The Secretary
Petroleum & Natural Gas Regulatory Board
1st Floor, World Trade Centre, New Delhi – 110 001

Dated: 01st June’ 2018

Dear Madam,

Subject: Comments and Suggestions in respect of PNGRB proposal to declare HPCL’s Mumbai Refinery to Mumbai Airport petroleum and petroleum products (ATF) pipeline of HPCL as common carrier pipeline


We refer to the aforesaid public notice issued by the Hon’ble Board inviting suggestions, including objections, to the Board declaring HPCL’s Mumbai Refinery to Mumbai Airport petroleum and petroleum products (ATF) pipeline of HPCL’s pipeline as a common carrier pipeline to be regulated by the board in terms of applicable notified Regulations. In this regard we submit that we are completely in agreement with and support the opinion of the Board and we would like to place our views and suggestions for the consideration of the Hon’ble Board.

Background:

1. As the Hon’ble Board is aware, Reliance Industries Ltd (RIL) is, inter alia, engaged in the business of refining, storing, distribution and sale of petroleum products. RIL produces 2.84 MMTPA, which is approximately 25% of the domestic production of ATF in India. RIL has also been granted authorisation by the Central Government to market Aviation Turbine Fuel (ATF), in the country. The current authorisation is valid upto 30th November 2025. [Copy of renewal of authorisation issued by Ministry of Petroleum and Natural Gas, Govt. of India dated 04.11.2015 is attached for reference]. RIL has set up 28 Aviation Fuel Stations (“AFS” in short) across the country and is selling ATF to the Airline Customers. RIL is also the Operator of the Aviation Fuel Facilities and provides into plane services at the Rajiv Gandhi International Airport at Shamshabad.
2. The existing HPCL Mumbai Refinery – Santacruz ATF pipeline ("HPCL ATF pipeline" for short) is the pipeline carrying ATF from the HPCL Refinery in Mumbai to the Chhatrapati Shivaji International Airport ("CSIA" in short).

3. As per the information available, the pipeline capacity, its own requirement and the remaining capacity of "HPCL ATF pipeline" is as under:

(Figures in MMTPA unless otherwise stated)

<table>
<thead>
<tr>
<th>Pipeline Capacity</th>
<th>Own requirement based on estimated sale in 2017-18</th>
<th>Remaining capacity</th>
<th>Remaining capacity in %</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.10</td>
<td>0.16</td>
<td>0.94</td>
<td>85.4</td>
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4. The present ATF demand at CSIA is 1.4 MMTPA (about 1.75 Million KLPA), which is approximately one fifth of the total demand for ATF in the country.

5. The current demand is met by supplies through two dedicated ATF pipelines connected end to end with the two refineries in Mumbai viz. HPCL’s Mumbai Refinery and BPCL’s Mahul Refinery. BPCL Mahul Refinery to Santacruz ATF pipeline has a capacity of 1.44 MMTPA. It appears that IOCL has entered into an arrangement/agreement with HPCL/BPCL/MAFFFL in respect of ATF supplies at and from CSIA.

6. **Integrated Farm Fuel Facility at CISA:**
   a. Mumbai International Airport Pvt. Ltd. (MIAL), has granted Licence to Mumbai Aviation Fuel Farm Facility Private Limited (‘MAFFFL’ for short) for developing the Integrated Fuel Farm Facility (‘IFFF’ in short) project at CSIA, Mumbai.
   b. MAFFFL is a Joint Venture Company (JVC) comprising of Mumbai International Airport Private Limited (‘MIAL’ in short), Indian Oil Corporation Limited (‘IOCL’ in short), Bharat Petroleum Corporation Limited (‘BPCL’ in short) and Hindustan Petroleum Corporation Limited (‘HPCL’ in short).

   MAFFFL is operating and maintaining the existing Aviation Fuel farm facilities and provides Into-Plane services at CSIA. MAFFFL is also, developing, and shall operate and maintain the new IFFF on Open access basis at CSIA. BPCL has been appointed as Fuel Farm Operator to operate and maintain the Fuel Farm Facility at CSIA, Mumbai. Any intending ATF supplier is required to enter into tripartite agreement (Supplier Agreement), with MAFFFL. Currently IOCL, BPCL and HPCL, the 3 Public Sector Undertaking Oil Marketing Companies (‘PSU OMCs’ in short) are the only ATF Suppliers at CSIA.Sub-concessions has been granted to Bharat Star Services Pvt. Ltd., (‘BSSPL’ in short) and M/s Indian Oil Skytanking Pvt. Ltd. (‘IOSL’ in short), at CSIA, for providing Into-plane
(ITP) services on a non-discriminatory basis. [BSSPL is a joint venture company of BPCL in business alliance with ST Airport Services Pvt Ltd (acronym as STARS, a Member of Singapore Airport Consortium) with equal participation. IOC is a joint venture partner in IOSL. [Source: MAFFFL website]

7. As can be seen from the foregoing data, currently the three PSU OMCs are completely in control of the product source, logistics (transportation through pipeline), infrastructure at the Airport, including the into plane services, and thereby enjoying amongst them 100% of the total demand for ATF at CISA. This means that the PSU OMCs are enjoying without any competition approximately 18% of the All India demand for ATF.

8. Considering these factors, while approving the combination between MIAL, the 3 PSU OMCs and MAFFFL, pertaining to creation of the aforementioned joint venture, the Hon’ble Competition Commission of India (“CCI” in short) had in its order dated 29.9.2014 (which Order is hosted on the website of the CCI and a copy attached hereto) recorded its various concerns arising out of the proposed combination, which included the fact that that the PSU OMCs could foreclose access to the infrastructure essential to supply ATF at the Airport, that the conflict of interest could be an impediment to the operationalization of the JV on non-discriminatory and open access basis etc. The CCI also recorded the voluntary commitments offered by the parties to the aforesaid Combination, which included the submission by them that IFFF and the infrastructure could be used by any of the ATF suppliers, in an open access and arm’s length basis, upon payment of a regulated common fee. The CCI also recorded that the various agreements between the shareholders of MAFFFL also contemplate that MAFFFL will operate with all the ATF suppliers on an arm’s length basis only. The opinion of CCI expressed in Paragraph 22 of the aforesaid order approving the Combination, which is very important and relevant to the issue is reproduced below for reference of the Hon’ble Board:

