



**ALIANZA  
HUMEDALES  
ANDINOS**

# **Protected Salt Flats Network: Critical Analysis of the Implementation of the National Lithium Strategy Criteria**

*Policy Brief No. 2 | October 2024*





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*The Alianza de Humedales Andinos (Andean Wetlands Alliance) brings together civil society organisations, local communities, and socio-environmental movements in Argentina, Bolivia, and Chile. Its goal is to protect, conserve, and defend Andean wetlands in peasant and indigenous territories. The Alliance's work is grounded in environmental conservation, respect for human rights, and environmental justice in the face of the ecological and climate crisis.*



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In Chile, the Alianza de Humedales Andinos consists of the following organisations:

**Fundación Tantí**

<https://www.fundaciontanti.org/>

**ONG FIMA**

<https://www.fima.cl/>

**ONG Defensa Ambiental**

<https://www.ongdefensaambiental.cl/>

**Formando Rutas**

<https://formandorutas.tech/>

**Contributors to this volume:**

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The National Lithium Strategy sets out criteria for prioritising the exploitation and protection of salt flats in Chile. However, implementing these criteria has raised concerns about their effectiveness in balancing environmental protection with the development of mineral extraction projects. This document aims to highlight key points where gaps in applying ecological, water, and productive criteria are evident, and to examine the risks posed by poor implementation.

The danger of generating unassessed impacts on the ecosystems of high-Andean wetlands is clear, given the socio-ecological networks represented by these salt flats. The State of Chile has ratified a series of international instruments for biodiversity protection, which create obligations to safeguard various types of ecosystems.

The analysis shows that the prioritisation criteria of the National Lithium Strategy are unbalanced, favouring exploitation over environmental protection.

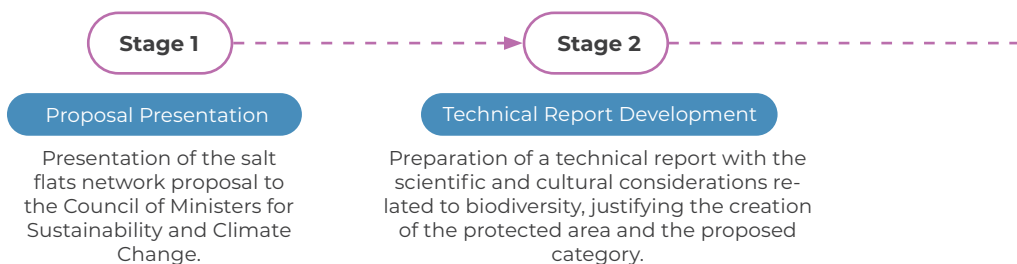
To move closer to the Strategy's goal of achieving sustainable development, it is necessary to adjust how these criteria are applied so that ecological aspects receive their stated importance, while also ensuring the participation of local communities and guaranteeing access to information throughout the process.

## 1. The Protected Salt Flats Network as an Element of the National Lithium Strategy

The Red de Salares Protegidos (Protected Salt Flats Network) aims to: “Safeguard a representative percentage of saline ecosystems (saline lagoons and salt flats), in line with the Global Biodiversity Framework of the Convention on Biological Diversity<sup>1</sup>, and in the case of ecosystems containing projects, ensure the use of low environmental impact technologies.”<sup>2</sup>

This network aims to provide some form of protection for Andean and pre-Andean salt flats by using the categories incorporated into the legal framework under Law No. 21,600, which created the Servicio de Biodiversidad y Áreas Protegidas (SBAP, Biodiversity and Protected Areas Service). The goal is to achieve protection of at least 30% of these ecosystems by 2030, in line with the Global Biodiversity Framework of the Convention on Biological Diversity. The process of establishing the Network includes a series of stages for its implementation, summarised in the figure below:

### Creation of the Protected Salt Flats Network National Lithium Strategy



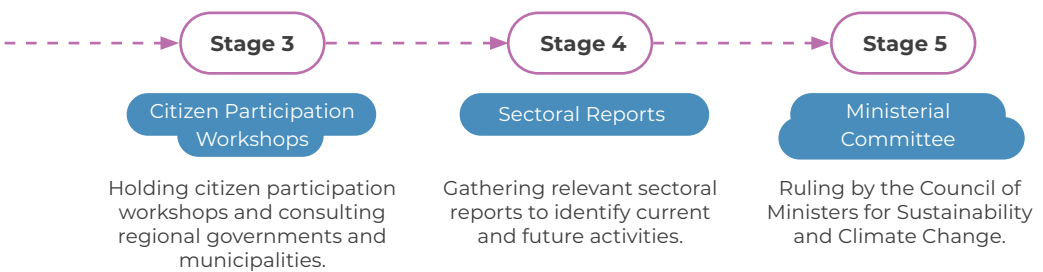
**Figure 1:** Decision-making procedure for implementing the Protected Salt Flats Network.

