

SPECIFIC OPERATING PROCEDURES ON EXIT STRATEGY FOR AIRPORTS, AIRLINES AND PASSENGERS FOR COMMENCEMENT OF DOMESTIC FLIGHT OPERATIONS

1. INTRODUCTION

On March 24th, 2020¹, the Government of India initiated a nationwide lockdown for a period of 21 (twenty-one) days, limiting movement of the general public as a preventive measure to contain the spread of COVID-19 pandemic in India. The lockdown was further followed by a series of enforcement of other regulations in the country's COVID-19 affected regions.

Since the current pandemic of COVID-19 in India continues to be a cause of concern, Directorate General of Civil Aviation (“DGCA”) issued a circular² with respect to operations by carriers operating with scheduled operator permits, non-scheduled operator permit, and private aircraft respectively, which were restricted to operate any commercial flights within India. International operations of airlines were restricted on the same date, although the DGCA had been progressively winding down the restrictions from before according to the country level restrictions either from India or abroad. Pursuant to the circular issued by DGCA, the only exempted categories of air operations were cargo and other emergencies, including medical emergencies.

The lockdown period commenced from March 24th, 2020, which was further extended on April 14th, 2020, until May 3rd, 2020, with a conditional relaxation after April 2020 for the regions where the spread had been contained. On May 1st, 2020, the Government of India extended the nationwide lockdown further by 2 (two) weeks until May 17th, 2020. The DGCA, in view of the prevailing situation has decided to suspend all commercial operations³ ⁴ of the airlines till the lockdown is in force. On May 20th, 2020, the Ministry of Home Affairs issued an order⁵ amending the guidelines on lockdown and thereby allowing domestic air travel of the passengers. Accordingly, the Ministry of Civil Aviation (“MOCA”) on May 21st, 2020, issued an order⁶ (“Order”) for gradual recommencing domestic air travel of passengers with effect from May 25th, 2020 with augmentation of flights to be done in a calibrated manner. The Order further recommends certain precautionary measures in the form of general instructions, guidelines to be followed by passengers and specific operating procedures for stakeholders like airlines, airport operators, ground handling agencies, etc. to ensure the safety of the passengers during the prevailing circumstances due to COVID-19.

¹ https://www.mha.gov.in/sites/default/files/MHAorder%20copy_0.pdf

² <https://dgca.gov.in/digigov-portal/jsp/dgca/homePage/viewPDF.jsp?page=topHeader/COVID/Circular%203%20-%2023.3.2020.pdf>

³ <https://dgca.gov.in/digigov-portal/jsp/dgca/homePage/viewPDF.jsp?page=topHeader/COVID/Circular%20Domestic-14.4.2020.pdf>

⁴ <https://dgca.gov.in/digigov-portal/jsp/dgca/homePage/viewPDF.jsp?page=topHeader/COVID/Circular%202.5.2020.pdf>

⁵ https://www.mha.gov.in/sites/default/files/MHAOrderDt_20052020regdeletionofdomesticairtravelofpassengers.pdf

