operator has followed any applicable document-change process. Compliance with a separate aviation-security approval or qualification requirement is not assessed under this GL.
- ✓ Use interviews, observations and walkthroughs where these provide sufficient evidence of implementation.
- ✓ Assess a document that is not currently aligned or in force as a present deficiency against the applicable requirement.

Current conformity, implementation and effectiveness are the principal verification objectives. The operator may use existing records to demonstrate these matters; a separate transition report or reconstruction of the implementation timeline is not prescribed.

(b) Record retention

- ✓ Verify that the operator retains records connected with searches, random screening, fact-finding investigations and disciplinary action for at least five years from the date of creation.
- ✓ Verify that records created since the Notification took effect are retrievable and capable of being shown or delivered to CAAT.
- ✓ Review a small proportionate sample of current records.
- ✓ Verify that the retention setting or documented retention period is at least five years.
- ✓ Verify that the prescribed retention period is established and applied to records created from the effective date.
- ✓ Review earlier relevant records where available or where another applicable requirement provides for their retention.
- ✓ Apply the Clause 12 (Record Retention) five-year minimum to records relating to searches, random screening, fact-finding investigations and disciplinary action. Assess other CBC records against the retention period established by the applicable requirement or the operator’s controlled record-retention arrangements.

10. Operator Readiness for CAAT Oversight - Clause 13

Clause 13 provides for CAAT to assess compliance during:

- inspection for issuance of an AOC;
- AOC renewal;
- surveillance; or
- a special audit/inspection.

The assessment considers whether the operator has established, implemented and continuously maintained effective measures under the Notification. Where a deficiency or non-compliance is identified, CAAT may direct the operator to take corrective action within a specified period or proceed in accordance with its legal powers.

Operators should be able to demonstrate compliance through current controlled documents and records generated through normal operations. Relevant evidence may include risk assessments, special permissions, training and signed acknowledgements, screening records, investigations, internal audits, corrective actions, management reports and records required by Clause 12 (Record Retention).

Relevant evidence should be identifiable and retrievable when requested. Existing document-control systems, indexes, registers or document maps may be used; a separate CBC evidence index is not required. Confidential information should be provided through lawful, controlled access that protects reporter identity, personal data and evidence integrity.

The operator’s compliance monitoring and internal audits should confirm that the CBC measures work in practice. This includes confirming that crew understand the prohibition, random selections remain unpredictable, selected screenings are completed or any non-completion is explained, special permissions are traceable, required reports are submitted promptly, investigations cover the required elements, corrective actions are followed up and relevant records are retrievable.

10.1 CAAT Oversight Approach and Evidence Capture

- ✓ Define the inspection scope against the applicable clauses of the Notification.
- ✓ Begin with the smallest sample reasonably capable of supporting a conclusion.
- ✓ Expand the sample only where discrepancies, control weaknesses or assessed risk justify further review.
- ✓ Reuse reliable evidence across related inspection areas.
- ✓ Use interviews, observation and walkthroughs where these can establish implementation without requiring additional documentation.
- ✓ Distinguish between a legal requirement, an operator-selected method and a recommended practice.
- ✓ Raise a finding only against an applicable legal or operator requirement.
- ✓ Assess compliance against the applicable requirement and the effectiveness of the operator’s arrangements. The absence of a recommended form, database, committee, report or organisational arrangement does not, by itself, establish non-compliance.
- ✓ Consider the recent commencement of the Notification when assessing the availability of historical evidence, annual assessments and annual audits.
- ✓ Verify whether the measures are established, implemented and maintained continuously and effectively, as required by Clause 13 (CAAT Oversight).

11. Operator Implementation Plan

The following sequence provides a concise method for confirming current compliance and maintaining the CBC system. Operators may adapt it to their existing management system. A separate CBC project, implementation register or evidence package is not prescribed, provided that compliance can be demonstrated through current controlled documents and ordinary operating records.