**Source:** *Estrategia Nacional del Litio (National Lithium Strategy)*, Own Elaboration.

1 Framework adopted in December 2022 during the Conference of the Parties to the Convention on Biological Diversity (COP15) in Montreal, Canada.

2 Gobierno de Chile (2023). *Estrategia Nacional del Litio* (p. 14). Available at: <https://www.gob.cl/chileavanzaconlitio/>





### Considerations of the Process

Considerations within the framework of the official protection procedure for each salt flat and/or lagoon protection proposal



Submission and management by the Ministry of the Environment (MMA) of requests for a Technical Report to create a protected area, in accordance with the provisions of the SBAP Law.

Protection proposals must align with the categories of protected areas set out in the SBAP.

Consultation on relevance, in accordance with ILO Convention No. 169 with the Ministry of Social Development to evaluate areas potentially subject to Indigenous Consultation.

Presentation of the proposal to create a protected area before the Council of Ministers for Sustainability, pursuant to Article 71(c) of Law 19,300.

Approval by DIFROL (National Directorate of Borders and Boundaries) of official cartography related to protection polygons, if these are public lands in border areas.

Preparation and signing of the Supreme Decree establishing the area.

Submission of the decree to the Office of the Comptroller General of the Republic for final approval

Publication of the decree in the Official Journal.



**Figure 2:** *Considerations in the decision-making process for implementing the Protected Salt Flats Network*

In March 2024, the Council of Ministers for Sustainability approved the proposed list of salt flats and lagoons to be placed under protection. The selection and exclusion of salt flats and lagoons were justified based on the criteria outlined below, which appear in the minutes of the session held on the same date.<sup>3</sup>

The selection process began with a nationwide catalogue of salt flats, led by the National Service of Geology and Mining (SERNAGEOMIN), using satellite imagery. The resulting data were then complemented by the Censo de Aves de Atacama (Atacama Bird Census) carried out by the Corporación Nacional Forestal (CONAF, National Forestry Corporation) in 2021, and by information on protected aquifers managed by the Dirección General de Aguas (DGA, General Directorate of Waters). Finally, as noted in the minutes, this information was further supplemented with available scientific literature.

Based on this, a first complete list of lagoons and salt flats identified by SERNAGEOMIN was compiled, followed by a second list of lagoons and salt flats already under some form of protection, and a third list of salt flats to be considered for studies by the Ministry of the Environment for new protection categories.

Notwithstanding the scientific and ecological criteria outlined in the Council of Ministers' resolution, there is currently limited information available about the ecosystems included in the protection list, as few studies have been conducted, and some still have characteristics that remain unknown.

The implementation of the Protected Salt Flats Network includes the development of these detailed studies for each salt flat, which will be carried out after determining which ecosystems will be included in the protection network. This reveals that the exclusion criteria have been applied without taking into account any analysis of carrying capacity or the ecological and biodiversity aspects of each salt flat.

Secondly, the exclusion of local knowledge in defining which salt flats should be protected, and in gathering environmental information about them, is apparent. The stages of citizen participation and Indigenous consultation are planned to take place once the Protected Salt Flats Network is already established, thereby reducing the capacity for communities in these territories to incorporate their ancestral knowledge

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<sup>3</sup> Consejo de Ministros para la Sustentabilidad y el Cambio Climático (2024). Acta sesión extraordinaria N° 01/2024, Ministerio del Medio Ambiente, Gobierno de Chile. Available at: <https://mma.gob.cl/wp-content/uploads/2024/04/Acta-Extraordinaria-1-2024.pdf>

and relationship with these ecosystems into decision-making process. This knowledge is crucial for collecting information and promoting a dialogue of diverse knowledges, consistent with the International Human Rights System and the right to self-determination and prior, free, and informed consultation of Indigenous peoples, as recognised in ILO Convention No. 169.