22. The Commission noted that Mumbai Airport is a land constrained airport and the integration of individual facilities of the Oil PSUs, post combination, would lead to an optimum usage of the land. The Commission noted that the integrated fuel farm facility would work on an open access basis and the charges for the operation of which would be regulated by AERA. The Commission also noted that the proposed fuel farm facility is stated to bring in reduction in the infrastructure charges to be paid by the ATF suppliers vis-a-vis the present charges for operation of the individual facilities. The Commission took note of the fact that taking into consideration the
examples of fuel farm facilities operating at the other airports it is only after the creation of such facilities at those airports that the ATF suppliers other than the Oil PSUs entered the market to supply ATF. Accordingly, the Commission is of the opinion that creation of such facility could provide similar benefits to all the users of such facility at the Mumbai Airport. The Commission also observed that as the proposed combination is about integration and upgradation of the existing fuelling infrastructure and operations at the Mumbai Airport, there could be competition enhancing benefits associated with the creation of such a facility, absent which, it could be practically difficult for new entrants to duplicate the infrastructure for fuelling the aircrafts, thus resulting in a status quo condition with respect to the number of ATF suppliers at the airport.

9. In order to make the “Open Access” at IFFF in CISA a reality it is ABSOLUTELY ESSENTIAL that access to the HPCL ATF pipeline is available to other ATF marketing Oil Companies like RIL. This can be done only by declaring the HPCL ATF pipeline as a ‘common carrier’ as proposed by the Hon’ble Board. Non-availability of access to the pipeline would deny to the ultimate consumers the benefit of competition. For the reasons explained hereinafter, the non-PSU ATF marketing Companies will not be able to bring ATF to the IFFF without access to the HPCL ATF pipeline.

10. RIL had, in fact, by its letter dated 22nd Aug 2016 to HPCL sought access to the “HPCL ATF pipeline” to enable RIL to transport ATF to service its customers at the CSIA. HPCL has not responded to the aforesaid letter nor has it allowed access to RIL.

11. MIAL and MAFFFL have already given their commitment to RIL provide access to the IFFF on an “Open Access” basis, as noted hereinafter.

12. MIAL had advised us by letter dated 11th Nov 2014 that, (a) the IFFF formed under the directions of the National Facilitation Committee (under the Chairmanship of Secretary, MOP&NG, GOI) at CSIA will operate on an “open access” basis post commissioning allowing access to all ATF suppliers; (b) Competition Commission of India (CCI) has granted approval for IFFF to be set up by MAFFFL; (c) once the IFFF is completed, the same could be used by any of the ATF suppliers, in an open access and arm’s length basis; and (d) MIAL is fully committed for introducing further competition and therefore shall look forward to participation by RIL and other private players as soon as the IFFF are commissioned.

13. MAFFFL also informed RIL by letter dated 18th Nov 2014 that, the approval of CCI has been obtained to the combination (the formation of JV as aforementioned); that in the application made and considered by CCI in
its approval, the facilities will be operated on “Open Access” basis with the commissioning of the IFFF; and that the IFFF is planned to be commissioned by October 2017.

14. By letter dated 21st Dec 2017, MAFFFL has informed RIL that the construction of the IFFF is still underway and that we will be intimated regarding completion of the facility on an open access basis as soon as the same is commissioned. MAFFFL has also confirmed that it remained committed towards the construction and commissioning of the IFFF.

15. As can be seen, the MAFFFL is controlled by the three PSU OMCs. The pipeline carrying ATF into the MAFFL facilities are controlled by HPCL and BPCL. And the ITP Services are also in effect controlled by BPCL and IOCL.

16. The Hon’ble Board is aware of the matter pending before the Hon’ble Delhi High Court with regard to the Information filed by RIL in connection, inter alia, with the cartelization, anti-competitive activities etc. of PSU OMCs in the matter of ATF tender floated by the then National Aviation Company Limited.

17. From the above, submissions, it can be seen that the 3 entities viz. HPCL, BPCL and IOCL are enjoying monopoly to the exclusion of all other ATF marketing companies in supply of ATF at CISA. This resulted in entry barrier to the other authorized ATF Suppliers. It has deprived the airlines customers of the benefit of effective competition at the airport and in effect impacted the cost to the passengers at large.

Our Submissions/Suggestion/Recommendation:

18. Though MIAL and MAFFFL have committed to providing access to the IFFF for receiving ATF on an “Open Access” basis, in order to bring ATF into the IFFF, access is required to be provided to the “HPCL ATF pipeline” as a Common Carrier, in view of the following, among other, reasons:

a. **Laying of a 3rd pipeline for carrying ATF into IFFF not the best option:**
   i. As mentioned above, there is a surplus capacity of about 0.94 MMTPA which over 85% of the HPCL’s own requirement, available in the “HPCL ATF pipeline”.
   ii. Creation of a third pipeline will create environmental and safety hazards.
   iii. Mumbai city is already being subjected to several underground and above ground infrastructure development and the laying of another long distance petroleum product pipeline would add to the complexities, and increase the environmental and safety hazards.
   iv. Creation of a third pipeline will result in infructuous investments as surplus capacity is available in the existing “HPCL ATF pipeline”.

\[\text{Signature}\]
v. Using the surplus capacity available in the existing pipeline would bring reduction in the infrastructure charges to be paid by the ATF suppliers, vis-à-vis the charges for operation of the individual facilities.
vi. Using the surplus capacity available in the existing pipeline would derive immense cost benefit to the travelling air-passengers and would result in affordable air travel to the public in general.
b. **The only other alternative of bringing ATF by road Tankers is also not an option:**
i. If access to the "HPCL ATF pipeline" is not provided, an estimated 400 number of ATF road tankers will be required to be deployed to bring ATF to CSIA by the private ATF marketing Companies and an estimated 100 number of such Road Tankers will be plying in the Mumbai City and adjoining Towns of Navi Mumbai/Thane adding to the already stressed road traffic. This will, as mentioned above, substantially increase the auto-pollution, environmental, health and safety hazards. Deployment of these road tankers would also result in wastage of precious fuel.
ii. CSIA is a totally land constrained airport and there will not be sufficient space available to park the road tankers carrying ATF to IFPF and parking of these Tankers waiting for decanting the ATF near the airport is not possible given the current constraints;
iii. Movement of such large number of road tankers into and out of airport will cause immense security concerns;
iv. Handling of the fuel received through road tankers will be time consuming, inefficient and prone to spillages and safety hazards;
v. Using the surplus capacity available in the existing pipeline would bring reduction in the infrastructure charges to be paid by the ATF suppliers, vis-à-vis the charges for operation of the individual facilities.
vi. Using the surplus capacity available in the existing pipeline would derive immense cost benefit to the travelling air-passengers and would result in affordable air travel to the public in general.

