

Recall Checklist

01/2001

The Office of Compliance at the U.S. Consumer Product Safety Commission has prepared the following recall checklist to help manufacturers, importers, distributors and retailers conduct an effective and comprehensive product safety recall. This list is a guide only to assist recalling firms in removing products from all stages of the distribution process. Not all items will necessarily apply in all recalls. Recalling firms may obtain further guidance from the Office of Compliance at 301-504-7913 or at sect15@cpsc.gov. Information can also be found at www.cpsc.gov.

Production

- Identify defect/safety issue
- Stop production
- Isolate inventory to be recalled
- Determine appropriate remedy
- Test replacement/repair
- Repair/Dispose units on hand and units returned under the recall
- Discuss all aspects with CPSC Compliance staff
- Redesign future production to eliminate hazard
- Change model/serial number for redesigned product
- Where product changes are made to existing products, label so as to distinguish from recalled products

Retailer (Products at the retail level)

- Give retailers notice of recall well before public announcement
- Give retailers information to readily identify recalled products, e.g., UPC codes, date codes, model numbers and any other critical identifying information
- Give retailers information on any in-transit shipments that may contain the recalled product
- Ask retailers to stop sale of recalled product
- Ask retailers to isolate inventory of recalled product and give them instructions on how to return and/or dispose of these products so they are not released for sale
- Ask retailers to block sale at register
- Provide retailers with Recall posters to display in conspicuous locations
- Inform retailers of remedy e.g., recall/repair/replace/refund
- Work with retailers on disposition of consumer returns, e.g. return to mfr., disposal, repair
- Ask retailers to maintain accurate accounting of product inventory
- Ask retailers to review customer records and identify likely purchasers using extended warranties, credit card customers, parts customers, catalog sales etc.
- Work with retailer on how they will receive credit and/or refunds for recalled products
- Provide special “retailers-only” phone number for retailer inquiries
- Anticipate CPSC investigator monitoring of recall at retail stores

Consumer (Notice to consumers)

- Joint Press Release (all language must be worked out with CPSC Compliance staff)
 - forms the basis for all consumer notice
 - identifies program as a recall
 - includes all pertinent information in press release including the number of incidents and injuries and a description of each
 - gives clear, unambiguous description of defect and hazard
 - provides toll-free number
 - describes recalled product and model number(s)
 - includes color photo or graphic of product/hazard
 - includes incident information/injury information
 - describes how to obtain remedy e.g., call manufacturer, return to retailer, etc.
 - includes dates of production and sale
 - includes recalling firm’s web site address
 - identifies where product was sold (list top retailers)
 - provides recalling firms and CPSC’s contact name and phone number for media inquiries

- prepare questions and answers for media and consumer inquiries in consultation with CPSC
- **Direct mail (all language must be worked out with CPSC Compliance staff)**
 - identify customers who have product in advance of public notice and mail them notice of recall
 - include all pertinent information related to recall
 - include picture from poster, press release, web site
 - include as heading on notice and on outside of envelope “Important Safety Message” or “Safety Recall” (in red)
 - include toll-free number and web site address
 - notify consumers through e-mail
 - give consumers ability to obtain remedy through e-mail notification
 - provide authorization for return shipping where applicable
- **Toll Free Number**
 - assure it will be available and operational before the recall is announced
 - assure number is operational in all areas of the U.S.
 - assure sufficient number of operators to handle calls
 - assure sufficient number of phone lines
 - assure reasonable hours of operation
 - assure number has overload capability
 - assure access for non-touch tone phones
 - determine need for non-English speaking operators or recorded information
 - CPSC must review all scripts before implementation
 - determine if you will have an automated or live operator system
 - assure contingency plans for use of additional 800 lines and operators in the event system is overloaded (especially during first week of public announcement)
 - CPSC monitors use and responses – find out how consumer heard about recall
 - identify key company representative who can handle “special” consumer needs
 - maintain toll-free number during recall and afterwards forward calls to firm number
- **Video News Release (VNR) – language follows agreed upon press release language**
 - guidelines located at cpsc web site www.cpsc.gov
 - CPSC and recalling firm usually have a spokesperson in the VNR
 - recalling firm pays costs
 - recalling firm chooses a production company
 - CPSC must review and approve script
 - recalling firm obtains and provides monitoring and tracking report on usage
 - recalling firm purchases satellite time for release in coordination with CPSC
 - recalling firm provides multiple copies of tapes to CPSC for dissemination
- **Paid Advertising**
 - includes all pertinent information related to recall
 - general or targeted audience
 - place in newspapers, magazines, trade papers, etc...
 - assure prominent placement of ads - use of color
 - CPSC must review and approve text
 - include toll-free number/web site address
- **Pediatrician or Specialty Posters**
 - includes all pertinent information related to recall
 - use organizations who conduct mailing
 - approx. 40,000-70,000 pediatricians
 - CPSC must review and approve text
 - include toll-free number/web site address
 - disseminate when recall is announced or closely thereafter

- **Recall (in-store) Posters**
 - includes all pertinent information related to recall
 - make it big, bold and in color
 - include photo/graphic or picture of product hazard
 - include toll-free number/web site address
 - CPSC must review and approve text
 - consider tear-off sheets with toll-free number/web site address
 - must be in stores before joint press release is issued
 - print on poster “display to date” (minimum 120 days) (for store clerks)

- **Web-site**
 - guidelines located at cpsc web site www.cpsc.gov
 - include reference to recall in prominent location on home page/first entry point
 - link to joint press release
 - include interactive registration of recalled product for remedy
 - CPSC must review and approve text
 - be sure recall notice on web-site is operational at time of recall announcement
 - maintain on site during course of recall and thereafter

Other Notice Forms

- include recall information in product inserts
- include recall notice in accessory parts
- include recall notice in bills sent to distribution chain/consumers
- include recall notice in credit card statements
- send direct mail notice to customers whose names are known to firm through customer service inquiries, parts orders, warranty card/product registration with company and catalogs
- provide pre-paid mailer for return of recalled product
- provide in-home repair by authorized dealer
- provide in-home repair with detailed instructions for consumer repair
- provide bounties for return of recalled products
- provide incentives for return of recalled products, e.g., free gift, discount coupon, etc.
- consult with CPSC staff prior to release of any documents related to recall

Key Points To Remember

- remedy should be easy for consumer so as to encourage correction
- submit timely monthly progress reports on the number of products corrected and notification measures implemented to CPSC and continually review for additional actions
- support CPSC publicity efforts
- be responsive to individual customer needs
- designate a key company official to take care of special needs
- stay on message (with language agreed to in joint press release)
- don't blame the consumer
- consult frequently with Compliance staff working with you on the recall to avoid problems
- BE CREATIVE and ORIGINAL in an effort to reach as many consumer and other owners of the recalled product.