



# Conducting a consumer product safety recall

**A guideline for suppliers**

April 2023

## Acknowledgment of country

The ACCC acknowledges the traditional owners and custodians of Country throughout Australia and recognises their continuing connection to the land, sea and community. We pay our respects to them and their cultures; and to their Elders past, present and future.

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Ngunnawal  
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# Conducting a consumer product safety recall

- Australians expect that the products they buy are safe, and that suppliers will protect consumers.
- When a product is potentially unsafe, suppliers need to move quickly to remove the product from sale, contact consumers, and publicly offer to repair, replace or refund the product.
- Research shows that consumers appreciate businesses that are honest about safety risks. Consumers also have [more trust and confidence in a business when a recall is well managed](#). Where a product has caused an injury, a well-managed recall is expected to reduce overall legal risk.
- While the obligation is on suppliers to start a recall (and many do so voluntarily), there are other ways recalls can occur. The Commonwealth Minister may order a compulsory recall and sometimes other government agencies lead the recall.
- Supplier led recalls are the focus of these guidelines.

# Supplier checklist for conducting a recall

This checklist is not listed in a particular order and not all items apply to every recall. You may complete many items at the same time and some items are ongoing. You can modify this checklist to suit your business processes.

## Tell the ACCC

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- Tell the ACCC about your recall within 2 days of taking a [recall action](#).
  - Tell overseas persons about the recall and send a copy of this notice to the ACCC within 10 days – if you have supplied the recalled product to persons overseas.
- 

## Identify affected products and assess the risk

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- Identify affected products – name, model, serial numbers, batch numbers, production dates, manufacturer, expected lifespan of the product.
  - Stop sale, manufacture, import, and advertising of the product.
  - Identify the number of affected products supplied to consumers and those in the supply chain.
  - Identify the defect and hazard – write a clear description.
  - Submit a [mandatory report](#) within 2 days of becoming aware of death, serious injury or illness - review details of all known injuries or incidents.
  - Conduct risk assessments to understand the risk, failure rate and urgency of the recall.
  - Identify the cause of the defect and the stage of supply where the fault occurred.
  - Fix the root cause – decide the steps to take and assess whether your fix is effective – keep good records of the steps taken.
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## Prepare to recall

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- Take immediate recall action.
  - Work out if you or another supplier will lead the recall.
  - Activate your recall plan.
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## Choose the remedy and/or remedies

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- Decide on a suitable remedy – be consistent with [Australian Consumer Law remedies](#).
  - Plan how you will recall products that have been sold second-hand. This includes any products that contain a recalled part.
  - Give instructions to the supply chain about the remedy.
  - Plan how you will dispose of the affected product or faulty part.
- 

## Plan how you will communicate the recall

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- Identify how you will tell consumers about the recall.
  - Gather contact details for consumers, those in the supply chain, manufacturers, importers and overseas recipients you have supplied.
  - Create your recall advertisements and messages. Consider social media, in-store, online advertising, emails and text messages. Plan when and how often you will advertise and how long you'll promote them for.
  - Communicate early and often with consumers and those in the supply chain.
  - Provide information about the recall to your supply chain. Include how to communicate the risk, advertising details, and other steps to improve the recall's effectiveness.
  - Set up multiple ways for consumers and those in the supply chain to contact your business about the recall.
  - Set up a dispute resolution process to address consumer complaints about the recall – keep records.
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## During the recall: Track, review, report and adjust

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- Keep track of how many products you and others in the supply chain have provided a remedy for – submit a recall progress report one month after your recall is published and then at agreed times.

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- Monitor and track incidents and complaints.

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- Reassess the risk.

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- Regularly review and update your strategy to know if your communication is effective.

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- Keep recall communication current and consistent. Update messages when there is a change to the defect or hazard or how to receive a remedy. Tell the ACCC so we can update the Product Safety Australia website.

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- Tell the ACCC of any issues or changes with the recall.

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## Finalise the recall

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- Continue to provide remedies to consumers until all products are accounted for.

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- Tell us when all products have been accounted for.