Step	Action	Completion evidence
1	Confirm the responsible coordinating person or function and the allocation of responsibilities within the existing organisation.	Responsibility allocation and appropriate management authority.
2	Confirm that a current risk assessment covers relevant routes, stations, crew channels, events and existing controls.	Current risk assessment, control actions and residual-risk decision.
3	Review the policy, permitted-item categories, measurable limits, prohibition and special-permission process for conformity with the Notification.	Current controlled policy, established limits, approval authority and permission records.
4	Verify that the risk-based screening programme includes the minimum inspection elements, uses suitable methods and provides for Secondary Screening and evidence-of-origin checks when required.	Current procedure, station arrangements, screening method and completed screening records.
5	Confirm that confidential reporting, fact-finding, interim-action and CAAT-reporting arrangements are established and usable.	Reporting route, case-handling arrangements, investigation procedure and authority-notification procedure.
6	Confirm that affected existing controlled documents, including the OM, SOPs, work rules or personnel-administration regulations and the AOSP where affected, conform to the Notification and have followed the applicable change process.	Current controlled documents and applicable approval, acceptance, acknowledgement or notification evidence.
7	Confirm that all crew members have received the required awareness training and signed acknowledgements, using existing training where suitable, and that person(s) assigned to CBC inspections have received relevant instruction.	Existing security-awareness, training or briefing material; completion records; and signed crew acknowledgements.
8	Verify that screening and associated record controls operate at the main base and applicable stations.	Screening, selection and related operational records; interviews or walkthroughs.
9	Review whether the required measures operate effectively and address any identified deficiency through the operator's corrective-action process.	Assurance evidence, identified deficiencies, corrective actions, follow-up and management information.
10	Maintain the annual risk assessment, annual internal audit, event-driven reviews and continuous monitoring required by the Notification.	Review schedule, audit programme, management information and continuing evidence of implementation and effectiveness.

Appendix A - Clause-by-Clause Compliance Matrix

The matrix summarises the Notification for reference. The evidence identified in the third column is illustrative and does not prescribe a particular form, register, document, assessment method or organisational arrangement. Equivalent existing evidence may be used where it adequately demonstrates compliance with the applicable requirement.

Clause	Requirement or applicability point	Illustrative objective evidence
1	States the official title of the Notification. This clause does not create a separate operator compliance action.	Not separately assessed.
2	The Notification was published on 4 July 2026 and took effect on 5 July 2026. This clause establishes commencement and does not create a separate continuing operator action.	Not separately assessed. Current compliance is assessed against the applicable substantive clauses.
3	Apply the defined scope for AOC holder, crew member, crew baggage and CAAT.	Definitions in controlled policies and training.
4(1)	Limit permitted items to duty necessities and reasonable personal use.	Item categories and crew guidance.
4(2)	Establish operator-determined weight, quantity and maximum-size controls, or a maximum-value control, together with criteria and conditions for exceptional permission. CAAT does not prescribe a kilogram limit.	Established limits recorded in a controlled document
4(3)	Prohibit carriage or facilitation for another person unless assigned by the operator, paid or unpaid.	Express prohibition, training and acknowledgement.
4(4)	Control special permission, authorised decision, assessment and traceable evidence.	Permission procedure, authorised decision-maker and traceable approval evidence.
4(5)	Require cooperation with inspection, including disclosure, declaration or opening of baggage when requested.	Crew duty, standard procedures, acknowledgement and refusal procedure.
4(6)	Inspect on a risk basis under Clause 6 (Inspection System) and record the result.	Screening programme and completed records.
4(7)	Initiate fact-finding where a breach is found or reasonably suspected; apply disciplinary action as warranted by the established facts; and provide the outcome to CAAT when requested.	Investigation, discipline and response records.
5	Integrate CBC into management, CMS, SMS and security measures.	Management-system documentation, CBC risk-assessment record or equivalent controlled evidence, and assurance records.
6(1)	Provide pre- or post-duty baggage searching.	Procedure, programme and search records.
6(2)	Conduct unannounced random screening.	Selection method, protected selection information, and records sufficient to compare selections with completed screenings.
6(3)	Conduct secondary screening where reasonable suspicion exists.	Trigger criteria and targeted-screening records.