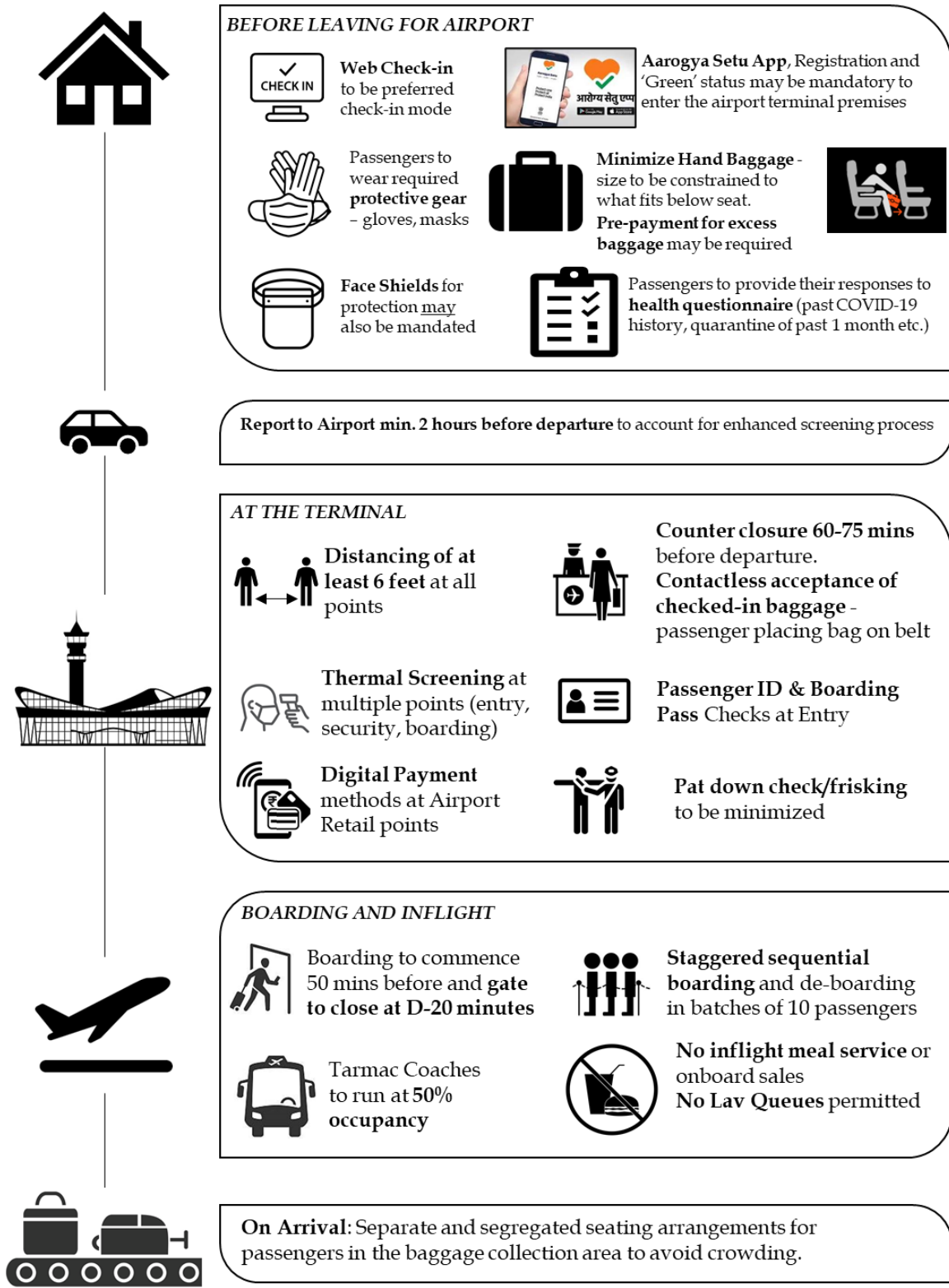
⁶ https://www.civilaviation.gov.in/sites/default/files/Order_of_MoCA_dated_21st_May_2020.pdf

In the view of the same, Specific Operating Procedures (“SOPs”) have been annexed to the Order in the form of guidelines or relative do’s and don’ts with detailed actions points under which various stakeholders like State Government, airport operators or terminals, security agencies, health officials, airlines cabin crew and passengers traveling in the aircraft are required to ensure compliance of such action points. The stakeholders are required to help in the prevention of COVID-19, once scheduled operating carriers are permitted to resume their commercial operations. While these guidelines are mainly important for the passengers traveling in the aircraft, listed below are certain ‘do’s and don’ts’ which are equally important for other stakeholders involved in the process.

While coming up with the SOPs, reliance would have been placed upon certain guidelines in this regard which are issued by various international authorities. Such guidelines are:

- (i) Airport Preparedness Guidelines for Outbreaks of Communicable Disease issued by Airport Council International and International Civil Aviation Organization, revised April 2009;
- (ii) COVID Medical Evidence for Strategies 200421/CAAC- CAAC- Preventing Spread or Coronavirus Disease 2019 (COVID-19) Guideline for Airports – 4th Edition;
- (iii) Security screening best practices during COVID-19- ACI Advisory Bulletin- March 2020;
- (iv) Airport-Operational-Practice-Examples-for Managing-COVID-19- ACI;
- (v) IATA Guidance on Cabin Operations during and post-pandemic – Edition 1 22 April 2020;
- (vi) COVID Medical Evidence for Strategies 200421;
- (vii) EASA Guidelines – COVID-19;
- (viii) Guidance on Management of Crew Members in relation to the SAR-CoV-2 pandemic-issue no:01, issue date:26/03/2020/SUSPECTED COMMUNICABLE DISEASE;
- (ix) Guideline for Crew, IATA Dec 2017/FAA-COVID-19: Updated-Interim Occupational Health and Safety Guidance for Air Carriers and Crews. SAFO US DOT April 2020/IATA;
- (x) WHO Operational Considerations for managing COVID-19 cases or outbreak; and
- (xi) Suspected Communicable disease- Guideline for Crew, IATA December 2017.

