

BACKGROUND INFORMATION DOCUMENT

PRE-APPLICATION NOTICE

SUSTAINABLE HEATING ASPEN PHARMACARE BOILER, GQEBERHA, NELSON MANDELA BAY MUNICIPALITY, EASTERN CAPE

CEN Integrated Environmental Management Unit

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PURPOSE OF THE BACKGROUND INFORMATION DOCUMENT

The purpose of this Background Information Document (BID) is to provide stakeholders with additional information, the opportunity to register as Interested and Affected Parties and to obtain their comments on the proposed activities for the **Sustainable Heating Aspen Pharmacare Boiler**, in Gqeberha, Nelson Mandela Bay Municipality, Eastern Cape.

Sustainable Heating 8 (Pty) Ltd will be applying for a **Waste Management Licence** in terms of the **National Environmental Management: Waste Act (Act 59 of 2008)**. The proposed activities require that a **Scoping & Environmental Impact Assessment** process be undertaken and the relevant authority is the **National Department of Forestry, Fisheries and the Environment - Waste Management Directorate (DFFE)**.

Sustainable Heating 8 (Pty) Ltd will also apply for an **Atmospheric Emissions Licence (AEL)** in terms of the **National Environmental Management: Air Quality Act (Act No. 39 of 2004)**. The application for the AEL will be submitted to the **National Department of Forestry, Fisheries and the Environment – Air Quality Directorate (DFFE)**.

If you would like to participate in the process, please register yourself and/or your organization as an Interested and Affected Party. In participating in the EIA process, your consent is provided for your information to be added to the Interested and Affected Parties (I&AP) Database as required by the EIA Regulations, 2014 as amended. Submit issues or comments that you feel need to be addressed by completing the response form or in a letter or by email to:

CEN IEM Unit

Dr Mike Cohen / Mrs Lucille Behrens

Fax: 086 504 2549

Email: steenbok@aerosat.co.za / lucille@environmentcen.co.za

**REGISTRATION AS AN INTERESTED AND AFFECTED PARTY AND ALL
COMMENTS MUST BE SUBMITTED WITHIN 30 DAYS OF THE DATE OF THIS
NOTICE.**

DATE OF NOTICE – 20 October 2026

CLOSING DATE FOR COMMENTS – 20 November 2026

1. THE PROPOSED PROJECT

1.1. Introduction

CEN IEM Unit has been appointed by Lethabo Air Quality Specialists (LAQS) on behalf of Sustainable Heating 8 (Pty) Ltd (Sustainable Heating) to undertake the EIA process as the independent Environmental Assessment Practitioner (EAP) for the proposed activities for the Sustainable Heating Aspen Pharmacare Boiler.

The applicant for the Waste Management Licence and Atmospheric Emissions Licence will be Sustainable Heating, represented by Mr Mark Velayutham.

1.2. Locality

The Sustainable Heating Aspen Pharmacare Boiler is located at the Aspen Pharmacare Facility, 7 Fairclough Road, Korsten on Erf 3278 Mount Road, within Ward 7 of the Nelson Mandela Bay Municipality, Eastern Cape. Refer to **Figure 1** for the locality map. The SG 21 digit Code is C05900250000327800000.

The geographic co-ordinates of the central point for the proposed project is: 33°55'58.32"S, 25°35'21.60"E.

1.3. Existing / Current Operations

Sustainable Heating owns and operates two biomass boilers on the Aspen Pharmaceuticals site in Gqeberha in order to generate steam for Aspen's operations.

The biomass boilers currently utilises wood chips and shredded wood. Wood chips are purchased from two suppliers and stored in bunkers enclosed on 3 sides (1 opening for offloading). Disused wood products, such as pallets, are procured from various companies and shredded on site. The wood chips and shredded wood is conveyed to a blender in an enclosed conveyor system to a central blender. The blended wood material is then conveyed into the two boilers in an enclosed conveyor.

