

Product recall basics

Use this document as a guide to determine if the basic components of a product recall program have been established. Any company that has product exposures should develop a written product recall program and ensure responsibilities of the program are followed.

Per Consumer Product Safety Commission (CPSC) guidelines, “A comprehensive plan should be developed that reaches the entire distribution chain and consumers who have the product. The company must design each communication to reach affected parties and consumers, motivate people to respond to the recall, and take the action requested by the company.”

The CPSC has authority over many types of consumer products, which includes but is not limited to coffee makers, toys, lawn mowers and fireworks. Other government agencies may be involved in product safety, depending on the type of products manufactured, such as the Federal Aviation Administration (FAA), National Highway Traffic Safety Administration (NHTSA), Food & Drug Administration (FDA), Environmental Protection Agency (EPA), etc.

PRODUCT RECALL DEFINITION

Per the CPSC, it “expects that companies will use the word ‘recall’ to refer to any voluntary action taken pursuant to a corrective action plan (CAP) that involves removing, repairing, inspecting, discarding, updating, or otherwise altering for safety a product once it has been purchased by a consumer. Although details and circumstances of CAPs and products may differ, the consistent use of the term ‘recall’ is currently the best way to ensure consumers’ attention to a safety notice.”

ACCORDING TO THE CPSC, THE OBJECTIVES OF A RECALL ARE:

- 1.** To prevent injury or death from defective or violative products.
- 2.** To locate all such products as quickly as possible.
- 3.** To remove such products from the distribution chain and from the possession of consumers.
- 4.** To communicate to the public in a timely manner accurate and understandable information about the product defect or violation, the hazard, and the corrective action. Companies should design all informational materials to motivate retailers and the media to get the word out and to spur consumers to act on the recall.

This form, supplied by UFG Insurance, merely provides minimum guidelines for you to follow and may be utilized as a tool for fact-gathering purposes to assist in your investigation. The information requested above is not exhaustive and you should, at your own discretion, request any necessary additional information as the specific situation may warrant.

PRODUCT RECALL BASIC CHECKLIST	
<input type="checkbox"/>	<p>Who is responsible for the product recall program?</p> <ul style="list-style-type: none"> — Designated personnel with written responsibilities and duties? — Is a designated liaison in place to ensure communication with customers, retailers, wholesalers, distributors, etc.?
<input type="checkbox"/>	<p>What is the nature of the incident – reason for the recall, hazards, discontinuation of product use?</p> <ul style="list-style-type: none"> — Ensure that ownership/management, public relations, and legal counsel is involved as needed.
<input type="checkbox"/>	<p>A written product recall program is highly recommended. The program should include responsibilities, flowcharts, procedures, CAPs, follow-up, communication requirements, regulatory requirements, etc.</p>
<input type="checkbox"/>	<p>Are product incident investigation procedures in place (what, when, how, where, etc.)?</p> <ul style="list-style-type: none"> — Risk assessment on the severity of the reported hazard(s) and recommended actions?
<input type="checkbox"/>	<p>Mechanism in place to ensure communication to appropriate parties involved: insurance, regulatory agencies (FDA, CPSC, EPA, FAA, etc.), customers, public, etc.?</p> <ul style="list-style-type: none"> — Ensure professionally trained and qualified individuals are communicating (legal, public relations professional, etc.).
<input type="checkbox"/>	<p>Are there procedures implemented and training performed to identify non-conforming products?</p>
<input type="checkbox"/>	<p>Are defective raw materials or products identified and isolated (quarantined) during the production process?</p>
<input type="checkbox"/>	<p>Do finished products have unique identifiers and/or paperwork that ensures traceability back to when the product was manufactured?</p> <ul style="list-style-type: none"> — Tracking may be completed by serial numbers, batch codes, date codes or other unique identifiers.
<input type="checkbox"/>	<p>Are corrective and preventative action (CAPA) procedures in place to identify the root cause of defects and to prevent recurrence?</p>
<input type="checkbox"/>	<p>Mechanisms in place to ensure feedback and analysis of products are performed regularly to ensure the company is proactive in preventing product safety issues (customer complaints, near misses, field employee reports, etc.).</p>

Don't hesitate to reach out to your UFG Risk Control consultant for any additional assistance.

Works cited

Product Safety Planning, Reporting, and Recall handbook. Revised September 2021.

[Recall Handbook News Release/Revised Recall Handbook combined \(cpsc.gov\)](#). Accessed May 31, 2023.

This form, supplied by UFG Insurance, merely provides minimum guidelines for you to follow and may be utilized as a tool for fact-gathering purposes to assist in your investigation. The information requested above is not exhaustive and you should, at your own discretion, request any necessary additional information as the specific situation may warrant.