



121 North Henry Street
Alexandria, VA 22314-2903
E: arsa@arsa.org
www.arsa.org

December 15, 2025

Original Delivered by
Email; Delivery and Read
Receipts Requested to: kate.manderson@casa.gov.au

Kate Manderson, MD
Principal Medical Officer
Stakeholder Engagement
Civil Aviation Safety Authority
Government of Australia
GPO Box 2005
Canberra ACT 2601

RE: Recognition Waiver from U.S. Federal Aviation Administration
Foreign Repair Station Drug and Alcohol Requirements

Dear Dr. Manderson,

As you are no doubt aware, the Federal Aviation Administration (FAA) was mandated by the U.S. Congress to expand drug and alcohol testing requirements to 14 CFR part 145 repair stations located outside the United States. The FAA issued the new rule last December. As a country that has equivalent requirements, we hope Australia's Civil Aviation Safety Authority (CASA) will accept the Aeronautical Repair Station Association's (ARSA) help in obtaining a waiver from the U.S. requirements for all approved maintenance organizations in Australia that hold 14 CFR part 145 certificates.

ARSA has been deeply involved in ensuring proper implementation of the FAA and U.S. Department of Transportation requirements since the FAA introduced drug and alcohol testing for air carriers and their maintenance providers. ARSA's objective is the highest level of safety by the most efficient means possible; we therefore continually seek opportunities to lessen the burden of requirements on governments and regulated parties.

In that spirit, we offer the draft waiver attached to the transmission email that CASA can use to obtain acknowledgement that your country's drug and alcohol testing regime is equivalent to that being imposed by the United States on "foreign" repair stations under CASA's jurisdiction. We are also hopeful that the draft waiver can serve as an example of the care and detail that the American regulations require to establish a country-wide waiver.

December 15, 2025
Kate Manderson, MD
Page 2

RE: Recognition Waiver from United States Federal Aviation Administration
Foreign Repair Station Drug and Alcohol Requirements

We welcome any questions you may have.

Your Servant,



Sarah MacLeod
Executive Director
M: 703.785.6605
E: sarah.macleod@arsa.org

Attachment to CASA-FAA-DAWaiverRequest_DRAFT
Email:

cc: Dr. Jonathan Aleck, Executive
Manager, Legal, International &
Regulatory Affairs
Andreas Marcelja, Stakeholder
Engagement
Pip Spence, Chief Executive
Officer/Director of Aviation Safety

jonathan.aleck@casa.gov.au

andreas.marcelja@casa.gov.au

ceo@casa.gov.au