19. Not declaring the "HPCL ATF pipeline" as a common carrier and denying access to the ATF suppliers other than the PSU PMCs would,
a. Inspite of the fact that MIAL and MAFFFL have agreed to grant access to IFPP on an "open access", actually and effectively deny the private ATF marketing entities the "Open Access" to the IFPF and defeat its purpose;
b. Deny the private ATF marketing entities the opportunity of marketing ATF at CSIA;
c. Deny the airline customers, the benefit of competition (efficient supply, competitive pricing) adversely impacting the speedy, cost effective and efficient transportation of public at large;
d. Give encouragement to the anti-competitive activities of PUS OMCs; and
e. Defeat the very purpose of Government of India to encourage new players in the system and usher in much needed competition in the system.

20. Therefore, declaring the “HPCL ATF pipeline” as a common carrier and allowing access to the “HPCL ATF pipeline” would allow optimum utilization of the infrastructure of petroleum and petroleum products and avoidance of infructuous investments, promote compliance with environmental and safety statutes, promote competition and will best serve the consumer interest. Such declaration would immensely benefit the public at large in terms of cost, efficient and speedy air travel.

21. Such a declaration will be completely in consonance with the Objectives as laid down under the Petroleum and Natural Gas Regulatory Board (Guiding Principles for Declaring or Authorizing Petroleum and Petroleum Products Pipelines as Common Carrier or Contract Carrier) Regulations, 2012.

22. We, therefore, strongly urge the Hon'ble Board,-
   a. To declare the “HPCL ATF pipeline” as Common Carrier and enable access to other entities on a non-discriminatory basis;
   b. To determine tariff for transportation of ATF through the “HPCL ATF pipeline” as per relevant regulations on entry exit point basis.
   c. To allow entities desirous of transporting ATF through “HPCL ATF pipeline” to have hook-up to the ATF storage facility within HPCL Mumbai refinery battery limits from where the ATF is being pumped into this ATF pipeline and/or provide interconnection/hook-up to the existing pipelines to proposed feeder pipeline (owned or leased by entity) from neighbouring terminals. The interconnectivity will follow the same principles as provided to other entities.
   d. To facilitate in having practical terms and conditions for HPCL to give RIL a hook-up to the pipeline system without creating any further entry barriers.
We request the Hon'ble Board to afford us an opportunity of being personally heard.

Thanking you,

Yours truly,

for **Reliance Industries Limited**

\[Signature\]

Dr Shanker Adawal  
President  
Corporate Affairs

Encl.:

1. Copy of authorisation letter dated 04.11.2015 from MOP&NG, GoI to RIL  
2. Copy of order dated 29.9.2014 of CCI  
3. Letter dated 11.11.2014 from MIAL to RIL  
4. Letter dated 18.11.2014 from MAFFFL to RIL  
5. Letter dated 21.12.2017 from MAFFFL to RIL  
6. Letter dated 22.08.2016 from RIL to HPCL
Ref: RIL/AV/HPCL/ Mumbai

Date: 22.08.2016

To,
General Manager (Aviation)
Hindustan Petroleum Corporation Limited
Hindustan Bhavan, Ground Floor, B,
Shoorji Vallabhdas Marg, Ballard Estate,
Mumbai - 400 001

Kind Attention: Shri Dilip Kumar Pattanaik

Dear Sir,

Sub: Access to ATF pipeline from marketing terminal at Mahul to Mumbai Airport

We understand, HPCL has a 10" dia ATF pipeline from the marketing terminal of HPCL refinery at Mahul, (Mumbai) to Mumbai Airport. This pipeline is used for transferring ATF from refinery to the ATF storage tanks of Mumbai Aviation Fuel Facility Private Limited (MAFFFPL) at Mumbai airport to feed your airline customers and other oil companies operating at Mumbai Airport.

In this regard, we propose to meet ATF requirements of approximately 100 KL/day for our airline customers at Mumbai airport by transferring ATF through this pipeline. ATF can be supplied by hooking-up pipeline from our storage facilities to this ATF pipeline or by transferring product to the ATF storage tanks of your terminal. The modification which is required for hooking up the pipeline or transferring into tanks will be carried out on RIL account. Product from MAFFFPL tanks will be withdrawn for onward supplies to our airlines customers either through refuellers or hydrant system available at the Mumbai airport.

We request you to appraise us tariff along with terms and conditions applicable for accessing this ATF pipeline.

We look forward to a favourable response from your end at the earliest.

Regards

G.R. Reddy
Head – ATF Business
Reliance Industries Limited

Reliance Corporate Park (RCP), Block 5, B-Wing, 2nd Floor, 5-TFC Industrial Area, Thane - Belapur Road, Ghansoli, Navi Mumbai - 400 701, India. Telephone: +91-22-4477 0000

Register Office: Maker Chambers IV, 3rd Floor, 222, Nariman Point, Mumbai - 400 021, India.
COMPETITION COMMISSION OF INDIA
(Combination Registration No. C-2014/04/164)

29.09.2014

Notice u/s 6 (2) of the Competition Act, 2002 given by:

- Mumbai International Airport Private Limited;
- Indian Oil Corporation Limited;
- Bharat Petroleum Corporation Limited;
- Hindustan Petroleum Corporation Limited; and
- Mumbai Aviation Fuel Farm Facility Limited

Order under Section 31(1) of the Competition Act, 2002

1. On 3rd April 2014, the Competition Commission of India (“Commission”) received a notice under sub-section (2) of Section 6 of the Competition Act, 2002 (hereinafter referred to as the “Act”) relating to the proposed combination between Mumbai International Airport Private Limited (“MIAL”), Indian Oil Corporation Limited (“IOCL”), Bharat Petroleum Corporation Limited (“BPCL”), Hindustan Petroleum Corporation Limited (“HPCL”) (IOCL, BPCL and HPCL are hereinafter collectively referred to as the “Oil PSUs”) and Mumbai Aviation Fuel Farm Facility Limited (“MAFFFL”) filed by MIAL, IOCL, BPCL, HPCL and MAFFFL (hereinafter collectively referred to as the “Parties”). The proposed combination pertains to creation of a joint venture by IOCL, HPCL, and BPCL along with MIAL in MAFFFL. The said joint venture is proposed to be created to construct and manage an integrated fuel facility at Chhatrapati Shivaji International Airport, Mumbai (“CSIA” or “Mumbai Airport”).