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- When not all products can be retrieved or accounted for - tell us when and why you think your recall has removed the risk from consumers and you want to finalise your recall. We will consider the next steps.

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- Update your recall plan to include any lessons learned from the recall.

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# When to recall a consumer product for safety reasons

## Highlights:

- Suppliers have a responsibility for removing risk to public safety by recalling unsafe products.
- Suppliers should maintain good quality assurance processes and keep up to date with media and feedback on the products they supply.
- Suppliers must tell the ACCC about a recall of a consumer product that will or may impact people's safety, within 2 days of commencing recall action.
- There are several steps suppliers can take to reduce the chance of a safety issue with their products.

Australian consumers trust that the products they buy are safe. A safe product is one that is free from risk of injury, including when it is misused in a foreseeable way. When there is risk of injury, the product is unsafe. As a supplier, you have a responsibility for removing the risk to public safety as quickly as possible by recalling the product. This responsibility sits with you no matter where you are in the supply chain – manufacturer, importer, distributor or retailer.

A **product** is a consumer product when it is intended to be used, or is of a kind likely to be used, for personal, domestic or household use, including gifts and promotional material.

A **consumer** is the end user of the product.

## Learn about any safety issues with your products

Maintain good quality assurance processes and keep up to date with media and feedback on the products you supply.

There are many ways you can be alerted to a safety issue with your product. This includes through:

- supply chain or manufacturing advice
- product or quality testing
- contact from a government agency
- overseas recalls
- warranty returns and refunds
- consumer reports of an injury or death
- enquiries or complaints from consumers
- product reviews
- media reports.

You should have systems in place so you are quickly informed and able to act on any potential safety issues with your products. The earlier you act on a safety hazard, the more effective your recall is likely to be.

If you are an Australian supplier of an imported product and the overseas parent company is recalling it, you still need to:

- conduct your own enquiry into the safety risk
- actively pursue the parent company about the need to recall and manage the recall
- monitor safety issues and recalls taking place overseas and act – do not ignore what is happening with a recall action in another country or by another supplier of a similar product.

[You may not have all the available information when telling us about a recall.](#)

You should continue to review the safety risk and update us as your understanding of the risk changes.

## When to recall a consumer product

Recall a consumer product when you become aware:

- using it will or may injure a person (even if it has no apparent defect)
- using it in a reasonably foreseeable way, including foreseeable misuse, will or may injure a person
- it is likely it does not comply with [mandatory safety standards](#) under the Australian Consumer Law
- it is the subject of an [interim or permanent ban](#).

## When to tell the ACCC

You must [tell us about a recall](#) for a consumer product you have supplied that will or may impact people's safety within 2 days of commencing recall action.

However, you do not need to tell us about consumer products that are recalled for reasons that do not relate to the safety of people. For example, you do not need to tell us about:

- recalls due to quality issues if they will not cause harm to people
- recalls where the safety concerns are directed towards animals, such as pet food.

Learn more about your obligations when [notifying a recall to the ACCC](#).

# Suppliers conduct the safety recall

When a product needs to be recalled for safety reasons, it is the supplier who leads the recall. This is known as a voluntary recall which is the focus of these guidelines.

Suppliers should avoid using the term voluntary in recall communications as it reduces the likelihood that consumers will respond to the recall.

A **supplier** is a person or entity that supplies, or agrees to supply or resupply, by way of sale, exchange, lease, hire or hire-purchase a consumer good.

You are a supplier if you are:

- a retailer, dealer, contractor, distributor, installer, repairer, franchisor, franchisee, importer, manufacturer, or exporter of a consumer product, or
- in the business of importing, manufacturing, selling, leasing, exchanging, hiring, repairing, installing, supplying on consignment, or making available for hire-purchase any consumer product.

When there is more than one supplier of a product, for example a product manufacturer, importer and distributor, the suppliers need to decide who will lead the recall, and what each supplier is responsible for. See [Work out which supplier will lead the recall](#) for more information.

Learn about what the [ACCC expects of suppliers during a recall](#) and the role of the [ACCC and government in recalls](#).