2. INDICATIVE PASSENGER PROCESS



(More Details in Tabulation Below)

3. GENERAL REQUIREMENTS FOR ALL STAKEHOLDERS

Serial No.	Action Points	Stakeholder
For Terminals		
1.	Use of trolleys to be discouraged in the departure and arrival areas. If need be used for any genuine reason, the same should be used sparingly. Trolleys must be [disinfected by suitable means like disinfecting spray etc.	Airport Operator
2.	Designated separate entry gates for different airlines to avoid crowding.	Airport Operator
3.	All entry gates to the terminal building shall be opened to avoid overcrowding.	Airport Operator
4.	Sufficient security to be deputed at entry points at the airport, frisking booths, boarding gates so as to ensure sufficient distance among passengers.	Security Officials
5.	Sanitization of trays at the security check cabin baggage screening areas.	Airport Operator/Security Agencies
6.	To provide a clear transparent glass shield on a pedestal to act as a barrier between passenger/staff and security officials at the entry gate.	Airport Operator
7.	Sufficient staff to be deputed near washrooms, X-Ray machines, conveyor belts, food and beverage outlets to guide passengers to maintain sufficient distance.	Airport Operator
8.	To ensure the use of sanitized vehicles with restricted seating for transportation of staff and passengers within the airport, including golf carts facility provided for persons with reduced mobility.	Airport Operator
9.	<ul style="list-style-type: none"> • Thermal scanner and sanitizer dispensers to be installed at entry points for passengers and staff gates, boarding and disembarkation points; and • Temperature screening to be carried out at various entry, boarding and disembarkation point through validated equipment and by adequate and trained staff who shall be wearing personal protective equipment (“PPE”). 	Airport Operator
10.	<ul style="list-style-type: none"> • Entry inside the terminal to be permitted with adequate protective gear like masks, gloves, shoe cover, and PPE only; and • Arrangements to be made for making such protective gear available to the passengers on a chargeable basis. 	Airport Operator

Serial No.	Action Points	Stakeholder
11.	Provide counters mounted with a glass or Perspex/plexiglass sheet with a corner having a magnifying area to check the flight ticket/boarding pass and identification documents. In case the same is not feasible, the concerned person to use a face shield.	Airport Operator
12.	Any member of staff showing symptoms such as high fever, difficulty in breathing, and cough may not be taken on duty and allowed inside the terminal. Such cases to be reported to the appropriate health authorities.	Airport Operator
13.	Only passengers with departures in the next 4 (four) hours to be allowed inside the terminal.	Airport Operator
14.	Visitors entry into terminal and forecourt area to be suspended.	Airport Operator
For Check-in and Security Check		
15.	Frontline staff to be provided with a transparent glass shield on a pedestal to act as a barrier between the passenger and staff in addition to the staff wearing mandatory masks and gloves and ensure safe distancing while accepting baggage.	Airlines/ Airlines Operator
16.	Airports to earmark separate areas for a change of PPE by the staff.	Airport Operator
17.	Passengers must be educated about web check-in and alternate arrangements to be provided in the event the passenger has no access to the computer. Passengers should also download the baggage tag/baggage identification number. Passengers to be informed about the necessary process of web check-in.	Passengers/ Airlines
18.	The booking system of airlines should provide for the printing of baggage tags by passengers. An alternative simple mechanism should also be provided to the passengers.	Airlines
19.	Airlines to devise a system to ensure that the boarding pass is issued only after the declaration to the effect of his health and safety is provided. In case of a PNR having more than 1 (one) passenger, the declaration would be deemed to be covering all the passengers mentioned in the PNR.	Airlines
20.	The airlines shall keep a record of the declaration and make it available to the authorities if required.	Airlines
21.	Airlines to furnish the passenger manifest of each flight to the State/Union Territory in a prescribed format.	Airlines