The heat generated by the combustion process (from the boilers) is used to indirectly heat water to generate steam for Aspen Pharmaceuticals. The off gas from the indirect heating process is passed through a second chamber to indirectly pre-heat water before it is introduced into the main heating chamber. After the indirect pre-heating chamber, the off gas is passed through a baghouse unit before reaching the atmosphere. The dust captured by the abatement system is stored in sealed bulk bags/containers and disposed by Enviroserve. Ash from the current process is removed from the enclosed boiler unit and is provided to a composting company.

Sustainable Heating currently uses 40 tons of biomass per day and produces approximately 4-5 tons of wood ash.

The Sustainable Heating boiler facility at Aspen has been operational since November 2023, and operates under the NMBM Fuel Burning Equipment Certificate NMBM FBE 5/4 (valid until 25/06/2029), which limits fuel to biomass.

1.4. Proposed Activity

Sustainable Heating proposes to co-feed pharmaceutical and clean/pre-consumer medical / health care waste generated by Aspen Pharmaceuticals with the biomass mix as a supplementary fuel. The pharmaceutical waste is generated and stored by Aspen Pharmaceuticals on the same premises as the boiler house. The Sustainable Heating Aspen Boiler will treat (thermal treatment / incineration) approximately 370 tons per month, of which about 80-90 tons would be classified as hazardous waste (pharmaceutical / medical / health care waste). This amounts to a monthly average of three (3) tons of hazardous waste per day.

Waste material will be delivered to the Sustainable Heating boiler area in trolley loads and will be tagged with the classification of waste. This area will be an enclosed waste receiving / processing area of approximately 75m² (15m × 5m). The pharmaceutical waste will then be placed into an enclosed shredding plant. The materials will be shredded before introducing it to the biomass fuel source. The pharmaceutical waste will be co-fed with the biomass based on moisture content to ensure stability of the moisture content before being introduced into the boiler. A maximum of 10% pharmaceutical waste will be co-fed into the biomass material.

The materials will be conveyed to the boilers via a sealed pipe conveyor. The ash from the proposed process will be stored in an enclosed area. Once co-feeding starts, Sustainable Heating will have the ash analysed to determine if the ash is hazardous in order to further determine disposal options.

The proposed system will be fully automatic with no human handling of the waste and an enclosed system to prevent open areas for tampering.

Waste streams and classification:

- Non-hazardous wood waste already sent to the boiler (wood pallets, wood shippers, wood skip) – ~30 t/month.
- Non-hazardous and hazardous pre-consumer pharmaceutical waste planned for the boiler (contaminated High-Density Polyethylene (HD) drums, general waste bales, rejected warehouse printed components, Polypropylene (PP) bottles, plastic pallets, scrap wood, cardboard, paper and plastics) – ~50 t/month.
- Hazardous Schedule 0–4 pharmaceutical solid waste (desiccant, HVAC filter bales contaminated with pharmaceutical powder, ad hoc rejected tablets, baled dry pharmaceutical packaging, expired stock / raw materials) – ~60 t/month.

Need and Desirability:

Waste management hierarchy: the proposed project moves Aspen's residual pre-consumer and pharmaceutical waste up the hierarchy from disposal (landfill / off-site hazardous waste treatment) to energy recovery, in line with the National Waste Management Strategy (2020) and the NEM:WA Policy on Thermal Treatment of General and Hazardous Waste (GNR 777 of 2009).

Treatment at source: the waste is generated on the same premises as the boiler, which reduces road transport of hazardous waste, transport costs and associated risks for Aspen, and supports Aspen's compliance with its duty of care.

Fuel displacement: waste-derived fuel replaces up to 10% of the wood biomass; and the biomass steam generation already displaces fossil fuel for Aspen's steam needs.

Existing infrastructure: the activity uses an existing, operating boiler plant with baghouse abatement in an established industrial area; no new boilers, stacks or change in land use is required.

Growth: steam demand is expected to increase when Aspen's SVP3 plant comes online (~2 t/h additional steam), which would increase the allowable waste co-feed at the 10% cap.

