



Federation of Indian Airlines

E-166, Upper Ground Floor,
Kalkaji,
New Delhi - 110019.
Website: www.fiaindia.in

29 November 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. 04/2025-26 - Determination of Aeronautical Tariff for Swami Vivekananda International Airport, Raipur for the 2nd Control Period (01.04.2025 - 31.03.2030)

Ref: AERA stakeholder consultation meeting held on 14.11.2025 at AERA Office.

Dear Sir,

We, the Federation of Indian Airlines (“FIA”) (on behalf of our member airlines IndiGo, SpiceJet, Go First, and Air India), hereby submit our comments in response to AERA’s CP No. 04/2025-26 titled “*Determination of Aeronautical Tariff for Swami Vivekananda International Airport, Raipur (RPR) for the Second Control Period (01.04.2025 – 31.03.2030)*” (“Consultation Paper” or “CP”). At the outset, we would like to express our sincere gratitude to AERA for inviting stakeholder comments on the CP and for convening the stakeholder consultation meeting on 14.11.2025.

Sir, FIA submits that, as per the Investment Information and Credit Rating Agency of India (ICRA), the Indian aviation industry is estimated to report a net loss of INR 5,000–6,000 crores in FY24 and FY25. While the industry has shown signs of stability, it has not yet fully recovered from the severe financial headwinds arising from multiple factors, including a hostile macroeconomic environment, geo-political uncertainties, the lasting impact of the COVID-19 pandemic, significant global supply chain disruptions, elevated Aviation Turbine Fuel (ATF) prices, limited government financial support, constrained passenger affordability, and persistent foreign exchange volatility.

Despite the gradual revival in passenger traffic, elevated ATF prices and depreciation of the Indian Rupee continue to exert substantial pressure on airline finances, as a significant portion of airlines’ operating costs—including ATF and several technical/operational expenses—are denominated in U.S. dollar terms.

In this backdrop, FIA request AERA to kindly consider FIA’s submission enclosed as **Annexure ‘A’**.

We look forward to the continued support of the Authority during these challenging times.

Yours Truly,

For and on behalf of the Federation of Indian Airlines,

UJJWAL DEY
Director

FIA comments on AERA CP.No.04/2025-26 in the matter of Determination of Aeronautical Tariff for Swami Vivekananda International Airport, Raipur for the 2nd Control Period (01.04.2025 - 31.03.2030)

Particulars	Unit	Existing Rates	Tariff Proposed by Airport Operator				
TABLE A: Landing Charges							
		FY 2025-26 (Tariff w.e.f. 01.04.2025 to 30.11.2025) Existing Rate	FY 2025-26 (Tariff w.e.f. 01.12.2025 to 31.03.2026)	FY 2026-27 (Tariff w.e.f. 01.04.2026 to 31.03.2027)	FY 2027-28 (Tariff w.e.f. 01.04.2027 to 31.03.2028)	FY 2028-29 (Tariff w.e.f. 01.04.2028 to 31.03.2029)	FY 2029-30 (Tariff w.e.f. 01.04.2029 to 31.03.2030)
DOMESTIC/INTER NATIONAL		0	0	0	0	0	0
Eg: Impact on A320 (Rs.)	79 MT	27717	55433	63194	72041	82847	95274
Variance % from existing			100%	128%	160%	199%	244%
Variance % from YoY			100%	14%	14%	15%	15%

TABLE B: Parking Charges

	INR/Hr /MT in excess of 50MT	FY 2025-26 (Tariff w.e.f. 01.04.2025 to 30.11.2025) Existing Rate	FY 2025-26 (Tariff w.e.f. 01.12.2025 to 31.03.2026)	FY 2026-27 (Tariff w.e.f. 01.04.2026 to 31.03.2027)	FY 2027-28 (Tariff w.e.f. 01.04.2027 to 31.03.2028)	FY 2028-29 (Tariff w.e.f. 01.04.2028 to 31.03.2029)	FY 2029-30 (Tariff w.e.f. 01.04.2029 to 31.03.2030)
DOMESTIC/INTERNATIONAL (for 1st 2 chargeable hrs)		0	0	0	0	0	0
<i>For next 4 hours</i>	79 MT	5.8	8.4	9.25	10.2	11.2	12.3
Variance % from existing			45%	59%	76%	93%	112%
Variance % from YoY			45%	10%	10%	10%	10%
<i>For subsequent hours</i>	79 MT	11.6	16.8	18.5	20.4	22.4	24.6
Variance % from existing			45%	59%	76%	93%	112%
Variance % from YoY			45%	10%	10%	10%	10%

