



FEDERATION OF INDIAN PILOTS

FIP/DGCA/26-07

10 May 26

The Director General,
Directorate General of Civil Aviation (DGCA),
Opposite Safdarjung Airport,
New Delhi - 110003

**TEMPORARY EXTENSIONS / VARIATIONS TO FLIGHT DUTY
TIME LIMITATIONS (FDTL) AND NON IMPLEMENTATION OF
THE CAR SECTION 7 SERIES J PART III DATED 26 MAR 2024
:SERIOUS SAFETY CONCERNS**

Respected Sir,

1. Reference is made to the following letters:

- a) Our letter no FIP/DGCA/2025-02 dated 11 Jul 25.
- b) Our letter no FIP/DGCA/2025-05 dated 01 Sep 25.
- c) Our letter no FIP/MOCA/2025-12 dated 28 Oct 25.
- d) Our letter no FIP/DGCA/2025-13 dated 02 Dec 25.
- e) Our letter no FIP/MOCA/2025-14 dated 05 Dec 25.
- f) Our letter no FIP/MOCA/2025-18 dated 18 Dec 25.
- g) Our letter no FIP/MOCA/2026-01 dated 08 Feb 26.
- h) Our letter no FIP/DGCA/FDTL//2026-01 dated 15 Mar 26.
- i) Hon'ble High Court of Delhi Orders on FDTL dated 24 Feb 25 and 07 Apr. 2025.

2. The Hon'ble High court of Delhi ordered "**...the implementation of CAR 2024 will commence from 01 Jul 25 and the Respondents are bound down to the timelines as set out in their affidavit dated 19 Feb 2025**" The said undertaking was expressly recorded and confirmed in the orders dated 07 Apr 25 passed by the Hon'ble High Court which further observed that – "**...in the event of any non-compliance, the Petitioners shall be at liberty to approach the appropriate forum albeit in accordance with law**" The DGCA is thus, bound by its own solemn undertaking and the directions of the Hon'ble High Court. Any decision to extend, defer, or modify the



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implementation of the FDTL CAR of 2024 without leave of the Hon'ble High Court would be contrary to the law, in breach of judicial assurance and tantamount to wilful disobedience of the Court orders, thereby attracting contempt jurisdiction under the Contempt of Court's Act 1971.

3. The reported grant of extensions/dispensations to the airlines therefore, amounts to a deliberate departure from the timeline affirmed before the Hon'ble High court undermining the sanctity of judicial proceedings and eroding the confidence of stakeholders in the regulators adherence to the rule of law. Such a deviation, is not being corrected and is a wilful and deliberate contempt of court. **DGCA has been wilfully violating the court orders by granting dispensations to the airlines since Oct 2025.** This is a serious safety concern and the FIP has filed a contempt case against the DG in the Hon'ble High Court. In the case of FDTL CAR for pilots the DG is not empowered to grant ant variation/dispensation as the CAR was implemented by the order of the Hon'ble High Court. No dispensations/variatiions are given on law/rules which are a binding. If such exigency arises then the law/rule needs to be changed. This norm is followed by most regulatory bodies in the World.
4. Before the implementation of the second phase of FDTL CAR, DGCA started to grant dispensations even though there was no shortage of crews by any airline. **All airlines had sufficient crews to manage the flight schedules.** However, Indigo airline caused mass cancellations of flights from 02 Dec till 12 Dec 25. This was highlighted to two Parliamentary Committees after the Indigo crisis. The dispensation on the long haul flights of Air India continue by the DGCA. This is a **gross violation** of the **court orders** and a very **serious safety concern**. After a long time, the DGCA made a good FDTL CAR which scientifically based study incorporating the 2011 report of exhaustive report on FDTL made by the committee headed by Dr Nasim Zaidi.
5. The Federation of Indian Pilots (FIP) wishes to bring to your urgent notice recent operational incidents leading to the death of

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two pilots on 29 Apr and 30 Apr 26 respectively. **Operational instability linked to crew fatigue, poor rostering practices and Extensions/Dispensations/ Variations** granted to FDTL and Flight Time (FT) could be the causes attributable to the death of two pilots. Again dues to airspace closures extension of FDTL was granted to airlines. The DGCA has made a regular practice of facilitating the airlines in granting variations even though there was no shortage of aircrews with AI and Indigo.

6. It is reiterated that these developments are not isolated occurrences, but a continuation of systemic issues previously highlighted by this

Federation are as follows:

- a) Excessive reliance on regulatory **dispensations/ variations**.
 - b) **Deviation** from scientifically established **fatigue limits**.
 - c) **Inadequate manpower** planning by the airlines.
7. The recent deaths of pilots clearly demonstrate the following:
- a) **Fatigue exposure** is increasing particularly during **extended duty periods and WOCL operations**.
 - b) **Operational safety margins are being eroded** especially in high workload phases such as take-offs and approach/landing phases.
 - c) Regulatory relaxations are being used as a substitute for **proper planning and compliances**.
8. It is further submitted that:
- a) The current FDTL CAR has been developed after **scientific study** and judicial oversight.
 - b) Any deviation without robust Fatigue Risk Management System (FRMS) is contrary to the **ICAO Annex 6 principles** and greatly compromises SAFETY.
 - c) Continued relaxations may expose the DGCA and operators to **serious safety and legal consequences**.



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9. In view of the above the **FIP strongly recommends** the following:

- a) **Immediate withdrawal** of all temporary FDTL extensions granted.
- b) Mandatory implementation of **crew augmentation** for extended sectors.
- c) Independent **risk based safety** audits of recent incidents linked to fatigue.
- d) **Enhanced DGCA oversight** including real time monitoring of crew planning and utilization of especially Air India and Indigo.
- e) **Constant consultation** with pilot representative bodies regarding FDTL/FRMS matters.

Yours Sincerely

Warm Regards,
Capt. C.S. Randhawa,
President, Federation of Indian Pilots

Copy To:

- 1. Minister of Civil Aviation, MOCA, Rajiv Gandhi Bhavan, New Delhi-110003
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