## Reduce the likelihood of needing to recall a product

Exercise care and take steps to confirm facts when sourcing products. Consider engaging a consultant to check that you are meeting all required safety criteria.

Actions you can take to reduce the chance of a safety issue with your products are:

- Be aware of and meet any relevant [mandatory standards](#) or industry standards. These standards specify minimum safety requirements that the products must or should meet before supply.
- Engage a [National Association of Testing Authorities \(NATA\)](#) accredited test facility to [test your products](#) against safety criteria. Some overseas test facilities may also be able to test your product if they are accredited with a recognised testing authority. You are responsible for meeting the requirements outlined in [mandatory standards](#) and industry standards before supplying products to consumers.
- Contact [Standards Australia](#) to find out if there are any standards that you can use to make your consumer products safe.
- Check if your product is [banned](#). If a permanent or interim ban is in place for a product or product-related service, it is against the law to supply, offer to supply, manufacture, possess, or have control or custody of the product.
- If you're importing goods, find out if they are [prohibited from being imported](#).

Set up and maintain a quality assurance and testing system to identify safety issues before your products are supplied to consumers.

You should also ask your suppliers for quality assurance reports, so you know that products and their parts meet any related standards and are safe.

## Resources

- [Subscribe](#) to Product Safety Australia for updates about product safety news and recalls.
- [Product safety: A guide to testing](#).

# What the ACCC expects of suppliers during a recall

## Highlights:

- We expect suppliers to protect consumers and move quickly to recall any unsafe product.
- Suppliers should identify the hazards and create a strategy that makes it easy for consumers to find out about the recall and easily access a remedy.
- Suppliers are responsible for ongoing assessment of the risk associated with the recalled product and adjusting the recall strategy if the risk level changes.
- Consumers still have access to their Australian Consumer Law rights of a repair, replacement or refund in addition to any remedy they receive under a recall.

We expect suppliers to protect consumers and move quickly to recall any unsafe product.

This means:

- removing the product from sale
- contacting consumers
- publicly offering a [repair, replacement or refund](#), where appropriate.

When conducting a recall, identify the hazards and create a strategy that makes it easy for consumers to find out about the recall and easily access a remedy.

Keep consumer safety front of mind by:

- communicating clearly
- contacting consumers directly where possible and using your online spaces
- engaging with retailers who supply your products
- helping consumers to access recall remedies.

As a supplier, you are responsible for ongoing assessment of the risk associated with your recalled product and adjusting your recall strategy if the risk level changes.

Plan how you will communicate your recall with consumers and businesses in the supply chain. Your communication strategy should be proportionate to the risk of the product.

Consumers still have access to their Australian Consumer Law rights of a repair, replacement or refund in addition to any remedy they receive under a recall.

When recalling a product, suppliers must not mislead consumers about what they're entitled to under [consumer guarantees](#).

You should also actively monitor the progress of the recall. This includes taking action when return rates are low and modifying your recall strategy to reach more consumers.

We expect you to try more incentives and different communication styles and channels to increase the numbers of affected products that consumers return.

A recall can be started by a supplier or ordered by a Commonwealth, state or territory minister responsible for administering the Australian Consumer Law.

See [How to conduct an effective product safety recall](#) for the steps and [Tell the ACCC of the recall](#) for your notification requirements.

# Tell the ACCC of the recall

## Highlights:

- You are required under s128 of the Australian Consumer Law to tell us of the recall within 2 days of taking a recall action.
- If you have supplied people overseas, you also need to tell them and give the ACCC a copy of your notice.
- Submit a mandatory report within 2 days of becoming aware of any death, serious injury or illness associated with a consumer product you supplied.
- The ACCC is authorised by the Commonwealth Minister to receive recall notifications and publish them.

## Checklist items:

- 
- Tell the ACCC about your recall within 2 days of taking a recall action.
- 
- Tell overseas persons about the recall and send a copy of this notice to the ACCC within 10 days – if you have supplied the recalled product to persons overseas.
- 

See the [complete supplier checklist](#) for conducting a product recall.