2. The Oil PSUs are, inter alia, engaged in refining, production and marketing of petroleum and related products including petrol, diesel, gas, aviation turbine fuel (“ATF”), and petrochemicals. IOCL supplies ATF and owns and operates ATF fuelling infrastructure at over 80 airports in the country. As a joint venture partner in the companies namely, Delhi Aviation Fuel Facility Private Limited (“DAFFFL”) and Indian Oil Skytanking Limited (“IOSL”), IOCL, also partially owns the fuelling
infrastructure at Terminal 3, Indira Gandhi International Airport and at Kempegowda International Airport, Bengaluru respectively. BPCL, *inter alia*, supplies ATF through its 36 aviation service stations at all the major airports in the country. It renders Into-Plane services to leading domestic and international airlines through a joint venture company, namely, M/s Bharat Stars Services Private Limited ("BSSPL"). HPCL is stated to own and operate 30 aviation service facilities in India for supply of ATF to its customers.

3. MIAl is the airport operator and presently has no role in supplying ATF to aircrafts. It has the exclusive right and authority to *inter alia* operate, manage and develop Mumbai Airport/CSIA and contract with third parties pursuant to the Operation, Management and Development Agreement, dated 4th April 2006, entered into between Airports Authority of India ("AAI") and MIAl ("OMDA").

4. MAFFFL was incorporated by MIAl in the year 2010 as its fully owned subsidiary company. It has been stated by the Parties that in-principle decision regarding creation of MAFFFL was taken in a meeting of the National Facilitation Committee ("NFC") held under the chairmanship of Secretary, Ministry of Petroleum and Natural Gas, Government of India, in March 2009. MAFFFL had been incorporated specifically in order to establish an integrated fuel farm facility at the Mumbai Airport.

5. The proposed combination relates to formation of a joint venture (JV) in MAFFFL by IOCL, BPCL, HPCL and MIAl in terms of the Shareholders Agreement ("SHA") entered into among the Parties on 6th March 2014. Post combination, it is proposed that:

- Each of the JV partners would have 25 per cent shareholding in MAFFFL. MAFFFL will own the existing fuel facilities at Mumbai Airport, modify the existing fuel infrastructure owned by the Oil PSUs to create an integrated fuel facility and operate it after commissioning.
• MAFFFL, as the owner of the facilities, will only be responsible for receiving ATF from the ATF suppliers, storing, handling and delivering the same to the aircrafts of the respective airlines, either on its own or through an operator selected by way of a competitive bidding process.

6. The proposed combination falls under Section 5 of the Act.

7. In terms of Regulation 14 of the Competition Commission of India (Procedure in regard to the transaction of business relating to combinations) Regulations, 2011 (hereinafter referred to as “Combination Regulations”), vide letter dated 11th April 2014, the Parties were required to remove certain defects and provide information/document(s) latest by 21st April, 2014. The Parties filed their reply on 24th April, 2014 after seeking an extension. In terms of sub-regulation (4) of Regulation 5 and sub-regulation (2) of Regulation 19 of the Combination Regulations, vide letter dated 25th April 2014, the Parties were required to provide certain additional information by 1st May 2014. After seeking extension, the Parties filed the reply on 12th May 2014. Vide letter dated 13th May 2014, the Parties were required to provide further additional information by 21st May 2014. After seeking extension, the Parties filed their reply on 22nd May 2014. Further, vide letter dated 27th May 2014, the Parties were required to provide certain additional information by 30th May 2014, the reply of which was filed by them on 3rd June 2014. Vide letter dated 6th June 2014, the Parties were required to provide certain clarifications and additional information by 10th June 2014, the reply to which was filed by due date. Furthermore, vide letter dated 20th June 2014, the Parties were required to provide certain clarifications and additional information by 30th June 2014. However, the Parties filed their reply on 7th July 2014 after seeking extension in this regard.

8. In terms of Regulation 34 of the Combination Regulations, letters each dated 12th May 2014, were sent to Airports Economic Regulatory Authority (“AERA”) and Petroleum and Natural Gas Regulatory Board (“PNGRB”), to seek comments on certain issues relating to proposed combination. In terms of sub-regulation (3) of Regulation 19 of
the Combination Regulations, letters were also sent to Reliance Industries Limited ("RIL"), Essar Oil Limited ("Essar") and Shell MRPL Aviation Fuels and Services Ltd. ("Shell MRPL") (RIL, Essar and Shell MRPL hereinafter collectively referred to as the "Private Oil Cos.") for seeking their comments/views on the proposed combination.

9. The Commission considered the details provided in the notice, replies furnished by the Parties to the queries of the Commission, comments of the Private Oil Cos. and the information available in public domain relating to the proposed combination in its meeting held on 20th June 2014, 3rd July 2014 and 8th July 2014. In this regard, the Commission was not satisfied with the plea of the Parties that the proposed combination will provide impetus to the market for ATF supply in Mumbai Airport and formed a prima facie opinion that the proposed combination is likely to cause appreciable adverse effect on competition in the relevant market as defined by the Parties i.e. market for supply and distribution infrastructure necessary to supply ATF to aircrafts within the Mumbai Airport.

10. The Commission decided to issue a show cause notice to the Parties in terms of sub-section (1) of Section 29 of the Act as to why investigation in respect of the proposed combination should not be conducted in its meeting held on 8th July 2014. Accordingly, a show cause notice ("SCN") under sub-section (1) of Section 29 of the Act was issued to the Parties on 17th July 2014 directing them to respond in writing within thirty days of the receipt of the notice.

11. The Parties filed the response to the SCN on 19th August 2014. Although, due date for submitting the response was 16th August 2014. However, since 16th to 18th August 2014, were public holidays, the Parties submitted the response to the SCN on 19th August 2014 ("the Response").