Some of these participation and consultation processes have already begun. In the second half of 2023, the Ministry of the Environment announced the start of participatory and dialogue processes in various localities of the country, such as Antofagasta, Diego de Almagro, and Copiapó.<sup>4</sup> Likewise, in May 2024, the first Salt Flats Protection Roundtable was held in the commune of Ollagüe.<sup>5</sup> Indigenous consultation processes have also been initiated for specific projects, for example, the ENAMI project (High-Andean Salt Flats)<sup>6</sup> in February 2024, and the project in the Salar de Maricunga and its surroundings<sup>7</sup> by CODELCO, which began in August 2024.

Thirdly, it is necessary to address the current protection categories assigned to some of our country's saline systems. Throughout the history of exploiting these ecosystems in the region, the existing protection and conservation instruments have not prevented harmful activities, involving unassessed impacts or, in some cases, outright environmental damage. These cases are now becoming evident in Chile:

- The case of the Reserva Nacional de los Flamencos (National Reserve of the Flamingos) and the Salar de Atacama, where in 2015, a sanctioning procedure was initiated against the SQM company for the illegal extraction of brine.<sup>8</sup>

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4 Comité de Lito y Salares avanza en definiciones para diseño de salares estratégicos y protegidos. Available at: <https://www.cdt.cl/comite-de-litio-y-salares-avanza-en-definiciones-para-diseno-de-salares-estrategicos-y-protegidos/>

5 Ministerio del Medio Ambiente. (2024). Región de Antofagasta: Ministra Maisa Rojas presidió la primera Mesa de Protección de Salares en Ollagüe. Available at: <https://mma.gob.cl/region-de-antofagasta-ministra-maisa-rojas-presidio-la-primer-mesa-de-proteccion-de-salares-en-ollague/>

6 Ministerio de Minería. (2024). Consulta a Pueblos Indígenas – Otorgamiento de contrato especial de operación para la exploración, explotación y beneficio de litio en los salares Aguilar, Infieles, Las Parinas, Grande y La Isla, de la región de Atacama, de la Empresa Nacional de Minería, ENAMI LITIO SPA. Available at: <https://participa.min-mineria.gob.cl/es-CL/projects/consulta-previa-a-los-pueblos-indigenas>

7 Ministerio de Minería. (2024). Consulta a Pueblos Indígenas – Modificación de Contrato Especial de Operación para la Exploración, Explotación y Beneficio de Litio (CEOL) en el Salar de Maricunga y sus alrededores. Available at: <https://participa.min-mineria.gob.cl/es-CL/projects/consulta-a-pueblos-indigenas-modificacion-de-contrato-especial-de-operacion-para-la-exploracion-explotacion-y-beneficio-de-litio-ceol-en-el-salar-de-maricunga-y-sus-alrededores>

8 Mongabay. (2019). Chile: detienen proceso sancionatorio de SQM acusada de graves infracciones ambientales. Available at: <https://es.mongabay.com/2019/01/chile-detienen-sanciones-por-danos-ambientales-en-salar-de-atacama/>

- The case of the Monumento Natural, Reserva de la Biósfera y Sitio Ramsar (Natural Monument, Biosphere Reserve, and Ramsar Site) of the Salar de Surire, which led to a recent environmental damage lawsuit filed by the Consejo de Defensa del Estado (Council of Defence of the State) against Quiborax for irreparable harm to the ecosystem after 37 years of exploitation.<sup>9</sup>
- The case of environmental damage with a conviction against Minera Maricunga<sup>10</sup> for impacts on Laguna del Negro Francisco and Laguna Santa Rosa, which are part of the hydrological network of the Nevado Tres Cruces National Park.<sup>11</sup>

## **2. Looking at Biological Diversity: Are Ecological Criteria Being Incorporated?**

To meet the commitments of the National Lithium Strategy, the [Lithium and Salt Flats Strategic Committee](#)<sup>12</sup> was created. This CORFO Committee is responsible for implementing the Strategy, taking into account both the ecological and exploitation dimensions, and plays a key role in determining whether a salt flat is approved for productive purposes or designated for protection.

