



FEDERATION OF INDIAN PILOTS

FIP/MOCA/25-18

18 Dec 2025

Hon'ble Minister of Civil Aviation ,
Ministry of Civil Aviation,
Rajiv Gandhi Bhavan,
Aurobindo Marg,
New Delhi – 110003.

**SUBJECT: FULL IMPLEMENTATION OF CAR SEC 7 SER J PART III REV 2
WITHOUT ANY DISPENSATIONS / VARIATIONS AND WITHDRAWAL OF
BLANKET DISPENSATION OF CAR TO INDIGO AIRLINES**

Respected Sir,

1. Reference is made to our letter no. FIP/MOCA/25-14 dated 05 Dec 25.
2. The FDTL regulations which are in accordance with ICAO Annex 6 are scientifically made and are mandatory in every country to ensure “**AIR SAFETY**”. FDTL CAR 7/J/III Issue III dated 24 Apr 2019 did not cater for any findings/recommendations of Dr. Zaidi report and had many lacunas which did not enhance SAFETY and were detrimental. Therefore, in 2019, FIP filed a case in the High Court regarding various lacunas which existed in the CAR and to be based on Dr Zaidi report. The current CAR on FDTL is well made scientifically by DGCA, incorporating Dr. Nasim Zaidi Committee reports findings / recommendations as Rev 1 and later Rev 2 of 7/J/III.
3. The Hon'ble Delhi High Court after lot of deliberations and hearings an order for implementation of FDTL CAR 7/J/III Rev 2 dated 26 Mar 2024. All the airlines again approached the MoCA / DGCA and requested for a phase wise implementation of the said CAR. Thus, 15 clauses of the CAR were implemented by the airlines on 01 Jul 25 and 07 clauses on 01 Nov 25. The importance of FDTL is mandatory for the reasons listed below:
 - a) To promote Air Safety
 - b) Ensures pilot alertness, fitness to fly, Crew Health & wellbeing.
 - c) Reduces fatigue-linked errors.
 - d) Protects Pilots from chronic fatigue.
 - e) Enhances passenger safety.
 - f) Enhances Performance.



FEDERATION OF INDIAN PILOTS

g) Regulatory Compliance

4. In Oct 2025 DGCA started granting dispensations to the airlines before the implementation of the second phase of 7 clauses, which mainly pertaining to the rules for night duty periods. The DG can grant dispensations only under extreme circumstances however, there were **no such necessity for the same and on this issue he should have taken permission of the Hon'ble Court.** Following variations were granted by DGCA;

INDIGO

- a) Clause 3.11 Dispensation granted for Night Duty definition rolled back to 0000-0500 from 0000-0600.
- b) Clause 6.1 - Additional Note 4 is added beyond CAR-Where the crew is acclimatized (A-320).
 - i. For FDP ending between 0000-0159 hrs or commencing between 0501-0600 hrs, one additional landing shall be permitted.
 - ii. If the FDP consists of only one landing, maximum FT may be increased to 9 hrs, and maximum FDP may be increased to 11 hours.
- c) Clause 10.1 modified - Note 3: In case a flight crew returns to duty after published leave, the minimum rest period of 10 hrs (from 0000hrs) shall be given. "Published leaves" refers to any leave that has been assigned and included in the roster on the day of its release. The leaves shall be considered as local days.

AIR INDIA

- a) Clause no 6.1.4 (Max 2 Landings)-
 - i. Where, due to flight delay, an extra night landing permitted the last sector originally scheduled to complete before 2359 hrs now completes between 0000-0159 hrs, the crew may operate that sector to complete the flight.
 - ii. When the flight duty begins between 0501-0600 hrs, the crew may operate up to three landings (2 Landings).
- b) Clause 10.1 - Rest Period (before flight) For Management Pilots modified.



FEDERATION OF INDIAN PILOTS

- c) Clause 10.3 - Note 3: In case a flight crew returns to duty after leave, the minimum rest period of 10 hrs (from 0000 hrs) shall be given. The leaves shall be considered as local days. This will be applicable to leaves provided as part of the monthly roster publication.
 - d) Clause 13.3 - When a crew has undertaken flight duties in consecutive nights, then for transition to flights beyond period 0000 to 0600 hrs, he/she should not be scheduled for a flight which is commencing prior to, at least 24 hrs including one local night from arrival of flight and prior to company local night plus 2 hrs.
 - e) Clause 15.6 - "Flight Crew... on return to Home Base shall be provided with a period of least 120 hours free of all duties. The rest period shall increase by 24 hours after 02 consecutive ULR flights –Variation granted (As per 3 Notes to the clause).
 - f) Clause 16.1 - Flight Time, Flight Duty Period and Landing may be extended due to unforeseen operational circumstances as follows:
 - i. Flight Time by maximum of 01 ½ hour (From 1 hr).
 - ii. FDP by maximum of 03 hours (From 2 hrs).
5. M/s IndiGo started cancelling flights from 02 Dec till 12 Dec 25 wherein almost 6000 flights were cancelled and many delay in the domestic sectors. Thus, creating absolute chaos in the country. On 05 Dec 25 the following dispensations were granted to IndiGo:
- a. One-time relaxation granted to **IndiGo**:
 - i. Para 3.11 waived off (night duty 0000-0500).
 - ii. Para 6.1.4 waived off (for ops encroaching night duty).
 - iii. **FULL CAR FDTL dated 26 Mar 24 held in abeyance** till 10 Feb 26.
 - b. Reviewed every 15 days.
 - c. **Permanent dispensation to all airlines that “no leave shall be substituted for weekly rest has been withdrawn”.**



