FEDERATION OF INDIAN PILOTS

FIP/MoCA/26-23 **21 October 2026**

To,
The Hon'ble Minister of Civil Aviation
Ministry of Civil Aviation
Government of India
Rajiv Gandhi Bhavan
New Delhi – 110003

Subject: URGENT REPRESENTATION FOR IMMEDIATE WITHDRAWAL OF FDTL DISPENSATIONS EXTENDED BY DGCA UP TO 31 MARCH 2027 — SAFETY IMPLICATIONS, NON-IMPLEMENTATION OF MANDATORY FDTL PROVISIONS, AND CONCERNS REGARDING COMPLIANCE WITH DIRECTIONS OF THE HON'BLE DELHI HIGH COURT

Respected Sir,

1. References are made to the following:

a) Hon'ble Delhi High Court proceedings concerning implementation of the revised Flight Duty Time Limitations (FDTL) Civil Aviation Requirements, including orders dated 24 October 2024, 23 January 2025, 24 February 2025 and 7 April 2025, in the connected proceedings concerning FDTL implementation.

b) FDTL-related representations and submissions made by the Federation of Indian Pilots (FIP), Indian Pilots Guild (IPG) and Indian Commercial Pilots Association (ICPA), along with representations made by the Airline Pilots' Association (ALPA).

c) Minutes of DGCA meetings held pursuant to the directions of the Hon'ble Delhi High Court and subsequent discussions concerning implementation of CAR Section 7, Series J, Part III.

d) FIP/DGCA/26-11 dated 9 July 2026.

e) FIP/DGCA/26-15 dated 21 August 2026.

f) FIP email dated 23 August 2026 concerning FDTL implementation, airline dispensations and associated safety concerns.

g) FIP/DGCA/26-17 dated 15 September 2026, concerning full implementation of FDTL regulations, strengthening of FRMS oversight and concerns relating to pilot health and fatigue.

h) The DGCA decision extending the existing FDTL dispensations, previously stated to remain in force until 31 October 2026, up to 31 March 2027.

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2. On behalf of the Federation of Indian Pilots (FIP), I wish to bring to your urgent attention a matter of grave concern involving the continued extension of dispensations from the prescribed Flight Duty Time Limitations (FDTL) requirements granted by the Directorate General of Civil Aviation (DGCA) to Airlines operating in India. The decision to extend these dispensations, which were previously due to expire on **31 October 2026 and have now reportedly been extended until 31 March 2027**, is deeply concerning from the **perspective of Flight Safety, Pilot Fatigue Management, Regulatory Accountability and Compliance** with the applicable Civil Aviation Requirements and the directions of the Hon'ble Delhi High Court.

3. FIP has consistently maintained that the revised FDTL provisions must be **implemented fully and uniformly, without selective relaxations** that undermine their purpose. This position has been communicated repeatedly to DGCA, including during formal meetings attended by representatives of **FIP, ALPA, IPG and ICPA**. The pilot organisations have specifically urged the regulator to withdraw the dispensations and ensure that all airlines comply with the prescribed duty, flight-time and rest limitations.

4. It is particularly disturbing that, despite these representations and discussions, the period of relaxation has been extended by a further five months. Such an extension risks normalising exceptional arrangements that were intended to be temporary, rather than ensuring that airlines make the necessary operational and manpower adjustments to comply with the law.

5. FIP therefore requests your immediate intervention to secure the withdrawal of these dispensations and the full implementation of the applicable FDTL requirements.

6. **Background and Repeated Representations by FIP and Other Pilot Organisations**

FIP, together with ALPA, IPG and ICPA, has been actively engaged with DGCA regarding implementation of the revised FDTL Civil Aviation Requirements and the need to protect pilots from excessive duty periods, inadequate recovery opportunities and cumulative fatigue. During these discussions, the **Pilot Organisations** consistently emphasised that FDTL regulations are Safety requirements and cannot be treated merely as operational constraints to be relaxed whenever an airline encounters difficulties in scheduling or deploying its crew. The issue has been raised through formal representations, meetings and written communications. Most recently, FIP submitted the following representations:

a) **FIP/DGCA/26-11 dated 9 July 2026**, raising concerns relating to FDTL implementation and regulatory compliance.

b) **FIP/DGCA/26-15 dated 21 August 2026**, reiterating the need for appropriate regulatory action.