Clause	Requirement or applicability point	Illustrative objective evidence
6(4)	Use inspection methods and equipment appropriate to risk; initial methods may include visual inspection, a manual hand search and a flashlight, with X-ray or other detection equipment considered for higher risks.	Risk-based method, assigned person and screening record; equipment arrangement where higher risk warrants it.
6(5)	Provide search by person(s) assigned by the operator; the assignment may be made from any department or other operator personnel.	Assignment, relevant instruction and operator procedure; no separate national aviation-security qualification solely for CBC.
6(6)	Verify provenance documents when reasonable suspicion exists.	Receipts, assignment or other provenance assessment.
7(1)	Conduct a risk assessment at least annually, establish appropriate controls and mitigation, and review the measures when the risk level changes or a related event occurs.	Dated risk assessment, controls and review records.
7(2)	Train crew on measures, liabilities, risks and consequences, using existing security-awareness or other training where suitable.	Existing training or briefing content and completion records.
7(3)	Provide confidential reporting and protect good-faith reporters.	Reporting arrangement, confidentiality and reporter-protection controls.
7(4)	Conduct and retain fact-finding investigations with the required elements.	Case file, evidence, interviews, risk and outcome.
8(1)	Audit internally at least annually and when breach is reasonably suspected.	Audit programme, report, sampling and event-triggered audit.
8(2)	Determine and follow corrective action.	Corrective-action and follow-up records.
8(3)	Retain audit results and evidence for CAAT inspection.	Retained audit results, related evidence and retrieval demonstration.
8(4)	Report audits to management and provide documents to CAAT on request.	Management submission and CAAT response record.
9(1)	Assess suspected breach risk and consider interim measures.	Immediate risk assessment and reasoned action.
9(2)	Report to CAAT without delay when aviation safety or aviation security may be affected, or the act or behaviour may constitute a contravention of law.	Initial and updated report with time record.
9(3)	Cooperate with CAAT and relevant Thai and foreign authorities.	Coordination, evidence and disclosure log.
10	Embed measures in work rules; signed acknowledgement; serious disciplinary offence and prompt proportionate discipline.	Valid work rules, acknowledgements and disciplinary records.
11	Required the OM, AOSP, SOPs, other relevant controlled documents and work rules or personnel-administration regulations to be reviewed, revised and brought into force within 30 days from the effective date.	Current effective controlled documents and applicable document-control or change records.
12	Retain specified records at least five years from creation and produce them to CAAT on request.	Retention requirements and retrieval of current records.

Clause	Requirement or applicability point	Illustrative objective evidence
13	CAAT assesses whether the required measures are established, implemented and maintained continuously and effectively, and may require corrective or further action where deficiencies are identified.	Evidence of implementation, effectiveness and corrective-action follow-up, as applicable.

Appendix B - Operator Readiness Checklist

For a current review of its CBC system, management should confirm:

1. Are permitted categories and operator-determined limits clear and consistent across the affected controlled documents?
2. Can crew members explain why unpaid carriage for another person may still be prohibited?
3. Is special permission decided before carriage by an identified authorised person and capable of later verification?
4. Can selections, completed screenings and justified non-completions be reconciled?
5. Do risk-based arrangements cover relevant stations and contracted interfaces?
6. Can reasonable-suspicion screening and event response be initiated promptly?
7. Has every crew member completed the required training and signed an acknowledgement?
8. Does confidential reporting protect a good-faith reporter, including when a report concerns a senior person?
9. Can a suspected event be traced through risk action, investigation, reporting, corrective action and closure?
10. Are the affected documents and work rules or personnel-administration regulations current, in force and consistent with the measures implemented in practice?
11. Are records covered by Clause 12 (Record Retention) configured to be retained for at least five years from creation, and can the records created to date be produced promptly?
12. Has the operator verified that the CBC system operates continuously and effectively?

