

# AIRLINE OPERATORS COMMITTEE OF MUMBAI



**Mr. Victor Denis Dsouza**  
**Chairman AOC Mumbai**

**C/O Cathay Pacific Airways Limited**  
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Dear Mr. Gupta,

Greetings from AOC Mumbai.

This communication is submitted on behalf of AOC – Mumbai in connection with the Determination of Aeronautical Tariff for Chhatrapati Shivaji Maharaj International Airport (CSMIA), Mumbai, for the Fourth Control Period (01.04.2024 – 31.03.2029).

We urge AERA to undertake a comprehensive, transparent, and stringent review of the following concerns before arriving at any final determination, ensuring that passenger interest and the sanctity of UDF utilization are fully protected:

## **1. Airside Projects from Second & Third Control Periods:**

AERA must demand complete transparency from MIAL regarding the status of all Airside projects planned under the Second and Third Control Periods. The lack of updates and incomplete implementation raise serious concerns about efficiency and accountability. It is imperative that AERA obtains detailed status reports, including reasons for delays, from MIAL.

## **2. Revised Timelines and Penalty Mechanism:**

Given that nearly a year has elapsed in the Fourth Control Period, MIAL must be held accountable to furnish revised start and completion timelines for all Airside projects. AERA must introduce a robust penalty mechanism for non-compliance and delays to deter systemic inefficiencies and safeguard stakeholder interests.

## **3. Applicability to Major Infrastructure Projects:**

This accountability framework must also extend to all major infrastructure as mentioned in the MASTER PLAN submitted by MIAL, undertakings including the new Terminal 1, NW Pier at Terminal 2, the Crew Terminal, and other future developments. No project should be allowed to proceed unchecked or without a clear roadmap and consequence for delay.

## **4. Review of NAD Colony Project:**

The recurring inclusion of the NAD colony project since the First Control Period without tangible progress calls for an immediate and strict re-evaluation. AERA must question its continued relevance and scrutinize expenditure, if any.

## **5. Expenditure on Bays and Hangars – RWY 09/27 (Southern Side):**

These facilities, primarily serving General Aviation, should not be funded through passenger-related aeronautical charges unless GA operations are definitively shifted to Navi Mumbai. AERA must ensure segregation of costs and enforce this strictly.

**Member Airlines:** Cathay Pacific Airways Limited: Saudi Arabian Airlines: Gulf Air: Virgin Atlantic Airways: Malaysia Airlines: Akasa air: Qatar Airways: Turkish Airlines: Oman Air: Srilankan Airlines: Etihad Airways: Lufthansa German Airlines: Swiss International Air Lines Ltd: Emirates: All Nippon Airways Co. Ltd: United Airlines Inc: Iran Air: Kuwait Airways Company: Air Mauritius: Jazeera airways: Air Arabia: Kenya Airways: Flydubai: Ethiopian Airlines Group: Singapore Airlines Limited: SpiceJet Ltd: AirIndia Express: Air China: Air France: Air India: Air Tanzania: British Airways: EL AL Israel Airlines: Indigo: Nepal Airlines: Thai Airways: Vietnam Airlines: Ugand Airlines: LOT Polish: Air Canada: Flynas: Azerbaijan Airlines: KLM Royal Dutch Airlines: Vietjet

**GHA Partners:** CelebiNas: Bird Worldwide Flight Services: AI Airport Services Limited

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## **6. Proposed Airport Management Corporate Office – Misuse of UDF:**

The plan to construct a corporate office at the T1-A site is deeply concerning. This prime airport location must be reserved for public-serving Airport infrastructure such as the new Terminal 1 or expanded Domestic cargo operations. We strongly object to any approval of UDF funds for such internal MIAL administrative projects. AERA is urged to review the proposal and not to be funded through passenger-related aeronautical charges .

Additionally, considering its proximity to RWY 09 approach, AERA must consult DGCA, ICAO, and IATA to verify whether the building infringes on Obstacle Limitation Surfaces (OLS). Air safety must be non-negotiable.

## **7. Inconsistency in Stand Utilization (V1, V2, V3L/V3R):**

While new parking stands (V1 & V2) are being proposed, the closure of recently constructed stands (V3L/V3R) and their conversion into GSE parking raises questions of planning inefficiency. AERA must obtain a detailed explanation from MIAL and hold it accountable for any misuse of funds or mismanagement of resources.

## **8. Metro Station Construction Costs – UDF Misuse:**

The continued carry-forward of metro-related construction costs into this control period is unjustified, especially as the metro line does not serve as a dedicated Airport line. MIAL is also expected to commercially benefit from the surroundings of the metro stations. Public money, especially collected under UDF, must not be used to subsidize commercial ventures. We urge AERA to categorically disallow such costs from being passed on to passengers.

In closing, we reiterate our expectation that AERA will uphold the principles of financial prudence, public accountability, and operational transparency in all deliberations. We request your review and detailed attention to our comments.

Sincerely,

On behalf of AOC Mumbai

Victor Denis Dsouza  
Chairman – AOC Mumbai



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