



## FEDERATION OF INDIAN PILOTS

Ref No: FIP/DGCA/2023 - 12

4<sup>th</sup> October 2023

To,  
Mr. A X Joseph,  
Director of Air Safety,  
Office of the Director General of Civil Aviation,  
Opp. Safdarjung  
Airport, Aurobindo  
Marg, New Delhi - 110  
003.

**Sub: Comments/Objections to the draft revision to CAR Section 5 Series F Part III - Procedure for medical examination of aircraft personnel for alcohol consumption.**

Dear Sir,

With reference to the draft amendments to the CAR section 5 Series F Part III- Procedure for medical examination of aircraft personnel for alcohol consumption, we submit our comments as under-

1. The FIP strongly supports the spirit of the CAR as well as the Aircraft Rule 24, pertaining to the prohibition on consumption of intoxicating and psychoactive substances. Safety is always paramount.
2. The world's leading aviation regulators including EASA/FAA have set BAC limits to 0.02%. This is not to say that these countries with extremely high safety standards are not in keeping with the ICAO recommendation that the acceptable level of blood alcohol (BAC) compatible with safe flying is "zero".

Breathalyzers do not conclusively measure BAC as this can only be done through a blood sample.

Instead, they "estimate" the BAC indirectly by measuring the Breath Alcohol content (BrAC). The rationale of Breath Alcohol content (BrAC) 0.02% as the measured value is to allow for practical differences in equipment tolerances and accuracies. No manufacturer can attest that their equipment can produce 100% accurate results 100% of the time.

3. If the BAC limit is maintained at 0.0% which is to say no allowance is given by DGCA, contrary to the given international standards for sensor tolerance, then confirmatory tests should be done using blood samples.

A blood sample test is the most accurate method to measure the blood alcohol level and it will rule out any possibility of "false positives".

4. Point 5 of the draft provides a limited calibration process after a set 10,000 blows. There is no provision for equipment accuracy checks where the readings are checked against a known standard e.g. a dry gas cylinder. If it fails the accuracy check a calibration should be necessary before subsequent use.

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5. Point 4.3.9 suggests that the DGCA clearly recognises the possibility of “false positive” BA tests with the innocent use of perfumes, tooth gel, mouthwash. However instead of making a provision to rule out “false positive readings” a convoluted measure here seeks to completely ban crew members from using perfumes/body sprays/tooth paste/hygiene products. The majority of crew members are expected to serve fare paying passengers in close quarters. This proposed ban is completely out of touch with the practicalities of passenger airline operations which is a service and hospitality-based industry. Further such seemingly absurd measures have the potential to bring India’s aviation reputation to question in the eyes of the world.

6. All records of the pre/post medical tests including doctors report should be treated as confidential and protected medical documents.

In conclusion, while we support every effort to eradicate the use of alcohol and psychoactive substance abuse within the aviation community, we feel the prescribed legal limits must have reasonableness to ensure no innocent person is wrongly charged/penalised. False positive results from Breathalysers leading to the unjust grounding of pilots not only tarnish personal reputations and damage careers but also strip the industry of vital human resources. **This not only elevates operational costs but also exacerbates manpower shortages, which is ultimately detrimental to the public interest.**

We therefore once again reiterate our above suggestions that the Breath-analyser Test limit ought to be revised to 0.02% in line with international best practices and that confirmatory blood tests are mandated in the interest of an effective, just and evidence based regulatory policy.

Thanking you,

Yours faithfully,

**Capt. Surinder Mehta**  
**President, FIP**

cc: Hon. MoCA  
cc: Hon Min. of Commerce and Industry  
cc: Secretary, MoCA  
cc: Chairman, Federation of Indian Airlines (FIA)  
cc: President FICCI  
cc: Mr. Vikram Dev Dutt, Director General of Civil Aviation