TABLE C: UDF Charges

		FY 2025-26 (Tariff w.e.f. 01.04.2025 to 30.11.2025) Existing Rate	FY 2025-26 (Tariff w.e.f. 01.12.2025 to 31.03.2026)	FY 2026-27 (Tariff w.e.f. 01.04.2026 to 31.03.2027)	FY 2027-28 (Tariff w.e.f. 01.04.2027 to 31.03.2028)	FY 2028-29 (Tariff w.e.f. 01.04.2028 to 31.03.2029)	FY 2029-30 (Tariff w.e.f. 01.04.2029 to 31.03.2030)
DOMESTIC/INTERNATIONAL	Per Embar king	500.00	650.00	680.00	700.00	700.00	700.00

Variance % from existing			30%	36%	40%	40%	40%
Variance from YOY			30%	5%	3%	0%	0%

1. Observation: Reference to the table above

Tables A (Landing Charges): AAI has proposed an increase in Landing Charges (Domestic & International) by approximately 100% from existing charges in FY 2025-26(01-Dec-25 onwards) and a 14% Y-O-Y increase for two years subsequently with 15% increase thereafter for remaining years.

Table B (Parking Charges): AAI has proposed an increase in Parking Charges (Domestic & International) by approximately 45% from existing charges in FY 2025-26(01-Dec-25 onwards) and a 10% Y-O-Y increase thereafter.

Table C (UDF): AAI has proposed an increase in Domestic/International UDF of 30% for FY 2025-26(01-Dec-25 onwards) with an annual increase of 5% and 3% in subsequent years. Thereafter, the UDF rates are static for next two years.

Comments: It is in the interest of all the stakeholders that the proposed tariffs as noted above may not be implemented as the proposals are excessive. Also, requesting AERA to provide at least 60-90 days for implementation of tariff card by Airlines into their systems and considering the same, effective date of 1st December as per Tariff order is unfeasible.

The User Development Fee (UDF) is a transparent mechanism through which passengers contribute directly to the development and upkeep of airport infrastructure. Increasing UDF ensures that the cost of enhanced facilities—such as modern terminals, advanced security systems, improved passenger amenities, and better operational efficiency—is borne by those who benefit from them. This approach makes the investment visible and justifiable to passengers, reinforcing the principle that UDF is a user-centric charge linked to tangible improvements in airport infrastructure. It is therefore recommended that the cost recovery be done through UDF instead of through doubling of aeronautical charges. Raising landing and parking charges significantly increases the financial burden on airlines, which are already under pressure and often criticized for higher ticket prices. Such increases will need to be absorbed by the airlines, distorting pricing and airline economics. On the contrary, UDF is a transparent pass through charge with clear end-date timelines, and we recommend that the landing and parking and other charges be increased moderately and that the cost recovery be done through increase in UDF. This approach ensures that infrastructure development is funded equitably, without destabilizing airline viability or creating negative perceptions around airfare inflation.

2. In addition, we request AERA and AAI to clarify the following:

- a) **Reference to Table 71** Landing charges(domestic) proposed by the Authority for Raipur Airport for the Second Control Period: Kindly Clarify the use of words "Rates per Hour (₹)" in the table headers in the calculation.
- b) **Reference to Note (1) to Landing Charges:** We kindly request AERA to provide clarification on unscheduled flights operated by domestic scheduled operator as the same are currently being charged by Airport Operator. There should be a clarification to this effect since the exemption is provided to domestic scheduled operators and not restricted to only schedule operations by them.
- c) **Reference to Notes to User Development Fee (UDF) Charges Collection Charges:** We would like to invite AERA's attention to notes 1 of UDF charges in Annexure II of Consultation Paper, wherein the rate of collection of UDF charges has been proposed to be as per the agreement between Airport Operator and Airline, we request AERA to kindly consider the collection charges to be specified at the rate of Rs. 5.00 per embarking passenger, in line with the proposal by AAI in notes to UDF in Annexure I. Further, it is stated that revised UDF charges will be applicable on tickets issued on or after 01/12/2025 for FY 2025-26 and thereafter applicable on date of travel from 1st April 2026 to 31st March 2030, AERA is requested to clarify the words "date of travel" as mentioned above with the help of an iteration/ example.
- d) **Reference to Notes on Parking Charges effective from 1st December 2025 to 31st March 2030:**

"5. At the in-contact stands and open stands, after free parking, for the next two hours normal parking charges shall be levied. After this period, the charges shall be double the normal parking charges."

Rate for parking beyond first six hours has already been defined in Table 72 and 73 Table. To avoid any further confusion, this note should be deleted

"7. For unauthorized overstay of aircraft an additional charge of ₹ 20.00 per hour per MT beyond 24 hours is to be payable or as per revised rate if any."

It is requested to please define the nature and/or circumstances which come under unauthorised stay of aircraft.