



## AIRLINE CANCELLATIONS & THE CPA: RIGHT TO REFUNDS AND COMPENSATION

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### ABSTRACT

*It is necessary to determine whether mass flight cancellations and delays constitute a deficiency in service under the Consumer Protection Act, 2019, with a focus on IndiGo's large-scale disruptions following the implementation of revised Flight Duty Time Limitation (FDTL) norms. While the FDTL regulations aimed to enhance flight safety<sup>12</sup> by limiting pilot duty hours, they exposed gaps in airline preparedness and passenger protection. The cancellations arising from foreseeable operational factors place a heightened duty on airlines to manage disruptions responsibly, including timely communication, processing refunds, providing alternate travel, and compensating affected passengers. Findings suggest that IndiGo's handling of these cancellations revealed deficiencies in service delivery,<sup>3</sup> highlighting the critical role of both the Consumer Protection Act and DGCA regulations in enforcing passenger rights. This article identifies policy gaps in enforcement, automatic passenger relief, and information transparency, and recommends reforms to strengthen consumer protection in India's expanding aviation sector.*

**Keywords:** Airline Cancellations, Consumer Protection Act 2019, DGCA Regulations, Passenger Rights, Flight Duty Time Limitation.

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<sup>1</sup> DGCA, 'Home, Directorate General of Civil Aviation, GoI' <https://www.dgca.gov.in/digigov-portal/> accessed 19 December 2025.

<sup>2</sup> 'Fatigue Management' <https://www.icao.int/safety/fatigue-management> accessed 19 December 2025.

<sup>3</sup> 'India Code: Home' <https://www.indiacode.nic.in/> accessed 19 December 2025.

## INTRODUCTION

India's airline industry has undergone massive growth<sup>45</sup> through the provision of direct, affordable transportation options to millions of individuals every day. Due to this rapid growth, airlines face a high incidence of cancellation and delay of aircraft due to adverse weather events, mechanical issues, or operational decisions made by the airlines resulting from technical difficulties with their aircraft. While aircraft cancellations and delays can adversely impact passengers in many ways such as scheduling, financial loss, and overall travel experience, they also provide consumers with an opportunity to demand accountability, fairness, and legal responsibility from airlines in cases of confirmed flight cancellations or delays.

The Government of India has designated the airline business as a consumer service<sup>6</sup> and therefore passengers have the right to protection under the Consumer Protection Act, 2019 (CPA), as well as the Directorate General of Civil Aviation (DGCA) and their passenger rights. These laws provide specific rules and regulations for airlines with respect to passenger protection in cases of canceled or delayed flights, such as timely communication of flight status, refund processing, arrangements for alternate flights, and compensation. Nevertheless, due to enforcement gaps and the general lack of awareness among passengers regarding the protections available to them, many consumers remain exposed to airline cancellations or delays.

The objective is to determine if large-scale flight cancellations and delays, which occurred with IndiGo as a result of new Flight Duty Time Limitation (FDTL) norms, can be defined as a failure to provide service under the CPA and also examine an airline's obligation to anticipate operational disruptions and the manner in which consumer protection laws and the regulations of the DGCA work in conjunction with each other to protect consumer rights.

## UNDERSTANDING AIRLINE CANCELLATIONS AND THEIR CONSUMER LAW IMPLICATIONS

**Understanding Airline Cancellations:** The airline industry experiences many cancellations or delays on a regular basis. This may be due to different reasons such as: Operational Factors,

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<sup>4</sup> 'Home, Ministry of Civil Aviation, GoI' <https://www.civilaviation.gov.in/> accessed 10 December 2025.

<sup>5</sup> IATA, 'IATA' <https://www.iata.org/> accessed 19 December 2025.

<sup>6</sup> 'India Code: Home' <https://www.indiacode.nic.in/> accessed 19 December 2025.

Technical Factors, & External Factors. When an airline does not operate a scheduled flight and does not provide the passenger with another method of transportation, it is deemed to be cancelled. Although both types of activities can be annoying for passengers, they differ in timescales. With cancellations, an airline has to offer another method for transportation; however, this is not the case with delays.