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c) **FIP email dated 23 August 2026,** bringing the continuing concerns to the attention of DGCA.

d) **FIP/DGCA/26-17 dated 15 September 2026**, specifically addressing the urgent need for full implementation of FDTL regulations, stronger FRMS oversight and the importance of addressing pilot fatigue and health concerns.

6.1 These communications form part of FIP's continuing effort to ensure that the regulatory framework is implemented in practice and that operational considerations do not override the fundamental objective of aviation safety. The concerns raised by FIP are neither new nor speculative. They have been communicated directly to the regulator and brought to the attention of the relevant authorities, including Parliamentary Oversight bodies.

7. Clear and Consistent Position Conveyed During DGCA Meetings

During the last two meetings held with DGCA concerning FDTL implementation, the **Pilot Organisations** reiterated that the **airlines should be required to comply fully with the applicable FDTL provisions** and that the dispensations should be withdrawn without further delay. FIP, ALPA, IPG and ICPA made it clear that the regulatory relaxation should not continue merely on the basis of general assertions regarding operational difficulties or the need for additional flexibility in crew rostering.

7.1 The position communicated by the pilot organisations was that, **there is no demonstrated industry-wide shortage of pilots that justifies the continued blanket relaxation of the prescribed FDTL requirements**. FIP further maintains that the relevant airline-wise manpower and operational data must be examined objectively rather than accepting a general claim of **Pilot shortage** as sufficient justification **for extending dispensations**.

7.2 The Pilot organisations have repeatedly emphasised that Airlines must plan their flight schedules, recruit and deploy adequate crew, maintain appropriate reserve strength and manage their operations within the applicable regulatory limits. FDTL provisions cannot be subordinated to commercial schedules or short-term operational convenience. If an airline's scheduling model cannot support its published operations while complying with mandatory duty and rest requirements, the appropriate response is to correct the operational and manpower planning, not to continue relaxing the safety standards.

7.3 In light of the representations made during these meetings, the subsequent extension of the dispensations is difficult to reconcile with the concerns and objections expressly conveyed by the pilot organisations. FIP therefore requests that the Ministry obtain and examine the minutes of the last two DGCA meetings, together with the written submissions and airline-wise data considered by DGCA, to establish the basis on which the extension was recommended and approved.

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8. The Issue of Pilot Availability Must be Assessed on Objective Evidence

FIP has brought to the attention of DGCA and parliamentary committees its position that the continued dispensations are not justified by a demonstrated shortage of pilots across the industry. The availability of pilots must be assessed airline by airline, based on verifiable information, including:

a) The number of Pilots holding valid licences and the relevant aircraft type qualifications.

b) The number of Pilots employed, rostered and operationally available.

c) The Aircraft fleet strength and the corresponding crew requirements.

d) Planned and actual recruitment, training, conversion and recurrent-check capacity.

e) Leave, training, standby, reserve and other legitimate crew-availability requirements.

f) Rostering practices, utilisation levels and compliance with duty and rest requirements.

g) The extent to which operational disruptions arise from manpower constraints, scheduling decisions or other operational factors.

8.1 FIP has consistently maintained that the regulator should not permit an entire industry to continue operating under relaxed safety requirements without transparent, independently verifiable evidence establishing why each dispensation is necessary and proportionate. Where a particular airline claims that it cannot meet the prescribed FDTL limits, DGCA should require the airline to submit its actual **manpower position, recruitment plan, crew utilisation data and time-bound corrective action plan.**

8.2 The relevant data should then be independently examined and the need for any exceptional regulatory measure, if legally permissible at all, should be assessed strictly within the governing legal framework. A blanket or prolonged extension, without a publicly explained and objectively substantiated necessity, risks transferring the consequences of inadequate planning from airline management to Flight Crew and Passengers.

9. Concerns Regarding the Repeated Extension of Dispensations

The original period of the dispensations was understood to extend until **31 October 2026**. The subsequent extension until **31 March 2027** substantially prolongs the period during which the prescribed requirements will not be applied in the ordinary manner to the extent covered by the dispensations.