Appendix C – Inspection Checklist

Inspection Checklist attached to this Guideline: OPS – Crew Baggage Control for AOC Holders

CAAT สำนักงานการบินพลเรือนแห่งประเทศไทย The Civil Aviation Authority of Thailand	Checklist Number: Checklist attached to CAAT-GL-OPS-CBC Iss.01 Rev.00 Checklist Name: OPS – Crew Baggage Control for AOC Holders Applicability: Location: Date:

No.	Subject	Ref.	S	U	N/A	Comment
1	APPLICABILITY					
1.1	Scope and verification basis - The scope covers all persons assigned aircraft duties during the flight duty period. - The scope covers carry-on, checked and other items taken aboard or through crew channels. - All applicable controls in Clauses 4-12 are established - Implementation is proportionate and risk-based, and the smallest sufficient sample is used. *Note:* *1. Existing systems, records, interviews, observations or walkthroughs are accepted as evidence.* *2. A separate CBC manual, form, course or database is not required.*	Notification Cl. 3 and 13; GL Items 1.6, 10.1				
2	CREW BAGGAGE CONTROL POLICY AND LIMITS — CLAUSE 4					
2.1	Overall control objective - The operator prevents the use of crew status to carry another person's property for personal or third-party benefit. - Operator-assigned duties are excluded.	Notification Cl. 4; GL Item 2.11				
2.2	Permitted items - Permitted items are limited to duty needs or reasonable personal use.	Notification Cl. 4(1); GL Item 2.11				
2.3	Baggage limits - The operator sets the maximum weight, quantity and size, or the maximum item value.	Notification Cl. 4(2); GL Item 2.11				
2.4	Prohibition - The operator prohibits the acceptance, carriage, delivery or facilitation of another person's items, with or without payment. - Operator-assigned duties are excluded.	Notification Cl. 4(3); GL Item 2.11				
2.5	Special permission - The operator defines the criteria and approval method. - The operator identifies the approving authority. - Approval evidence is retained and traceable.	Notification Cl. 4(2), 4(4); GL Item 2.11				
2.6	Crew cooperation - The operator requires crew members to cooperate with inspection of baggage and items. - The operator requires crew members to disclose, declare or open baggage for screening when requested by the operator or a personnel assigned by the operator.	Notification Cl. 4(5); GL Item 2.11				

2.7	**Inspection records** - Baggage and items are inspected under the Clause 6 risk-based system. - Every inspection result is recorded.	Notification Cl. 4(6), 6; GL Items 2.11, 4.11				
2.8	**Investigation and discipline** - An actual or suspected breach triggers fact-finding and disciplinary action. - The results are available to CAAT upon request.	Notification Cl. 4(7); GL Item 2.11				
3	CREW BAGGAGE INSPECTION SYSTEM — CLAUSE 6					
3.1	**Risk-based inspection system** - The inspection system covers every element of Clause 6. - The frequency, coverage, locations and methods reflect the assessed risk. - Actual screening is observed, or a walkthrough is completed.	Notification Cl. 6; GL Item 4.11				
3.2	**Search timing** - Crew baggage is searched before or after duty, as defined by the operator.	Notification Cl. 6(1); GL Item 4.11				
3.3	**Random screening** - Random screening is conducted without prior notice and is unpredictable.	Notification Cl. 6(2); GL Item 4.11				
3.4	**Secondary screening** - Secondary screening is additional to normal aerodrome screening of crew members or their baggage. - Secondary screening is applied where reasonable suspicion exists. - Secondary screening may also be risk-based, random or targeted.	Notification Cl. 6(3) and definition; GL Item 4.11				
3.5	**Inspection methods and equipment** - Inspection methods and equipment reflect the assessed risk. *Note:* *1. Visual inspection, hand search and a flashlight are accepted as initial methods.* *2. X-ray screening or other suitable equipment is used where warranted by risk.*	Notification Cl. 6(4); GL Item 4.11				
3.6	**Assigned search personnel** - Searches are conducted by person(s) whom the operator has assigned to perform the search function. - Assigned person(s) are trained on the Notification, security awareness and operator procedures. *Note: National aviation-security qualifications are not required for the CBC assignment.*	Notification Cl. 6(5); GL Item 4.11				
3.7	**Evidence of origin** - Documents or other evidence of origin are checked where reasonable suspicion exists.	Notification Cl. 6(6); GL Item 4.11				