According to the commitments made by the State regarding biodiversity, it has pledged to protect at least 30% of different types of ecosystems by 2030. This commitment, which is part of Target 2 of the [Kunming-Montreal Global Biodiversity Framework](#) adopted at the 15th Conference of the Parties (COP15) of the Convention on Biological Diversity (CBD), refers to the need to conserve significant areas of terrestrial, marine, and freshwater ecosystems to ensure biodiversity and the ecosystem services essential for life on Earth.

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9 CIPER. (2024). La fórmula de minera Quiborax para saltarse las reglas en el Salar de Surire. Available at: <https://www.ciperchile.cl/2024/03/06/la-formula-de-minera-quiborax-para-saltarse-las-reglas-en-el-salar-de-surire/>

10 El Mostrador. (2018). Tribunal Ambiental condena a Minera Maricunga por daño en humedal altoandino de Atacama. Available at: <https://www.elmostrador.cl/noticias/pais/2018/11/23/tribunal-ambiental-condena-a-minera-maricunga-por-dano-ambiental-en-humedal-altoandino-de-atacama/>

11 Mongabay. (2022). Chile: ocho proyectos mineros cercan el Parque Nacional Nevado Tres Cruces. Available at: <https://es.mongabay.com/2022/01/chile-ocho-proyectos-mineros-cercan-el-parque-nacional-nevado-tres-cruces/>

12 The Committee is overseen by a Strategic Council composed of the Ministry of Mining, the Ministry of Economy, Development and Tourism, the Ministry of Finance, the Ministry of Foreign Affairs, the Ministry of the Environment, the Ministry of Science, Technology, Knowledge and Innovation, and CORFO's Executive Vice-Presidency. Resolución 62/2023 del Ministerio de Economía, Fomento y Turismo y Corporación de Fomento de la Producción. (2023). Ejecuta acuerdo de Consejo N° 3.135, de 2023, que crea 'Comité del Litio y Salares' y fija normas que regularán su funcionamiento y aprueba su Reglamento. Available at: <https://www.bcn.cl/leychile/navegar?idNorma=1193984>

The first definitions by the Lithium and Salt Flats Committee and its technical team took place between January and March 2024. The sixth meeting of the Committee<sup>13</sup> outlines the decision-making process and its logical sequence. Prior to discussing and defining the first ecological criteria for implementing the Protected Salt Flats Network, the Committee defined the strategic nature of the exploitation of the Salar de Atacama and the Salar de Maricunga, as well as assigned the respective public companies—CODELCO for the Salar de Pedernales and ENAMI for the Salar Grande, Los Infieles, La Isla, and Aguilar—the task of developing projects through public-private partnerships. In addition, the Committee decided to open tender processes for awarding Special Lithium Operation Contracts (CEOL) to private investors.

Only after making this strategic decision did the Committee begin to outline certain ecological criteria for the creation of the Protected Salt Flats Network:

1. Biodiversity conservation, considering the distribution of threatened species, habitats important for threatened species, proximity to other protected areas, key sites for biodiversity conservation, and wetland density.
2. Water resource conservation, considering the amount of water generated in the area, proximity to natural water sources, recent precipitation variations, and temperature variations over the past 20 years.
3. Carbon sequestration, referring to the amount of organic carbon in the soil.
4. Social and cultural benefits, taking into account proximity to areas of tourist interest or ZOIT (Tourist Interest Zones), tourist attractions, sustainable tourism offerings, and the presence of Indigenous populations.

The existence of wetlands of international importance, known as Ramsar Sites, is also taken into account. These must be placed under one of the protection categories outlined in Article 56 of the law creating the Biodiversity and Protected Areas Service, in accordance with the fourth transitional article of the same law.

Subsequently, in March, during the seventh meeting of the Committee<sup>14</sup>, the list of salt flats and lagoons to be included in the Protected

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13 Comité Corfo de Litio y Salares. (2024). *Acta sexta sesión del consejo estratégico del "Comité Litio y Salares,"* de fecha 26 de enero de 2024. Available at: <http://wapp.corfo.cl/transparencia/home/ActaColegiados.aspx>

14 Comité Corfo de Litio y Salares. (2024). *Acta séptima sesión del consejo estratégico del "Comité Litio y Salares,"* de fecha 26 de marzo de 2024. Available at: <http://wapp.corfo.cl/transparencia/home/ActaColegiados.aspx>

Salt Flats Network was presented and approved. It was decided that all saline ecosystems classified as National Parks, Natural Monuments, or National Reserves would be part of the network. These would be complemented by the list of ecosystems proposed for consideration as new protected areas, adding 27 lagoons or salt flats<sup>15</sup>, thereby reaching 33% protection at the national level.