Some of the primary reasons why flights are cancelled include bad weather, equipment malfunction, air traffic control limitations, unavailability of crew members, and changes in regulations or operations. Although there are some flight cancellations that will occur due to reasons outside of the airline's control, many cancellations will be a result of how an airline organizes its flights and resources. Understanding how these cancellations are caused, and how they differ from cancellations due to aircraft malfunction, is key in determining who is legally responsible for the cancellation.

To many passengers, flight cancellations are a source of more than just inconvenience. Passengers rely heavily on the assurance of an airline to travel at a scheduled time, and when a flight is cancelled, it can cause financial hardships, missed obligations, and emotional hardship. As a result, these cancellations affect the customer experience significantly, and they also raise questions around responsibility and fairness in service delivery.

**Air Travel as a Consumer Service:** Air travel is a commercial transaction where an airline provides transportation<sup>7</sup> via aircraft to passengers for a fee also referred to as consideration. The passenger who is a consumer here, purchases a ticket with the expectation that the airline will deliver safe and timely transport. The consumer's protection extends further than just the flight; it also includes everything that needs to be done, if necessary, by the airline in order for the consumer to receive the service. This includes providing the customer accurate information, support, and assistance with any service disruptions that may occur.

A passenger buying a ticket for leisure or personal reasons is considered a consumer of the services of the airline. Therefore, the passenger is owed a duty by the airline to provide reasonable care and diligence when providing service. This obligation does not end just because a flight has been cancelled;<sup>8</sup> it continues through the airline's obligation to provide timely communications, process refunds, and arrange alternative travel after cancellation.

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<sup>7</sup> Consumer Protection Act, 2019.

<sup>8</sup> 'National Consumer Disputes Redressal Commission', <https://ncdrc.nic.in/> accessed 19 December 2025.

The relationship between a passenger and an airline reflects an extreme power imbalance in terms of control, access to real-time information, scheduling, and operational decision-making. Passengers are entirely dependent on the airline for current information<sup>9</sup> and assistance and rely on the airline for updates and additional aid. This imbalance highlights the importance of treating air passengers as consumers and providing the legal protections afforded to consumers against unfair or negligent behaviour by an airline.

**Why Consumer Protection Law applies in Airlines Cancellations:** Consumer protection law is designed to address unfair trade practices and deficiencies in service that cause harm to consumers.<sup>10</sup> When it comes to airline flight cancellations, consumer law does not assess whether or not the flight cancellation is a valid decision made by the airline. Rather, consumer law examines how the airline handles and manages the consequences associated with cancelled flights.

Once an airline has cancelled a flight, passengers are frequently dependent upon the airline to provide them with information regarding their availability for refund, for rebooking, for hotel accommodation, or other compensation. Airlines that do not send timely and/or accurate notifications to affected passengers, process refunds within a reasonable period of time, or assist passengers in obtaining services as needed will create additional hardships for their customers. Therefore, these actions may be viewed as detrimental service to the passenger and a violation of consumer protection laws.

It should be remembered that consumer protection laws do not require that airlines maintain a constant state of readiness in providing passenger transportation services. For a variety of reasons, airplanes do not have sufficient equipment or personnel available to provide services, and they may therefore have to cancel flights for reasons of safety, regulatory, or operational.

While it is possible for airlines to remain legally compliant with consumer protection laws by cancelling flights, they still must do so in a fair, transparent, reasonable manner.<sup>11</sup> Therefore, consumer protection laws have the positive purpose of balancing operational realities against the rights of airline passengers. In addition, consumer protection laws ensure that airlines

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<sup>9</sup> OECD, 'OECD.org – OECD' <https://www.oecd.org/> accessed 19 December 2025.

<sup>10</sup> Consumer Protection Act, 2019.

