



## FEDERATION OF INDIAN PILOTS

Ref No: FIP/MOCA/2024 - 01

28<sup>th</sup> March 2024

To  
Shri Jyotiraditya Scindia  
Hon'ble Minister of Civil Aviation  
Ministry of Civil Aviation,  
Rajiv Gandhi Bhavan,  
Safdarjung Airport,  
New Delhi – 110 003

**Subject:** Implementation of CAR Section 7 Series J Part III- Duty Period, Flight Duty Period, Flight Time Limitations and Prescribed Rest Periods – Flight crew Engaged in Scheduled Air Transport Operations, revised on 08.01.2024 (“**Revised CAR**”).

**Ref:** Proceedings before the Hon'ble High Court of Delhi, namely Federation of Indian Pilots v. Director General of Civil Aviation W.P.(C) 616/2023. (hereinafter “**Writ Petition**”)

Dear Sir,

We are, the Federation of Indian Pilots (“**FIP**”), registered as a Society under the Societies Registration Act 1860 and as a Public Trust under the provisions of the Bombay Public Trust, 1950, having its office at C-1202 Lotus Corporate park, Off Western express Highway, Near Jai coach signal, Goregaon East, Mumbai - 400063. FIP has around 5000 members who are pilots and/ or related to the field of aviation. FIP objects include inter alia, to carry out all activities to develop the profession of and the field of aviation; and to submit views or make representation before the Government or other authorities on any subject affecting the interest of its members.

You had on 08.01.2024 publically stated on social media and the press that the Revised CAR pertaining to *Flight Duty Time Limitations* had been prepared. As you are aware this Revised CAR was also filed in *WP(C) No. 616 of 2023* before the Hon'ble High Court of Delhi and thereafter the DGCA has vide its notification dated 08.01.2024 released the Revised CAR. As per the notification dated 08.01.2024, no operator/flight crew engaged in such operations shall operate beyond 01.06.2024 unless the requirements of the Revised CAR are complied with.

Thereafter, it came to the notice of the FIP, through newspaper reporting, that the operators, through the Federation of Indian Airlines, have submitted a representation before the DGCA seeking deferment of the implementation of the Revised CAR, which is due to be implemented from 01.06.2024. Accordingly, the FIP submitted a representation to DGCA as the request of the operators was prejudicial to passenger safety and the FIP asserted that such deferment requests made by the operators should be rejected by the DGCA. A true copy of the representation dated 29.02.2024 submitted by the FIP to DGCA is attached herewith and marked as **Annexure- A**

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It is regrettable to observe that the DGCA has chosen to disregard the representations made by the FIP. Without prior consultation with stakeholders, the DGCA proceeded to issue a revised version of the CAR on 26.03.2024. This revision eliminates the mandatory requirement for operators to implement the Revised CAR before 01.06.2024. Instead, operators engaged in scheduled air transport operations are now permitted to continue operations in accordance with CAR Section 7 Series J Part III Issue III dated 24th April 2019 until the approval of their respective schemes, in alignment with the new CAR. The latest revision by the DGCA has made the Revised CAR a dead letter of the law as it has effectively granted operators discretionary powers in implementing the Revised CAR, a decision that, as you duly recognize, does not serve the interests of pilots and the aviation sector in India. It is also relevant to mention that with the latest revision the DGCA has, inter alia, amended the regulation for Consecutive Night Operation and deleted Regulation 13.4 from the Revised CAR, without conducting any consultations with stakeholders and following due process.

We would like to state that the latest revision by the DGCA, i.e. omitting the cutoff date for implementation and amendment to the regulations pertaining Consecutive Night Operation, is arbitrary as it has the effect of ensuring the Revised CAR is "stillborn". Clearly that was not your intent as conveyed to the public at large.

The action of the DGCA not only endanger pilot safety but also undermine the safety of passengers which the implementation of the Revised CAR could prevent. Furthermore, the health and safety of the pilots cannot be prejudiced for the commercial benefit of the operators.

We earnestly hope that you would ensure that the DGCA follow in letter and spirit the pious intent of your message of 8<sup>th</sup> January 2024 as was reported on social media and newspapers.

Thanking you

Warm regards

Capt. C.S. Randhawa  
President – FIP.

Cc;

1. Shri Vumlunmang Vualnam, Secretary Ministry of Civil Aviation.
2. Mr. Vikram Dev Dutt, Director General of Civil Aviation.