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9.1 **This raises several serious questions?**

a) **First,** if the dispensations were introduced to address temporary operational difficulties, why have those difficulties not been resolved within the original period?
b) **Second**, what specific airline-wise manpower deficiencies or operational circumstances justify continuing the relaxations for another five months?
c) **Third**, what measurable corrective actions were required from the airlines during the original dispensation period, and what evidence establishes that those actions have been completed or are progressing satisfactorily? Any risk assessment done?
d) **Fourth**, what independent fatigue-risk assessment was undertaken before the extension was granted, and how were the concerns raised by the pilot organisations considered?
e) **Fifth**, what is the legal basis for continuing or extending the dispensations in the face of the applicable CAR provisions and the directions of the Hon'ble Delhi High Court?
f) **Sixth**, what arrangements exist to ensure that any temporary relaxation does not expose pilots to excessive duty, insufficient rest, cumulative fatigue or reduced opportunities for adequate recovery?

9.2 Unless these questions are satisfactorily answered, the extension risks creating the impression that compliance with mandatory safety requirements may be deferred whenever operational pressures arise. FIP respectfully submits that the Ministry must ensure that the original purpose of **FDTL regulation is not defeated by repeated extensions of exceptions.**

10. **FDTL is a Safety Requirement, Not an Administrative Formality**

Flight Duty Time Limitations are designed to manage Fatigue-Related Risks and preserve the ability of flight crew to perform their duties safely. Fatigue can affect **alertness, reaction time, judgement, situational awareness, memory, communication and decision-making.**

10.1 A Pilot may appear fit for duty and may be willing to undertake an additional duty period, but subjective willingness does not establish that fatigue-related risks are adequately controlled. Similarly, compliance with an isolated numerical limit does not, by itself, demonstrate that a pilot has obtained adequate restorative sleep or that cumulative fatigue has been effectively managed. The purpose of the prescribed FDTL framework is to establish enforceable operational safeguards. These safeguards must operate alongside an effective Fatigue Risk Management System (FRMS), supported by data, reporting, monitoring and corrective action.

10.2 The continued use of dispensations may weaken the effectiveness of these safeguards, particularly if exceptional allowances become a routine feature of airline

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scheduling. FIP is not suggesting that every dispensation necessarily results in an unsafe flight. The concern is that prolonged relaxations of established safety limits, without demonstrable necessity, adequate safeguards and transparent regulatory justification and risk analysis, can increase exposure to fatigue-related risk and undermine confidence in the regulatory system.

10.3 The Ministry must therefore assess this matter as a flight-safety and regulatory-compliance issue, rather than solely as a question of operational continuity.

11. Judicial Directions and the Binding Nature of the FDTL Implementation Process

The implementation of the revised FDTL framework has been the subject of proceedings before the Hon'ble Delhi High Court, including proceedings involving FIP and other Pilot Organisations. The Court's orders and the commitments recorded in the proceedings established a defined process for implementing the revised Civil Aviation Requirements.

11.1 In its order dated 23 January 2025, the Hon'ble Court recorded the implementation timelines communicated by the respondents. The subsequent order dated 24 February 2025 addressed implementation of the revised CAR provisions, and the order dated 7 April 2025 reiterated the requirement for airlines to submit their respective FDTL schemes expeditiously. The Court also expressly preserved the petitioners' liberty to approach the appropriate forum in the event of non-compliance. These proceedings are significant because they demonstrate that implementation of the revised FDTL framework was not merely an internal administrative objective. It was addressed through judicial proceedings, with implementation timelines and obligations recorded before the Court.

11.2 FIP's position is that DGCA must act strictly within the applicable law and the governing judicial directions. A regulatory dispensation cannot be presumed lawful merely because it has been issued by the regulator; its legal basis, scope, duration and compatibility with the Court's orders must all be established.

11.3 In particular, the Ministry should examine the interaction between **CAR Section 1, Series B, Part III**, referred to in connection with the authority for granting dispensations, and **CAR Section 7, Series J, Part III**, which prescribes the relevant FDTL requirements. FIP's concern is that the power to administer or grant relief under a general regulatory provision cannot automatically be interpreted as an unrestricted authority to dilute mandatory safety requirements or to circumvent the implementation framework established through judicial proceedings. The precise scope of any dispensation-making power must be determined from the applicable text, conditions and limitations of the CARs, read with the relevant court orders and undertakings placed before the Court.