<sup>11</sup> DGCA, 'Home, Directorate General of Civil Aviation, GoI' <https://www.dgca.gov.in/digigov-portal/> accessed 19 December 2025.

continue to be held accountable for the way in which they deal with consumers after such operations have been disrupted, especially where such disruptions involve the cancellation of multiple flights affecting large numbers of passengers.

## LEGAL FRAMEWORK GOVERNING AIRLINE CANCELLATIONS IN INDIA

**Consumer Protection Act, 2019:** The Consumer Protection Act, 2019 (CPA) addresses the grievances faced by consumers due to the deficiency and inequity of “service”<sup>12</sup> provided in the country. In addition to that, the CPA governs all types of services that are provided in exchange for some form of compensation unless stated otherwise and that the Courts have interpreted to cover Transportation and Travel-related services.

A consumer according to the CPA is any individual who purchases goods or gains access to services for the purpose of personal use. Therefore, airline passengers purchasing their travel tickets for the sole purpose of their use constitute consumers in accordance with the definition. Airlines, therefore, constitute a service provider and are required to comply with the requirements established under the CPA. The definition of the term "service" by the CPA is expansive enough to incorporate any action undertaken or performed in return for consideration. In the case of air travel, this includes not only the actual transport of the passenger, but also all related services, including customer support, the provision of information, the processing of refunds, and assistance in relation to incidents resulting from flight delays.<sup>13</sup> Therefore, the responsibilities of airlines do not terminate when a flight has been cancelled.

The concept of deficiency in service lies at the heart of the Consumer Protection Act (CPA) and refers to any fault, imperfection, shortcoming or inadequacy in relation to the quality, nature or manner in which a service provider provides services to consumers as required by law. Deficiency in airline operations includes unreasonable delays experienced by passengers, failure to provide information, denial of refund requests, lack of assistance offered, even when there has been a justified cancellation by the airline.

The CPA allows consumers to pursue remedies through district, state and national consumer commissions. The types of relief that may be available to the consumer are a refund of their fare, compensation for pain and suffering caused by a service provider, and compensation for

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<sup>12</sup> Consume Protection Act, 2019.

<sup>13</sup> ‘National Consumer Disputes Redressal Commission’ <https://ncdrc.nic.in/> accessed 19 December 2025.

the mental anguish suffered as a result of the deficiency in service provided by the airline. A key aspect of the CPA is the importance placed on the consumer's experience of a service deficiency rather than the service provider's intent or difficulties in the performance of their duties.

**Directorate General of Civil Aviation Regulations on Passenger Rights:** General consumer law in India mainly governs airline cancellations, but regulatory standards for airline cancellations are set out in the Civil Aviation Regulations (CAR)<sup>14</sup> by the Directorate General of Civil Aviation (DGCA). CARs establish basic minimum standards for airlines' obligations to passengers in terms of delays, cancellations, or denied boarding on scheduled flights.

There are several significant elements of the regulatory requirements on airlines under the DGCA. First, all airlines must provide timely notification to their passengers of any disruptions to scheduled flights. The DGCA believes that by notifying passengers in advance, airlines will reduce their inconvenience and permit them to make alternate travel arrangements.

Second, the DGCA mandates that when an airline cancels a customer's flight, the customer be given a choice of either a full refund of his or her fare or alternate travel arrangements. Refunds must be processed according to the timelines established by the DGCA, and airlines may not require restrictive conditions to be placed on the issuance of refunds or require customers to accept a credit towards a future fare rather than receive a monetary refund.

According to Third, the DGCA Regulations hold Airlines accountable for meeting a 'Duty of Care' to its customers when cancellations occur and are found to be under an Airline's Control; Air Lines must, therefore provide accommodation, meal, refreshment and hotel should it be required in case of a Cancellation or Delay, primarily for passengers with Long Delays or who have had to stay overnight at an Airport. This signifies a position of the principle that Airlines Operational Failures should not be placed upon Passengers.

