



R. Bishton
Chief Executive Officer
UK Civil Aviation Authority
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12 August 2026

Dear Rob,

Consultation on Heathrow's Future Regulatory Framework: CAP3286

oneworld welcomes the opportunity to respond to the UK Civil Aviation Authority's consultation on Heathrow's future regulatory framework.

Our alliance wrote previously in support of the CAA's review of Heathrow's regulatory model, highlighting the importance of maintaining Heathrow's position as a globally competitive hub airport, delivering excellent customer outcomes and providing a regulatory framework capable of supporting long-term international connectivity. We continue to believe those objectives should underpin the next phase of reform and welcome the progress the CAA has made in recognising the need for more fundamental change.

As one of the world's leading airline alliances, oneworld exists to make international travel more seamless for customers travelling across multiple airlines, markets and continents. The success of that model depends upon hub airports that combine operational efficiency with high-quality customer experience. Heathrow is one of the alliance's most important global hubs, supporting extensive connectivity across Europe, North America, Asia-Pacific, the Middle East, Africa and Latin America.

The choices made through this consultation will therefore have implications that extend well beyond the airport itself. They will influence the competitiveness of global airline networks, the ease with which customers connect between flights, and the attractiveness of Heathrow as an international gateway for decades to come.

We agree with the CAA that the current regulatory framework is no longer capable of delivering the outcomes that consumers and airport users should expect. The structural weaknesses identified in the





consultation have become increasingly evident over time, and we do not believe they can be resolved through incremental adjustments alone. Fundamental reform is both necessary and timely.

In particular, we welcome the CAA's recognition that competition across the operating environment has an important role to play in improving Heathrow's performance. However, the effectiveness of that reform will depend on competition being applied sufficiently broadly to transform incentives rather than simply refine existing arrangements.

From the perspective of a global airline alliance, such direct competition offers the greatest opportunity to improve outcomes. Competition creates incentives to attract and retain airline customers by delivering better operational performance, improved facilities, greater efficiency and higher service standards. Just as importantly, it ensures that operators bear responsibility for inefficient investment decisions and poor performance.

For alliance customers, these incentives translate directly into better experiences. Reliable operations, efficient transfers, resilient infrastructure and consistently high service standards are essential for passengers travelling across multiple airlines within a single journey. A competitive terminal environment is far more likely to deliver these outcomes than a framework in which investment decisions remain largely insulated from competitive pressures.

The same principle applies to Heathrow's future expansion. Expansion will only deliver its full benefits if it is undertaken efficiently and at a cost that supports the long-term competitiveness of the airport and the airlines that serve it. Competition can help create the commercial discipline necessary to deliver affordable investment while strengthening Heathrow's position among the world's leading hub airports.

By contrast, limiting competition solely to new assets, procurement, and delivery would leave many of today's structural incentives unchanged. The CAA has correctly identified the weaknesses in having an airport operator be the sole body to determine the scope and design of projects without application of competitive disciplines. We thus urge the CAA to adopt a governance structure that addresses competition comprehensively, rather than partially.

We welcome the proposal to establish a strengthened capital governance framework, including the creation of a senior capital committee. However, governance reforms will only achieve their objectives if they are supported by robust regulatory powers and timely decisive enforcement. Effective scrutiny of capital investment, together with a clear focus on consumer outcomes, will be essential if the new framework is to command confidence among airlines and other airport users.

Our previous submission argued that Heathrow's future success depends upon a regulatory framework that promotes efficient investment, transparency, accountability and customer-focused outcomes. We remain firmly of that view. This consultation provides an important opportunity to build upon those principles by introducing meaningful competition that strengthens incentives throughout the airport.





oneworld therefore encourages the CAA to proceed with comprehensive reform that combines stronger governance with genuine competitive disciplines. Together, these measures can deliver a more efficient Heathrow, support affordable expansion, improve the experience of millions of connecting passengers and reinforce Heathrow's role as one of the world's foremost international hub airports.

Yours sincerely,

Signed by:

A handwritten signature in black ink that reads "Ole Orvær".

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Ole Orvær

Chief Executive Officer

oneworld Management Company, Inc.