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### ANNEX - A

Mr. Vikram Dev Dutt,  
Director General of Civil Aviation,  
Office of the Director General of Civil Aviation,  
Opp. Safdarjung Airport,  
Aurobindo Marg,  
New Delhi - 110 003.

**Subject:** The Representation of the Federation of Indian Pilots seeking implementation of CAR Section 7 Series J Part III- Duty Period, Flight Duty Period, Flight Time Limitations and Prescribed Rest Periods – Flight crew Engaged in Scheduled Air Transport Operations, revised on 08.01.2024 (“**Revised CAR**”).

**Ref:** Proceedings before the Hon’ble High Court of Delhi, namely Federation Of Indian Pilots v. Director General Of Civil Aviation W.P.(C) 616/2023. (hereinafter “**Writ Petition**”)

Dear Sir,

We are, the Federation of Indian Pilots (“**FIP**”), registered as a Society under the Societies Registration Act 1860 and as a Public Trust under the provisions of the Bombay Public Trust, 1950, having its office at IAAS, C-02-1202 Lotus Park, Goregaon East, Mumbai. FIP has around 6000 members who are pilots and/ or related to the field of aviation. FIP objects include inter alia, to carry out all activities to develop the profession of and the field of aviation; and to submit views or make representation before the Government or other authorities on any subject affecting the interest of its members.

It is pertinent to mention that the vires of “*Civil Aviation Requirement, Section 7 - Flight Crew Standards Training and Licensing, Series J, Part III dated 24.04.2019*” is presently under challenge in *WP(C) No. 616 of 2023* before the Hon’ble High Court of Delhi and it is in these proceedings that the Revised CAR has been presented before the High Court as per details given below.

The Director General of Civil Aviation (“**DGCA**”) circulated for comments a draft revision to CAR Section 7 Series J Part III - Duty Period, Flight Duty Period, Flight Time Limitations and





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Prescribed Rest Periods – Flight crew Engaged in Scheduled Air Transport Operations (“**Draft CAR**”). As a part of the consultation process, the DGCA invited comments on the same from the general public, stakeholders or the persons likely to be affected. Accordingly, the FIP, vide its letter dated 02.012.2023, had submitted its representation on the Draft CAR of the proposed revision.

Thereafter, the DGCA has vide its notification dated 08.01.2024, released the Revised CAR, wherein it can be noted that the DGCA has fairly included a few of the suggestions made by the FIP to the CAR. This inclusion is appreciated as it signifies a progressive step in the consultation process. However, it is also noteworthy to mention there are several crucial amendments are further required to be included in the Revised CAR, to revamp the same in the interest of pilots and the general public.

As per the notification dated 08.01.2024, it is stated by the DGCA that All operators engaged in scheduled air transport operations may continue to operate in compliance with CAR Section 7 Series J Part III Issue III dated 24.04.2019 till approval of their respective scheme in compliance with the Revised CAR or 01.06.2024 whichever is earlier. It was further categorically stated that no operator/flight crew engaged in such operations shall operate beyond 01.06.2024 unless the requirements of the Revised CAR are complied with.

It has come to the notice of the FIP, through newspaper reporting, that the operators, through the Federation of Indian Airlines, have submitted a representation before the DGCA seeking deferment of the implementation of the Revised CAR, which is due to be implemented from 01.06.2024. The aforesaid representation by the operators is prejudicial to passenger safety and for this reason, the FIP would like to strongly assert that such deferment requests made by the operators should be rejected by the DGCA. The following are principal reasons why such deferment cannot be granted, viz. -

- (i) The amendments in the Revised CAR are geared towards passenger safety, advancing the welfare and safety of pilots and crew members.
- (ii) The health and safety of the pilots cannot be prejudiced for the commercial benefit of the operators.
- (iii) Certain operators have been consistently associated with practices of prioritizing financial gains over the well-being of pilots. Such practices could include cutting corners on safety measures, imposing unrealistic workloads, neglecting adequate rest periods, and failing to provide sufficient training and support for pilots. These actions not only endanger pilot safety but also undermine the safety of passengers which the implementation of the Revised CAR could prevent.



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Hence, it is paramount to prioritize these changes for the collective benefit of the aviation community and the DGCA should not accede to the operators' request for deferment.

Best Regards

Capt CS Randhawa,  
President FIP

**Copy To:** Ms Shweta Singh, CFI, DGCA, Sri Aurobindo Marg, New Delhi