This selection, which dictates the development of socio-ecological studies for each ecosystem, was based on four documents: [the National Catalogue of Geological Mining Information; Northern Chile Salt Flats and Their Lithium Potential](#) (2017); [Andean and Pre-Andean Salt Flats Studies in the regions of Antofagasta and Atacama](#) (2019-2022); [Lithium Studies by SERNAGEOMIN](#) and the SERNAGEOMIN Library.

This decision was submitted to the Council of Ministers for Sustainability and Climate Change, which ultimately approved the proposal. It is important to note that both the Lithium and Salt Flats Committee meeting and the Council of Ministers meeting were held on the same day, with both submitting and approving the proposal on 26 March 2024.

It is necessary to contrast this background with the publicly disseminated information on the ecological criteria used to define the Protected Salt Flats Network, as outlined below<sup>16</sup>:

**Saline Systems:** These must currently be included in protection categories such as National Monuments, National Reserves, or National Parks.

**Ecological Value Criterion:** Technical environmental variables were considered, using as a reference the information from the 2020 Wetlands Classification and Prioritisation Study held by the Ministry of the Environment.

**DGA Restriction Criteria:** Restrictions arising from the declaration of protected aquifers and wetlands, according to the DGA database, and restrictions derived from the declaration of Restricted Areas and Prohibited Zones; as well as the Common Aquifer Utilisation Hydrogeological Sector (SHAC), in order to delimit protection zones in mixed salt flats.

**Productive Criteria:** Portions of salt flats or entire saline systems, as appropriate, that are currently in production or those involving State projects at any development phase. Additionally, saline systems in border areas were excluded from this proposal.

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<sup>15</sup> Among the 27 considered, three salt flats are partially protected: the Salar de Atacama, the Salar de Maricunga, and the Salar de Pedernales.

<sup>16</sup> Estrategia Nacional del Litio. Available at: <https://www.gob.cl/chileavanzaconlitio/>

No more specific information is available on how the exclusion criteria used to create the Protected Salt Flats Network were weighted. An analysis of the documents shows that the geological potential for mineral exploitation is the predominant criterion for the exploitation of salt flats, despite preliminary 2017 studies indicating relevant environmental data about the salt flats mentioned therein<sup>17</sup>

An example of this is the decision granting ENAMI the exploitation of the Aguilar, La Isla, and Parinas salt flats. The same SERNAGEOMIN report indicates that high mineral potential must be reconciled with other specific features of each ecosystem.<sup>18</sup> For instance, the Aguilar Salt Flat is an area of considerable scientific interest due to the presence of stromatolitic structures, i.e. “geological formations created by organic colonies that inhabit only very specific places on the planet, and which until recently were believed uninhabitable.”<sup>19</sup> Meanwhile, in the case of Isla and Parinas, colonies of flamingos have been identified, although their potential impact is still unclear owing to the lack of concrete studies.<sup>20</sup>

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17 The 2017 lithium exploitation potential studies provide information about the quantitative methodologies used by the Administration to define the prioritisation of salt flats to be exploited, in which 2 out of 7 factors relate to ecological aspects (such as the existence of a wetland or a protected area) and were only assigned 20% relevance. SERNAGEOMIN. (2017). *Estudio salares del Norte de Chile y su potencial en litio* (p. 25). Available at: <https://repositorio.sernageomin.cl/server/api/core/bitstreams/fcd25a3c-6cfe-4ca1-a1fc-ed00e6d8f8a3/content>

18 SERNAGEOMIN. (2017). *Estudio salares del Norte de Chile y su potencial en litio* (p. 27).

19 Ibid.

20 SERNAGEOMIN. (2017). *Estudio salares del Norte de Chile y su potencial en litio* (p. 28).

### ***3. Transparency in Decision-Making within the National Lithium Strategy***

To deepen the understanding of public participation spaces in the decision-making process of the National Lithium Strategy, technical, ecological, hydrogeological, and sociocultural information used for creating the Protected Salt Flats Network was requested,<sup>21</sup> as well as the exclusion of certain saline systems from protection.