4	RISK MANAGEMENT, TRAINING, REPORTING AND INVESTIGATION — CLAUSE 7					
4.1	**Risk assessment** - CBC risks are assessed at least annually. - Controls reflect the assessment results. - Measures are reviewed following a change in risk or a related event.	Notification Cl. 5, 7(1); GL Item 3.7, 5.7				
4.2	**Crew training** - All crew members are trained on CBC prohibitions and measures. - The training covers legal and disciplinary responsibilities, aviation-security risks and consequences. *Note*: *1. An existing security-awareness course is accepted.* *2. Only Notification topics not already covered require an additional briefing or training.*	Notification Cl. 7(2); GL Item 5.7				
4.3	**Confidential reporting** - A confidential reporting channel covers prohibited carriage and suspicious conduct. - Reporter confidentiality is protected. - Good-faith reporters are protected from adverse impact or harassment.	Notification Cl. 7(3); GL Item 5.7				
4.4	**Fact-finding investigation** - Reasonable suspicion or a report triggers an investigation. - The procedure covers evidence, interviews, risk assessment and risk-control measures. - Corrective or disciplinary action is taken, and the investigation result is retained.	Notification Cl. 7(4); GL Item 5.7				
5	MONITORING, EVALUATION AND CORRECTIVE ACTION — CLAUSE 8					
5.1	**Monitoring and annual audit** - Implementation and effectiveness are monitored continuously. - An internal audit is completed at least annually.	Notification Cl. 5, 8, 8(1); GL Item 3.7, 6.6				
5.2	**Event-triggered audit** - An internal audit is conducted where reasonable suspicion of a breach exists.	Notification Cl. 8(1); GL Item 6.6				
5.3	**Corrective action** - Corrective action is assigned for identified deficiencies. - The action is followed up, and its effectiveness is verified.	Notification Cl. 5, 8(2); GL Item 3.7, 6.6				
5.4	**Monitoring records** - Monitoring results and evidence are retained and made available to CAAT.	Notification Cl. 8(3); GL Item 6.6				
5.5	**Audit reporting** - Internal-audit results are reported to management. - Requested results, reports, documents and evidence are provided to CAAT.	Notification Cl. 8(4); GL Item 6.6				

6	RESPONSE TO SUSPECTED BREACHES AND UNLAWFUL ACTS — CLAUSE 9					
6.1	Response and risk measures - The response process covers a suspected CBC breach or a possible offence under aviation, customs, narcotics, anti-money-laundering or other law. - The operator assesses the risk and considers appropriate preventive or mitigating action. *Note: Temporary duty suspension is optional and based on risk.*	Notification Cl. 9, 9(1); GL Item 7.6				
6.2	Report to CAAT - CAAT is notified without delay where conduct may affect aviation safety, security or compliance with law.	Notification Cl. 9(2); GL Item 7.6				
6.3	Cooperation with authorities - The operator cooperates with CAAT and relevant Thai or foreign authorities. - The cooperation covers fact-finding, evidence collection and legal proceedings.	Notification Cl. 9(3); GL Item 7.6				
7	WORK RULES, ACKNOWLEDGEMENT AND DISCIPLINE — CLAUSE 10					
7.1	Work rules and acknowledgement - CBC measures are included in work or personnel rules. - All crew members are informed and sign an acknowledgement.	Notification Cl. 10; GL Item 8.3				
7.2	Disciplinary action - A breach is classified as a serious disciplinary offence. - Action is taken promptly and strictly according to the seriousness of the breach. - Criminal or other legal action and CAAT powers remain unaffected.	Notification Cl. 10; GL Item 8.3				
8	DOCUMENT ALIGNMENT AND RECORDS — CLAUSES 11 AND 12					
8.1	Document alignment - The OM, SOPs, work rules or personnel-administration regulations and other relevant controlled documents have been reviewed, revised and brought into force so as to conform to the Notification, and are consistent with the measures implemented in practice. *Note: The AOSP is included where affected.*	Notification Cl. 11; GL Item 9.5				
8.2	Record retention - Search, random-screening, investigation and disciplinary records are retained for at least five years from creation. - The records are readily shown or delivered to CAAT upon request.	Notification Cl. 12; GL Item 9.5				