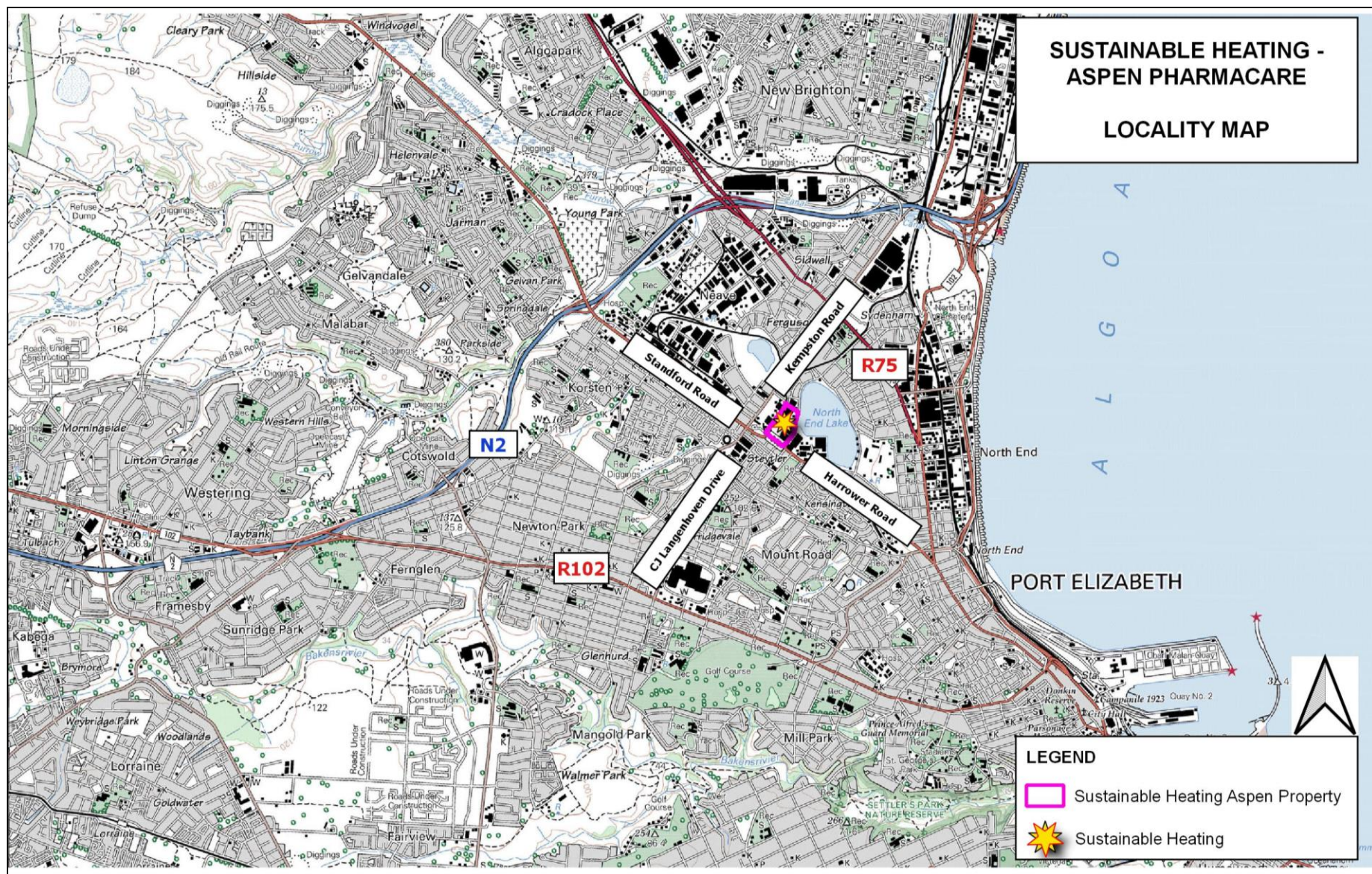


Figure 1: Locality Map

2. LEGAL FRAMEWORK

2.1. National Environmental Management: Waste Act and EIA Regulations (2014)

The treatment of waste is regarded as a listed activity in terms of Section 19(2) of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) which requires a Waste Management Licence (WML).