12. The Commission considered the information available on record including the Response in its meeting held on 27th August, 2014.
13.1 As regards the efficiencies of the open access fuel farms especially with reference to the Mumbai Airport, the Parties have submitted in the Response that the proposed combination would result in reduced infrastructure charges as compared to those presently incurred individually by the ATF suppliers. It is also stated that the proposed combination would reduce burden on limited land resources available at Mumbai Airport. Further, as the integrated fuel farm facility is to work on open access and arm’s length basis, this would provide an opportunity to other ATF suppliers to sell ATF at Mumbai Airport and thus, increase the competition. As stated by the Parties absent the proposed combination, other ATF suppliers would have to go through the entire process for creation of infrastructure after seeking specific regulatory approvals and it is only after creation of integrated fuel farm facility that the other ATF suppliers would be able to supply ATF at Mumbai Airport. It has been submitted by the Parties that, while offering a wide choice of ATF suppliers to the airlines, such a model of integrated fuel farm facility could also trigger competition among the oil companies for supply of fuel at lesser rates.

13.2 In this regard, the Commission noted that ATF can be transported from refineries / terminals / depots to aviation fuel stations at the airports through various modes such as pipelines, rail or trucks depending on the infrastructure available ("Off-site"). The Off-site infrastructure is one part of the overall ATF supply chain and accordingly, ATF suppliers may have collaborations / tie ups with the other ATF suppliers for renting Off-site infrastructure. ATF which is supplied to an airport is then stored and transported to the aircraft ("On-site"). ATF suppliers themselves undertake fuelling operations at airports where no integrated fuel farms are under operation. At airports with integrated fuel farms operating on open access basis, independent operators are selected through competitive bidding for the management and operation of the farm. Operators selected for fuelling of aircrafts are known as ‘Into Plane Service Providers’.

13.3 The Commission observed that an aviation fuel farm or depot is a facility at an airport for receipt, storage, handling and delivery of aviation fuel to aircrafts. An aviation fuel
farm typically has product receipt facilities, storage tanks, pumps, filters and delivery facilities through a hydrant system or refuellers. An open access system allows qualified ATF suppliers to access and use the fuel farm facility on a non-discriminatory basis and enables air carriers to freely select the ATF suppliers. As per the information given in the notice, open access systems are now prevalent in Delhi, Bangalore and Hyderabad airports. As per their submissions, the Parties seek to create an open access aviation fuel farm at Mumbai Airport by taking over the existing fuel facilities currently owned by the Oil PSUs; disposing off the redundant facilities; modifying existing fuel infrastructure to create the integrated facility, and thereafter, operating it either on their own or through an operator selected by way of competitive bidding.

13.4 It is observed in this regard that the AERA regulates tariffs in relation to aeronautical services including the service for supplying fuel to the aircrafts at an airport.

14. The following paragraphs describe the specific concerns of the Commission and the clarifications submitted by the Parties in respect of these concerns expressed in the SCN.

15.1 In the SCN, the Commission had expressed its view that non-availability of Off-site infrastructure facilities may constrain the ability of new ATF supplier to operate and compete with Oil PSUs at the Mumbai Airport. The Commission also observed that the existing inter se arrangement between the Oil PSUs whereby IOCL has been extended the facility of buying and drawing ATF from two refineries of BPCL and HPCL for supplying ATF at Mumbai Airport is likely to distort the level playing field in ATF supply.

15.2 As per the submissions in the Response, the Off-site infrastructure (i.e. pipelines) may not constrain the ability of a new ATF supplier to operate at Mumbai Airport owing to the fact that ATF suppliers at other airports including at Delhi, Bangalore and Hyderabad, are transporting ATF to the airports through both tank trucks and pipelines. The Parties have submitted that the pipelines are connected to fuelling infrastructure at
the Mumbai Airport on one end and to HPCL’s and BPCL’s respective refineries at the other, as a result of which allowing access to any other ATF supplier is not physically possible.

15.3 As regards, the issue of existing arrangements between the Oil PSUs, the Parties have submitted that the product sharing arrangements among the Oil PSUs are entered into on need and mutual exchange/reciprocal basis at an all-India level. It has been further submitted by the Parties that a new ATF supplier may also negotiate with BPCL and/or HPCL for a similar product sharing arrangement subject to commercial considerations. It is submitted by the Parties that at present, the Oil PSUs have a similar tie up with a non-PSU entities for product sharing with respect to sale of motor spirit and high speed diesel, at feasible locations.

16.1 In the SCN, the Commission had observed that certain restrictive clauses of SHA, viz., restriction on share transfers for a period of five years, obligation on the Oil PSUs to together hold minimum fifty-one per cent of the share capital of MAFFFL at all times, right of first refusal (“RoFR”) to non-selling shareholders and prior written consent from each of the non-selling shareholders in case the prospective transferee was their competitor, indicated an intention of the Parties to control operations and management of MAFFFL in perpetuity. The Commission viewed that such restrictions in the SHA reinforced the likelihood of conflict of interest and the possibility of foreclosure due to dual role of Oil PSUs as ATF supplier and owner of the integrated fuel farm facility.

16.2 As regards the restriction on share transfers for a period of five years, the Parties have submitted that at the initial stages when MAFFFL would be setting up an integrated fuel farm facility, the experience and capability of the Oil PSUs in constructing, commissioning and managing integrated fuel farm facility will be critical as well as helpful. Further, by stipulating that the existing shareholders would continue as part of MAFFFL for a period of five years, an attempt was being made to ensure that MAFFFL’s policies continue to be influenced by the Government’s mandate and that the transparency is maintained in operations. The Parties have also submitted that the
stipulated five year period could be justified when viewed in the light of gestation period required for the recoupment of investment by MAFFFL’s shareholders.

16.3 In this regard, the Parties have voluntarily in good faith, on an in-principle basis, pending approval from their respective board of directors, offered to amend the SHA to the effect that clause 10.2\(^1\) of the SHA and all references to the term “lock-in period” in the SHA shall stand deleted by way of an amendment agreement to the SHA. The Parties have agreed further to seek board approval for such an amendment, within a period of three months, from the date of the Response.

16.4 As regards the Commission’s concern expressed in the SCN regarding obligation on the Oil PSUs in SHA to together hold minimum fifty-one per cent of the share capital of MAFFFL at all times, the Parties have submitted that such equity stake, whether held by the Oil PSUs or by any other ATF supplier, will have no impact on the supply of ATF at the Mumbai Airport, as MAFFFL would continue to treat all ATF suppliers, whether public or private, as equal players. The Parties have also laid stress on the point that Oil PSUs are not ‘selling’ but are only ‘transferring’ their infrastructure to MAFFFL and hence, it is justified that they participate in MAFFFL’s management. The Oil PSUs, being the Government owned companies are also required to ensure that distribution and marketing of ATF is done in a manner which best serves public interest.

