



turn back the toxic tide

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December 18, 2014

Mr. Bruce Manssuer
CEO
Diversified Recycling
2700 Hazelhurst Avenue
Orlando, FL

Dear Bruce,

This letter is to inform you that the Basel Action Network (BAN) has decided to withhold the possibility of e-Stewards Certification from Diversified Recycling for a minimum of two years commencing today.

The decision was made on the basis of the information collected during the past several weeks and as described in the Evidentiary Report sent to you on December 15, 2014. This report described what BAN deems to be multiple Critical Non-Conformities and, likely, other major non-conformities not previously uncovered during the audit process. We found these violations to be willful and egregious, and resulting in serious risk to worker safety and to the environment. Some violations appear also to be contributing to what may very well be illegal activities.

Our decision is also based on the information you have provided to us in response to the presented evidence – both as stated in your letter on December 16 and in our phone conference from today. While you indicated remorse and a willingness to prevent such acts in the future, you did not contest the report nor were you able to provide any extenuating circumstances that could explain the willful choices and decisions made in complete violation of the Standard and in a manner that risked contributing to the endangerment of workers and the environment.

I believe we all agree that the circumstances, and thus their consequences, are unfortunate. We are hopeful that you will take this opportunity to learn and make the choices that will ensure that in the future your business model is sustainable both in terms of profits but also in terms of environmental health and social responsibility.

We do not take this decision lightly, but it is very important that, first and foremost, human health and the environment are protected. Second, it is important that the integrity of the e-Stewards Standard is upheld and that the hard work and internalization of costs achieved by others to obtain e-Stewards Certification is not so easily belittled by allowing violators to avoid being held accountable for their actions. As noted in the Critical Non-Conformity policy, BAN believes that in the interests of such accountability and awareness raising, it is also important that we make this decision and the reasons behind it, known to the public and business community.

If after two years, Diversified still wishes to become e-Stewards Certified, we will undertake a review to determine whether lessons have been learned and a sustainable business model has been achieved to open the door to a possibility of e-Stewards Certification.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Puckett', with a stylized flourish at the end.

Jim Puckett
Executive Director
Basel Action Network