

25 October 2023

James Kirk

**Email:** [c/-fyi-request-24247-16f67469@requests.fyi.org.nz](mailto:c/-fyi-request-24247-16f67469@requests.fyi.org.nz)

Dear Mr Kirk,

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

1. We write further to our email of 28 August 2023, acknowledging receipt of your email of 25 August 2023 (via the third party public platform [fyi.org.nz](http://fyi.org.nz)) in which you requested the following information pursuant to the OIA:

*“Please clarify Mr. Duncan Small's role working for CIAL or acting on behalf of CIAL from 1 Jan 2018 onwards. Please provide any information /correspondence between Mr Small and CIAL, and Mr Small and any government agency (where it relates to work he or his colleagues are undertaking for Christchurch Airport) during this time. Please provide all specific information / correspondence by Mr Small on "project Oscar" / the proposed Tarras airport.” (the “Request”)*

**Clarify Mr Small’s role**

2. Mr Small is an experienced and highly regarded individual with extensive experience across aviation, tourism, regional economic development and public sectors. CIAL has engaged Mr Small to provide a range of services across CIAL’s business since February 2020. These include assisting in the activation of projects under CIAL business strategy and supporting stakeholder engagement across CIAL’s strategic priorities, which include but are not limited to the project to explore the potential for a new airport in Central Otago.
3. We are withholding further information related to Mr Small and his work for CIAL under sections 9(2)(a) and 9(2)(ba)(i) of the Act. This information is personal to the individual and the greater public interest is in CIAL maintaining the confidence of employees and individuals engaged by it, both current and future. We have considered the countervailing public interest in release in making this decision and consider it does not outweigh the need to withhold at this time.

**Information and correspondence between Mr Small and CIAL, and Mr Small and any government agency**

4. Notwithstanding the above, CIAL considers your request to be too broad in scope and therefore, is unable to provide you with this level of information. This request could cover a substantial amount of material, including correspondence and documents, which would need to be identified, extracted and then assembled. To do so would involve the diversion of personnel for a substantial period of

time to research and collate the information you are requesting, impacting on CIAL's ability to carry out other operations.

5. Further, it is likely that internal emails between Mr Small and his colleagues would be withheld under section 9(2)(g)(i) of the OIA.
6. We do note that previous responses to requests for information via the [fyi.org.nz](http://fyi.org.nz) website include correspondence between CIAL (including Mr Small) and a number of government agencies. While not specific to Mr Small, these requests would include any correspondence between Mr Small and the relevant agency, if the information exists. The responses to requests for information between CIAL and government agencies is linked below:
  - a. [Otago Regional Council](#)
  - b. [Treasury](#)
  - c. [Ministry for the Environment](#)
  - d. [Waka Kōtahi](#)
  - e. [Ministry for Business, Innovation and Employment](#)
  - f. [NZ Infrastructure Commission](#)
7. CIAL has considered whether charging or extending the timeframe for responding to your request would help, as required by section 18A of the OIA. However, given the size of the request, we do not believe this to be a viable option.
8. We trust we have answered your requests for information. If you require any further information or we have in some way misinterpreted your requests, please let us know.
9. 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](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

Yours sincerely

**CIAL LEGAL TEAM**

Email: [legal@cial.co.nz](mailto:legal@cial.co.nz)