



16 April 2026

██████████  
Environmental Officer  
EIA North – EPA Services  
Department of Water and Environmental Regulation

Submitted via: ██████████

Dear ██████████

### **Lake MacLeod Solar Salt Expansion Project – Broader Context**

I am writing regarding the proposed development of the Lake MacLeod Solar Salt Expansion Project (**Expansion Project**) located approximately 50 kilometres north of Carnarvon in the Gascoyne region of Western Australia.

On 10 April 2026 you sent an email requesting some additional information on three separate areas. This letter has been prepared to respond to those questions and to inform the Environmental Protection Authority's (**EPA**) decision on whether to assess the Expansion Project under Part IV of the *Environmental Protection Act 1986 (EP Act)*.

The three comments raised are below along with the responses from Lake MacLeod Pty Ltd (**LMPL**):

1. A rundown of historical and current saline groundwater abstraction volumes for the Lake MacLeod salt operations, and how this expected to change with the current expansion. It would also be helpful to understand any expectations around abstraction volumes into the future, beyond the current proposal.
  - o The historical saline groundwater (**brine**) usage volumes provided below have been estimated based on historical salt production data and a conversion factor validated over time and applied in the hydrogeological modelling of the saline lake system. At the time of LMPL acquiring the Lake MacLeod operations in December 2024 it was operating at a salt growth rate of between 1-1.5 million tonnes per annum (**Mtpa**). In the period between 2020 and 2024 the average salt growth rate was 1.2 Mtpa and average brine abstraction was 6.7 GL/a. In the 2025 year, under LMPL ownership, the salt growth rate was 3 Mt and the brine abstraction was 16.5 GL. We also note that Lake MacLeod operated at this increased level in the

period between 2012 to 2014 with the average salt growth rate of 2.9 Mtpa and the average brine abstraction was 16 GL/a.

- The current expansion proposal is expected to increase the annual average brine abstraction to 20.6 GL/a.
  - LMPL does not have any reasonably foreseeable plans to increase brine abstraction volumes beyond the current proposal.
  - As previously stated in the ERD, a significant amount of work has been conducted over the many years the salt operations have existed to understand potential impacts of brine abstraction on the lake hydrology, including the northern ponds. This work has consistently concluded that at the abstraction levels significantly higher than those proposed, the risk to the lake hydrology is very low.
2. Given the references within the ERD to future-proofing for further expansion, whether there are any reasonably foreseeable expansions to operations beyond the current proposal.
- LMPL does not have any reasonably foreseeable plans to expand the salt operations beyond those detailed within the current proposal. The reference to future proofing in the ERD was general in nature and not in relation to any current additional expansion plans for the salt operation.
  - Based on the current production rates for the gypsum operation LMPL will be seeking a future prescribed premises licence amendment in 2028 to enable an increase to the footprint of the gypsum operation in 2029. This amendment would not be seeking an increase in production rates, only an additional footprint within the lake adjacent to the current operation and in line with historical gypsum expansion practices. The mining of the upper level of gypsum was previously referred to the EPA and it was determined that formal assessment was not required. The referral document noted that there would be no impact to the northern ponds due to the distance from the gypsum mining operation and upslope.
3. Some clarification on current arrangements for management of Lake MacLeod, noting LMPL is the entity responsible for the lake, including:
- what management plans, monitoring frameworks or governance arrangements are currently in place, and
    - LMPL's current management plans, monitoring frameworks and governance arrangements are focused on the operational areas of the lake in accordance with current approvals instruments.

- LMPL is also reviewing what management practices could be implemented for the broader lake area and has been engaging with the Baiyungu traditional owners (as Native Title holders) on working together to manage the northern ponds.
  - As part of this review LMPL has already reinstated the water level monitoring network in the northern area of the lake between the operations and northern ponds.
- Any management controls which may have been inherited from Dampier Salt, including the catchment management plan and management advisory group referred to in the decision not to progress the Ramsar nomination for the lake, and whether these have been retained.
  - While LMPL is aware of a May 2008 Lake MacLeod Management Plan, an initiative of Rio Tinto Minerals, the Department of Environment, and WWF the status of this plan is unclear. LMPL has no information on the proposed five-yearly reviews of the plan.
  - Records from any Management Advisory Group were not handed over to LMPL as part of the asset sale process and it is understood that no management plan work was actively being undertaken by DSL at the time of LMPL acquiring the asset. LMPL notes that investigations into the hydrological links between the northern ponds and operations had been conducted and referred to in the current section 38 referral.
  - LMPL reiterates that the proposed salt expansion is 35 km from the northern ponds, and 30 km from the nearest boundary of the proposed Ramsar nomination and can be managed under Part V of the EP Act given hydrological modelling concluded no impact to the northern ponds with brine extraction rates far in excess of that currently proposed.

This letter is intended to provide additional relevant information as well as reiterating sections of the ERD to assist the EPA in making an informed decision about whether the Expansion Project requires assessment under Part IV of the EP Act. As stated in the ERD, LMPL considers that the Expansion Project can be adequately managed under Part V of the EP Act.

Should you have any queries or require any additional information please do not hesitate to contact at [environment@leic.com.au](mailto:environment@leic.com.au).

Yours sincerely



**Scott Nicholas**  
Chief Executive Officer