Finally, CAR and Cancellation compensation clauses in CAR will provide Compensation under designed conditions, mainly when a Cancellation occurs with little to no notice or a short notice and does not fall under any Extraordinary Circumstance. The intent behind compensation serves to create a remedy for affected Passengers; and to deter Airlines from committing avoidable Service Failures in the future.

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<sup>14</sup> DGCA CAR s3, Series, Part IV.

**How Consumer Protection Law and DGCA Regulations Operate Together:** DGCA & Consumer Protection Act - Regulations Work Together. DGCA's regulations contain requirements for airlines concerning how they should operate, CPA is the legal process that passengers can take to enforce these regulations and claim compensation.

DGCA regulations state what airlines were supposed to do in response to an event, for example, refunds. The CPA addresses whether not following through on these responsibilities is a failure to provide adequate services. Consumer courts have looked to DGCA regulations to determine whether airlines acted properly, reasonably, and with diligence. Therefore, the DGCA failure to abide by the CARs is a strong indicator of deficiency under CPA. Further, the CPA has a number of other remedies to compensate passengers for stress, which are not available under aviation regulations.

The combination of the CPA and DGCA regulations aims to balance the challenges faced by airlines with the need to protect passengers from being treated unfairly. This combined framework is a legal foundation for establishing carrier liability for mass cancellations, including that caused during a recent IndiGo incident.

## **DEFICIENCY IN SERVICE AND AIRLINE OBLIGATIONS: THE INDIGO CANCELLATIONS CASE STUDY**

**Background to the IndiGo Cancellations:** In early 2024, the Indian aviation industry experienced significant flight interruptions after the Directorate General of Civil Aviation introduced new Flight Duty Time Limitation (FDTL) regulations.<sup>15</sup> The new FDTL regulations were created to both reduce pilot fatigue and improve flight safety, and include maximum duty limits and required additional minimum rest between duties. Although the stated purpose of the new regulations was safety, they had an immediate and large operational impact on airlines with tight crew scheduling practices.

India's largest airline by market share, IndiGo, was one of the carriers most affected by the new FDTL regulations. After the new FDTL regulations went into effect, IndiGo cancelled and delayed hundreds of flights on numerous routes. Flight cancellations occurred over several days and disrupted a substantial number of customers. Many customers did not receive notice of flight cancellations until shortly before their scheduled departure. Reports indicate that the

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<sup>15</sup> 'Fatigue Management' <https://www.icao.int/safety/fatigue-management> accessed 19 December 2025.



majority of cancelled flights were due to a shortage of crew members due to IndiGo's inability to schedule pilots in accordance with the new duty limitations.

In response to the widespread cancellations, a majority of the travelling public, and regulators, were drawn to this issue as a result of seeing:

1. Passengers left at the airport
2. Passengers uncertain about how to get their money back
3. Passengers receiving little or no help finding a place to stay or an alternative way home

In addition, the cancellation of thousands of flights took place even though these revised FDTL norms had been released prior to their enacting. Consequently, it brings into question how well prepared the airline was for these cancellations; and their planning for such disruptions.

It is possible to examine how mass cancellations, stemming from internal operational issues, intersect with consumer protection laws. In this respect, it is not important to evaluate the legality of the FDTL norms; rather it is critical to determine if the manner in which IndiGo managed these cancellations was compliant with the standards of fairness and diligence expected under the Consumer Protection Act, 2019 and DGCA passenger rights regulations.

**Whether the Cancellations Were Within Airline Control:** Liability for airline cancellations is determined primarily by whether or not the reason for cancellation was controllable by the airline. According to DGCA regulations and Consumer Protection laws, airlines are allowed to have a more lenient policy of liability when there is an unforeseeable cause of cancellation such as acts of God, natural disasters, or an act of war. When there are internal system issues with the airline's operation, this is more likely to find the airline liable for the cancellation.