## Submit a recall notification form

Submitting a recall notification is a legal requirement under the Australian Consumer Law and failure to notify may result in a penalty.

The ACCC receives the recall notification on behalf of the Commonwealth Minister.

You only need to tell us when a consumer product is being recalled and the reasons are safety related. See [When to recall a consumer product](#) for more information.

Fill in the [recall notification form](#) within 2 days of taking [recall action](#) with a consumer product. If the first day is on a weekend, then this is day one. If the second day falls on a weekend or public holiday, then the form must be sent by the end of the next business day.

When you tell us of your recall, you must state that the consumer products are under recall and address each of the following:

- if the consumer goods contain a defect, are dangerous, or have a dangerous characteristic, describe why they are defective or dangerous
- if reasonably foreseeable use or misuse of the consumer goods is dangerous, describe the circumstances of that use or misuse
- if the consumer goods do not, or it is likely that they do not, meet a safety standard for the goods that is in force, describe the reason for the non-compliance or likely non-compliance



- if an interim ban, or a permanent ban, on the consumer goods is in force, state that fact.

The [recall notification form](#) lets you know what information you need to give us.

The ACCC does not consider that submitting a recall notification to the ACCC is in itself an admission of liability.

### **You may not have all the information when telling us**

We recognise that you may not have all the available information when telling us about a recall. We are aware that risk levels can change when you receive more information and can better understand and assess the risk of the product.

If you do not have all the required information, fill out the form and submit what you have. You can email further information as it becomes available with the reference number you received when you submitted the recall to [recalls@accc.gov.au](mailto:recalls@accc.gov.au).

## **Send us draft recall advertisements**

Include draft recall advertisements if you can when submitting your recall notification.

While we welcome early draft consumer recall documents, the primary objective of notifying your recall is that you meet the 2-day notification requirement.

Recall advertisements raise awareness of the recall and are used by suppliers across many forms of media, including print and online. They can also be used in direct communications to consumers.

Advertisements have a red hatched border with a red safety triangle in the top left corner. For most product safety recalls, advertisements include a headline 'Product Safety Recall' and includes the words 'See [productsafety.gov.au](http://productsafety.gov.au) for Australian product recall information' at the base of the notice.

Your recall advertisements and other communications to consumers should clearly describe:

- product description
- picture of the product
- why the product is being recalled (any defect or dangerous characteristic)
- the hazard and how it could lead to injuries
- the remedy and what consumers should do
- how consumers can contact the supplier.

Make sure that there are staff available to respond to consumers on the contact details you give on the recall advertisements.

Your recall advertisement is attached to your recall notice on the Product Safety Australia website.

You may need to change the amount of information available on your recall advertisement to suit the communications channel you use. Always give consumers a link to the full details and recalls advertisement that is on your website or the recall notice on the Product Safety Australia website.

Examples of advertisements and communications are in our [recall communications package](#).

Example:



# Product Safety Recall

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### Do you own this product?

"[Click to add: Product name]"

"[Click to add: product identifiers]"

Dates sold: "[Click to add: dates sold]"

---



**Why the product is recalled:** "[Click to add: Text]"

**Hazard:** "[Click to add: Text]"

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- "[Click to add call to action statement]"
- Send us an email or phone us if you are unable to return the product or have sold or gifted it to another person

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Ask our staff to find out more about the recall.

[email@email.com]

"[Phone number]" Xam to Xpm Monday to Friday

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Purchased from: "[Click to add: Text]"

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Scan for information about this recall

[Add your own QR Code or remove if not required]

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Set yourself a reminder to check at home

- Take a photo of this notice
- Set a reminder on your phone

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PRA [xx/xxxx]

**See [productsafety.gov.au](https://productsafety.gov.au) for  
Australian product recall information**

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## Tell people who are overseas and give us a copy

Tell people you have supplied the product to, who are located outside Australia, in writing as soon as practical.

Tell them that the product is being recalled in Australia and describe:

- the defect or why it is dangerous, or the use or misuse that is dangerous
- if the product does not meet or is likely not to meet a mandatory safety standard or is banned.

