



Mr Darren Walsh
Chair
Environmental Protection Authority
By email: EOsupport@dwer.wa.gov.au

19 December 2025

Dear Chair,

Referral to EPA - Lake MacLeod Solar Salt expansion proposal

I am writing to refer Lake Macleod Pty Ltd's proposed expansion of its Lake MacLeod Solar Salt Project to the WA EPA under section 38(1) of the *Environmental Protection Act 1986*, as per the attached referral form. The proponent has applied for a licence amendment (DWER Licence L7178/1997/11) under Part V of the Act, which is currently under assessment.

The Protect Ningaloo campaign is part of the Australian Marine Conservation Society which is Australia's peak marine conservation organisation, working to protect our ocean and coastal environments, representing over 300,000 people from all around the country. Our campaign represents local, state-wide and national interests of the Australian conservation sector for the Exmouth Gulf-Ningaloo area and relevant matters in the broader region. The campaign is in partnership with local conservation organisation, the Cape Conservation Group.

AMCS has strong concerns about the proposed expansion of Leichhardt's industrial salt operations within Lake MacLeod, given the scale and nature of the expansion and the environmental significance of the area.

Our view is that the proposed licence amendment should not be approved without a comprehensive and independent review of its potential environmental impacts.

Lake MacLeod is an ecologically unique wetland system with exceptional biodiversity and hydrogeological features. Owing to its high ecological, hydrological, and geomorphological values, it is recognised as meeting multiple criteria for listing as a Wetland of International Importance under the Ramsar Convention.¹ It is listed in the *Directory of Important Wetlands in Australia* as an

¹ Ecological character of the Lake MacLeod Wetland of International Importance
<https://library.dbca.wa.gov.au/FullTextFiles/064089.pdf> ; Biodiversity and ecosystem functioning of the Northern ponds, Lake MacLeod, ECU, 2016,
[https://www.researchgate.net/publication/311768430 Biodiversity and ecosystem functioning of the Northern ponds Lake MacLeod](https://www.researchgate.net/publication/311768430_Biodiversity_and_ecosystem_functioning_of_the_Northern_ponds_Lake_MacLeod)

outstanding example of a major coastal lake, which includes permanent saline wetlands and inland mangrove swamps that are maintained by subterranean waterways.²

Its unique geological evolution has resulted in a marine ecosystem surrounded by semi-arid desert and connected to the ocean through underground karst limestone waterways, recharged with a continuous supply of seawater as well as episodic freshwater pulses.

Lake MacLeod supports the largest inland populations of *Avicennia marina* (grey mangrove) in the world. It provides important habitat for large numbers of shorebirds and waterbirds—regularly supporting over 1% of the global population of several migratory species, making the wetlands internationally important. The wetlands also support diverse aquatic invertebrates and fish adapted to hypersaline environments.

The northern section of Lake MacLeod was also included in the optimal Ningaloo World Heritage boundaries proposed by the WA Government World Heritage Advisory Committee in 2004.³

The proposed expansion of the industrial salt operations is significant, with double the annual salt production, double the annual brine flows through the plant, and major new infrastructure. This includes an additional 300 ha of crystalliser ponds, new haul road levees, a new northern flood levee, earth works, channels, two new bitterns pump stations, oily water separator upgrades, an additional oily water separator not on the licence, borrow pits and clearing of native vegetation (with potentially additional borrow pit locations to be applied for later in the year). The application also seeks to reduce monitoring requirements associated with the acid sulfate soils at the gypsum mining operations. The application also refers to further expansions of the crystalliser field north in the years to come.

We are concerned about the potential cumulative and landscape-scale impacts of this expansion - and the existing industrial salt production and open-cut mining of gypsum - to this nationally and internationally important wetland system. These impacts include large-scale land clearing and disturbance, modifications to natural hydrological processes and wetland connectivity, potential seepages and contamination affecting groundwater quality and salinity, and flow-on impacts to important habitats and species.

The licence application does not provide adequate information or assessment of impacts, particularly cumulative impacts, to demonstrate that there will be no significant impacts from the proposal. Our concern is that this Part V process, with repeat amendments to the licence (and further expansions flagged) without a proper and public assessment of impacts, will enable ongoing damage to a unique and irreplaceable environment.

We have a further concern that this internationally significant wetland ecosystem is not being managed by the WA Government. We understand that an arrangement was made for the mining company to lead on managing this area, which is unusual and not considered good practice. Furthermore, while there was some consultation on a draft Lake MacLeod Management Plan in 2005,⁴ this plan - nor a final management plan - is not publicly accessible and it appears that there has been no public reporting, monitoring or independent oversight of its implementation. This lack of transparency and accountability undermines confidence that the environmental values of Lake MacLeod are being properly protected and managed.

² <https://www.environment.gov.au/water/wetlands/australian-wetlands-database/directory-important-wetlands>

³ World Heritage Consultative Committee (2005). Report on a proposal to nominate the North West Cape — Ningaloo Reef area for inscription on the World Heritage List. World Heritage Consultative Committee Final Report 18 October 2004, <https://library.dbca.wa.gov.au/FullTextFiles/023086.pdf>.

⁴ [Legislative Council Questions on Notice, 12 October 2022](#)

Given the above concerns, we are calling for the WA EPA to carry out an independent environmental impact assessment of the proposed expansion, consistent with the scale and significance of potential impacts and the value of the wetland ecosystem. This should include hydrological and water quality modelling, surveys, and independent peer review.

If you have any questions, please don't hesitate to contact me at [REDACTED]

Yours sincerely,

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Protect Ningaloo/WA Campaign Manager
Australian Marine Conservation Society (AMCS)