In terms of the IndiGo cancellations, the main cause was attributed to the inability for pilots to work due to changes to the FDTL related to the implementation of these regulations. Airline operators are responsible for crew planning, crew scheduling, and crew staffing; therefore, these issues fall strictly under the airline's discretion.<sup>16</sup> Although changes made by the regulators can

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<sup>16</sup> Kalra A, 'Indigo Faces India Antitrust Scrutiny after Mass Flight Cancellations' Reuters, <https://www.reuters.com/sustainability/boards-policy-regulation/indias-competition-regulator-review-airline-indigo-over-antitrust-allegations-2025-12-18/> accessed 19 December 2025.



sometimes limit an airline's ability to operate, the airline is still expected to be aware of impending changes and make all necessary preparations to maintain service.

Airlines had ample notice about the new FDTL Norms, enough time to change their schedules, hire a crew, or change how they are running their flights. If an airline doesn't plan for changes that are coming from the government it won't be able to respond to them effectively and that suggests a lack of preparation on the part of the airline, not an unforeseen force outside of their control.

For consumer protection, foreseeability is crucial in finding whether a company provided adequate service. If a company sees that there will be a disruption and has time to implement preventive measures but fails to do so, the inconvenience the passengers suffer from cannot be based solely on the airline's inability to predict the situation. The passengers should not suffer in these cases because they did not create the problem and have no authority to oversee internal staffing and decisions made regarding regulatory compliance.

For these reasons, while it should be recognised that the goal of the FDTL Norms was to improve public safety and to act in a reasonable manner in that regard, the inability of an airline to be organised and prepared for changes and their effect to get the crew planning in place will likely be considered to be within the airline's control. How it is viewed affects the degree of IndiGo's legal responsibilities toward passengers who are affected by their flight cancellations to the extent of contract communications, refunds, help, and how much compensation they might receive.

**Timely Communication and Information Failure:** Effective, timely communication between an airline and its customers is essential for providing high-quality service to passengers. Passengers who experience a flight cancellation need to know about it as soon as possible so they can make alternate arrangements and reduce the amount of inconvenience they suffer from the airline's service interruption. In recognition of this need, the DGCA has issued regulations that specify the time that airlines must notify their passengers of flight cancellations and require that such notifications are sent as far in advance of the scheduled flight departure as possible.

Many passengers affected by IndiGo's flight cancellations report that they received notice of their flights' cancellations only a short period before the scheduled departure, usually after they

arrived at the airport.<sup>17</sup> This type of communication greatly increases the hardship experienced by these passengers due to the fact that there are very limited options available to them for alternate transportation and to repurchase tickets. Furthermore, there is a correspondingly greater burden on the passenger's finances and logistical capabilities as a result of late notifications.

The failure to provide timely information about cancellations has been viewed as providing a service deficiency from a consumer protection standpoint even if the cancellation was valid. When cancellations are communicated inadequately, the provider has not acted with reasonable care or diligence in providing the service. The lack of timely notice denies consumers the opportunity to make an informed decision regarding whether to seek a refund or to rebook onto another flight.

In mass disruption situations, a subsequent delay in providing notice of a cancellation only exacerbates the conclusion of service deficiency under the Consumer Protection Act and in conjunction with passenger rights regulations issued by the DGCA.

**Refund Obligations and Practices:** DGCA regulations require that passengers affected by a flight cancellation originally booked through an IndiGo-behind airline be provided a full refund for the price of the ticket (or, alternatively, a rebooking to another flight at the discretion of the passenger) within specified timelines. Airlines are not allowed to offer refunds in the form of travel credits unless the passenger agrees in writing to waive the monetary refund option.

Many passengers who had purchased tickets with IndiGo reported difficulty receiving their refunds and reported being forced into accepting credit-based alternatives. Such practices, when they occur, show that airlines do not respect the autonomy of their customers and place an undue burden on the passenger financially.<sup>18</sup>

Under the Consumer Protection Act, any delayed or declined refund represents a serious deficiency of service. While the need to refund was created by the cancellation of the flight, it is also a result of a failure by the airline to provide the contracted service. The increased amount

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<sup>17</sup> Sengupta J, 'Worried Flyers of Cancelled IndiGo Flights Complain about No Information from Airline', <https://timesofindia.indiatimes.com/city/pune/worried-flyers-of-cancelled-indigo-flights-complain-about-no-information-from-airline/articleshow/12601934.cms> accessed 19 December 2025.

