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26 October 2023

Wayne Bosley

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Tēnā koe Wayne

OFFICIAL INFORMATION ACT 1982 (OIA) – REQUESTS FOR INFORMATION - CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED (CIAL)

1. We refer to our email of 21 August 2023 and our response of 15 September 2023, in relation to your request dated 18 August 2023 via the third party platform fyi.org.nz.

We write in respect of your further email dated 27 September 2023 in which you requested the following information:

"Thanks for your answers so far, but I did also ask for a) a summary of emissions from retail activities and other businesses at the airport, and also b) for detailed workings (not summaries).

Could you please provide both a) and b) which are missing from your response."

2. To clarify the position further, we refer you to the latest GHG Inventory Report ('Inventory') which is available on our website:

<https://www.christchurchairport.co.nz/globalassets/about-us/sustainability/carbon/fy2022-23-independent-ghg-inventory-report>

Outside the Organisational Boundary

'Retail activities and other airport businesses' are provided at the airport by CIAL's tenants. The tenants' businesses are not owned or operated by CIAL. Our tenants are entirely separate entities that are run independently of CIAL. As such, CIAL has no control over the organisational values of each tenant and does not have any means of access to their carbon emissions data.

As a result, the Organisational Boundary at paragraph 5 of the Inventory excludes tenants that are separately metered or sub metered within the airport and have the ability to control their own energy use. Therefore 'retail activities and other airport businesses' fall outside of the Organisational Boundary and is therefore not included in the Inventory.

Where a sub-metered space becomes vacant, CIAL will assume operational control until that space is leased again and any emissions covered for the period that CIAL has operational control, will be included in the Inventory under Scope 2 or Scope 3. We are unable to extract that data but notwithstanding that, we would not expect that the emissions from vacant premises would be particularly significant.

Inside the Organisational Boundary

The emissions data recorded from our terminal would include 'retail activities' however this data has not been gathered at a tenant level. For example, Waste for terminal tenants is included in the Inventory by virtue of CIAL's overall operations data and the information specifically relating to retail activities is unable to be extracted. For this reason, CIAL does not hold the data you have requested and your request is refused on the basis of section 18(g) of the OIA.

As advised, 'retail activities and other airport businesses' fall outside CIAL's Organisational Boundary except where CIAL has on-sold energy to tenants on our airport campus and such supply is not sub metered. To provide emissions estimates from on-sold energy information for 'other airport businesses' would involve a substantial amount of collation and research. Therefore your request is refused pursuant to section 18(f) of the OIA.

Furthermore, where this data cannot be estimated using on-sold energy information, tenant participation is only a voluntary data sharing arrangement due to tenants' rights to quiet enjoyment and/or the need for the information to remain confidential (refer paragraph 6.3). The disclosure of such confidential information to the public may prejudice the supply of similar information which is in the public interest to continue to be supplied. Your request is therefore refused pursuant to section 9(2)(ba)(i) of the OIA.

3. We trust we have now answered your requests for information. If you require any further information or if we have in some way misinterpreted your Request, please let us know.
4. You have the right to seek an investigation and review by the Ombudsman of the decisions contained in this letter. Information about how to contact the Ombudsman or make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Ngā mihi

CIAL LEGAL TEAM

Email: legal@cial.co.nz