

Product Recall Guide for Suppliers

The Consumer Product Safety Office (CPSO) safeguards consumer safety by ensuring consumer products supplied in Singapore are safe for use and comply with applicable safety standards. The CPSO is an office of the Competition and Consumer Commission of Singapore ("CCS"), which is a statutory board of the Ministry of Trade and Industry.

Visit www.consumerproductsafety.gov.sg for more information.

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1. Purpose of the guide

The purpose of this product safety recall guide is to assist suppliers to develop, implement and improve their product recall programmes to increase effectiveness of recall, and reduce the risk caused by unsafe products in the marketplace.

The product safety recall system that a supplier has in place should be tailored to specific products they supply and the degree of risk these products pose to consumers.

2. Key Regulations

For Controlled Goods that fall under the **Consumer Product (Safety Requirements) Regulations (“CPSR”)**:

Regulation 4(1): No person shall, in the course of any trade or business, supply or advertise for the purpose of supply any Controlled Goods after the effective date specified in the First Schedule unless:-

- a. such Controlled Goods are registered Controlled Goods conforming to the safety requirements specified by the Safety Authority for those goods; and
- b. such Controlled Goods have affixed to them the Safety Mark in accordance with Part III.

Regulation 4(2): Where any person contravenes paragraph (1), he shall be guilty of an offence under section 11(2) of the Act, and the Safety Authority may-

- a. require such person to effect a recall of the Controlled Goods and keep the Safety Authority informed of the progress of such recall; and
- b. take such steps as may be necessary to inform users of the Controlled Goods of the potential danger of such goods.

Regulation 24(4)(a): A Registered Supplier who fails or neglects to effect a recall of the registered Controlled Goods required by the Safety Authority under paragraph (2)(b)(i) shall be guilty of an offence and shall be liable on conviction to a fine not exceeding \$2,000 or to imprisonment for a term not exceeding 12 months or to both.

3. Suppliers' Responsibilities

Responsibility for the supply of safe products

A supplier is the entity that has primary responsibility for the supply of safe consumer products in Singapore.

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“Suppliers” include manufacturers, importers, distributors and retailers.

Each entity in the supply chain is responsible for assessing and (if necessary) rectifying potential safety hazards presented by the consumer products that they supply.

The responsibility to ensure consumer goods are safe and fit for purpose should not be discharged to other parties in the supply chain, whether they be domestic or overseas manufacturers, suppliers or distributors.

When a product recall is assessed to be necessary, the supplier should inform the CPSO and present a product recall plan. Suppliers may refer to this guide on the reporting requirements.

4. Assessment for Product Recall

To determine the need for product recall, suppliers should put in place a process to act upon receipt of information when a product has safety concerns. Suppliers may take guidance from Diagram 1¹ below.

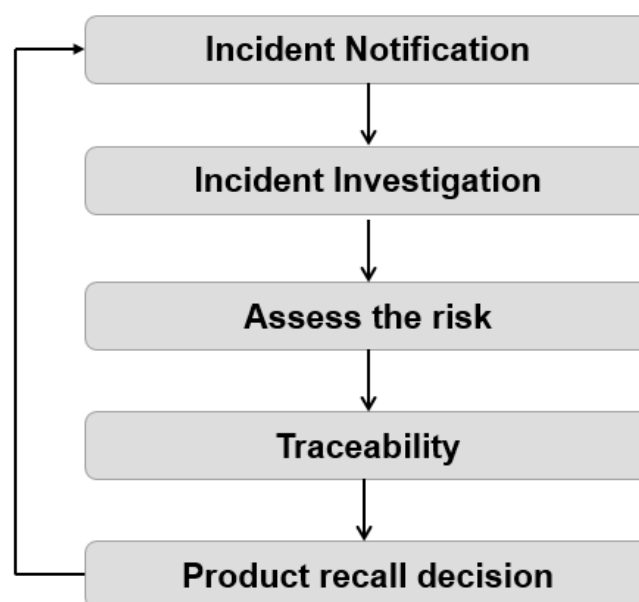


Diagram 1 – Assessment for Product Recall

¹ Reference made to section 5 of ISO 10393 – Consumer product recall – Guidelines for suppliers

4.1 Incident notification

Suppliers should put in place a system for collecting information on product incidents and communication with stakeholders.

