



## Federation of Indian Airlines

E-166, Upper Ground Floor,  
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19 December 2025

To,  
**The Chairperson,**  
Airports Economic Regulatory Authority,  
AERA Building, Administrative Complex,  
Safdarjung Airport,  
New Delhi- 110 003.

**Kind Attention – Shri. S.K.G. Rahate Ji**

**Sub:** FIA submission towards AERA CP. No. 05/2025-26-Determination of Tariff for Cargo Handling Services at Manohar International Airport, Mopa, Goa (GOX) for the First Control Period (FY 2024-25 TO FY 2028-29) - reg.

Dear Sir,

The Federation of Indian Airlines (FIA), on behalf of its member airlines—Air India, IndiGo, and SpiceJet—submits its comments in response to *AERA CP. No. 05/2025-26 on the determination of cargo handling tariffs at Manohar International Airport, Mopa (Goa), for the first control period (FY 2024-25 to FY 2028-29)*.

At the outset, FIA submits that, as per ICRA, the Indian aviation industry is expected to incur net losses of INR 5,000–6,000 crores during FY 2024–25. Despite a gradual recovery in traffic, airlines continue to face severe financial stress due to persistently high ATF prices, foreign exchange volatility, global supply-chain disruptions, and limited pricing flexibility.

In this context, any steep or disproportionate increase in aeronautical charges, including cargo handling tariffs, would further strain airline finances and adversely impact cargo development and regional connectivity.

FIA therefore respectfully requests the Authority to consider FIA's detailed submissions enclosed as Annexure 'A' while finalising the tariff determination.

FIA remains grateful for the Authority's continued support and is available for any further engagement as required.

Yours Truly,

For and on behalf of the Federation of Indian Airlines,

**UJJWAL DEY**  
Director

**ANNEXURE (A) - Comparison of existing rates charged by GOX vs proposed**

Table A	Existing GAL Rates (as per the agreement)		Tariff proposed by Airport Operator							
	FY25-26		FY25-26		FY26-27		FY27-28		FY28-29	
Outbound	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min
<b>TSP Charges</b>	1.09	188.80	1.54	280	2.08	378	2.81	510	3.79	689
Variance from existing			41%	48%	91%	100%	158%	170%	248%	265%
Variance % from Y o Y			41%	48%	35%	35%	35%	35%	35%	35%

Table-B	FY25-26		FY25-26		FY26-27		FY27-28		FY28-29	
Inbound	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min
<b>TSP Charges</b>	1.09	188.80	1.8	280	2.43	378	3.28	510	4.43	689
Variance from existing			65%	48%	123%	100%	201%	170%	306%	265%
Variance % from Y o Y			65%	48%	35%	35%	35%	35%	35%	35%

Table-C	FY25-26		FY25-26		FY26-27		FY27-28		FY28-29	
Outbound	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min
<b>Handling Charges</b>	1.09	145	3.27	254	4.41	343	5.95	463	8.03	625
Variance from existing			200%	75%	305%	137%	446%	219%	637%	331%
Variance % from Y o Y			200%	75%	35%	35%	35%	35%	35%	35%

Table-D	FY25-26		FY25-26		FY26-27		FY27-28		FY28-29	
Inbound	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min
<b>Handling Charges</b>	1.09	145	1.93	254	2.61	343	3.52	463	4.75	625
Variance from existing			77%	75%	139%	137%	223%	219%	336%	331%
Variance % from Y o Y			77%	75%	35%	35%	35%	35%	35%	35%

Table-E	FY25-26		FY25-26		FY26-27		FY27-28		FY28-29	
Outbound	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min	Rate/KG	Min
<b>X-Ray Charges</b>	1.72	156	3.08	273	4.16	369	5.62	498	7.59	672
Variance from existing			79%	75%	142%	137%	227%	219%	341%	331%
Variance % from Y o Y			79%	75%	35%	35%	35%	35%	35%	35%



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### Key Highlights from Tables A–E:

- 1. Outbound TSP Charges (Table A):** The proposed increase is projected to range between 41% and 48% for FY25–26, with a significant rise reaching approximately 248% to 265% by FY28–29. Additionally, a Year-on-Year (YoY) escalation of around 35% is expected for the subsequent years.
- 2. Inbound TSP Charges (Table B):** The proposed increase is expected to range between 65% and 48% in FY25–26, escalating significantly to approximately 306% to 265% by FY28–29. Furthermore, a Year-on-Year (YoY) escalation of 35% is anticipated for the subsequent years.
- 3. Outbound Handling Charges (Table C):** The proposed increase is projected to range between 200% and 75% in FY25–26, rising sharply to approximately 637% to 331% by FY28–29.
- 4. Inbound Handling Charges (Table D):** The proposed increase is expected to start at 77%–75% initially, with a substantial escalation reaching approximately 336% to 331% by FY28–29.
- 5. Outbound X-Ray Charges (Table E):** The proposed increase is projected to range between 79% and 75% in FY25–26, escalating significantly to approximately 341% to 331% by FY28–29.

### Comments:

- The proposed tariff hikes are excessive and disproportionate, especially when compared to existing GMR and AAICLAS rates.
- CP appears to cover only Cargo Charges, whereas typically both Aeronautical and Cargo tariffs are included.
- Comparative analysis with AAICLAS shows GMR's proposed rates are significantly higher across all categories (refer Tables A–E).
- Such excessive tariffs will discourage airlines, freight forwarders, and shippers from utilizing GOX as a cargo hub, thereby adversely impacting the airport's cargo growth and regional trade.

### Recommendation

The proposed tariff hikes are excessive and disproportionate and therefore warrant a comprehensive review and rationalisation to ensure competitiveness, fairness, and alignment with prevailing industry conditions. In the interest of all stakeholders, it is respectfully requested that AERA may not implement the proposed tariffs in their present form. A detailed reassessment and rationalisation of the proposed tariffs is necessary to arrive at a fair, reasonable, and financially sustainable pricing framework.