

26/09/2022

External Reporting Board  
PO Box 11250, Manners St Central,  
Wellington 6142



Dear External Reporting Board Submission Review Committee,

Wellington Airport welcomes the opportunity to submit on the External Reporting Board's (XRB) final consultation round in the development of Aotearoa's climate-related disclosures framework.

As signalled by the XRB the information, presentation principles and general requirements put forward as part of this consultation are heavily derived from existing and well-established international standards. These standards are agreeable, comprehensive and have been proven to work well within diverse foreign contexts. However we urge that the provisioning of detailed, evidence-based criteria around what the XRB is looking for, will be critical in ensuring the smooth rollout of climate related disclosures in Aotearoa. We discuss this in further detail below.

We feel that the principles of information that the XRB have put forward are standard and critical in the development of any best-practice reporting. However, we suggest that the XRB provides clear guidance around expectations for what is required to meet each of these principles when developing disclosures reporting.

The airport agrees with the principles of presentation put forward by the XRB. Understandability, consistency, completeness and coherence are all attributes that will be critical in maintaining an effective and systematic rollout of disclosure requirements across industry. However, it is important for the XRB to provide and maintain specific criteria around the expectations of these elements. Currently entities across various industries have pursued a variety of approaches for developing early disclosures reports. These reports have all varied greatly in regard to principles of presentation, hence why consistent, detailed and example-support guidance will be necessary when obligatory climate related disclosures realise.

We have taken the step of exploring each of the proposed general requirements outlined in NZ CS3, the conclusions of which are explored below.

At present the airport has explained the methodology it has used to develop each of the disclosures in significant detail within draft TCFD reporting. This is intended to avoid any ambiguity around the development of disclosures conclusions. This includes elaborating and completely disclosing the processes and data sources employed in the technical work carried out to understand our strategic climate-related risk. However, many organisations have included limited to zero information around these processes. Therefore, centralised guidance around the degree of methodological information expected would be useful in establishing consistency.

We agree with the inclusion of materiality in ensuring relativity and suitability within information supplied by entities through the disclosure framework. We note that the XRB places significant weight behind its allusion to the significance of materiality. While this is supported, we would recommend that the XRB provides very detailed and clear guidance to ensure consistency across organisations' understanding and portrayal of materiality.

We support the inclusion of entities' value chains within the general requirements of climate-related disclosures. Wellington Airport has a diverse portfolio of commercial interests, operations and subsidiaries that comprise its value chain, which extend beyond its function of serving aircraft. We recommend that the XRB be

very specific around the levels of exposure and the levels and components of value chains that ought to be considered in the development of climate related disclosures.

The inclusion of comparative information is a highly beneficial element of the proposed general principles. We feel that this promotes the maintenance of robust and accurate climate-related risk information, which is subject to the rigor of the XRB's verification processes. This is compatible and agreeable with the airport's existing approach to the maintenance of climate related metrics and reporting.

In summary, we feel that the principles and requirements stipulated in NZ CS3 are comprehensive, well-founded and based on solid international standards. If stipulated with sufficient criteria and detail, these will stand as a solid foundation for entities to prepare climate related disclosures across industry.

Please feel free to contact me if you wish to discuss any aspect of this submission.

Kind regards,

Chris Vidal  
**Sustainability Manager**  
**Wellington Airport**