4.2 Incident Investigation

Suppliers should establish a process for investigating product incidents or potential incidents.

- a. Form a team comprising persons with applicable expertise to investigate the cases;
- b. Document the key information of investigation, include findings and actions taken;
- c. Assess the validity of the incident report;
- d. Retrieve relevant documents of the affected product, and prepare samples of actual product which may be used for testing purposes;
- e. Identify the root cause of the defect that has safety concerns and to identify the affected batches;
- f. Assess the risk in accordance to 4.3;
- g. Determine if there have been other incidents regarding the product in question, including those related to similar products.

4.3 Assess the risk

Suppliers should establish a process for assessing the risk of harm by considering the following factors:

- a. **Severity of the injury/potential injury** - Identify the safety hazard posed by the product in question. Consideration is to be given to the maximum potential injury that the product in question can create.
- b. **Probability of hazard occurring** - The likelihood is determined by considering the number of injuries that have occurred, or that could occur.
- c. **Hazard Recognition** - The ability to recognise a potentially hazardous condition will significantly reduce the possibility of injury. Recognition should relate to the ability of the average adult to assess any potential or actual hazard with a product. To consider the intended or reasonably foreseeable use or misuse of the product, and the population group (such as children, the elderly, or the disabled) exposed to the product.
- d. **Availability of the product** - If a product is widely or generally available, the chances of an incident occurring are higher than if it is only available through selected outlets. The number of affected products remaining with consumers is also a relevant consideration.

4.4 Traceability

Suppliers should leverage on systems and processes to trace the affected batches of products. Information captured should clearly identify the product. Key characteristics include product variants, e.g. lot, batch number, colour etc. Suppliers should also maintain accurate customer and contact lists to ensure recalls can be initiated quickly.

4.5 Product Recall Decision

Once the assessment for risk is completed, the supplier should determine the next course of actions. If the risk is assessed to be high, supplier should decide on the need for a product recall. However, the decision on implementing a product recall need not be determined solely by the level of risk.

The supplier should consider all the relevant facts and circumstances that may influence the level of harm the affected product may cause, the nature of potential harm and severity of potential harm.

For situations where very serious injury or substantial property damage could occur, suppliers should consider implementing a product recall even if the assessed risk level may not be high, e.g. if the probability of the hazard occurring cannot be accurately determined at the preliminary phase.

5. Implementing a product recall

When the decision is made that a product recall is necessary, the supplier should inform the relevant stakeholders in the supply chain.

Suppliers should also inform the CPSO of the intended product recall

5.1 Objectives of implementing a product recall

Recall objectives should generally include the following:

- Locate all the affected products promptly;
- Stop the distribution and sale of the affected products promptly; and
- Communicate the information in a timely manner to inform the public of the affected product, the hazard, and the corrective actions.

Suppliers may take guidance from the flowchart of the overall process of product recall when implementing.