The response included a “Summary of Background Information for the Creation of a Protected Salt Flats Network,” providing a brief characterisation of the Andean salt flats in Chile as biodiversity hotspots. The response, obtained through a public information request, confirms the logical sequence of decisions described earlier. SERNAGEOMIN (Servicio Nacional de Geología y Minería, National Service of Geology and Mining) identified all salt flats in the national territory using satellite imagery across various spectra. After that, all protected areas containing salt flats were identified. Additionally, it reiterates the use of ecological value criteria, restrictions imposed by the Dirección General de Aguas (DGA, General Directorate of Waters), and productivity criteria.

It then refers to the use of information from the DGA on watersheds, sub-watersheds, and sub-sub-watersheds, as well as protected aquifers, classified from the most fragile to the least fragile, with the most fragile being prioritised for protection. A qualitative criterion was also developed, comprising: exploitable aquifers; aquifers with exploitation restrictions; aquifers with no information; and aquifers under an exploitation ban.

Regarding ecological value, the response notes that biodiversity conservation, water resource conservation, carbon sequestration (soil), and social and cultural benefits (tourism and Indigenous populations) were considered as multidimensional elements of ecological value. These dimensions are reflected in a study carried out by the Ministry of the Environment in 2020.<sup>22</sup> That study concluded that in the Atacama Region, all salt flats had low ecological value except for Maricunga. Subsequently, the Atacama Bird Census by CONAF was used as complementary information.

The application of the so-called “dragging criterion” for salt flats is also mentioned. This means that in cases where two or more salt flats share

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21 Information request identified with folio No. AW002T0011921, in accordance with the provisions of Law No. 20,285 on Access to Public Information and its Regulations.

22 Ministerio del Medio Ambiente. (August 2020). Clasificación y priorización de Humedales de Chile.



aquifers, the environmental value of one could extend protection to the other, provided there is dependence on the same aquifer to sustain both ecosystems.

The response did not provide further details about the information obtained from these processes, nor how it was weighted in creating the list of salt flats to be protected. The creation of the list is the step prior to carrying out studies that will address the conservation status of flora, fauna, and microbiota—solely in the salt flats included in the network. These studies must also identify the main conservation targets and their primary threats, as well as cultural, social, and tourism aspects, including archaeological sites, traditional activities, and opportunities for recreational and tourism activities.

Furthermore, it was confirmed that the process design includes citizen participation and/or Indigenous consultation at later stages, which will not influence the decision-making process. These stages will be implemented in connection with: (i) the granting of a Special Lithium Operation Contract (CEOL), (ii) the environmental impact assessments of each project, and/or (iii) the creation of protected areas.

#### **4. The Bet on SBAP: The Protected Salt Flats Network and the Implementation of Law 21,600**

One of the major challenges in implementing the Protected Salt Flats Network relates to the implementation of the Law creating the Biodiversity and Protected Areas Service (SBAP). This law gives effect to advances in the commitments made by the State regarding biodiversity conservation. However, its implementation must address the considerable fragmentation in biodiversity governance and the current weaknesses in public action on this matter.<sup>23</sup>

The SBAP Law systematises the regulation of protected areas in the country. On the one hand, it creates the National Protected Areas System, comprising state and private protected areas—whether terrestrial, aquatic, marine, continental, or insular—that will be managed and administered by the Biodiversity and Protected Areas Service. On the other hand, the law consolidates protection into six categories, according to their level of protection, permitted activities, and intended management.<sup>24</sup> These categories are:

- Virgin Region Reserve
- National Park
- Natural Monument
- National Reserve
- Multiple Use Conservation Area
- Indigenous Peoples' Conservation Area

For the reclassification and standardisation of protected areas, the law provides a five-year timeframe. According to the timelines set out in the National Lithium Strategy, the protection categories for the Protected Salt Flats Network will be defined in parallel with the reclassification processes and the implementation of new regulations for creating protected areas.

One major concern about implementing the network is the absence of scientific and ecological criteria to support the decision to exploit some

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23 [OECD](#), (2016), p. 20.