Serial No.	Action Points	Stakeholder
	Check-in counters to open 3 (three) hours before the scheduled time of departure and close 60 (sixty) minutes before the departure and adequate allocation of counters for baggage drop to be ensured.	Airport Operator/ Airlines
22.	Airlines should provide enough number of counters to facilitate easy baggage drop by the passengers.	Airlines
23.	Contactless acceptance of checked-in baggage by passenger placing the bag on the baggage belt. The passenger shall indicate the PNR number mentioned on the baggage and upon such confirmation, the airline staff to print and attach the baggage tag and accept the bag. Instead of issuing a printed receipt to the passengers, an electronic receipt in the form of a text message shall be sent to the passenger.	Airlines
24.	Sanitization of checked baggage by installing UV light (or equivalent effective method) in the inline screening or standalone screening.	Airport Operator
25.	Strict adherence to the airline check-in bag policy and no cabin baggage to be allowed in the initial phase. Check-in baggage to be only one piece per passenger of 20 (twenty) kilograms. In addition to it, the hand baggage should fit under the aircraft seat.	Airlines
26.	Excess baggage to be avoided and if at all required, it should be dealt through web check-in and payment at the time of booking/check-in.	Airlines
27.	Airlines to release passengers for security check-in restricted numbers to ensure social distancing.	Airlines
28.	Availability of an adequate number of PPE for security personnel on duty to be ensured.	Airport Operator
29.	All screeners who undertake pre-embarkation security check duties at earmarked/isolated security checkpoints will wear complete PPE for protection.	Airport Operator/Security Agencies
30.	<ul style="list-style-type: none"> • Social distance markings at a distance of not less than 1 (one) meter to be provided at appropriate places, tensor barriers (Queue managers) and separate seating arrangements in the area before security to avoid crowding and queuing; and • Availability of hand sanitizer dispensers at the entry and exit of security checkpoints. 	Airport Operator
31.	<ul style="list-style-type: none"> • Pat down check/frisking to be minimized to an extent possible; and • Security staff shall practice 'Minimum Touch' concept to avoid any infection. 	Security Agencies

Serial No.	Action Points	Stakeholder
32.	<ul style="list-style-type: none"> • The entry to various rooms such as lounges, prayer rooms, kids play-rooms, smoking room, etc. to be highly restricted; and • No reading material/non-essential loose items to be kept. 	Airline Operator
33.	<ul style="list-style-type: none"> • Social distance markings & continuous sanitization of all possible areas including Food, beverage, and retail outlets, boarding gates, etc.; and • Chairs marked as "Not for Use" to be separated. 	Airport Operator
34.	All Food, beverage, and retail outlets to be opened with COVID-19 precautions/SOPs to prevent/avoid crowding of passengers in one place.	Airport Operator
35.	Promotion of digital payment, self-ordering booths at Food, beverage, and retail outlets to avoid social contact.	Airport Operator
36.	The positioning of yellow-colored disposal bins/bags for disposal of masks, gloves, PPE (Bio-hazardous material) at strategic locations, and frequent disinfection/removal of the same.	Airport Operator
For Maintenance of Terminal		
37.	<ul style="list-style-type: none"> • Social distance markings to be created inside the terminal; • Regular disinfection of all common areas like lifts, escalators, chairs, retail and food outlets, security screening areas, etc. and disinfection of surfaces and touchpoints after every 30 (thirty) minutes to be ensured; and • Availability of movable hand wash cart or alcohol-based hand sanitizers at regular intervals at the entry point and within the terminal to be ensured. 	Airport Operator
38.	Bleach cleaning mats to be placed at the entrance or any such material capable of disinfecting shoes.	Airport Operator
39.	<ul style="list-style-type: none"> • Airport staff, crew and passengers to use sanitized vehicles with limited seating capacity for transportation within the airport; and • Only select taxi services which are authorized by the airport authority to ply. 	Airport Operator
40.	<ul style="list-style-type: none"> • Open-air ventilation system to be used instead of central air conditioning inside the terminal; • Wherever such open-air ventilation is not possible, change in air circulation of central air conditioning 	Airport Operator

