

Product Recalls

Sharing Best Practices & Insights

By Rutger Oldenhuis LLM | ©RecallDesk

Introduction









About RecallDesk

Example of services RecallDesk:

- Completing the recall team
- Making risk assessments
- Liaising with/reporting to market surveillance authorities
- Communication
- Product compliance issues
- Claiming damages
- Insurance coverage
- QuickScan



Some numbers

Number of recalls from 2010 until now:

#1: Toys	5,292
#2: Automotive	5,081
#3: Electrical supplies	3,043
#4: Clothing:	2,860
#5: Sports equipment	1,996

(Source: https://globalrecalls.oecd.org/#/dashboard)



Topics

"The best thing about product recalls... is not having one"

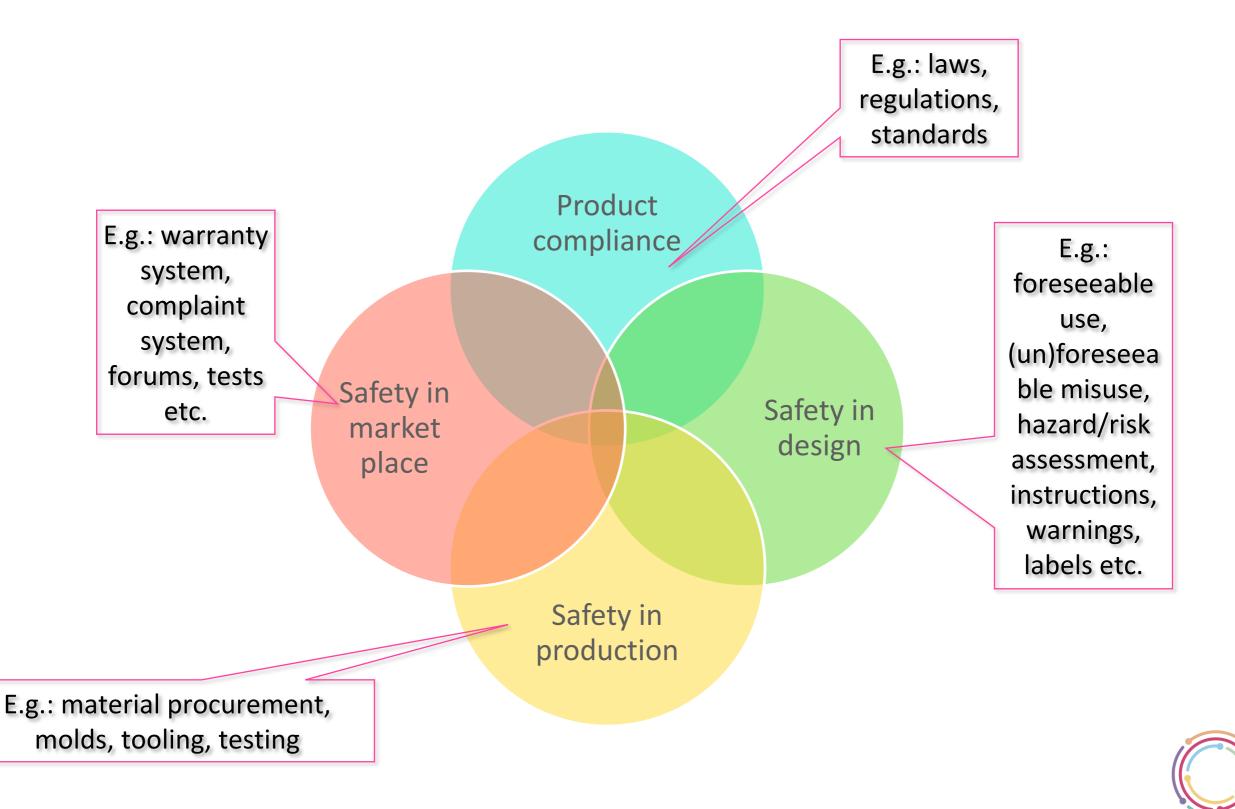
- How to mitigate the risk of having a recall?
- How to be prepared for a recall?
- How to ease the burden of a recall?
- How to manage a recall?