S = Satisfied
U = Unsatisfied
N/A = Not Applicable
Comment = Details / evidence

Inspector / Air Operator's Auditor name: ....

Position: ....

Completed on: ....

Appendix D - Practical Scenarios

These scenarios illustrate application of the Notification. They do not replace case-specific risk assessment or other legal requirements.

D.1 Gift purchased and owned by the crew member

A crew member buys two ordinary gifts during a trip for personal presentation to family members. The items are within the operator's category, quantity, size, weight and value limits and comply with all customs, security and dangerous-goods requirements.

Position: This may be treated as reasonable personal use. The crew member should make any required declaration and remain subject to screening. The fact that another person will eventually receive a genuine personal gift does not by itself make the crew member a carrier for that person.

D.2 Sealed parcel from a friend

A friend asks a crew member to take a sealed parcel to another person at destination. No payment is offered and the friend says that the parcel contains clothing.

Position: Carriage should be refused. The item belongs to another person and the requested delivery is unrelated to assigned operator duties. Absence of payment does not remove the Clause 4(3) prohibition. Opening or inspecting the parcel does not convert the private request into permitted carriage.

D.3 Company document assigned for urgent delivery

Operations control formally assigns a crew member to transport an original company document because the approved courier cannot meet an operational deadline. The assignment is recorded, the document is identified, security and customs requirements are checked, and custody at destination is arranged.

Position: This may fall within operator-assigned duties. The operator should use its controlled company-assignment process and maintain a traceable record. Informal instruction from a colleague without authority is insufficient.

D.4 Personal item above the normal value limit

A crew member wishes to carry a personally owned high-value watch above the operator's normal declared-value limit.

Position: The item may be considered through the Clause 4(4) (Special Permission) exceptional-permission process because it is outside a Clause 4(2) (Baggage Limits) limit. Approval should consider ownership, provenance, route, security, customs and conditions. The approval cannot waive another legal restriction.

D.5 Several electronic devices for a relative

A crew member carries five new mobile phones purchased by a relative and is asked to deliver them at destination. Receipts are available and no payment is made to the crew member.

Position: Carriage is prohibited unless it forms part of a legitimate duty assigned by the operator. Receipts may establish purchase but do not make the items the crew member's reasonable personal effects. Quantity, ownership and delivery purpose indicate third-party carriage.

D.6 Higher-risk screening equipment unavailable at an outstation

A station normally uses visual inspection, a manual hand search and a flashlight for routine CBC inspections. X-ray equipment planned as an additional control for a higher-risk operation becomes unavailable shortly before departure.

Position: Routine inspection may use visual inspection, a manual hand search and a flashlight where consistent with the operator's risk-based programme. For the higher-risk operation, the operator should apply an alternative suitable control. Repeated unavailability of a control selected by the operator should prompt review of the station arrangement.

D.7 Confidential report concerning a senior manager

A crew member reports that a senior operational manager has repeatedly requested carriage of private goods. The normal reporting channel reports to that manager.

Position: The conflict-of-interest route should be used immediately. Reporter identity should be restricted, evidence preserved, risk assessed and a sufficiently independent investigator appointed. Seniority should not prevent interim action, CAAT reporting assessment, audit or discipline.

D.8 Suspicious item detected after arrival

Post-duty screening finds an undeclared package suspected to contain an unlawful substance.