Serial No.	Action Points	Stakeholder
	to be mandatory after every 6 (six) hours and filters must be replaced frequently; and <ul style="list-style-type: none"> • In the event there is an exposure of a particular area in the terminal by the COVID-19 affected person, complete disinfection of the terminal to be undertaken. 	
41.	Isolation zones to be created inside the terminal building and airside to manage passengers showing any symptoms of the infection.	Airport Operator/Health Officials
42.	<ul style="list-style-type: none"> • Every major change of management and projects being undertaken at airport terminal or airside to be suspended unless of critical nature; and • Labour and staff to ensure that crowding is avoided at all times. 	Airport Operator
43.	The entry of ground staff, cabin crew, maintenance staff, commercial staff, and security staff to be restricted to bare-minimum and airline operators to ensure the development of such procedures.	Airlines
For Pre-Departure and Boarding		
44.	Announcement through the PA system as well as by way of displays and video clips in the airport area about various health advisories, pre-boarding, and flight precautions.	Airport Operator
45.	All airlines to disseminate the information regarding the precautionary measures to be taken by the passengers. This may be done through their websites, flight information display systems, travel agents, call centres, airport displays, assistance booths, etc.	Airlines
46.	Airlines to train and educate their staff about various protective measures that need to be taken.	Airlines
47.	Airlines to ensure that their aircraft are sanitized after every trip and at the end of the day as per the protocol prescribed by the DGCA.	Airlines
48.	All airlines to ensure that all tickets are sold electronically and build enough redundancy to ensure uninterrupted service to the passengers.	Airlines
49.	Passengers to collect the safety kit from the airlines near the boarding gate.	Airlines
50.	Check-in of the boarding pass would be done by the passenger by self-scanning of the e-boarding pass.	Passengers
51.	Passengers would be required to show their identity cards to the airline staff at the boarding gate.	Airlines/Passengers

Serial No.	Action Points	Stakeholder
52.	Airlines to ensure that there is no crowding on the step ladder. The grab rails of the step ladder should be sanitized continuously.	Airlines
53.	Boarding to commence 50 (fifty) minutes before and gate to close at D-20 minutes.	Airlines
54.	Staggered sequential boarding in batches of 10 (ten) passengers at a time. If possible, self-scanning of e-boarding pass.	Airlines
55.	In order to prevent the passengers from crossing each other in the cabin area while boarding: <ul style="list-style-type: none"> • Single Door Boarding will follow reverse zone starting from rear of the aircraft to the forward zone; and • similar rules to be followed for Dual Door boarding. 	Airlines
56.	Secondary temperature check by airlines at the Boarding Gate.	Airlines
57.	Safe distance markings to be created by airport operators on the aerobridges.	Airport Operator
58.	Wherever the use of coaches is necessary, clear marking in the coaches to ensure limited occupancy and coaches to be sanitized continuously.	Airlines
For Cabin Crew and Aircraft		
59.	The same set of cabin and cockpit crew to be paired to prevent any cross-contamination.	Airlines
60.	Norms for cockpit crew entry, pre, and post-flight to be laid down to reduce any risk of contamination.	Airlines
61.	Airlines to conduct a health check-up of all cabin crew regularly.	Airlines
62.	Cabin crew must wear PPE and such PPE must conform to the standards laid down by bodies like ICAO/WHO/ICMR etc.	Airlines
63.	Re-Circulation fans not to be used in flight (Subject to Original Equipment Manufacturer Clearance).	Airlines
64.	Permitted hand baggage to be restricted to the bare minimum.	Airlines
65.	Inflight procedures for COVID-19 including related to the proper method of donning/doffing of PPE suits to be documented.	Airlines
66.	<ul style="list-style-type: none"> • Social Distancing to be ensured during boarding and disembarkation process; and 	Airlines

