NON-CONFIDENTIAL

PUBLIC

Stewart Carter

Programme Director

Consumers and Markets

Civil Aviation Authority

Sent by email to: economicregulation@caa.co.uk & stewart.carter@caa.co.uk

15 June 2026

Dear Stewart,

Re: Royal Brunei Airlines response on CAA's Consultation on Heathrow Regulatory Options (CAP3251)

Thank you for inviting further stakeholder views on the Civil Aviation Authority's (CAA) latest proposals to enhance Heathrow Airport's regulatory framework, as set out in Consultation CAP3251, published on 15 May 2026.

This submission is provided on behalf of Royal Brunei Airlines (RB).

Given the demanding consultation timetable, which coincides with several other significant CAA consultations, Royal Brunei Airlines reserves the right to submit additional comments and supporting evidence as the review progresses.

Royal Brunei Airlines fully endorses the responses submitted by the Airline Operators' Committee (AOC) and the London Area Consultative Committee (LACC). We also support the CAA's decision to refine the options under consideration, moving from the broader "longlist" presented in CAP3195 to the more focused "shortlist" outlined in CAP3251.

We agree with the CAA's assessment that regulatory reform is necessary. Importantly, such reform should address the needs and performance of Heathrow's existing tworunway operation and should not be deferred until any future airport expansion proposals are realised.

Preferred reform package

Royal Brunei Airlines strongly supports the reforms shortlisted by the CAA that place greater emphasis on competition and robust capital governance, rather than adopting a more incremental approach to change.

While competition is often associated with lower prices, its benefits extend beyond cost reduction. Effective competition can drive innovation, improve responsiveness to customer needs, enhance service quality, and strengthen accountability. Where evidence from comparable airports demonstrates that competition can be introduced safely and effectively, it should be viewed as a catalyst for improved outcomes across the sector.

The proposed governance committee under Model 1a represents a positive step towards a more effective capital investment governance framework. However, to be truly effective, the committee must be granted meaningful authority, including the ability to withhold approval where appropriate and to escalate concerns directly to the CAA.

Affordability for both airlines and consumers should remain a central objective of the CAA's regulatory reforms. We believe that the benefits of competition should apply to users of both new and existing infrastructure, and that the CAA should ensure these benefits are delivered consistently and without delay across all airport facilities and terminals.

Conclusion

This review presents a significant opportunity to modernise Heathrow's regulatory framework and create a model that delivers better outcomes for consumers, airlines, and other airport users. The CAA should use this opportunity to establish a more efficient, transparent, and responsive regulatory regime that promotes affordability, operational performance, and accountability.

We therefore urge the CAA to prioritise and implement the proposed reforms as soon as practicable. Delaying action risks perpetuating the shortcomings of the current framework, which continues to impose unnecessary costs and inefficiencies on consumers and operators at Heathrow.

Yours sincerely

For Royal Brunei Airlines Sdn. Bhd.

Adiel Mambara

Adiel Mambara

Country Manager UK

Royal Brunei Airlines Sdn. Bhd., 49 Cromwell Road, London, SW7 2ED. Tel: +44 207 584 6660 Email: LonRba@rba.com.bn