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Tēnā koe Duncan

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

1. We write further to our email of 21 August 2023, acknowledging receipt of your OIA request (the **Request**) of 20 August 2023 seeking information (if held by CIAL) in relation to Christchurch Airport's native forest investment.

We have answered your Request in this letter and for completeness, we set out your Request below:

Request: Received 20 August 2023 – Christchurch Airport's native forest investment

"Could you please provide research and other documentation which shows the details of the methodology, volume and impact of carbon removal via your native forest investment programme? How much CO2 and over what timeframe?"

Please advise how long this saving is locked in for?"

2. CIAL rely on external expertise to provide it with its voluntary offsets (noting CIAL is not obligated to purchase offsets) but undertakes a process to understand what methodology is followed and has that independently assured. CIAL purchases offsets after the fact (as is normal practice), and it waits until its Greenhouse Gas Inventory has been independently audited for the year, in order to know how many offsets it would like to purchase.

CIAL believes emissions reduction actions must be prioritised over offsetting wherever possible. Offsetting is a useful tool, once available reduction technologies have been exhausted, but not in place of reduction activities.

From FY21, when CIAL achieved its 90% reduction in Scope 1 and 2 emissions, and with no further unbudgeted large scale reduction actions available to it, CIAL sought to balance hard-to-abate residual emissions with high-quality carbon removals (also known as carbon credits).

CIAL's preference to offset its Scope 1 & 2 emissions is to do so by supporting local native forest restoration via the purchase of New Zealand Units (**NZUs**) through Carbon New Zealand Limited.

NZUs from native forests can be used for voluntary carbon crediting. The Joseph Langer Charitable Trust (the **Trust**) owns land on Banks Peninsula. The Trust has been issued government-verified NZUs which recognises the carbon sequestered through their biodiverse, community-led and native forest restoration.

CIAL also chooses to offset controllable Scope 3 emissions, and its preference is to do so through supporting projects in the Pacific Island region. Initially, CIAL chose forestry projects because these were available and independently authenticated.

Offsets - Carbon Removals Scope 1 & 2 Emissions

Forest type

The section of forest that has been assessed is an exclusively biodiverse native broadleaved hardwood forest, surrounded by areas of scrub, ferns, tussock, and scattered shrubs at earlier stages of regeneration. The site is significant because it is the only known locality on the Banks Peninsula for Gentian, *Gentianella serotina*, a small montane to sub-alpine flower that grows with snow tussock. There are numerous other native species of note, including several which are uncommon in the region.

Location

The forest is located on land owned by the Trust, close to the township of Le Bons Bay. The land parcels are: 623997; CB506/73; and CB9F/216; - as recorded on the New Zealand Land Registry. The ETS registered native forest parcels are highlighted in green in Figure 1 ETS registered forest overlaid on topographical map outlined below.

Total area

A total of 37 hectares of land has been registered with ETS to date, for the post-1989 regenerating native forest. 735 NZUs have been issued to this area in recognition of the carbon sequestered over the 2018 to 2022 period.

Adjacent to the above 37 hectares, is an additional 120 hectares of non ETS forest. It is pre-1990 regenerating native forest and is also sequestering carbon due to the Trust's ongoing conservation efforts. The non-ETS registered native forest areas are highlighted in Figures 2 and 3.

Management

The historical land use prior to the native forest was pastoral farming. All of this area was land for pastoral farming prior to 1990. Due to stock exclusion and ongoing restoration activities, this land is regenerating into native bush. Carbon New Zealand Limited checks each NZU is exclusively from native forest using the Ministry for Primary Industries land classification.

Additionality

This management is consistent with the principles set out in the Integrity Council for the Voluntary Carbon Market definition: *"The greenhouse gas emission reductions or removals from the mitigation activity shall be additional, i.e., they would not have occurred in the absence of the incentive created by carbon credit revenues"*.

The native forest NZUs are consistent with the expectations of additionality under New Zealand’s commitments to and reporting for the United Nations Framework Convention on Climate Change, given the ETS is fully compliant with the framework.

Permanence

NZUs meet the obligations set out in the Climate Change Response Act 2002. All CIAL’s NZUs are measured by CarbonCrop who provide ongoing monitoring for reversal events. As part of CarbonCrop’s standard compliance assurance process, all registered areas are assessed for reportable forest loss using AI models applied to hyperspectral satellite data, on an annual basis. This occurs prior to the filing of emissions returns and issuances of further NZUs for the relevant period for the registered forest. At the point of filing emissions returns, a subsequent approval means permanence is verified by the Ministry of Primary Industries.