<sup>18</sup> Nimesh Khakhariya, 'IndiGo Flyers Say Refund Woes Persist', <https://timesofindia.indiatimes.com/city/rajkot/indigo-flyers-say-refund-woes-persist/articleshow/126044097.cms> accessed 19 December 2025.

of time necessary to receive a refund increases the financial burden on consumers and limits their trust in the airline's service level.

**Provisions of Alternate Travel and Passenger Assistance:** According to regulations set forth by the DGCA, airlines are expected to provide reasonable assistance to passengers as a result of cancelled flights for reasons within the airline's control. This includes providing passengers with alternate travel arrangements, meals, refreshments and accommodations, where applicable, during cases of extended wait periods or overnight delays.

As reported by passengers impacted by IndiGo cancellations, many passengers were left to find their own accommodations and food while receiving little to no assistance or direction from airline employees on what options are available to them. This lack of access to adequate support while waiting for flights caused increased dissatisfaction among passengers, especially those travelling with young children or elderly parents.

A failure to provide assistance to these passengers would be considered an absence of reasonable care and diligence and further support a finding of deficient service pursuant to the Consumer Protection Act.

**Compensation and Overall Findings:** According to DGCA regulations, airlines must compensate affected passengers if a flight was cancelled within their control with limited exceptions for extraordinary circumstances. Compensation is both a remedy for affected passengers and a deterrent for airlines against avoidable operational failures.

In the case of the IndiGo cancellations, the primary cause for the cancellations was due to crew planning constraints caused by compliance with the revised Flight Duty Time Limitations (FDTL) regulations. Due to the fact that these cancellations are largely foreseeable and in IndiGo's operational control, passengers who were affected by the cancellations could have been eligible for compensation. If IndiGo fails to pay compensation when required, it will support the conclusion that IndiGo has not met its obligations to comply with passenger rights.

IndiGo's handling of these cancellations as a whole demonstrates several deficiencies in service delivery with respect to delayed notifications, problems with issuing refunds and providing adequate customer assistance, and potentially not paying compensation. Therefore, even though IndiGo complied with safety regulations, IndiGo's handling of these cancellations could

be found to be a deficiency in service under the Consumer Protection Act, 2019 and in accordance with DGCA regulations concerning passenger rights.

## **POLICY GAPS AND RECOMMENDATIONS**

**Gaps in the Existing Regulatory Framework:** The DGCA Regulations on Passenger Rights and the Consumer Protection Act have broad-ranging consumer protection outlined in these two pieces of legislation and the means for consumers to seek a remedy for violations; however, there are numerous shortcomings for these protections to be enforced; among these is that there are no effective enforcement mechanisms to punish air carriers when they do not comply with the rules.<sup>19</sup> The DGCA regulations clearly state what an air carrier must do during a cancellation or delay, yet there are very few instances where a penalty was imposed as a result of an air carrier's failure to comply with these rules, which takes away the deterrent factor of the rules.

A significant gap within the DGCA Regulations and the Consumer Protection Act is that passengers do not receive automatic relief for a mass disruption or enormous cancellations.<sup>20</sup> Passengers are often forced to rely on the individual complaints process to receive refunds and compensation for the air carrier cancelling their flights. This is especially true for passengers affected by large-scale cancellations, where a passenger does not have the time, resources, or knowledge to file a formal complaint.

Information asymmetry creates this challenge as well.<sup>21</sup> Airlines have the ability to provide real-time information about cancellations, refunds, and re-bookings to passengers; however, passengers are typically dependent upon what the airlines send them officially. As a result, passengers may not always know about a cancellation or alternative re-booking options, which weakens a passenger's ability to make an informed decision and also diminishes their confidence in the regulator's ability to protect them.

