



Outlook

Response to quesry on residue stockpile clarification

From Aaron Kharivhe <Aaron.Kharivhe@dmre.gov.za>

Date Fri 1/28/2022 2:01 PM

To Brian Whitfield <brian@eims.co.za>

Cc Betty Mdala <BMDALA@dffe.gov.za>; Chantal Engelbrecht <CENGELBRECHT@dffe.gov.za>; Liam Whitlow <liam@eims.co.za>

Good Day Brian

This e-mail would serve to provide clarity and contextualize the aspects on Residue Stockpile as it relates to the Run of Mine and waste in General.

By virtue of the ROM constituting a stockpile, the definition of Residue stockpile may be misconstrued to suggest that the ROM would constitute part of the residue stockpile. It is however imperative to clarify that the necessity of the Chemical of mechanical process as it relates to minerals is to separate a product from remaining mass(waste). The ROM would therefore constitute a product mass and cannot be classified as Waste. The Waste would be valueless discard, which may in certain instances with future technology be worth reprocessing(regain value) however at the time of initial processing is deemed to be valueless and constitute Waste.

In short the ROM cannot be deemed to be Waste and the NEM:WA cannot be applicable to such. The Residue stockpile in this context cannot apply to the product.

If you have further queries, please do not hesitate to contact us.

Kind Regards,

Aaron

From: Brian Whitfield [<mailto:brian@eims.co.za>]

Sent: Tuesday, 25 January 2022 07:05

To: IQ <IQ@dffe.gov.za>

Cc: Liam Whitlow <liam@eims.co.za>

Subject: NEM:WA residue stockpile clarification

Good morning.

As the NEM:WA refers to the MPRDA definition of residue stockpile, would you kindly confirm if a mines Run of Mine stockpile (which is a product stockpile and not waste) is considered a residue stockpile in terms of the definition of such contained in the MPRDA?

MPRDA Definition: "residue stockpile" means any debris, discard, tailings, slimes, screening, slurry, waste rock, foundry sand, beneficiation plant waste, ash or any other product derived from or incidental to a mining operation and which is stockpiled, stored or accumulated for potential re-use, or which is disposed of, by the holder of a mining right, mining permit, production right or an old order right;

KIND REGARDS
BRIAN WHITFIELD