Serial No.	Action Points	Stakeholder
	<ul style="list-style-type: none"> • Face-to-face interaction between crew and passengers to be minimized. 	
67.	No queueing at lavatories to be permitted and only a single person is allowed to accompany in case of children/persons with any kind of disability.	Airlines
68.	Airplane lavatories to be cleaned/sanitized after every 1 (one) hour of flight.	Airlines
69.	<ul style="list-style-type: none"> • No inflight meal service or onboard sales to be permitted; and • Water to be available in the galley in cups/bottles. 	Airlines
70.	<ul style="list-style-type: none"> • Clearance of seat pockets of all items except for safety cards, which will be replaced or sanitized after every flight. 	Airlines
71.	<ul style="list-style-type: none"> • For in-flight Temperature Screening for Passengers, a non-contact infrared thermometer to be used for checking the temperature of the passengers, as and when required; and • In case any passengers found ill with symptoms including fever (37.3°C), fatigue, or cough, the occurrence should be dealt with in compliance with the handling measures of in-flight emergencies. 	Airlines
72.	<ul style="list-style-type: none"> • Special protections such as PPE and sanitizers to be used by the crew for handling such cases; and • Adequate quantity of PPE as per UPK standards to be made available for more than one such case. 	Airlines
73.	<ul style="list-style-type: none"> • In the event any of the crew member or other staff has any contact with COVID-19 infected person, Airport operators and health officers are to be contacted (“APHO”); and • Airport operators and health officers to ensure such processes to handle COVID-19 positive cases or any other health emergency. 	Airlines/Airport Operators/Health Officials
74.	Temperature screening of all domestic departing and arriving passengers to be mandatory until the threat from COVID-19 is over.	Health Officials
75.	In the case of COVID-19 related medical emergency on board, aircraft disinfection to be carried out with special attention to the affected seats.	Airlines
76.	Social distance and sanitation should be maintained at the arrival gate, aerobridges, coaches, jet ladders, ramps, etc.	Airlines

Serial No.	Action Points	Stakeholder
77.	In-flight announcement to be made for staggered passenger movement to ensure social distancing while disembarking from the aircraft.	Airlines
78.	Deploy staff with adequate awareness in passenger each coach to enforce and ensure social distancing is adhered strictly.	Airlines
79.	During transit air-conditioning, equipment from only Accelerated Processing Unit bleeds to be used in the aircraft and not from mounted air-cooling equipment.	Airlines
80.	Social distance markings like circle square around the baggage collection carousel.	Airport Operator
81.	Staggered placement of baggage on the arrival carousel.	Airlines
82.	Additional separate and segregated seating arrangements for passengers in the baggage collection area to avoid crowding.	Airport Operator
83.	Transit passengers not to be allowed/permitted to come out of the transit area.	Airport Operator/Security Agencies/ Airlines
84.	<ul style="list-style-type: none"> • Training to taxi/cab employees to be given regarding maintaining social distance among themselves and with the passengers traveling to the airport; and • Frequent patrolling and monitoring to be carried out to ensure social distancing. 	Airport Operator
85.	Fumigation of all kerbside/ landside commercial service outlets and associated queueing areas, once in a day to ensure the disinfection of the space.	Airport Operator
86.	Fumigation of the passenger drop off/pick up zone on the land side, normally used by the taxi/cab operators and private commuters, once in 6 (six) hours or each time a potential positive case is detected.	Airport Operator
For General Purpose		
87.	Respective State Governments to provide help at the airport in the event Airport Health Organization setup is absent.	State Government
88.	Airlines to adhere to the lower and upper limits of fares prescribed by MOCA during the period of COVID-19.	Airlines
89.	State Government and local administration to ensure the availability of proper public transport and private taxis for providing vital connectivity to the airport.	State Government

Serial No.	Action Points	Stakeholder
90.	Audit of all such arrangements by the regulators and health officials to be carried out to ensure compliance, followed by frequent random checks to ensure such continued compliance.	State Government/Health Officials
91.	The government plays a key role in providing guidelines on fit to fly certificate and once such guidelines are issues, the same will be communicated to passengers by the airlines.	State Government/Airlines

4. INDUSLAW VIEW

Given the extent of the spread of the COVID-19 infection, these SOPs are stepped in the right direction with an aim to reduce the risk of the further propagation, while enabling the restart of aviation in India. It will require all stakeholders to cooperate and implement these processes in an integrated manner. Further, there may be additional action steps for the next phase as per the situation prevalent at the point of time. All the airport operators and airlines may have to revamp their existing processes to introduce the prescribed changes in line with these SOPs which may include significant cost implications. These guidelines, along with new processing and distancing requirements will most likely necessitate the flight handling capacity of the airports to reduce until such norms remain in place.

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