Product safety from an ISO perspective

	West Coast Standards (Only) Admin			
West Coast Standards (Only) 🗸 🗟 Inbox	🕼 Líbrary 🔄 Product Compliance 🔿 Dashboard		Q aver 10	
	West Coast Standards (Only) Admin			
West Coast Standards (Only) 🗸 🗟 I	nbox 📴 Library 🔲 Product Compliance 📀 Dashboard		Q	CASSIC JG
STANDARD In force: published	on Apr 15, 2013by International Last alert: Apr 15, 2013 - Older Standard added Reference: https://www.techstree			A Share
ISO 10393:2013 Consume * 0 responsible Other names	r product recall - Guidelines for suppliers, 2013			
(Assessments - Company	attachments 📵	Tasks		
		Add task		
	🗋 Add note 🚯 Products 🚯 Organizations 🚯 Workflow			Z
Overview	Access Standard			
Scope	Overview			
Referring Regulations	ISO 10393:2013 provides practical guidance to suppliers on consumer product recalls and other corrective actions after the product has left the			
	manufacturing facility. Other corrective actions include, but are not limited to, refunds, retrofit, repair, replacement, disposal and public notification. ISO 10393:2013 is intended to apply to consumer products, but might also be applicable to other sectors. show less			
	iso rossizors is interface to apply to consumer produces, but might also be applicable to other sectors, show less			
	Scope			
	Products Covered			
	All Products			
	Dates			
	Apr 15 Date Published			
	2013		Ask our Experts	? Help
"Design and production highly prevent				

Product safety as a process



Product compliance

It should be noted from the EU general risk assessment methodology that "the risk assessment of a harmonized product does not replace the evaluation of the compliance of the product with the requirements laid down in EU legislation and the relevant harmonized standards. Product compliance or non-compliance remains the basis on which authorities decide whether corrective action is needed. The risk assessment of a harmonized product complements the product compliance evaluation, as it allows the assessment of how serious the possible consequences of noncompliance could be. It therefore helps to determine the most appropriate type of follow up (rapid intervention, RAPEX notification, proportionate corrective action). The risk assessment of a harmonized product is inherently linked to the evaluation of its compliance with legal requirements."









Apparel & Textile



Footwear



Sporting Equipment

Personal Protective Equipment



Consumer Electronics (Wearables)



Bikes (e-bikes)

Product compliance

Benefits

Up-to-date labelling requirements at your fingertips

Significant economies of scale with considerable time and cost savings

Ability to search and report on requirements by country and product

Free access to Subject Matter Experts

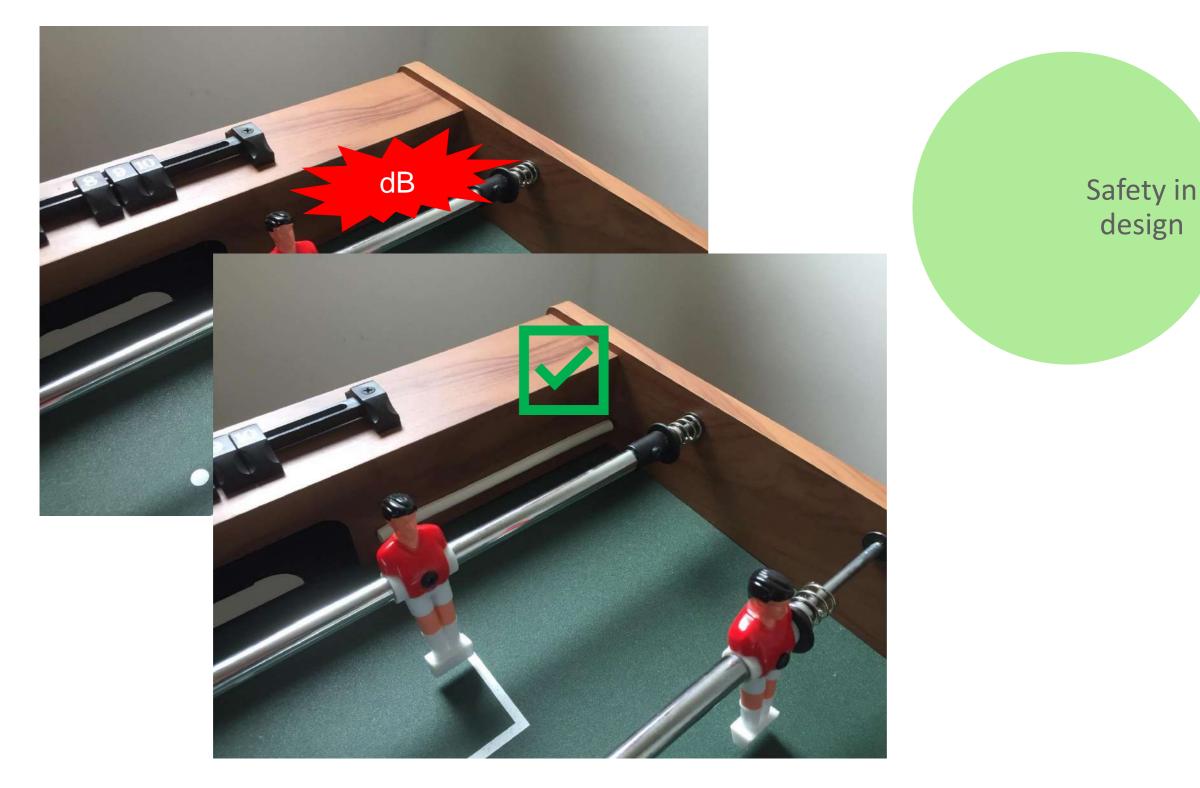
Receive target e-mail alerts when a requirement changes

Preferential pricing for WFSGI members but open to all associated sectors

Interested parties (i.e. Original Equipment Manufacturer OEM or branded labels) experiencing issues with labelling their products, such as those from the fashion sector, are invited to join the project to benefit from significant economies of scale.



