

DWARS RIVER MINE GRAVES - APPLICATION FOR WAIVER OF THE 100 M SERVITUDE REQUIRED FOR GRAVES

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1. BACKGROUND

The Two Rivers Platinum Mine received a complaint about a pipeline carrying mining effluent from the processing plant passing close to a Burial Ground located at GPS Coordinates Lat: 24°56'31.03"S, Long: 30° 7'35.39"E, and emptying into tailing storage facility located on the farm Grooteboom 373 KT south of the Mine. The burial ground is routed via Two Dwars River Mine on which the graves are located. Several families affiliated with graves represented by Mr. Caswell Pokwane expressed concern that the construction of the pipeline in proximity to the graves was a cultural offence and in breach of SAHRA regulations for Burial Grounds and Graves which stipulates a 100 m servitude around graves prohibiting development unless the developer seeks a special exemption from the Heritage Authority.

It is noted that a Heritage Impact Assessment was undertaken in 2013 to pave the way for the construction of the pipeline.¹ However, no graves were mentioned in the report. More information about the project was provided by Mine Officials. The graves were known before the project commenced. Whereas the original plan had been to run the pipeline east of the graves, this shorter route would have brought the pipeline within a few metres of the graveyard. So the plan was amended, and the route was moved to the west of the graveyard leaving a buffer of 50 m (Figures 1 - 4).

¹ Vallonhoven, A. 2013. A Report on a Cultural Heritage Impact Assessment for a Proposed new TSF Pipeline at the Two Rivers Platinum Mine, Close to Steelpoort, Limpopo province

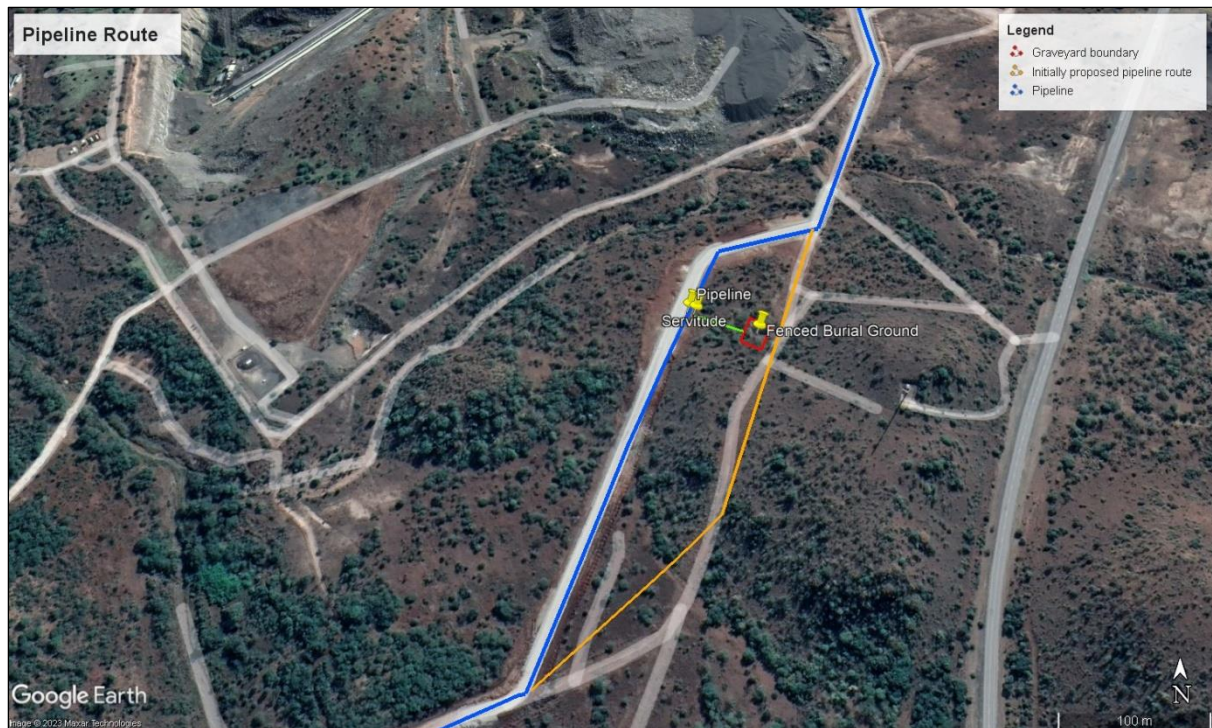


Figure 1: Google Earth map shows the pipeline route through Dwars River Mine towards the tailings (beyond the bottom left corner of the photo). The initially proposed route (orange) passed within a few metres of the graves



Figure 2: The distance between the graves and the pipeline servitude is 50 m The recommended buffer is 100 m



Figure 3: A view of the pipeline at the shortest distance to the graves located on the right side (not in the picture)



Figure 4: The graves seen from the pipeline at the shortest distance

From time to time the South African Heritage Authority (SAHRA) has been reviewing regulations concerning the treatment of human remains. Whereas normally the buffer for heritage recognized as vulnerable to development and must be protected is 30 m to 50 m, SAHRA now stipulates a 100 m servitude. This regulation is being enforced although it is in the process of being gazetted. The reason for these strictures is public sensibilities about the handling of graves and human remains, which have sometimes led to acrimony and nasty standoffs between communities and developers.

2. PROPOSED MITIGATION

To our knowledge, the 100 m regulation was already in place by the beginning of 2019. It is noted that Two Rivers Platinum had exercised due diligence by commissioning the Heritage Impact Assessment (HIA) study, and precautions had been taken on the basis of the information at its disposal at the time. During a meeting held at the Mine on 10th March 2023 between Mr. Pokwane representing the families and the Mine officials, attended by the heritage specialist, a common understanding was reached to maintain the status quo, i.e. that the pipeline would remain where it is, provided that

- (i) The Mine approaches SAHRA for a special exemption from the 100 m threshold;
- (ii) The families can hold a once-off appeasement ceremony. Both the Mine and the Families accepted that it was cultural remediation appropriate and in line with the local religious customs. The Mine agreed to provide funds and logistical support required for the ceremony. The families have signed Consent Forms for the propose exemption.

END OF REPORT