

HOW TO ORGANISE PRODUCT WITHDRAWALS AND RECALLS

The General Product Safety Directive includes provisions for mandatory and voluntary recalls of dangerous consumer products.

Product Withdrawals

If you discover that a product or service that you have placed on the market is unsafe, there are a number of possible actions that you can take in order to minimise the risk to consumers. The first obvious step to take is to stop further sales or deliveries from the locations under your control. The next step is to withdraw the product from the distribution chain. To be effective, this has to be implemented immediately and carried out swiftly. The operation of effective quality management procedures will assist you with this action by enabling you to inform all in the distribution chain of the identification of batch numbers or identification markings of the suspect products.

It is important that producers, importers and distributors co-operate so that all the necessary information is made speedily available throughout the distribution chain and effective action is taken as a result.

Product Recalls

In some cases it may be adequate to issue appropriate warnings and instructions to consumers who have already purchased the unsafe product telling them of both the potential fault and the correct preventative action. The risk to consumers must be accurately assessed and a proportional action taken. It may be necessary to seek expert advice at this point.

However in more serious cases it could be necessary for you to recall unsafe products from consumers. This course of action can be very costly for entrepreneurs in terms of refunding the cost to consumers, storing the returned stock and dealing with unsold stock as well as the possible costs involved in producing a revised safe product. It can even damage your reputation because it often entails the use of publicity to alert consumers and can also attract news coverage.

European Product Recall Guide

A useful and easy to understand European Product Recall Guide has been produced by a consortium of five Member States and is available on-line. The text is available in 19 languages at the following websites:

- **EuroCommerce** – The Retail, Wholesale and International Trade Representation to the EU - www.eurocommerce.be
- **UNICE** – Union of Industrial and Employers Confederations of Europe - www.unice.org
- **PROSAFE** – Product Safety Enforcement Forum of Europe - www.prosafe.org
- **Intertek RTC** – www.intertek-rtc.com