TRANSPOWER

HVDC undersea cable decommissioning

Summary of submissions to our consultation

May 2026

1. Executive summary

In April 2026 Transpower published a consultation paper entitled *Consultation: HVDC undersea cable decommissioning – options for the existing in-service undersea electricity cables once they are decommissioned* (the consultation paper).[1]

The existing High Voltage Direct Current (HVDC) submarine cables, which form part of the inter-island electricity link between the North and South Islands, were installed in 1991. The cables are approaching end of life and are expected to be decommissioned following installation of replacement cables as part of the wider HVDC upgrade[2] programme.

The consultation sought stakeholder views on options for managing the existing cables once they reach the end of their operational life, including the potential removal of the cables from the seabed.

Removal of the existing cables is consistent with Transpower's current consent arrangements and may provide long-term operational and environmental benefits. Transpower's current consents for the cables to occupy the seabed expire in the 2030s, and the cables are located within the Cook Strait Cable Protection Zone, which is becoming increasingly congested. Removal of redundant infrastructure may help reduce congestion and preserve space for future infrastructure.

However, cable removal would involve significant cost and potential environmental disturbance associated with recovery activities. Transpower's current estimate is that cable removal could cost approximately $120 million, partially offset by around $30 million in potential recycling value from recovered materials. The net cost would form a small component of transmission charges on consumers' future electricity bills.

Five submissions were received from iwi, industry groups, major electricity users and private individuals. While submitters generally supported further consideration of cable removal, views differed regarding environmental impacts, technical feasibility, affordability, future infrastructure needs, and the appropriate balance between removal and retention of redundant infrastructure.

This document summarises the submissions received and the key themes raised by submitters.

1 Consultation - HVDC undersea cable decommissioning - April 2026.pdf

2 HVDC link upgrade programme | Transpower

2. Submissions received

This section summarises the submissions received. Transpower thanks submitters for their participation in the consultation process.

Submissions were received from:

- Te Rūnanga o Toa Rangatira (**Ngāti Toa**) – is the mandated iwi authority representing Ngāti Toa Rangatira.
- The Major Electricity Users' Group (**MEUG**) – a trade association representing major electricity users
- New Zealand Steel (**NZ Steel**) – an energy-intensive industrial manufacturer and major electricity user
- Dr Karen Titus and Jarrod Baniqued – two private individuals with an interest in the project.

3. Key themes raised by submitters

Several common themes emerged across the submissions received.

Submitters generally supported further consideration of cable removal and acknowledged the potential long-term operational, environmental, and infrastructure benefits associated with removing redundant submarine cables from the Cook Strait Cable Protection Zone.

At the same time, a number of submitters emphasised the importance of adopting a risk-based and site-specific approach to decommissioning decisions, recognising that environmental conditions, technical feasibility, and cultural considerations may differ across sections of the cable route.

Environmental impacts associated with cable recovery activities were a recurring theme. Submitters identified potential risks relating to seabed and sediment disturbance, impacts on marine ecosystems, recovery complexity in environmentally sensitive areas, and possible effects on existing subsea infrastructure.

Affordability and cost allocation were also significant considerations, particularly for industry submitters. Several submissions noted the importance of carefully balancing environmental, technical, operational, and consumer cost considerations when assessing future decommissioning options.

The importance of engagement with mana whenua and recognition of cultural values associated with Te Moana o Raukawa was also emphasised by Ngāti Toa.

4. Summary of submissions

Ngāti Toa submission

Ngāti Toa's submission supports the general objective of removing redundant infrastructure and restoring the marine environment where practicable. However, the submission also emphasises the importance of:

- kaitiakitanga and protection of the mauri of Te Moana o Raukawa,
- meaningful engagement with mana whenua,
- and careful consideration of local environmental and cultural effects.

The submission states that decisions should not be driven solely by cost, efficiency, or regulatory considerations, and that a precautionary approach should be applied.

Ngāti Toa highlighted concerns regarding potential impacts in sensitive areas, including:

- disturbance to sensitive marine environments,
- long ecosystem recovery periods,
- and impacts on culturally significant areas.

While generally supportive of cable removal where impacts are low (particularly in soft-sediment areas), Ngāti Toa favours a differentiated approach whereby some cable sections may be retained in situ where removal would create disproportionate environmental, cultural or technical risks.

MEUG submission

MEUG's submission supports Transpower consulting on the issue prior to making any decisions or seeking Commerce Commission approval.

The submission states that there is currently insufficient information to identify a preferred option and notes the need to balance technical, environmental, operational, and affordability considerations when assessing future decommissioning proposals.

MEUG notes that there may be practical and logistical benefits associated with removing the existing cables at the same time as installation of the new HVDC cables, given the scale of the works and reliance on specialist vessels and equipment. The submission also notes the importance of avoiding potential ecological risks associated with degradation or exposure of redundant cable materials and recognises possible benefits associated with recovery and recycling of cable materials.

However, the submission places significant emphasis on affordability and consumer cost impacts, particularly in the context of broader increases in transmission, distribution and generation costs being faced by electricity consumers.

NZ Steel submission

NZ Steel's submission questions whether the benefits of cable removal are proportionate to the associated costs, noting that decommissioning represents a substantial project in its own right relative to the broader HVDC replacement programme.

The submission notes that removal of the existing cables does not appear necessary for operation of the replacement cables and raises questions regarding whether partial cable recovery or severed cable sections could create greater environmental effects than retaining cables intact in situ.

The submission also questions whether the potential future benefits associated with removal are sufficiently material to justify the expenditure in the current economic environment.

A key theme of the submission is affordability and cost allocation. NZ Steel submits that the costs associated with cable removal should be borne by Transpower as the asset owner, rather than recovered from current electricity consumers.

Private individuals' submissions

Karen Titus and Jarrod Baniqued both support Transpower's preferred approach of removing the existing cables following decommissioning, although the submissions differ in emphasis and focus.

Dr Titus' submission supports cable removal in principle while highlighting a number of environmental and practical implementation risks that should be carefully managed through a risk-based and site-specific approach. Key issues raised include:

- seabed and sediment disturbance associated with cable recovery activities,
- impacts on marine communities that may have colonised exposed cable surfaces,
- increased recovery complexity in shallow-water or environmentally sensitive areas,
- and risks to nearby subsea infrastructure such as telecommunications cables.

Dr Titus' submission references recent academic research (Clare et al., 2025[3]), which supports a risk-based and site-specific approach to subsea cable decommissioning, noting that there is unlikely to be a universally optimal removal approach across all marine environments.

Jarrod Baniqued's online submission also supports removal of the existing cables and focuses primarily on future network planning considerations. The submission recommends that Transpower undertake preliminary geotechnical investigations and begin securing legislative approvals and permits associated with potential future HVDC cable development, including potential fifth and sixth submarine cables.

No additional environmental or operational risks associated with cable removal were identified in the submission.

[3] Clare, M. A., Gates, A. R., Jones, D. O. B., Yeo, I. A., Hilario, A., Van Landeghem, K. J. J., et al. (2025). Environmental considerations for the decommissioning of subsea cables. *Journal of Environmental Management, 396*, 127962.

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