Overview of Product Recall Process

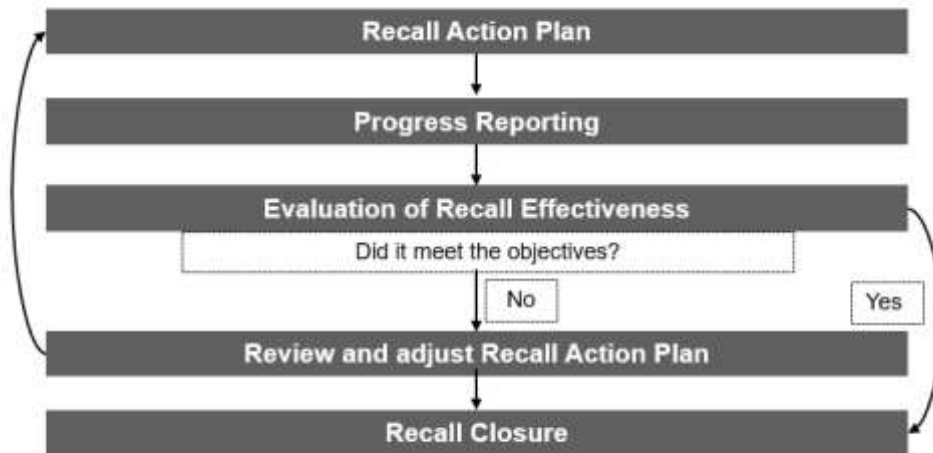
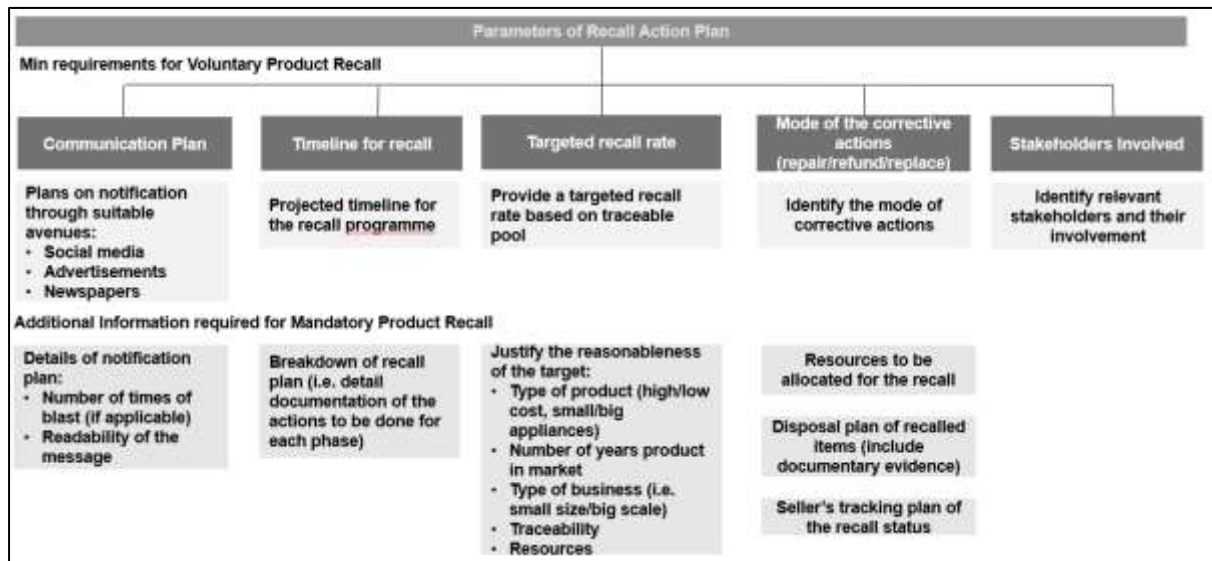


Diagram 2 – Overview of Product Recall Process

5.2 Recall Action Plan

The Recall Action Plan (RAP) should provide a clear overview of the actions to be taken for the product recall, what is to be achieved with the proposed corrective action, communication plan with relevant stakeholders in the supply chain and with consumers.

Suppliers should work closely with the CPSO when implementing the action plan, template of report is found in Appendix A.



The comprehensiveness of information provided is dependent on the types of recall². In general, RAP should address the following:

- **Communication Plan**
Identify the mode of communication to notify affected consumers of the recalled product
- **Targeted recall rate**
Set a target for the number of affected products to be recalled
- **Timeline for the recall**
Establish a reasonable period where the recall will be ongoing until it reaches targeted recall rate
- **Mode of corrective actions**
To specify the corrective action to be undertaken to mitigate product safety hazard – Repair, Replace or Refund
- **Stakeholders involved, and how the supplier will reach out to these stakeholders**
List out the stakeholders involved and provide a communication plan on how the respective stakeholders will be reached

² There are two types of product recalls; voluntary and mandatory. Voluntary recalls – suppliers initiate a product recall. Mandatory recalls – Safety Authority impose an order to supplier to enact a product recall. As illustrated above, the information required for submission differs depending on the type of recall.