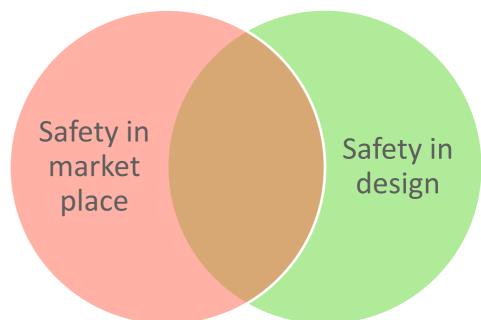
Safety in design





Safety in design

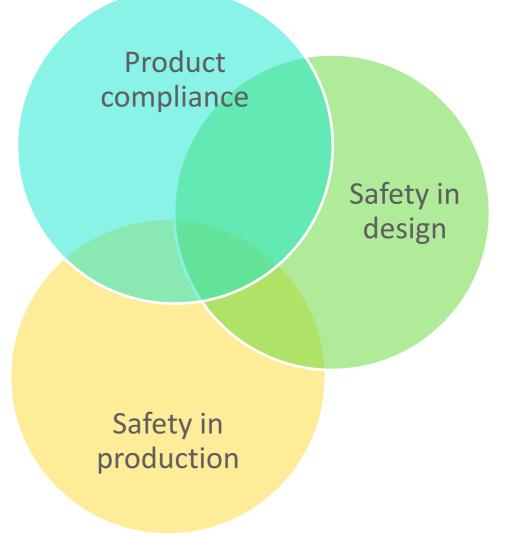






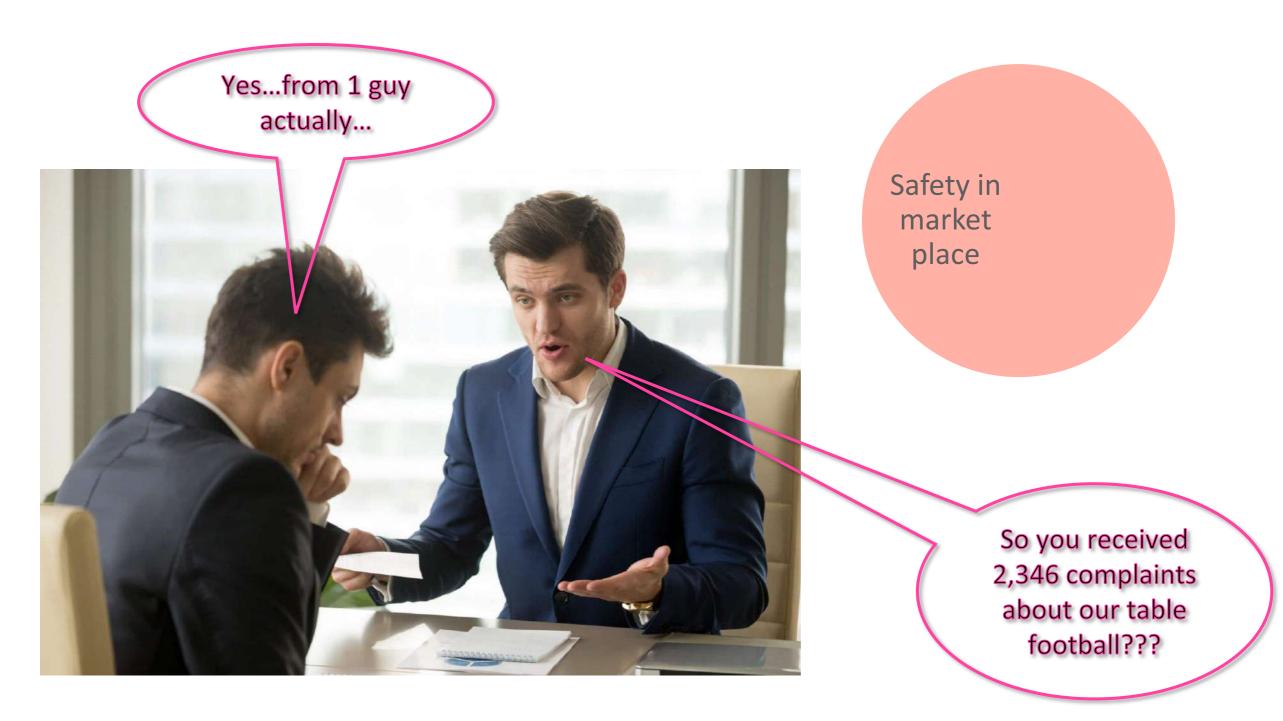
Safety in production







Safety in the marketplace





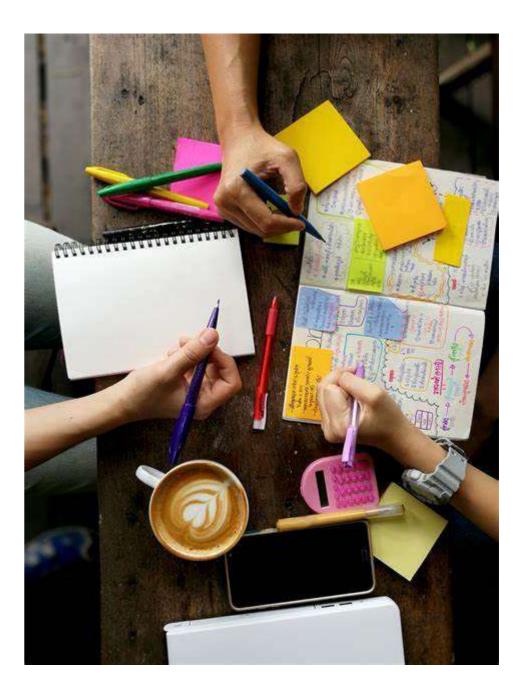
Supply chain





How to be prepared?

- Recall procedure
- Recall team
- Contact list (internal/external)
- Templates
- Infrastructure
- Inform/involve stakeholders
- Training

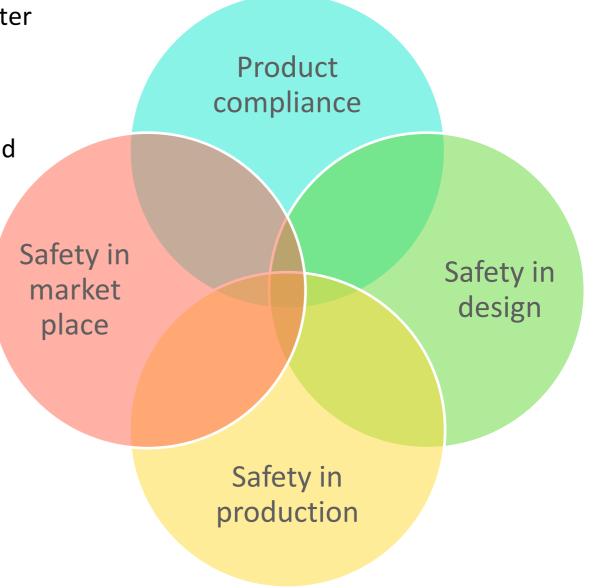




How to ease the burden?

The sooner you are aware of a potential issue, the better

- Keep abreast of product laws etc.
- Continue testing and auditing of products, tools and molds
- Continuously monitor the marketplace
- The less products are involved, the better
 - Product identification and traceability
- Make sure the burden is taken where it should
 - Contractual arrangements!
 - Product liability insurance: 'salvage costs', 'Aufwendungsersatz', 'bereddingskosten', 'reddingskosten'





How to manage a recall?

- No recall is the same
- Don't panic and stay calm
- Take control
- Recall as last resort remedy: risk assessment
- Allocate sufficient resources, hire experts if needed
- Follow your recall plan or make one
- Prepare and involve your stakeholders
- Beware of the recall infrastructure
- Have regular task force meetings

A well-conducted recall will likely increase your customers' trust



Key take-outs

- Product compliance is key
- Design and production defects are highly preventable
- Beware of your contractual arrangements
- Have a recall plan
- You can ease the burden of a recall
- Team work
- Don't panic!



Something to strive for

Product Recalls

Good news: no product recalls since 2009!

We work really hard to make sure children can play safely and enjoy our products - indeed, it's the most important thing for the LEGO Group. That's why we're working towards a zero product recall policy.





The QuickScan Quiz!!!

Product compliance =

rutger@recalldesk.com





Questions?

Thank you!

rutger@recalldesk.com

www.recalldesk.com



Disclaimer

Even though RecallDesk pays a lot of care and attention to the information and content provided in this presentation, it is not meant to serve as an advice (legal or otherwise) and no rights can be derived from it. RecallDesk is not liable for any damage (direct or indirect) resulting from or relating to the use of this presentation.