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11.4 The Ministry must, therefore, require DGCA to disclose the specific statutory and regulatory provisions relied upon to grant the original dispensations and NOT to extend them until 31 March 2027. It must also establish whether the extension is consistent with the orders and commitments recorded in the Delhi High Court proceedings and whether any further judicial clarification or directions are required.

12. **Serious Concern Regarding Possible Non-compliance With Court Directions**

FIP considers the continued extension of the dispensations, despite the judicially supervised implementation process and the objections repeatedly raised by the Pilot Organisations, to be a matter requiring immediate legal scrutiny. If the extension is inconsistent with a binding direction of the Hon'ble Delhi High Court, or defeats an obligation expressly undertaken before the Court, it could give rise to serious questions of non-compliance and potential contempt proceedings.

12.1 FIP does not consider it appropriate for the regulator to proceed on the assumption that an **administrative order can override or circumvent a binding judicial direction.** The Ministry should urgently obtain a formal legal opinion on whether the dispensations and their extension are within DGCA's powers and whether they comply with the relevant judicial orders. The opinion should address the precise provisions invoked, the nature of the relief granted, the period covered and the obligations undertaken by DGCA and the airlines before the Court.

12.2 The contempt of court petition has already been filed in the Hon'ble Delhi High Court since Nov 2025 and the matter is sub-judice.

13. **Accountability of DGCA and the airlines**

The **DGCA is responsible for ensuring that airlines comply with the applicable Civil Aviation Requirements** and that aviation safety is not compromised by commercial or operational pressures. The airlines, in turn, are responsible for planning their schedules, maintaining adequate crew strength, managing leave and training, and ensuring that their operations remain within the prescribed limits.

13.1 If the airlines have sufficient Pilots to comply with the FDTL framework, there is **no apparent operational justification for maintaining dispensations** on a blanket basis. If a particular airline asserts that it faces a genuine shortage, that claim should be established through objective data and assessed individually. The Ministry should ensure that accountability is not diluted by repeatedly extending dispensations without a clear and independently verified necessity.

13.2 FIP also requests that DGCA disclose what monitoring, audit and enforcement measures were applied during the original dispensation period, what corrective actions

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were required from the airlines and what evidence was considered before approving the extension. The **decision should be supported by a written safety-risk assessment**, an assessment of the availability of qualified pilots, an evaluation of alternative operational measures and a reasoned explanation of why full compliance could not be achieved within the original period. In the absence of such a record, continuing the dispensations would raise serious questions about the adequacy of regulatory oversight.

14. **Need for Immediate Withdrawal and Full Implementation of CAR**

FIP's position is unequivocal: the applicable **FDTL requirements must be implemented fully and uniformly, and dispensations that are not supported by lawful authority** and a demonstrable, properly assessed necessity must be withdrawn. The solution to an airline's operational difficulties cannot be the indefinite relaxation of safety safeguards intended to protect Pilots, Passengers and the Public.

14.1 Airlines must be required to adapt their operations to the applicable regulations. Where necessary, this may require changes to flight schedules, improved crew planning, recruitment, additional reserve capacity and better management of training and leave. Such measures may require commercial adjustments. However, **commercial/operational convenience cannot take precedence over mandatory safety requirements**.

14.2 FIP therefore urges the Ministry to intervene immediately and direct DGCA to review and withdraw the extension, subject to the governing legal framework and the applicable judicial directions, rather than allow the dispensations to remain in force until 31 March 2027 by default.