Within 10 days of informing overseas people, you must give a copy of your notice to the Commonwealth Minister. You can do this by emailing the notice to [recallsmonitoring@accc.gov.au](mailto:recallsmonitoring@accc.gov.au).

This is a requirement under the Australian Consumer Law.

If you are coordinating the recall for other suppliers who have supplied the product to a person outside Australia, you need to make sure that all the suppliers meet this notification requirement.

## Report any product-related deaths, serious injuries, or illnesses

[Submit a mandatory report](#) within 2 days of becoming aware of any death, serious injury or illness associated with a consumer product you supplied.

You are required to submit a mandatory report if your product has caused a death, serious injury or illness, regardless of whether you have recalled the product. This is a legal requirement under the Australian Consumer Law and penalties may apply if you do not report or take longer than 2 days to report.

A serious illness or injury is an acute physical injury or illness which needs medical or surgical treatment by, or under the supervision of, a medical practitioner or a nurse.

A mandatory report is when a supplier tells the Commonwealth Minister of a death, serious injury or illness that was caused, or may have been caused, by the use or foreseeable misuse of a consumer product.

The ACCC accepts your [mandatory report](#) on behalf of the Commonwealth Minister.

If you need to submit a mandatory report for a product you have recalled, [reassess the risk](#) and [update your communication strategy](#). This includes [adding a message](#) to your recall communications that serious injuries have occurred.

## Reporting a near miss, injury or illness

You can report a near miss, injury or illness that doesn't meet the threshold for a mandatory report in your regular [progress reports](#) or using the [voluntary supplier report](#) on our website.

More guidance for businesses on [mandatory reporting obligations](#) is on our website. Extra guidance on how we manage confidentiality requests is set out in our [Information Policy](#), [Privacy Policy](#) and [Accountability Framework for Investigations](#).

## Sometimes another government agency leads a recall

Different government agencies are responsible for regulating the safety of different types of products. Find out if [another government agency will lead a recall](#).

## Actions we take when we receive your notification

The ACCC is authorised by the Commonwealth Minister to receive recall notifications and publish them.

### We assess your recall notice

When reviewing your recall notice, we consider whether you have:

- complied with the reporting requirements under the Australian Consumer Law
- set out a suitable strategy for the recall.

We check for:

- clear identification of the product including high-quality photographs
- a simple description of the defect (why the product is being recalled) and the hazard (the most serious possible harm to the consumer)
- clear advice to consumers about what they should do
- proper remedies for consumers
- a suitable communication strategy to alert consumers
- how consumers can contact you for help or more information.

We will contact you when we assess your recall notice and discuss any changes needed. We may ask you to change the information in your recall notice and advertisements to make the information clearer to consumers.

Do not wait to start telling consumers and others in the supply chain about your recall. People should be alerted about unsafe products as quickly as possible.

## We publish your recall notice

We publish your recall notice on the [Product Safety Australia](#) website. We may also promote your recall on the ACCC Product Safety [Twitter](#) and [Facebook](#) feeds, or other social media, to help raise consumer awareness. You can share these on your own social media pages.

The recall notice we publish on the Product Safety Australia website includes:

- a description of the product (including photographs), why you are recalling it and the maximum potential injury the product can cause to consumers
- what consumers should do (including the remedy you are providing) and who consumers can contact
- a PDF of a recall advertisement
- the government agency that is the lead agency for the recall.

We will give you a copy of the notice that we propose to publish for review and nominate the date when we need a response from you. This will usually be 5 business days but could be less if there is a high risk to public safety.

If you do not respond by this date, we will likely use our authority to publish the notice on our website. Our view is that consumers should be alerted about unsafe products as quickly as possible.

If you respond by the due date but object to publication, we will consider your reasons but may still publish your recall notice on our website.

If we do not agree with your recall notice, including if we think you have understated the risk, we will ask you to amend it. If you do not agree, then we may publish your notice with our own message, for example, warning consumers that we think there is a risk of a more serious injury.