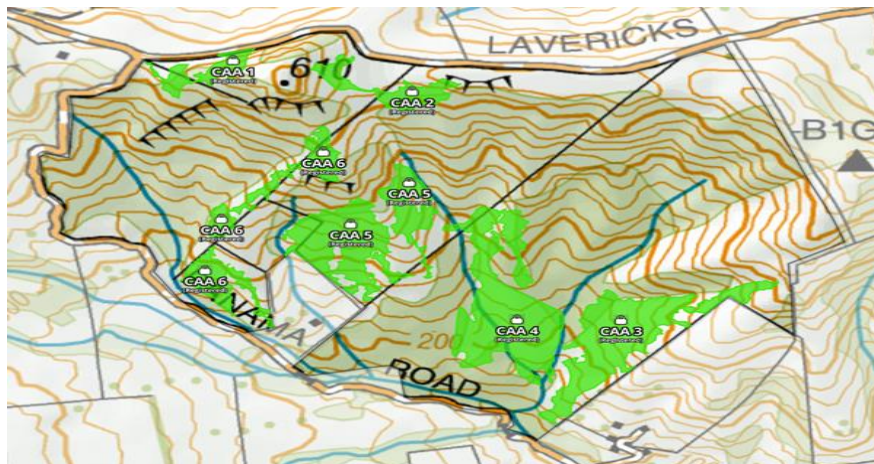
All parcels of Trust land have been placed under a government-recognised conservation covenant, with the Banks Peninsula Conservation Trust, and the land is now a Department of Conservation scenic reserve.

Double counting

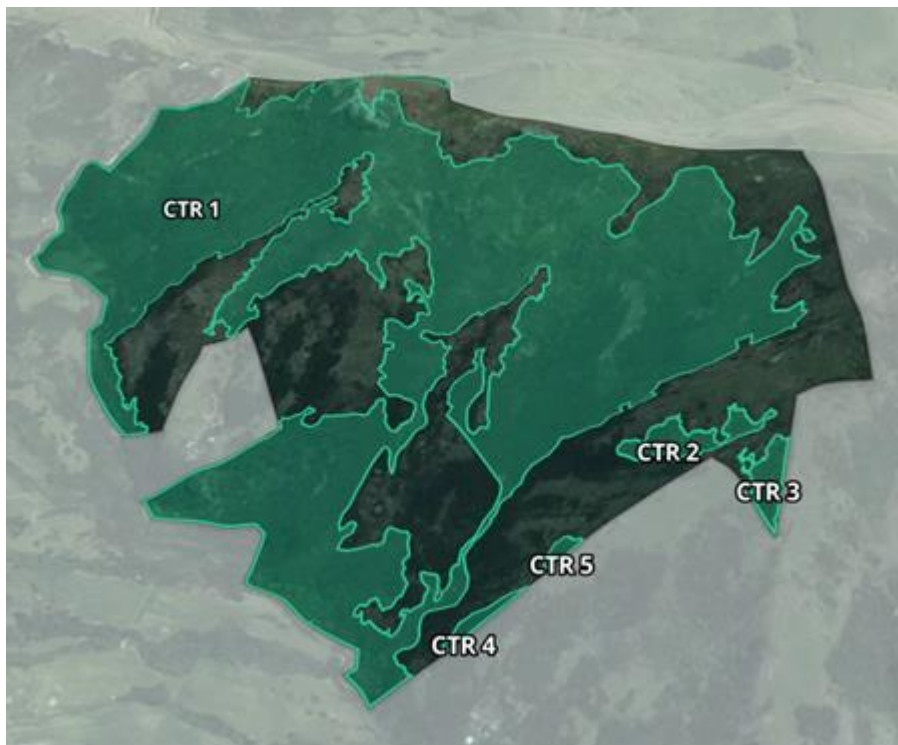
The Trust does not have any conflicting carbon credit registration with its registered ETS forest. NZUs are transacted on the government-operated Emissions Trading Register and cancelled on this register.

CIAL is the guaranteed beneficial owner of NZUs which are held and cancelled on the ETS register by Carbonz. Please refer to the Carbon New Zealand Limited terms and conditions under ‘The New Zealand Emissions Trading Scheme Carbon Credits’ in Appendix 310.

Figure 1 - ETS registered forest overlaid on topographical map:



Figures 2 and 3 - Non-ETS registered forest adjacent to ETS registered forest close-up and from a distance for location context:



Airport Carbon Accreditation Offset Removal Application Form

As an airport that participates within the Airport Carbon Accreditation Programme, CIAL's Scope 1 & 2 offsets are also subject to their additional layer of scrutiny. This is set out in their ACA Offset Merged Guidance Document 2023.