FEDERATION OF INDIAN PILOTS

6. The most concerning points which caused a national aviation crisis from 02 Dec till 13 Dec by IndiGo are attributable **neither to adherence to new FDTL rules nor crew shortage but a total failure of the system** to operate most of the domestic flights in the winter schedule. It was evident that the crews were waiting at various stations and aircraft were available yet the Flight Dispatch was not authorized to release the flights which caused a national chaos. The airline may have been short of 65-70 captains to cater for 6% increase in the winter schedule. DGCA had approved their winter schedule with 6% increase without verifying the availability of pilots/cabin crew/ground crew etc. Shortage of 65-70 captains CANNOT lead to mass cancellations of flights. It seems a deliberate attempt to forcefully ensure withdrawal of new FDTL CAR. The Government succumbed to the pressures and gave a relief to the airline till 10 Feb 25. Though the GOI has withdrawn 10% flights of IndiGo and given to other carriers **BUT HAS NOT WITHDRAWN THE OPEN DISPENSATION OF FDTL CAR to IndiGo.**

7. One important point which needs to be kept in mind that though the DGCA website shows 189 a/c for AI, 413 a/c for IndiGo etc but all these aircraft do not fly due to engines/landing gear/C or D Maintenance checks/AOG and other maintenance issues/refurbishment etc. It may be cross checked by DGCA that these two major carriers controlling more than 91% share in domestic skies are operating AI-169 and IndiGo-369 aircraft and have adequate pilots to operate these aircrafts. AI has 3200 pilots, AIE has 1851 and IndiGo 5463 pilots which are more than adequate to operate the aircraft operating in their airlines with the available aircraft. **THEREFORE, ALL DISPENSATIONS/VARIATIONS TO ALL AIRLINES MAY BE WITHDRAWN WITH IMMEDIATE EFFECT TO AVOID COMPROMISING SAFETY.**

8. In future, to avoid a crisis, all schedules or inductions of new aircraft in any airline must be based on the availability of pilots, cabin crew, ground crew, engineers, infrastructure, parking slots etc. Without satisfying these conditions NO AIRCRAFT OR SCHEDULE be approved by the DGCA (GOI). This month due to national crisis in aviation and many lessons were learnt. Some essential points which need immediate attention and incorporation are as follows:

- a) Never allow any airline or corporate in the country to monopolize / duopolize in the country.
- b) **Involve pilot bodies like FIP in the process of regulation making and all aviation matters,** as there are a lot of SME's in the field of aviation in



FEDERATION OF INDIAN PILOTS

the federation. This point was highlighted in the presentation to the Parliamentary Committee on aviation on 17 Dec 25.

- c) **Withdraw all dispensations/ variations on the FDTL CAR so that safety is not compromised.**
- d) **Periodic review of pilot's recruitment by the airlines by DGCA.**
- e) Do not approve the schedules of airlines without checking the availability of a/c, manpower, infrastructure etc.
- f) Do not approve the induction of new aircraft in the airlines without checking the availability of manpower, infrastructure, parking slots etc.
- g) Carry out strict oversight periodically by DGCA and vetted at the level of JDG/DG.
- h) All FDTL rules when incorporated in the crew rostering must not be based to the limits of FDTL. For planning of rosters the cut off shall be before the limit. Example if FDP is 8 hrs then planning to be made at 7:30-7:40 hrs.
- i) Periodic spot checks of operations, rostering, HR, airworthiness and air safety departments of the airlines by DGCA. Including exhaustive Special and regulatory audits
- j) Increase experienced and good manpower in DGCA. For flight inspectors do not cap the age but criteria of medical fitness should be maintained.
- k) **No dispensations to be granted by DGCA/MoCA.**
- l) Introduce FRMS in a phased manner and no pilot/crew/engineer/staff to be penalised for reporting fatigue or any safety matter.
- m) **SAFETY** should never be compromised for Commercial interests of the airlines.
- n) **Sufficient pilot training till 2034 to cater for induction of 1700 aircraft. Also, other manpower and ground infrastructure must be planned and checked periodically.**
- o) All airlines to strictly follow all regulations of the DGCA.



FEDERATION OF INDIAN PILOTS

9. To conclude we emphasise the following in the total interest of safety in the field of aviation.

- a) FDTL is a safety necessity and not an operational burden.
- b) Well-rested pilots would ensure safe skies.
- c) Scheduling must follow scientific fatigue principles. NOT commercial interests above safety. Pilots fatigue to be respected and not penalized.
- d) Full compliance of FDTL regulations without any dispensations / variations.
- e) Timely recruitment of pilots, cabin and ground crews.
- f) Immediate increase the manpower in DGCA.
- g) Increased Oversight by DGCA.
- h) **Involve body like FIP which has SME's in the aviation building in the country and assistance in framing regulations.** This should be mandatory rather than only facilitating the airlines in the process.
- i) Start the process of an independent body and formation of self-sustaining **CAA** (Civil Aviation Authority) in our country like other developed nations

With Warmest Respects,

(Capt. CS Randhawa)
President
Federation Of Indian Pilots (FIP)

Encls: As Stated

Copy To:

1. PMO's Office, South Block, New Delhi-110011.
2. Parliamentary Committee on Aviation, Rajya Sabha, Parliament House, New Delhi-110001.
3. Secretary Civil Aviation, MOCA, Rajiv Gandhi Bhavan, New Delhi-110003
4. DG, DGCA, Opp Safdarjung Airport, New Delhi-110011.