

01 May 2026

Feedback on the proposed approach managing the existing three undersea cables

Tēnā koe,

Te Rūnanga is the mandated iwi authority for Ngāti Toa Rangatira (Ngāti Toa). We have the responsibility for protecting and enhancing the mana of Ngāti Toa across the various political, economic, social and environmental spheres.

In relation to Te Ao Tūroa, the objective of Ngāti Toa is to nurture a resilient environment to sustain future generations through reclaimed connection and mātauranga to natural resources, empowering kaitiaki who are leaders and co-managers of our natural environment, our commitment to environmental sustainability and our ability to adapt to the impacts of climate change.

As mana whenua of Te Taihū and Te Whanganui-a-Tara, and as kaitiaki of Te Moana o Raukawa (Cook Strait), Ngāti Toa Rangatira have a direct and enduring interest in the decommissioning of the existing cables and the HVDC Upgrade Programme as a whole.

Proposed Approach

The consultation package indicates a preference to remove as much of the decommissioned cable infrastructure as practicable, citing regulatory, operational, environmental, and efficiency considerations. While removal of redundant infrastructure may, in principle, reduce long-term legacy risks associated with abandoned assets, any decommissioning approach must be carefully assessed in light of potential effects on the moana, taonga species, and the ongoing exercise of kaitiakitanga.

Te Rūnanga o Toa Rangatira considers that decisions on cable removal or retention must not be driven solely by cost, efficiency or regulatory convenience. Instead, they must demonstrably avoid, remedy, or mitigate adverse cultural and environmental effects, apply a precautionary approach, and recognise the enduring relationship of Ngāti Toa Rangatira with Te Moana o Raukawa.

This submission provides feedback on the environmental and cultural effects of Transpower's preferred approach, with a focus on ensuring that decommissioning outcomes align with the values and intergenerational responsibilities Ngāti Toa Rangatira has as kaitiaki.



Response to Consultation Questions

1) *Are there other environmental, operational, cultural, or economic considerations that Transpower should consider when determining the approach to cable removal?*

Yes, Te Rūnanga o Toa Rangatira considers that additional environmental and cultural considerations are critical in determining the most appropriate decommissioning approach. In particular, we believe that Transpower should further consider:

- The presence of sensitive benthic habitats, especially in near-shore and complex seabed areas, where disturbance may result in long-lasting or irreversible effects
- The exercise of kaitiakitanga and the enduring relationship of Ngāti Toa Rangatira with Te Moana o Raukawa
- The variability of effects along the cable route, recognising that environmental risk is not uniform and that different decommissioning outcomes may be appropriate in different locations or habitat types

2) *Are there any risks or impacts associated with cable removal that Transpower should consider further?*

Yes. While cable removal may result in localised and short-term effects in soft-sediment environments, Te Rūnanga o Toa Rangatira considers that removal presents increased risk in certain locations, particularly in shallow, near-shore, or ecologically complex areas.

In these areas cable removal activities have the potential to:

- Cause physical damage to sensitive marine environments, where even limited disturbance may result in long-lasting or irreversible effects
- Disturb taonga species and associated habitats, particularly where ecological recovery may take decades
- Pose risk to urupā or other areas of known cultural sensitivity

3) *Do you support Transpower's preferred approach of removing the existing HVDC undersea cables once they are decommissioned?*

Te Rūnanga o Toa Rangatira supports cable removal where it can be undertaken safely and with low environmental and cultural impact, particularly in soft-sediment areas where disturbance effects are limited.

However, we are not yet certain if we can support a blanket removal approach across the full cable route. At this stage, we are leaning towards a differentiated, site-specific approach, consistent with the principle of kaitiakitanga, whereby:



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- Cables are mostly removed – such as in locations where the environmental effects of removal are lower than those associated with leaving the cables in situ
- Cables are retained in situ where removal would damage sensitive environments, or create disproportionate environmental or technical risks

Conclusion

Te Rūnanga o Toa Rangatira appreciates the opportunity to provide feedback through this consultation process and acknowledges the engagement undertaken by Transpower to date. We value the constructive dialogue that has occurred and the close working relationship that has been established.

In principle, Te Rūnanga considers that redundant infrastructure should, where practicable, be removed so that the marine environment can be restored as closely as possible to its state prior to human intervention. This aligns with Ngāti Toa values of kaitiakitanga and the protection and restoration of the mauri of Te Moana o Raukawa.

However, Te Rūnanga also recognises that some locations may represent exceptions to this principle. In areas where removal would cause greater environmental or cultural harm than leaving cables in place, a more precautionary, site-specific approach may be required.

We look forward to continuing to work with Transpower to ensure that decommissioning decisions, and decisions on the wider HVDC Upgrade Programme, are informed by robust evidence, meaningful partnership, and a shared commitment to achieving positive outcomes for the taiao, both now and for future generations.

Ngā mihi nui,

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TOA RANGATIRA

TE AO TŪROA | OHANGA | ORANGA | WHAI MANA | NGĀTI TOA RANGATIRATANGA

