



28 November 2025

Shri Ram Krishan
Director- Policy & Statistics
Airport Economic Regulatory Authority
Udaan Bhawan, Safdarjung Airport Area
New Delhi – 110003
director-ps@aera.gov.in

Dear Mr. Ram Krishan,

[IATA response on determination of aeronautical tariff for Swami Vivekananda International Airport, Raipur \(RPR\), for the Second Control Period](#)

The International Air Transport Association (IATA) is the global trade association for the airline industry, representing some 360 airlines, carrying 83% of the world's air traffic. IATA members include the world's leading passenger and cargo airlines spread across 128 countries, which also include Indian scheduled carriers.

IATA has reviewed the detailed information provided by AERA in the consultation paper and would like to submit its feedback mentioned in the points below:

1. Disproportionate increase in Landing Charges and UDF

The proposed one-time 100% increase in landing charges, coupled with a steep escalation in User Development Fee (UDF), appears disproportionate to the actual growth in traffic and service enhancements. Such abrupt increases will inevitably compel airlines to either reduce frequencies or pass on the additional costs to passengers, thereby undermining affordability and the objectives of the National Civil Aviation Policy (NCAP).

We urge AERA to adopt a more balanced approach that safeguards passenger interests and supports sustainable traffic growth.

2. Recalibrating passenger growth assumptions

The projection of 10% annual passenger growth is optimistic, particularly when compared to the post-COVID compound annual growth rate (CAGR) of approximately 7%. Furthermore, the forecast does not adequately account for the potential dampening effect of higher tariffs on demand.

We would like to reiterate crucial feedback given by our member airlines during the in-person consultation on 14th November and recommend adopting a more conservative growth assumption of 6–7%, consistent with historical recovery patterns and global benchmarks, to ensure realistic planning.

3. Recoveries from the First Control Period

The proposal to recover INR 239.91 crore from the First Control Period through higher tariffs imposes a retroactive burden on current and future passengers and airlines. This approach highlights a structural gap in the current framework and True-Up approach, where business risks are disproportionately borne by users.

We recommend a phased recovery of this amount over multiple control periods and encourage partial



absorption by the airport operator to mitigate tariff shocks and maintain market stability.

4. Rationalising Capital Expenditure

While infrastructure upgrades are essential, several proposed projects appear non-critical and could be deferred or optimised based on actual traffic demand.

We urge AERA to prioritise projects that are essential for safety and regulatory compliance and ensure that all investments are supported by a clear business case and subject to meaningful user consultation.

Thank you for your kind consideration.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Amitabh Khosla", with a stylized flourish at the end.

Amitabh Khosla
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