5.3 Progress Reporting

After initiation of the product recall, the progress of the recall should be carefully monitored to ensure that it is effective and achieves its objectives.

Suppliers should report the progress to the CPSO, at a frequency that is agreed upon. The template can be found in Appendix C.

Data collected should be sufficient to measure the progress of the recall against objectives set. This includes:

- Number of affected products identified at each stage in the supply chain vs number of affected products returned, disposed, modified
- Number of affected consumers vs number of consumers that responded to recall
- Number of complaints, reported injuries, feedback received upon recall

5.4 Evaluation of recall effectiveness

It is important to evaluate the effectiveness continually to ensure that objectives are being met, and if it is necessary to adjust the Recall Action Plan to improve the recall effectiveness.

Some guiding parameters are:

- **Return Rate** – amount of affected products retrieved, repaired or modified. The return rate is dependent on various factors (duration of product in market, value of product, ease of return etc.), and therefore determining the “effective” rate varies.
- **Disposal Rate** – amount of product that has been disposed or destroyed.
- **Injury Rate** – if injuries or property damage have occurred as a result of the product incident, the reduction and eventual elimination of such occurrences is a key measure of effectiveness.
- **Enquiry Rate** – enquiry rates are generally high in the early stages of a recall. A significant reduction in enquiry rate can be used in conjunction with other measures as an indicator of effectiveness.
- **Communication** – effectiveness of the communication is an important measure. Direct and targeted communication is the most effective means of informing consumers of the recall.

Suppliers may measure the effectiveness of the communication by sampling target groups to determine if they are aware of the recall, if they have the affected products and if they know what actions they can take.

6. Review and adjust Recall Action Plan

It is important that suppliers actively monitor the progress of the recall. If the monitoring indicates that the recall objectives are not being met, the supplier may consider the following:

- Review communication strategy to affected consumers by:
 - Including additional or increasing existing media coverage
 - Adopt targeted messaging to affected consumers (i.e. direct calls, email blast etc.)
- Improve the ease of response for the affected consumers, as they may be reluctant to respond if it is too difficult and/or time consuming.

7. Closure of recall

Before the active recall operation ceases, suppliers should assess the following:

- Evaluate the effectiveness of the recall using the parameters identified in *0 above*;
- If the recall objectives have been met;
- If the targeted recall rates have been met, taking into consideration if appropriate level of returns, given the type of product and nature of risk;
- There are no more reported cases;
- Where applicable, when the CPSO is agreeable that the recall objectives have been met.

Suppliers are to ensure that consumers should be able to return the affected product at all times. The supplier should therefore continue to provide capability to receive products that are subject to recall, even if the active recall operation has concluded.

Appendix A

Recall Action Plan

Company

Unique Entity Number (UEN)

Product to be recalled

Brand and Model No.

Recall Communication Plan

Mode of corrective actions

Stakeholders Involved

Timeline of recall

Target recall rate

Signature:

Name:

Designation:

Date:

Please note that making a false statement on this application is an offence under the Consumer Protection (Trade Descriptions and Safety Requirements) Act (Chapter 53).

Appendix B

Guideline on a Recall Notice

The purpose of communicating with consumers about a recall is to ensure that further product related injuries are prevented by either removal or rectification of unsafe products.

A recall notice should include:

- a. **Product description**—a clear description of the product, including the name, make and model and any distinguishing numbers, such batch or serial numbers. Dates the product was available for sale should also be included.
- b. **Picture of the product**—a photograph or drawing of the product will provide the consumer with a convenient and effective means of identification.
- c. **Description of the defect**—a clear description of what the defect and its hazard.
- d. **Corrective actions** — supplier to specify the corrective action it will be undertaking
- e. **Contact details** —options on how consumers can reach out to suppliers to inform seek assistance.

Appendix C

Recall Progress Report

Total number of affected products

Traceable No of products

No of products returned

No of product being disposed (by consumers)

No of enquiries received

Recall rate (Return/Total affected)

Detailed report of actions taken during recall period

Disposal Record

Follow-up Plan

Assessment of effectiveness of Recall Action Plan

Suggestions on improvement of Recall Action Plan