



TETELESTAI RECOVERY CENTRE

AFTER DARKNESS, LIGHT.

5 BEACH ROAD, WINKLESPRUIT, KINGSBURGH 4126

REGISTRATION NO : 2019/632522/08

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To Whom It May Concern

22 October 2025

RE: SUBJECT: FORMAL APPEAL AGAINST THE CANCELLATION OF REGISTRATION – TETELESTAI RECOVERY CENTRE

We hereby submit a formal appeal in terms of Section 24(4) of the Prevention of and Treatment for Substance Abuse Act, 70 of 2008, against the Department's decision dated 29 September 2025 to cancel the registration of Tetelestai Recovery Centre (TRC) as a treatment facility.

While we acknowledge receipt of the Notice of Intention to Revoke Registration, we respectfully submit that the Department's subsequent decision to proceed with cancellation is unfounded, procedurally disproportionate, and unsupported by any material evidence of non-compliance.

1. Staffing Compliment Remains Fully Compliant

The Department's finding that TRC's staffing structure is non-compliant or insufficient is incorrect and misleading.

Our staff compliment remains exactly the same as when registration was approved on 13 March 2025. There have been no staff resignations, dismissals, or operational downgrades since that date.

Therefore, the Department's assertion that the facility no longer meets minimum staffing norms carries no factual basis and directly contradicts its own earlier findings when registration was granted under identical staffing conditions.

2. Lease Agreement Not a Requirement for Registration

It appears the Department's decision was influenced by issues relating to our lease agreement and the landlord.

We submit that:

- The Prevention of and Treatment for Substance Abuse Act (Act 70 of 2008) and the Minimum Norms and Standards do not require a lease agreement as a condition of registration.
- Civil or contractual disputes between a tenant and a landlord fall outside the legislative authority of the Department.
- The Centre remains fully operational, compliant with all health, safety, and fire regulations, and continues to provide essential rehabilitation services to service users in accordance with approved treatment protocols.

It is therefore unreasonable and ultra vires for the Department to cancel registration based on private property or lease-related matters that have no bearing on service delivery or client care.

3. Inadequate Consideration of Representations

Although the Department provided a notice of intention to revoke, our response and supporting documentation appear not to have been given due consideration before the cancellation was finalized.

This constitutes a failure to apply procedural fairness as required by Section 33 of the Constitution and the Promotion of Administrative Justice Act (PAJA), Act 3 of 2000, which mandate that all administrative actions be lawful, reasonable, and procedurally fair.

4. Continued Operations Pending Appeal

In accordance with Section 24(5) of the Act, we hereby notify the Department that Tetelestai Recovery Centre will continue its lawful operations for all existing and potential service users in line with its registration, pending the outcome of this appeal.

We request that the Department suspend the effect of the cancellation decision until the appeal process has been concluded.

5. Conclusion

Tetelestai Recovery Centre has at all times acted in good faith, upheld full compliance with statutory and operational standards, and continues to serve its community with integrity and professionalism.

The Department's decision to cancel registration on the grounds cited is neither reasonable nor legally sustainable, and we therefore request that it be reviewed and set aside, reinstating Tetelestai Recovery Centre's registration in full.

Kind regards,

A large, stylized handwritten signature in dark ink, consisting of a large loop at the top and a smaller loop at the bottom, crossing itself.

Donovan de Klerk
Managing Director

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