CIAL's application to have its offsets independently assessed according to the ACA best practice criteria involved the following information (and supporting documents which CIAL is sharing with you):

Name of airport	Christchurch International Airport
City/Country	Christchurch, New Zealand
IATA Code CHC	ACI Region Asia Pacific Region
Passenger numbers & year	3.26 million in 2022
Aircraft movements & year	84,330 total aircraft movements
Date	9 May 2023
Latest carbon footprint & year	219t CO2e FY22
Offset removal target	120% of remaining Scope 1 and 2
Baseline year & carbon footprint	3542t CO2e FY15
Amount of offset removals	262tCO2e
Proposed Offset programme	New Zealand Units (NZUs) of permanent native forestry
Project type	Afforestation/ Reforestation
Project name	Native Forestry in Langer Reserve, Banks Peninsula, Canterbury, New Zealand
Short project description	Reforestation of permanent native forestry on previous pastoral farming land in the Banks Peninsula region. Carbon removal units (NZUs) through forestry sequestration are registered under the New Zealand Emissions Trading Scheme.
Identification number	NZ-10716
Methodology/Certification Standard	Ministry for Primary Industries New Zealand Units
Web link	Here is a link to the specific project: https://www.jlct.org.nz Here is a link to the Ministry for Primary Industries information on the ETC: https://www.mpi.govt.nz/forestry/forestry-in-the-emissions-trading-scheme/
Other pertinent information	



Offsets - Controllable Scope 3 Emissions

Christchurch Airport voluntarily purchase additional carbon offset removals with respect to its controllable Scope 3 emissions. This is not a requirement of the Airport Carbon Accreditation Programme.

They support Pacific Island Rainforest Protection Projects (**VERS**) in Babatana, on the island of Choiseul, Solomon Islands through the purchase of voluntary carbon offset removals.

Activities in CIAL's Scope 3 supply chain for voluntary removals

The requirement for what should be included (and excluded, which was determined to be full flight emissions and ground transport connections) was independently determined by EKOS, a New Zealand based leader in Carbon Management best practice. CIAL's total Scope 3 carbon offset VERS for FY22 amounted to 1717tCO_{2e}, which when CIAL applied its intention to take responsibility for 120% of those emissions, amounted to the purchase of 2,060 units.

Scope 3	Activity	Activity Data	Units	tCO _{2e}
3	Category 3: Indirect GHG emissions from Transportation			
3.2	APU usage		10 minutes	591
3.3	Engine run-ups		669 run-ups	193
3.4	Ground support equipment, tenant, diesel	173,048 litre		466
3.5	Transmission & distribution losses	17,546,759 kWh		171
3.7	<i>Business travel</i>			

3.7.1	International, long-haul, business	63,013 pax.km	14
3.7.2	International, short-haul, business	9,266 pax.km	1
3.7.3	International, long-haul, economy	N/A pax.km	
3.7.4	International, short-haul, economy	51,973 pax.km	4
3.7.5	Domestic, national average	136,613 pax.km	22
3.8	<i>Upstream transportation and distribution of goods</i>		
3.8.2	<i>Fuel extraction, production, and distribution</i>		
3.8.2.1	Diesel	242,944 litres	1
3.8.2.2	Petrol	5,687 litres	0
3.8.2.3	LPG	27,279 litres	0
	Downstream transport and distribution		
3.9	of goods	N/A	
	Category 4: Indirect GHG emissions from products used by an organization		226
4.1	Purchased goods & services	N/A	
4.2	<i>Accommodation</i>		
4.2.1	New Zealand	113 room.night	1
4.2.2	Australia	26 room.night	1
4.2.3	Singapore	8 room.night	0
4.2.4	Canada	2 room.night	0
4.3	Capital goods	N/A	
4.4	<i>Disposal of solid and liquid waste</i>		
	Waste to landfill with landfill gas		
4.4.1	recovery	329,805 kg	68
4.4.2	Water supply	304,104 m ³	10
4.4.3	Trade wastewater	304,104 m ³	146
4.5	Use of assets	N/A	
5	Category 5: Indirect GHG emissions associated with the use of products from the organization		0
	N/A		
6	Category 5: Indirect GHG emissions from other sources		27.7
6	De-icing, tenant	31,859 litres	27.7

CIAL Scope 3 2060 VER units are supplied and certified to the Plan Vivo international carbon offset standard.

3. We trust we have answered your requests for information. If you require any further information or if we have in some way misinterpreted your requests, 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