15. **Relief and action requested from the Hon'ble Minister**

In view of the foregoing, the Federation of Indian Pilots respectfully requests the following urgent action:

a) **Immediate Review and Withdrawal:** Direct DGCA to withdraw the dispensations extended until 31 March 2027 and **restore full implementation of CAR Section 7, Series J, Part III, in accordance with law and the applicable Court Orders.**

b) **Examination of Court Compliance:** Obtain a formal assessment of whether the extension is consistent with the relevant orders and undertakings before the Hon'ble Delhi High Court, including the orders dated 24 February 2025 and 7 April 2025, and take corrective action if any inconsistency is established.

c) **Review of the Last Two DGCA Meetings:** Examine the minutes, attendance records, submissions and decisions from the last two meetings on FDTL

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implementation, including the representations of FIP, ALPA, IPG and ICPA concerning withdrawal of the dispensations.

d) **Independent Verification of Pilot Availability:** Direct DGCA to undertake an airline-wise assessment of qualified and available pilot strength, fleet requirements, recruitment, training, rostering and reserve capacity, rather than rely on generalised claims of pilot shortages.

e) **Disclosure of the Basis for Extension:** Require DGCA to provide a reasoned written justification for extending the dispensations from 31 October 2026 to 31 March 2027, including the supporting **manpower data, operational** necessity assessment and **safety-risk analysis**.

f) **Independent Fatigue-risk Assessment:** Require an assessment of the cumulative effects of the dispensations on duty periods, rest opportunities, fatigue exposure and FRMS effectiveness, with suitable Independent Oversight.

g) **Enhanced Monitoring and Enforcement:** Require DGCA to strengthen **audits of actual rosters, duty records, rest periods, fatigue reports and compliance with the FDTL provisions**, with appropriate enforcement action in cases of non-compliance.

h) **Consultation with Pilot Organisations:** Convene an urgent meeting with FIP, ALPA, IPG and ICPA before any further decision affecting the implementation of FDTL requirements, and ensure that their written submissions are formally considered.

i) **Written Response from the Ministry:** Request to provide a reasoned written response addressing the legal basis for the extension, the findings on pilot availability, the safety assessment and the steps proposed to secure full implementation.

16. Conclusion

The Federation of Indian Pilots wishes to emphasise that this representation is made in the larger interest of Aviation Safety and the effective Enforcement of the Regulatory framework governing Flight Crew duty and rest. FDTL requirements exist to protect pilots from Fatigue-Related Risks and to ensure that Commercial Air Operations are conducted within established safety limits. Their effectiveness depends on consistent enforcement, adequate airline manpower planning and a regulator that is prepared to insist on compliance even when doing so requires operational adjustments.

16.1 FIP, ALPA, IPG and ICPA have repeatedly conveyed their concerns to DGCA and urged immediate withdrawal of the dispensations. FIP has also placed its concerns on record through its representations dated 9 July, 21 August and 15 September 2026, among other communications, and has raised the issue with the relevant parliamentary

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oversight bodies. The extension of the dispensations until 31 March 2027, after the earlier expiry date of 31 October 2026, therefore requires **urgent reconsideration.** The Ministry must ensure that the extension rests on lawful authority, demonstrable necessity and a properly documented assessment of safety risks, and that it remains consistent with the directions of the Hon'ble Delhi High Court.

16.2 **Aviation safety must not be compromised to accommodate deficiencies in Airline Operational Planning.** No exception to a safety regulation shall become a substitute for compliance with that Regulation. We accordingly request your personal intervention to ensure that the dispensations are reviewed and **withdrawn without delay**, that the **FDTL provisions are implemented fully and uniformly**, and that the concerns raised by the Pilot Organisations receive a reasoned and time-bound response.

16.3 FIP remains committed to constructive engagement with the Ministry and DGCA. However, in view of the safety implications and the judicial history of this matter, we believe that further delay would be inappropriate and that the issue requires **immediate action at the highest level**. We request that this representation be treated as **URGENT** and that appropriate directions be issued to DGCA at the earliest.

Yours Sincerely,

(Capt. C. S. Randhawa)
President,
Federation of Indian Pilots (FIP)

Copy to:

1. Secretary, Ministry of Civil Aviation, Government of India.
2. Director General of Civil Aviation, DGCA, New Delhi.
3. Chairman, Parliamentary Standing Committee on Transport, Tourism and Culture, Rajya Sabha Secretariat.
4. Chairman, Public Accounts Committee, Lok Sabha Secretariat.
5. Principal Secretary to the Prime Minister, Prime Minister's Office.
6. Indian Pilots Guild (IPG).
7. Indian Commercial Pilots Association (ICPA).
8. Airline Pilots' Association (ALPA).

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