

21 September 2023

Simon Richardson

**Email:** [c/-fyi-request-23937-61f7d88d@requests.fyi.org.nz](mailto:c/-fyi-request-23937-61f7d88d@requests.fyi.org.nz)

Dear Mr Richardson,

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

1. We write further to our email of 24 August 2023, acknowledging receipt of your email of 24 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 provide research and fact base behind the annual value to the economy both passengers and freight for a 787 aircraft performing one flight per day either from Christchurch or Tarras” (the “Request”)*

2. CIAL will provide you with the requested information where it is able. However, you will note within this letter that it is occasionally unable to release requested information if it would prejudice or disadvantage CIAL’s commercial activities. Before we answer your specific query, it may be helpful to provide some context to this.
3. The OIA permits an organisation to refuse to release requested information it holds if the withholding of such information is necessary to enable the organisation to carry out its commercial activities or negotiations without prejudice or disadvantage (s 9(2)(i) and s9(2)(j) OIA) provided that such withholding is not outweighed in the circumstances by the public interest in making the specific information available. For example, while it may be in the public interest to understand that CIAL is investigating the feasibility of establishing an airport in Central Otago that does not mean CIAL must share every detail of its plans, analysis, work or negotiations within specific work streams.
4. As you may be aware, CIAL is a council-controlled trading organisation that has been specifically established to operate and manage its business as an independent commercial undertaking for the purposes of making a profit, and to follow generally accepted commercial practices and disciplines. CIAL is not a public body collecting and spending public funds. It operates as a wholly commercial, standalone entity. Due to the size and scale of those activities it is one of only three major airports in New Zealand regulated under Part 4 of the Commerce Act 1986.
5. As an airport, CIAL has a further overriding obligation under the Airport Authorities Act 1966, and reinforced by the Civil Aviation Act 2023, to act as a commercial undertaking. It does so in a commercially competitive environment both domestically and internationally, where its competitors

6. are not under corresponding disclosure requirements. The proposed Central Otago Airport Project (the **Project**) is a complex commercial activity, acknowledged as being in competition with the interests of other airports within New Zealand.
7. The Project is currently in the validation and planning phase which in and of itself is a complex commercial activity. At present, CIAL is under no legal obligation to consult in relation to the Project. To assist public understanding of the context of the Project and CIAL's decisions, CIAL has committed to, and does, proactively publish information as it completes pieces of work which is likely to be in the public interest to receive on its dedicated Project website at <https://www.centralotagoairport.co.nz/> (the Project Website). This publicly available summary information includes a document recently published in August 2023 titled "*Unlocking Potential: Central Otago's runway to a future-focussed airport*", which provides general information on the work and analysis CIAL has undertaken as at the date thereof in relation to the Project (<https://www.centralotagoairport.co.nz/uploads/images/Unlocking-potential-31-Aug2023.pdf>).
8. The *Unlocking potential: Central Otago's runway to a future-focussed airport* report includes summary information on annual value of passengers and freight based on daily services over 12 months. This information which is generic in nature, and does not relate specifically to Christchurch Airport or the proposed Central Otago Airport, compares widebody and narrowbody jets. The widebody analysis which, draws on information from Stats NZ, MBIE and airport analysis, is based on the capacity and value to New Zealand of a typical widebody B787-9 flight, including:
  - Passenger capacity: 300 seats
  - Tourist spend from a single flight: \$0.43m
  - Yearly tourist spend from a daily flight: \$157m
  - Freight capacity: 14 tonnes
  - Average value of freight on a single flight: \$1.4m
  - Yearly value of freight with a daily flight: \$509m.
9. 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.
10. 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)