16.5 The Parties have also submitted that without prejudice to their rights and voluntarily in good faith, on an in-principle basis, pending approval from the board of directors of each of the Oil PSUs, they are willing to delete clause 10.3\(^2\) of the SHA in its entirety,

\(^1\) Clause 10.2 of the SHA:

“No shareholder shall be permitted to transfer any shares held by it in the Company for a period of 5 years from the Closing Date” (the “Lock-in Period”)

\(^2\) Clause 10.3 of the SHA:

“Subject to compliance with the requirements set forth in this Section 10, Transfer any Shares held by it to a third Party in accordance with the procedure set forth in Section 10.4; and

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thereby stipulating no minimum shareholding requirements, in order to allay the concerns the Commission. The Parties further agree that board approval for such an amendment will be sought within a period of three months from the date of the Response.

16.6 As regards the restrictive clause in the SHA pertaining to RoFR and prior written consent from each of the non-selling shareholders in case the prospective transferee is their competitor, the Parties have submitted that this is a standard clause in almost all negotiated agreements pertaining to closely held companies, whereby the Parties, who run any commercial activity in the form of a joint venture, would prefer to operate with only the known promoters/individuals with whom there is a commonality of purpose in the business activity. However, with respect to the provision stated in clause 10.4(v)(a) in the SHA regarding prior written consent from each of the non-selling shareholders, the Parties, pending approval from their respective board of directors, have committed to delete the said clause in the SHA implying that there would be no restriction on transfer of shares to a competitor provided that the RoFR process as provided in the SHA had been followed. The Parties have agreed that the board approvals for this purpose will be sought within a period of three months from the date of the Response.

17.1 In the SCN, the Commission had expressed its concern that post combination, the Oil PSUs would act in dual capacity, one as being the shareholders in MAFFFL and the other in their role as ATF suppliers at the Mumbai Airport. The Commission had stated that it was evident from the various clauses of the SHA that the Oil PSUs would actively participate in the management of MAFFFL through their representatives on the

10.3(ii) Subject to compliance with the requirements set forth in Section 10.3, Transfer any Shares held by it to its Affiliates;

"Provided that notwithstanding, and subsequent to the completion of any such Transfer and subject to the provisions of Section 17.3, Oil PSUs shall be obliged to continue to hold at all times during the terms of the Concession, in aggregate, at least 51% of the issued and paid-up equity share capital of the Company"

3 Clause 10.4(v)(a) of the SHA:

"In case such third party is a "Competitor" (as defined in Section 10.6 below) of any non-Selling Shareholder, then sale shall be effected only with the prior written consent of such non-Selling Shareholder."
board and that there was a possibility that the Oil PSUs could foreclose access to the infrastructure essential to supply ATF at the Airport. The Commission in this regard also observed that the conflict of interest could be an impediment to the operationalization of the joint venture on non-discriminatory and open access basis.

17.2 The Parties have submitted that by way of the proposed combination, the ownership of all the existing fuelling infrastructure within the premises of the Mumbai Airport would be transferred to MAFFFL. Further, the Parties have stated that the integrated fuel farm facility and the infrastructure could be used by any of the ATF suppliers, in an open access and arm’s length basis, upon payment of a regulated common fee. The Parties have stated that the equitable distribution of shareholding and rights amongst its shareholders would further ensure that none of the shareholders could influence MAFFFL to their advantage. The various agreements between the shareholders of MAFFFL also contemplate that MAFFFL will operate with all the ATF suppliers on an arm’s length basis only.

17.3 The Parties have stated further that MAFFFL will not be privy to any of the negotiated agreements between the ATF suppliers, which include Oil PSUs, and airline operators. Further, it is submitted by the Parties that as regards providing Into-Plane Services, clause 10.4.4(i) of the Into-Plane Fuelling Service Agreement requires MAFFFL or its sub-contractors providing Into-Plane Services to act on a non-discriminatory basis. The Parties have stated that there are sufficient checks and balances to ensure that post combination MAFFFL shall operate in an independent and non-discriminatory manner and on an arm’s length basis with each of the Oil PSUs.

17.4 In this regard, the Parties have stated that they will set up a Joint Co-ordination Committee ("JCC"), in line with the JCCs functioning at the New Delhi and Bengaluru airports, which shall ensure effective and efficient performance of the proposed fuel farm facility and Into-Plane Services at the Mumbai Airport. As stated by the Parties, the JCC would, inter alia, consist of the representatives from the fuel farm operator who would be appointed by MAFFFL through a competitive bidding process; airport operator; MAFFFL; Into-Plane Service providers; Oil PSUs; private OIL Cos.;
domestic and international air carriers. The Parties have submitted that the JCC would, *inter alia*, review the operation of the open access system, to ensure that the ATF suppliers and air carriers are treated fairly and equitably.

18.1 In the SCN, the Commission had also expressed a concern that reduction in storage capacity available in Mumbai Airport from the present 49,000 KL to 38,000 KL post combination, is likely to distort the level playing field on account of possible non-availability of storage capacity to non-Oil PSU ATF suppliers.

18.2 In this regard, the Parties have submitted in the Response that based on the present and the projected demand for ATF at the Mumbai Airport in the next four to five years, the storage of 38,000 KL would provide for more than seven days of ATF requirement. The Parties have also submitted that depending upon the business of each individual ATF supplier, the storage capacity of 38,000 KL shall be shared amongst all the ATF suppliers on equal terms and there will be no discrimination between the suppliers for number of days of storage. Hence, there is no possibility of any distortion of level playing field pursuant to the proposed combination. It has been further submitted by the Parties that based on the agreements entered into with the ATF suppliers, MAFFFL shall monitor the inventory levels of ATF on a daily basis and that ATF suppliers, based upon their contracts and the actual daily upliftment by the airlines, shall be in close touch with MAFFFL, on a daily basis, to ensure placement of adequate quantity of their ATF in the proposed integrated fuel farm facility.

18.3 The Parties, through the Response, have also submitted that, pending approval from the board of directors of each of the Oil PSUs, they stand committed to construct all the five tanks in the first phase of construction itself for a total capacity of 47,500 KL. The Parties have submitted that they agree that the board approvals in this regard will be sought within a period of three months from the date of the Response.