The following activities are subject to a **Scoping & Environmental Impact Assessment (S&EIA)** process in terms of the Environmental Impact Assessment (EIA) Regulations 2014, made under Section 24(5) of NEMA and in the List of Waste Management Activities published in Government Notice No. 921 on 29 November 2013 (GN921) as amended. Additional listed activities may be identified as the process is undertaken. The competent authority is the **Department of Forestry, Fisheries and the Environment – Waste Management Directorate (DFFE)** due to the activities involving hazardous waste.

Listed Activity	Description
NEM:WA Category B Activity 4: The treatment of hazardous waste using any form of treatment at a facility that processes in excess of 1 ton per day calculated as a monthly average, excluding the treatment of effluent, wastewater, sewage or organic waste using composting or any other organic waste treatment.	The Sustainable Heating Aspen Boiler will treat (thermal treatment / incineration) approximately 370 tons per month, of which about 80 - 90 tons would be classified as hazardous waste. This amounts to a monthly average of three (3) tons of hazardous waste per day.
NEM:WA Category B Activity 10: The construction of a facility for a waste management activity listed in Category B of this Schedule (not in isolation to associated waste management activity).	Construction of the infrastructure to expand for the treatment of the hazardous waste.

2.2. National Environmental Management: Air Quality Act and Listed Activities

The incorporation of waste into the boiler system is regarded as a listed activity in terms of Section 21 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) which requires an Atmospheric Emissions Licence (AEL). The competent authority for issuing the AEL is the **National Department of Forestry, Fisheries and the Environment – Air Quality Directorate (DFFE)** due to the DFFE Waste Management Directorate being the competent authority for the WML application.

The proposed activities fall under the following categories in the National List of Activities Which Result in Atmospheric Emissions as published in Government Notice No. 893 on 22 November 2013 (GN893):

Activity	Description
Category 1: Combustion Installations Sub-category 1.6: Waste Co-feeding Combustion Installations Combustion installations co-feeding waste with conventional fuels in processes used primarily for steam raising or electricity generation. Application: All installations	Pharmaceutical waste is proposed to be co-fed (10%) with biomass (woodchips) for the generation of steam that is utilised within the Aspen Pharmacare Facility.

3. ENVIRONMENTAL ASSESSMENT PROCESS

To obtain a Waste Management Licence for the project, a comprehensive and independent EIA must be undertaken in terms of the NEMA EIA Regulations. The EIA process also provides for an appropriate participation process.

An EIA is a process by which possible impacts of a proposed project are identified, evaluated or assessed and possible mitigation measures identified. After that, recommendations are made on whether the proposed development should be authorised, and if so, under what conditions the project should be implemented.

As we progress with the environmental investigations, we will identify potentially beneficial and adverse impacts. All identified issues will be subjected to an assessment to determine if they are significant and if they require additional investigation. Possible mitigation measures will also be provided to reduce the anticipated adverse impacts or enhance positive impacts.

Based on our preliminary investigations, together with the DFFE Screening Tool, we have identified the following specialist assessments:

- ✿ Air Quality Impact Assessment

4. DESCRIPTION OF TASKS IN THE EIA ASSESSMENT PROCESS

- ✿ Pre-application public participation starts announcing the proposed project and registration of Interested and Affected Parties (I&APs). Newspaper advertisements and site notices are placed and notifications are also sent to identified stakeholders. Refer to **Figure 2**.
- ✿ An application for a Waste Management Licence will be submitted to the competent authority, namely the DFFE for this project.
- ✿ A Scoping Report is compiled that considers inputs from stakeholders, I&APs and specialists.
- ✿ The Draft Scoping Report is submitted for a 30 day review period to I&APs and stakeholders. This enables you to comment on the Draft Scoping Report.
- ✿ Your comments are incorporated and the reports are then finalised.
- ✿ The Final Scoping Report is submitted to the DFFE for consideration / authority review.
- ✿ Once the DFFE has accepted the Scoping Report, the EIA phase begins. This includes the compilation of an EIA Report and Environmental Management Programme (EMPr).
- ✿ The Draft EIA Report and EMPr is made available for a 30 day review period to registered I&APs and stakeholders. This enables you to comment on the Draft EIA Report and EMPr.
- ✿ Your comments are incorporated and the reports are then finalised.
- ✿ The Final EIA Report and EMPr is then submitted to the DFFE for consideration / authority review.
- ✿ The DFFE reviews the final reports and decides whether the project can proceed or not, their decision is known as a Waste Management Licence or Refusal.
- ✿ A copy of the Waste Management Licence or Refusal is made available to you to consider, along with the reasons for the decision made. If you disagree with the decision, you are provided with information on how to lodge an appeal.

