



# Product Recall Planning



No company wants to experience a product recall. However, a product withdrawal or recall from the supply chain and marketplace may be necessary to reduce potential harm to users, comply with regulations and decrease liability risk associated with harmful/defective products. According to the Organisation for Economic Co-operation and Development (OECD), over 14,500 products were recalled globally from 2016 through 2020, with the top three categories originating from the automotive, toy/game and electrical supply industries.



The following recall plan guidance can prepare your organization to act quickly in the event of a product recall.

#### Plan for a recall

- Create a recall policy and establish a recall procedure/plan.
- Designate a recall coordinator and recall team. The recall coordinator will lead the recall initiative and coordinate with internal and external parties involved with the recall process. The recall team may consist of staff from supply chain management/distribution, production operations, quality control, sales, legal and marketing/public relations, and will be responsible for creating, testing and updating the recall plan.
- Implement a product traceability program. It is important to maintain effective product and customer databases to track recalled products and their purchasers. Record and track lot numbers of all incoming and outgoing raw materials/products and store the records in an easily accessible format.
- Establish a system for referring any complaint calls to a specific person or department. Maintain a product incident log for customer complaints, incidents and accidents that might affect product safety.
- Develop customer repair and warranty reports that communicate safety-related information for trend analysis.
- Develop and maintain effective communication channels with final consumers, intermediaries, repair facilitators and the customer service department as part of pre-recall planning. Customer repair and warranty reports, product return records, customer service information and customer surveys contain useful safety-related information.
- Designate a media spokesperson who, in collaboration with the recall coordinator, will represent and oversee your company's public messaging strategy (including messaging to regulators, if applicable). The media spokesperson should establish consistent messaging strategies across multiple media platforms, including your company's main website, social media pages and industry associations/publications.
- Establish a list of key people and organizations to contact in the event of a recall. Communicate your recall plan to these key people and organizations.
- Test your recall plan. Your recall program should be tested (via mock recall) annually or more frequently to validate its effectiveness with program updates completed as required. This is a recursive process.

### When is a recall needed?

- Through your product monitoring protocols, you may discover that one of your products poses a potential risk to people or property. Conduct a risk assessment to identify the hazard, estimate the level of risk, assess the acceptability of the risk and determine next steps. Questions to ask include:
  - What is the hazard?
  - What products are affected?
  - How many products are in the marketplace or in use?
  - Who is affected?
  - What is the injury likelihood and severity?
  - Is regulatory reporting required?
- If your risk assessment concludes that product withdrawal or recall is the best course of action, then implement your recall plan.

### Initiate and execute the recall

- Contact and coordinate with regulators. Your company may have obligations to alert regulators of an identified hazard and impending recall request. These requirements vary globally, so it is important to determine the governing bodies for your company's operations. For example:
  - U.S. regulators include the CPSC, FDA, NIH, ATF, and state-level health and consumer safety divisions. The CPSC requires notification within 24 hours of obtaining reportable information. Reports may be electronically filed through the CPSC website, or by mail or telephone.
  - Canadian regulators include Health Canada CPSP and Transport Canada.
  - European regulators include the European Commission and competent authorities of EU member states. In the U.K., agencies such as the FSA, MHRA, DVSA and OPSS act as regulators.
  - Although the majority of product recalls are voluntary and initiated by the product manufacturer, there are cases where regulators may need to take immediate action in the interest of public safety by issuing mandatory recalls. In these recall events, regulators instruct companies to establish and coordinate product recalls with strict implementation timelines. Again, procedures and regulatory requirements vary by regulatory body.

- Contact your supply chain. Halt production of affected products pending investigation results. This includes both internal production operations as well as third parties responsible for product manufacturing and distribution. The objective is to prevent additional hazardous products from entering the marketplace.
- Implement your media strategy. It is important to work with regulators and contact consumers/affected parties as soon as possible to alert them of potentially hazardous products/conditions. Information communicated should include product identification details, a description of the product hazard and potential safety risk, required immediate actions, and your company's contact information for further inquiry or updated instructions.
- Establish corrective actions. Hazardous products may need to be repaired, replaced or destroyed. Take the appropriate actions as determined by your risk assessment to remediate the product hazard.

### Post-recall takeaways

- Evaluate your supply chain and production process. Determine what modifications can be made to product design, raw materials, manufacturing processes and other identified hazard factors to improve product safety and reduce the likelihood of a future product recall.
- Assess the effectiveness of your recall. Evaluate your investigation timeline, communication efforts and remediation process, and update your recall program to improve efficiency.

### References

- [OECD – Global Product Recall Dashboard](#)
- [U.S. Consumer Product Safety Commission \(CPSC\) Recall Guidance](#)
- [CDC – The Health Communicator's Social Media Toolkit](#)
- [Canada Consumer Product Safety Act \(CCPSA\) – Recalling Consumer Products Guide](#)
- [Canada Food Safety – How We Decide to Recall a Food Product](#)
- [Consumer Product Safety in Europe – Corrective Action Guide](#)
- [EU Guidelines for Good Manufacturing Practice – Complaints, Quality Defects and Product Recall](#)
- [PAS 7100 – Supporting Better Product Recalls](#)

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