19. The Commission has also noted that the parties in addition to the commitments, as detailed above, have also agreed in the Response to provide following safeguards in operation of MAFFFL, on its commissioning, as follows:
COMPETITION COMMISSION OF INDIA
(Combination Registration No. C-2014/04/164)

(a) MAFFFL shall publish on its website, from the date of commissioning of the integrated fuel farm facility, the following details:-

(i) tariff applicable (i.e., the AERA regulated fare) for various services, including discounts offered, if any;
(ii) maximum storage capacity used by various ATF suppliers vis-à-vis the allotted monthly capacity, on a monthly basis;
(iii) any change in availability of storage capacity on account of scheduled maintenance, cleaning etc shall be published at least one month in advance;
(iv) procedure for access to the integrated fuel farm facility, agreements to be entered into, criteria for assignment of storage capacity to an ATF supplier, etc.;
(v) template of the standard form agreements to be entered into by MAFFFL with ATF suppliers with MAFFFL and Into-Plane Service providers, as well as any revisions or amendments thereto (on a no-names basis); and
(vi) rates approved by AERA will be displayed on every revision.

(b) The Parties shall :-

(i) incorporate a clause in the standard supplier agreement to the effect that each ATF supplier shall comply with competition law principles in relation to the usage of the integrated fuel farm facility;
(ii) set up a Joint Co-ordination Committee; and
(iii) communicate (in writing) to the ATF suppliers, any deviation from the terms and conditions provided in the standard form agreement. The reasons for denying any ATF supplier the right to supply ATF at the Mumbai Airport shall also be communicated in writing to the concerned ATF supplier.

(c) The Parties shall put in place adequate monitoring mechanisms and shall ensure that the proposed integrated fuel farm facility operates in complete consonance with the principles of competition law and fairness.

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20. The Commission has noted that the supply of ATF from the refineries to the airports involves various steps, such as supply of ATF from the refineries to the airports; storage at the airports in tanks and distribution which entails delivery of ATF from the storage to the aircrafts. These steps are linked and constitute the supply chain necessary for the ATF supply to the aircrafts at the airports. Therefore, each of the steps necessary to supply ATF to the Mumbai airport could constitute a market or be treated as related markets. However, in this regard the Commission has noted that the Off-site infrastructure owned by the Oil PSUs are connected on end to end basis from refineries to Mumbai Airport and, therefore, it is not physically feasible to allow access to the Off-site infrastructure to any other ATF supplier. The Commission has, therefore noted that the relevant market in respect of the proposed combination would be the infrastructure facilities at the CSIA for the receipt, storage, handling and delivery of the aviation fuel to the aircrafts at the airport.

21. On the basis of submission of the Parties, the Commission has also noted that for management of On-site infrastructure of MAFFFL, an operator would be appointed through a competitive bidding process, whereas two operators would be selected for Into Plane Services.

22. The Commission noted that Mumbai Airport is a land constrained airport and the integration of individual facilities of the Oil PSUs, post combination, would lead to an optimum usage of the land. The Commission noted that the integrated fuel farm facility would work on an open access basis and the charges for the operation of which would be regulated by AERA. The Commission also noted that the proposed fuel farm facility is stated to bring in reduction in the infrastructure charges to be paid by the ATF suppliers vis-à-vis the present charges for operation of the individual facilities. The Commission took note of the fact that taking into consideration the examples of fuel farm facilities operating at the other airports it is only after the creation of such facilities at those airports that the ATF suppliers other than the Oil PSUs entered the market to supply ATF. Accordingly, the Commission is of the opinion that creation of such facility could provide similar benefits to all the users of such facility at the Mumbai Airport. The Commission also observed that as the proposed combination is
about integration and upgradation of the existing fuelling infrastructure and operations at the Mumbai Airport, there could be competition enhancing benefits associated with the creation of such a facility, absent which, it could be practically difficult for new entrants to duplicate the infrastructure for fuelling the aircrafts, thus resulting in a status quo condition with respect to the number of ATF suppliers at the airport.

23. As regards certain clauses of the SHA as mentioned in preceding paragraphs in respect of which the Commission had expressed its concern and discussed above in detail, the Commission considered all the arguments put forth by the Parties in this regard. The Commission is of the opinion that with the commitments offered by Parties regarding these concerns, participation of non-Oil PSU player(s) in the ownership of the MAFFFL would be possible in future. The Commission is also of the opinion that the with the commitment regarding increase in capacity, the concern arising therefrom would be alleviated. The Commission also took note of additional voluntary commitments submitted by the Parties. The Commission is of the view that such additional commitments offered by the Parties would enhance transparency and promote arm’s length distance in the operations of MAFFFL.

24. Accordingly, the Commission directs each of the Parties to pass requisite board resolutions, approving the following voluntary commitments, as offered by them vide the Response and as discussed above in detail, within three months from the date of this order:

a) Amendment of the SHA to the effect that clause 10.2 of the SHA and all references to the term “lock-in period” in the SHA are deleted by way of an amendment agreement to the SHA.

b) Deletion of clause 10.3 of the SHA in its entirety, thereby removing stipulation of minimum shareholding requirements of the Oil PSUs.

c) Amendment of the SHA to the effect that clause 10.4(v)(a) will be deleted in entirety such that there will be no restriction on transfer of shares to a competitor.
d) Commitment to construct all five tanks in the first phase of construction itself so that the total capacity available is not less than 47,500 KL.

25. In this regard, the Commission also directs the Parties to furnish the copies of the respective board resolutions alongwith the amended and restated agreements within 30 days of the passing of the aforesaid board resolutions.

26. Apart from the preceding commitments offered by the Parties in respect of which the Parties have been directed vide paragraph 24 above to pass the requisite board approvals, in keeping with the additional commitments offered by the Parties, the Commission directs each of the Parties to ensure the implementation of safeguards in the operation of MAFFFL on its commissioning as listed in paragraphs 19 (a), (b) and (c), in entirety.

27. Considering the facts on record as per the details provided in the notice given under sub-section (2) of Section 6 of the Act, the assessment of the proposed combination on the basis of the factors stated in sub-section (4) of Section 20 of the Act after taking in account the voluntary commitments offered by the Parties, the Commission is of the opinion that the proposed combination is not likely to have an appreciable adverse effect on competition in India and therefore, the Commission hereby approves the same under sub-section (1) of Section 31 of the Act.

28. This order shall stand revoked in case of failure to comply with the commitments submitted by the Parties, and/or order of the Commission and also if, at any time, the information provided by the Parties is found to be incorrect.