24 Perillán, Felipe. (2023). Nueva legislación para la naturaleza: ¿Qué es la ley SBAP y cuál es su importancia para Chile? Apunte de política ambiental, ONG FIMA. Available at: <https://www.fima.cl/wp-content/uploads/2023/10/Apuntes-politica-ambiental-edicion-especial.pdf>

high-altitude wetlands but not others, given that these ecosystems are highly fragile and of great importance in the Puna and High Andes regions.<sup>25</sup>

That said, there are two elements that appear to be underestimated in the decision-making on this issue.

Firstly, the Network's implementation must consider the ancestral use of these territories by Indigenous and rural communities, taking into account the compatibility of such uses with the restrictions inherent in the conservation categories. Thus, from an analysis of the new protection categories and the minutes of the CORFO Lithium and Salt Flats Committee,<sup>26</sup> it is evident that certain categories render natural resource exploitation incompatible, namely the Virgin Region Reserve, National Park, or Natural Monument. Meanwhile, the categories of National Reserve, Multiple Use Conservation Area, and Indigenous Peoples' Conservation Area only allow activities that align with the management plans that must be developed in each case.

Secondly, it is crucial that the conservation polygons integrate the hydrogeological systems of Andean wetlands. This implies considering the water bodies feeding the salt flats, their connection with underground aquifers, and, in general, the entire hydrological cycle of these wetlands. These criteria must be realised in the implementation of the Protected Salt Flats Network, but the publicly available information does not confirm that this criterion is being applied effectively.

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25 Montoya, B. (2024). Expertos critican ausencia de criterios científicos en red de salares protegidos anunciados por el gobierno de Chile. Mongabay. Available at: <https://es.mongabay.com/2024/04/expertos-critican-ausencia-criterios-cientificos-red-salares-chile/>

26 Comité Corfo de Litio y Salares. (2024). *Acta sexta sesión del consejo estratégico del "Comité Litio y Salares"*, de fecha 26 de enero de 2024 (p. 5). Available at: <http://wapp.corfo.cl/transparencia/home/ActaColegiados.aspx>

## **Conclusions**

Based on the analysis presented, five key aspects for the protection of the lagoons and salt flats intended to be included in the Protected Salt Flats Network are identified, which are not being adequately considered:

### ***1. Balance between productive and ecological criteria***

In the current prioritisation, productive criteria such as geological potential carry substantially more weight than ecological factors. Ecological factors must carry significantly greater weight in decision-making. Since salt flats are fragile ecosystems, incorporating verifiable environmental variables should be central to enabling a discussion about sustainability in decision-making.

### ***2. Protection of vulnerable ecosystems***

A large number of vulnerable and less-studied ecosystems are targeted for exploitation projects, and the decisions have not delved deeply into understanding their ecological characteristics. Before making exploitation decisions, detailed studies should be carried out on each salt flat, rather than focusing solely on geological potential or the minerals present. A lack of environmental information cannot be a plausible justification for excluding salt flats from protection measures.

Salt flats with high productive potential are prioritised without considering the presence of threatened species or unique ecosystems such as stromatolites and flamingo colonies. Exploitation decisions must align with the conservation of key species and biodiversity.

### ***3. Adequate participation***

Indigenous consultation and citizen participation have been postponed to advanced stages of the decision-making process. This reduces the ability of communities to influence significant decisions affecting their territories and ecosystems. Local communities must be involved from the outset, and participatory processes cannot merely be a formality to ensure legal compliance. Incorporating local knowledge is invaluable for implementing more effective and culturally sensitive protection measures.

### ***4. Transparency in public information***

Information regarding exclusion criteria and the studies used to prioritise salt flats is unclear and not readily accessible, hindering citizen oversight of the process. The National Lithium Strategy must become more transparent, providing timely access to the minutes of the various bodies responsible for key decisions, facilitating technical information, and clarifying the criteria employed in decision-making.

### ***5. Recognising the connection between salt flats and underground aquifers***

Current criteria do not adequately account for the interconnection between salt flats and their underground aquifers. Protecting only the visible salt flats or lagoons, without considering water sources—whether surface or underground—can lead to irreversible impacts. It is essential that any decision on exploiting or protecting salt flats includes a comprehensive analysis of the hydrogeological system to be effective.



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