**Measures to Improve Passenger Protection:** In order to close existing gaps in airline passenger rights, a number of reforms should be put into place. The first of these reforms would

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<sup>19</sup> Likhitha Eedara, 'From Boarding to Baggage Claims: Rethinking Passenger Rights in Indian Aviation Law', <https://www.legalserviceindia.com/Legal-Articles/rethinking-passenger-rights-indian-aviation-law/> accessed 19 December 2025.

<sup>20</sup> Wikipedia Contributors, 'Air Passengers Rights Regulation' (Wikipedia 19 December 2025) [https://en.wikipedia.org/wiki/Air\\_Passengers\\_Rights\\_Regulation](https://en.wikipedia.org/wiki/Air_Passengers_Rights_Regulation) accessed 19 December 2025

<sup>21</sup> 'Airlines Must Respect Consumers' Rights' (UN Trade and Development (UNCTAD) 4 June 2020) <https://unctad.org/news/airlines-must-respect-consumers-rights> accessed 19 December 2025

require regulatory authorities to implement policies that automatically refund/cancel an airline ticket, and compensate the consumer based upon airline-controlled factors,<sup>22</sup> without any individual passenger having to submit individual requests or claims for refunds or compensation. As a result of automation, this would lessen the burden of consumers and also increase compliance.

The reason for proposing the second reform is to provide the Directorate General of Civil Aviation (DGCA) with strong enforcement powers and clear penalty or risk structures, in order to help ensure compliance by airlines with their passenger rights obligations, as well as to help maintain accountability and public confidence in the DGCA, through the publishing of enforcement action.

The third reform that must be implemented would require that airlines adopt a system/process for communicating with passengers that is clear and consistent. This process would include the provision of real-time notification to passengers about the status of their upcoming flights, as well as clear and simple communication of a passenger's rights during times of disruption.<sup>23</sup> Having standardised information available to passengers will reduce confusion and eliminate inconsistencies.

The final reform that should be implemented is to have improved communication and coordination between the aviation regulators and the consumer-protection regulatory authorities. This communication would allow for the incorporation of the DGCA's compliance system into the consumer grievance redressal systems, thereby creating a more integrated and cooperative system of protecting passenger rights.

## CONCLUSION

The above information looks at whether mass cancellations and delays of flights fall under the provision for deficiency in service of the Consumer Protection Act, 2019 with specific reference to the large-scale flight disruptions experienced by IndiGo as a result of implementing the new Flight Duty Time Limitation (FDTL) norms. While the purpose of these

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<sup>22</sup> News T, 'DGCA Proposes 48-Hour Free Cancellation Window and Faster Refunds for Air Travellers' (Aviation Today 10 November 2025) <https://aviationtoday.in/civilaviation/airlines/dgca-proposes-48-hour-free-cancellation-window-and-faster-refunds-for-air-travellers/e> accessed 19 December 2025

<sup>23</sup> Sinha S, 'With Tickets, Send Flyers Link to Their Rights, DGCA Tells Airlines' (The Times of India 23 March 2025) <https://timesofindia.indiatimes.com/india/dgca-directs-airlines-to-send-link-to-flyer-rights-with-ticket/articleshow/119387350.cms> accessed 19 December 2025

new regulations is to improve safety, it will be seen that there are still areas where passenger interests were not adequately protected when mass flight disruptions occurred.

Cancellations alone do not necessarily mean that service has been deficient. Airlines have a responsibility to manage disruptions from foreseeable and controllable circumstances. In the case of IndiGo, the delays in providing information to passengers, refunding, providing assistance, and paying compensation indicate a possible deficiency in service under both the provisions of the Consumer Protection Act and regulations issued by the DGCA.

It is important to analyse how an airline handles disruptions, rather than the occurrence of the disruption itself. To provide proper balance between the growth of the Indian aviation industry and the rights of passengers, it is important to enhance regulatory enforcement of consumer rights, provide for automatic passenger care and assistance and improve transparency in airline practices.