



FEDERATION OF INDIAN PILOTS

Ref No: FIP/DGCA/2025 - 05

1st September 2025

To,
Ms. Shweta Singh
Chief Flight Operations Inspector
Director General Civil Aviation
Office of the Director General of Civil Aviation,
Opp. Safdarjung Airport,
Aurobindo Marg,
New Delhi - 110 003.

Subject: Follow-up on Request for clarification pertaining to clause 10.1 Note 3 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 26.03.2024 ("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 Madam,

Reference is made to our letter, Ref No: FIP/DGCA/2025 – 02, dated 11th July 2025, regarding the interpretation of Clause 10.1 Note 3 of the Revised CAR.

1. 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 representations before the Government or other authorities on any subject affecting the interest of its members.

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2. We write in reference to note 3 of clause 10.1 of Revised CAR which categorically states that "In case a flight crew returns to duty after leave, the minimum rest period of 10 hrs (from 0000hrs) shall be given. The leaves shall be considered as local days." It is also pertinent to state that DGCA had also, vide its affidavit dated 19.02.2025 filed in the writ petition, had also reiterated the said provision and undertook its implementation from 01.07.2025.

3. Several operators have issued their FDTL schemes in line with the Revised CAR. However, a review of these schemes reveals that Note 3 of Clause 10.1 has been applied only in cases where the flight crew return to duty after published leave. This narrow application excludes unpublished leave, such as emergency or unplanned leave, from its scope. Such a restrictive interpretation undermines the intent of the provision and significantly impacts fatigue management, as it denies flight crew the necessary recovery safeguards in situations where they may be most needed.

4. It has further been informed by the operators that their FDTL schemes have been approved by the DGCA and that the DGCA has issued a clarification stating that Note 3 of Clause 10.1 is applicable only to published leave.

5. In view of the aforementioned, we would like to request the following:

1) Please confirm if any clarification is issued regarding Clause 10.1 of the Revised CAR.

2) If yes, please share a copy of the clarification issued to the operators.

We are writing to respectfully follow up on this matter, as we continue to receive numerous inquiries from our members regarding the application of the aforementioned clause. An official clarification on this subject would be invaluable in ensuring the consistent and effective implementation of the Revised CAR across all operators.

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We would be grateful for a status update on our request for clarification and look forward to receiving a response from your office at your earliest convenience.

Yours Sincerely,

Capt. C.S. Randhawa
President – F.I.P.

✓ Cc; Mr. Faiz Ahmed Kidwai, Director General of Civil Aviation.

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