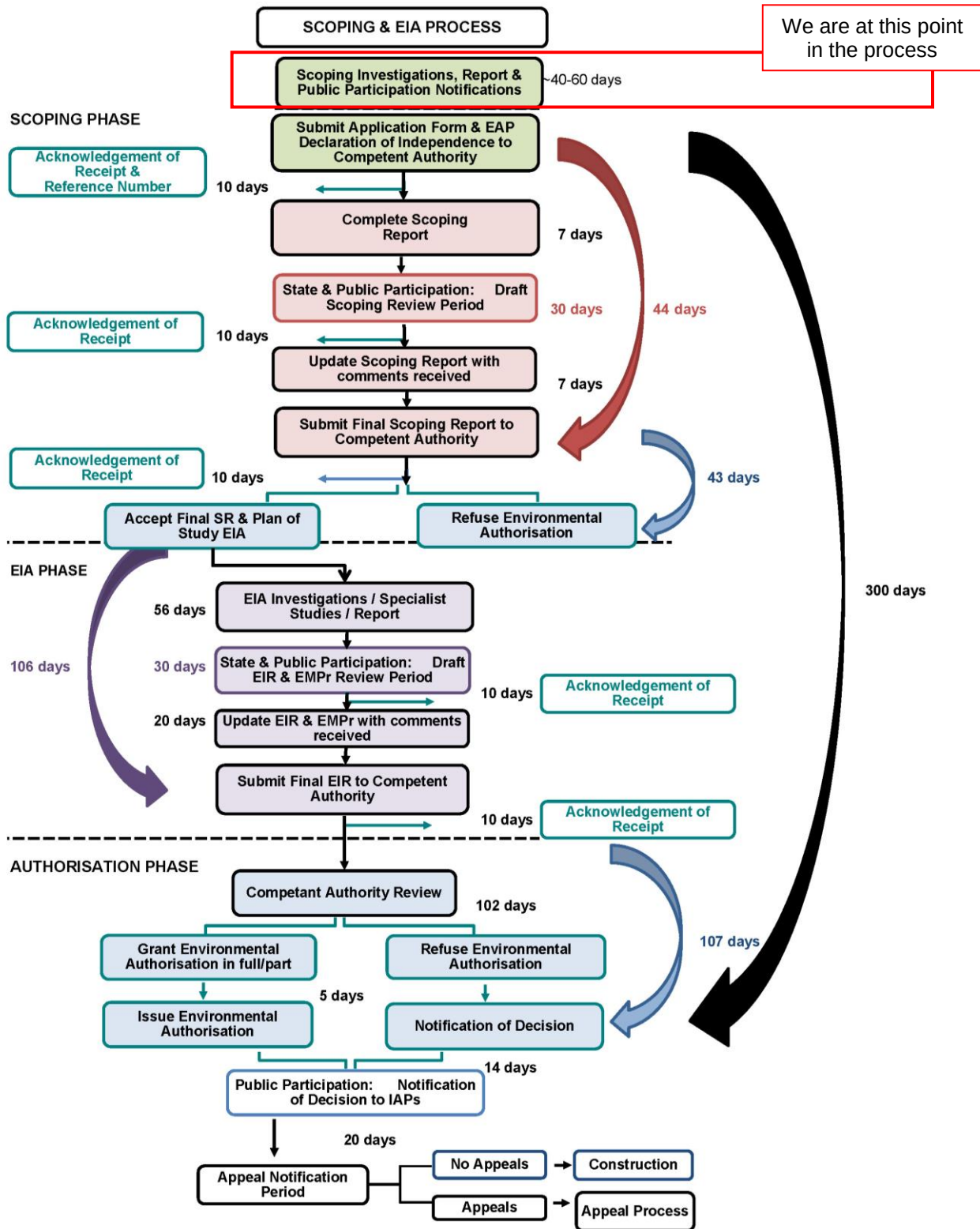


Figure 2: S&EIA Process, EIA Regulations 2014

5. HOW DO YOU PARTICIPATE

Register as an Interested and/or Affected Party (I&AP) in order to comment on the proposed application and raise issues or concerns that you feel need to be considered during the process.

Complete the attached registration form and submit it to the contact details as reflected. Upon submission of the registration form to CEN IEM Unit, you will be registered as an I&AP and be included on an I&APs database which will ensure that you receive future project notifications.

Regulation 42 of the EIA Regulations, 2014 as amended, requires a register of interested and affected parties to be opened and maintained throughout an EIA process. This register must contain the names, contact details and addresses of (a) all persons who, as a consequence of the public participation process conducted, have submitted written comments or attended meetings; (b) all persons who have requested in writing, for their names to be placed on the register.

In participating in the EIA process, your consent is provided for your personal information (names, contact details and addresses) to be added to the Interested and Affected Parties (I&AP) Database as required by the EIA Regulations, 2014 as amended.

Please note the I&AP database is required to be included in any draft or final EIA reports, however CEN IEM Unit will endeavour to not make your personal information (contact details or addresses) available in reports that are provided in the public domain.

If a commenting party has any objection to his or her name, or the name of the represented company / organisation being publicly available, such objection is to be highlighted as part of the comments submitted.

CEN IEM Unit will maintain the I&AP database until the end of the EIA Process and will not wilfully or intentionally distribute this information to a 3rd party.

In certain circumstances, e.g. appeals, CEN IEM Unit may be required to provide the I&AP database to the Applicant on closure of the EIA Process.

Please note if you do not want to be included in the I&AP database, please advise us in order for your details to be removed. Otherwise it is deemed that you consent for your details to be included, in terms of the Protection of Personal Information Act (No. 4 of 2013 (POPIA)).

If you intend to register as an I&AP or forward comments regarding the proposed application, please submit your completed registration form to CEN IEM Unit by **20 November 2026.**



CEN IEM UNIT

Fax 086 504 2549

Email steenbok@aerosat.co.za / lucille@environmentcen.co.za

REGISTRATION / COMMENT SHEET

SUSTAINABLE HEATING ASPEN PHARMACARE BOILER, GQEBERHA, NELSON MANDELA BAY MUNICIPALITY, EASTERN CAPE TAL

Date of Notice: 20 October 2026

I wish to register as an Interested and / or Affected Party and request that the following issues receive attention during the assessment process.

In participating in the EIA process, my consent is provided for my personal information (names, contact details and addresses) to be added to the Interested and Affected Parties (I&AP) Database as required by the EIA Regulations, 2014 as amended.

If a commenting party has any objection to his or her name, or the name of the represented company / organisation being publicly available, such objection is to be highlighted as part of the comments submitted.

Closing Date for Comments: 20 November 2026

Name of Respondent: _____

Organisation / Company: _____

Address: _____

Fax Number: _____

Tel Number: _____

Email: _____

Please use additional sheets as necessary

Signature: _____

Date: _____