Position: Personnel should avoid unnecessary handling, secure the situation, notify authorised security and competent authorities, preserve evidence, assess removal from duty and report to CAAT without delay where the Clause 9 (Response to Suspicion) threshold is met. The operator should initiate fact finding without compromising the authority investigation.

Appendix E - Illustrative Record Content

This appendix provides guidance only and does not create additional requirements. The Notification does not prescribe a particular form, register, system or set of mandatory data fields.

Operators may use existing forms, records, electronic systems, approvals or other evidence. Records may be combined, adapted or simplified according to the size and complexity of the operation, provided that the applicable activity, decision, action and result can be traced and the evidence remains controlled and retrievable. A separate record or register is not required solely to follow this appendix.

Confidential and personal information should be subject to appropriate access controls.

E.1 Special-permission record

Relevant content may include:

- reference, date, crew member and flight or journey;
- item description and relevant ownership, source, destination, quantity, weight, size or value information;
- reason for the request and applicable permission criterion;
- relevant operational, security, dangerous-goods or legal considerations;
- decision, reasons and any conditions;
- authorised person, date and attribution; and
- links to related screening or other records, where applicable.

E.2 Random-selection record

Relevant content may include:

- reference, date, period or location;
- selection method and what was selected, such as a crew member, flight or duty;
- selected crew member or unit;
- corresponding screening result or reference; and
- any substitution or non-completion and the reason.

The information may be held within the operator's existing screening or security system. A separate reconciliation report is not required where selections and completed screenings can already be compared.

E.3 Crew baggage inspection record

Relevant content may include:

- reference, date, location and flight or duty, where applicable;
- crew member and baggage or items screened;
- screening type, basis, scope and method;
- person assigned by the operator to conduct the screening;
- result and any relevant permission or evidence of the item's source;
- action taken, including any referral or explained non-completion;
- links to an investigation or CAAT report, where applicable; and
- signature or secure electronic attribution.

E.4 Confidential-report record

Relevant content may include:

- case reference, date and reporting channel;
- brief description of the concern;
- initial assessment and action taken;
- function or person assigned to handle the report;
- linked investigation or corrective action, where applicable; and
- status, outcome and closure date.

Reporter identity and contact information should be restricted and may be held separately where appropriate.

E.5 Fact-finding investigation record

Relevant content may include:

- allegation or concern, source reference and date opened;
- person responsible for the investigation;
- relevant evidence, interviews and response from the person concerned, where applicable;
- risk assessment and any interim risk-control action;
- conclusion and corrective or disciplinary action;
- CAAT reporting or coordination with relevant authorities, where applicable;
- closure date; and
- applicable access and retention controls.

Additional evidence-control or custody records may be used where necessary for the nature of the case.

E.6 Internal-audit and corrective-action record

Relevant content may include:

- audit scope, date, criteria and responsible auditor;
- locations, periods or evidence reviewed;
- findings, supporting evidence and applicable requirements;
- correction or corrective action, responsible person and due date;
- follow-up, effectiveness and closure evidence;
- management reporting; and
- records provided to CAAT, where requested.

Appendix F – References

The references below should be read in their current versions and are not exhaustive. For Thai legal instruments, the official Thai-language text prevails over any translation. Where this guideline conflicts with an applicable requirement, the applicable requirement prevails.

F.1 Primary instrument

Notification of the Civil Aviation Authority of Thailand on Measures to Control the Acceptance for Safekeeping or Carriage of Items by Crew Members of Air Operator Certificate Holders, B.E. 2569 (2026).

F.2 Related requirements

- Air Navigation Act B.E. 2497, as amended.
- Regulation of the Civil Aviation Authority of Thailand No. 27 on Operations of the Air Operator, particularly Clause 7(11).
- TCAR OPS Regulations
- Other applicable legal or regulatory requirements relevant to the operator's CBC arrangements.

F.3 Contact

Questions and submissions should use the current official CAAT channel applicable to the matter.