29. The Secretary is directed to communicate to the Parties accordingly.

Shastri Bhawan, New Delhi-110001

Dated the 4th November, 2015

After scrutiny of the Application for renewal of Authorization to market Aviation Turbine Fuel (ATF) in terms of the provisions of the Aviation Turbine Fuel (Regulation of Marketing) Order, 2001 and Aviation Turbine Fuel (Regulation of Marketing) Amendment Order, 2014 M/s Reliance Industries Limited (RIL), whose registered office is 3rd Floor, Maker Chambers IV, 222, Nariman Point, Mumbai – 400 021 are hereby authorized to market ATF from the date of issue of this authorization, as per following details:

1. Category (Strike out whichever is not applicable):
   Refinery/Oil Exploration & Production Company

2. ATF Storage Point(s):
   
<table>
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<tr>
<th>1. Jamnagar Refinery</th>
<th>2. Budge-Budge</th>
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<td>3. Rewari</td>
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3. ATF brand Name & Logo: Jet/Aviation Turbine Fuel

4. Valid up to: 30th November, 2025
   (Fresh application to be made for renewal of the authorization at least 90 days before the expiry of Validity.)

5. The authorization to market ATF is issued subject to compliance of Clause 7(3) of the Aviation Turbine Fuel (Regulation of Marketing) Amendment Order, 2014

Dated: 4th November, 2015

Signature:

Name: Awdhesh Kumar Mehta
Designation: Under Secretary

Place: New Delhi
Ref: MAFFFL/OPNS/RM/RIL /2

Dated: 18th Nov 2014

The Head ATF Business
Reliance Industries Limited
Navi Mumbai

Kind Attention: Mr. G R Reddy

Dear Sir

Sub: Access to RIL for ATF Supply to Customers at CSIA.

Please refer your letter No. MAFFFFPL/Nov 2014 dated 10.11.2014 on the above subject, we wish to inform the following:

- The approval from Competition Commission of India (CCI) has been obtained to the combination.
- In the application made and considered by CCI in its approval, the facilities will be operated on “Open Access” basis, with the commissioning of the Integrated Fuel Farm Facility.
- The Integrated Fuel farm facility is planned to be commissioned by October 2017.

The same was also informed to your representatives, Mr. Manoj Oberoi & Mr. Manoj Mahajan on 04.11.2014, during the Pre-Bid Meeting held on the tender for Fuel Farm Operations and Maintenance.

Thanking you & assure you best of our Services all the time.

Yours Truly,

For Mumbai Aviation Fuel Farm Facilities P Ltd

[Signature]
Shyam Mustywalwar
Chief Executive Officer.

CC: MIAL, Attn. Shri Sanjay Khanna
Ref: MAFFFL/OPNS/RM/RIL/1007

The Head ATF Business,
Reliance Industries Limited,
Navi Mumbai.

Kind Attention: Mr. G.R. Reddy

Sub: Access to RIL for ATF Supply to Customers at CSIA.

21 December 2017

Dear Sir,

We acknowledge receipt of your letters referenced below:

(i) Ref No. RIL/AV/MAFFFL/2017/01 dated 11 October 2017; and

By way of your abovementioned letters you had requested access to the Integrated Fuel Farm Facility ("IFFF") for receiving ATF on an 'Open Access' model which was planned to be operational by October 2017. We wish to draw your attention to our letter dated 18 November 2014 where we had informed you of the following:

- That the approval from the Competition Commission of India ("CCI") has been obtained for the combination; and
- That in the application made and considered by CCI in its approval, the facilities will be operated on an "Open Access" basis, on the commissioning of the IFFF.

In this regard, please note that MAFFFL remains committed towards the construction and commissioning of the IFFF. The construction of the IFFF is currently underway and will be completed in due course. We will intimate you regarding completion of the facility on an open access basis, as soon as the same is commissioned.

We thank you for your continued patience and assure you of our best services.

Yours sincerely,

For Mumbai Aviation Fuel Farm Facilities Private Limited

Surbanj Pal
Chief Executive Officer

Mumbai Aviation Fuel Farm Facility Private Limited
Regd. Office: Opp. ITC Maratha, Sahar Police Station Road, CSI Airport, Sahar, Andheri (East), Mumbai - 400099.
Tel: +91 22 2582 9881 Email: info@mafffl.in Web: www.mafffl.in
CIN: U63000MH2010PTC200463
No: - MIAL/RE/Miscellaneous/038

11th November, 2014

Mr. Sanjay Chauhan
Head – ATF Operations & Logistics,
Reliance Industries Ltd.,
Reliance Corporate Park,
Block 5, C-Wing, 2nd Floor,
5-TTC Industrial Area,
Thane Belapur Road, Ghansoli,
Navi Mumbai – 400 701.

Subject: “Open Access” – Entry of Private ATF Supplier at Mumbai Airport

Dear Mr. Chauhan,

This has reference to your letter no. MIAL/2014-15/03 dated 1st October, 2014 and also our discussions on the subject matter with your Shri Arpan Bhattacharya on 8th July, 2014.

As explained to you, the integrated fuel farm facilities formed under the directions of the National Facilitation Committee, at CSIA, will operate on an "open access" basis post commissioning, thereby allowing access to all ATF suppliers.

It is also pertinent to mention that CCI has recently granted approval for integrated facilities to be set up by MAFFFL at Mumbai airport. You are also probably aware that the integrated facilities project envisages taking over of all the existing facilities of the PSU Co’s at the airport, and revamping the entire facilities into Integrated Facilities so as to facilitate introduction of open access at the airport. During your visit it was explained to you that the existing facilities which are fed by the pipelines are inadequate for receipt of ATF by Tank trucks. Post CCI approval, action has been initiated for the remodeling of facilities and it is not feasible for providing additional facilities for receipt of Tank Trucks at this juncture. The entire project with stiff timelines is proposed to be completed within a set time frame. Thereafter, the integrated fuel farm facility and the infrastructure could be used by any of the ATF suppliers, in an open access and arm’s length basis, upon payment of regulated common fees.

We appreciate RIL’s keenness to have access to Mumbai airport and to participate in the ATF business under Open Access model. MIAL has also conveyed to you earlier that it is fully committed for introducing further competition and therefore shall look forward for your participation as well as participation by other private players as soon as the integrated facilities are commissioned.

Yours sincerely,

For Mumbai International Airport Pvt. Ltd.

Sanjay Khanna
Sr. Vice President & Head Commercial

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