There are some cases where we will not publish a recall notice on our website. These include where:

- [another government agency is the lead agency for the recall](#) and the other agency publishes recalls on its website
- it is a duplicate recall notice, trade-level only recall or recall where all affected products have already been repaired or removed from consumers.

We may:

- Share information about your recall with other product safety regulators to understand more about the risk, hazard, injuries and complaints. This may include overseas agencies in countries where the affected product is supplied.
- Use your photographs of the affected product in any media, including our social media posts, to increase awareness of the recall. This includes sharing photographs with other product safety regulators.

## We may assess other aspects of your recall strategy

Our focus is on consumers being notified accurately and quickly about the recall and the steps suppliers will take to reduce harm to people.

Depending on the level of risk to public safety, we may also ask you other questions about your recall strategy, such as:

- your assessment of the risk including the defect and failure rate
- whether the recall is being conducted at the proper level in the supply chain
- your instructions and support for downstream suppliers
- how stock will be tracked in a complex supply chain, including the second-hand market
- how you will collect, destroy, or repair the product, and how you will manage any delays
- whether your communication strategy is suitable, including how you will reach consumer groups such as people from culturally and linguistically diverse communities
- how you will manage consumer complaints
- how you will monitor your recall, including reports of fatalities, serious injuries or near misses, consumer complaints and barriers, such as parts not being available or consumers not responding to your recall messages
- your plan to further investigate the safety risk, including monitoring overseas developments.

We use our [Product Safety Priorities](#) when considering further action.

We may decide to publish a recall notice before you have your strategy finalised, especially when the risk to consumers is high, even if you have not yet decided on a suitable remedy.

# How to conduct an effective product safety recall

There are steps you should follow to run a well-managed product safety recall from start to finish.

## 1. Identify affected products and assess the risk

If you suspect there may be a safety issue with a product you have supplied, investigate to decide if it may or will cause harm to consumers. Use information about the product, defect or dangerous characteristic, and hazard to assess the risk.

You need to understand how and why it is dangerous, to reduce the likelihood that the safety issue will occur again and to prevent future recalls and people getting harmed.

## 2. Prepare to recall

Once you've identified the product and risk, don't delay starting the recall and informing consumers. Being prepared with a recall plan can save you time and lead to better results should you need to start a recall. Decide which supplier will lead the recall, if more than one supplier is affected.

## 3. Choose a remedy

Providing a suitable remedy helps achieve the objective of a recall, which is to remove the hazard from consumers and the marketplace as quickly as possible. You must also comply with Australian Consumer Law, which includes rights to a repair, replacement or refund as well as compensation for damages and loss.

## 4. Plan how you will communicate the recall

Use clear and direct communication, often on multiple channels, for an effective product recall. Consumers need to find out about the recall, how dangerous it is and know what to do.

## 5. Track, review, report and adjust

To make your recall successful, you need to track, review and be prepared to report on the success of the recall. You may need to adjust what you are doing to improve its effectiveness.

## 6. Finalise the recall

There is no set timeline for how long you should carry out a recall. You need to consider if you have done enough to reduce the risk to consumers.

# Identify affected products and assess the risk

## Highlights:

- To understand the size and urgency of the recall, you need information about the product, why it is unsafe and how it can potentially harm people.
- You also need to assess the risk posed by the affected product and understand if similar safety issues exist in other products you or others supply.

## Checklist items:

- 
- Identify affected products – name, model, serial numbers, batch numbers, production dates, manufacturer, expected lifespan of the product.
- 
- Stop sale, manufacture, import, and advertising of the product.
- 
- Identify the number of affected products supplied to consumers and those in the supply chain.
- 
- Identify why the product is unsafe and how it can potentially harm people – write a clear description. See [Submit a recall notification form](#) for more information.
- 
- Submit a [mandatory report](#) where death, serious injury or illness has occurred within 2 days of becoming aware of the incident - review details of all known injuries or incidents.
- 
- Conduct risk assessments to understand the risk, failure rate and urgency of the recall.
- 
- Identify the cause of the safety issue and the stage of supply where the fault occurred.
- 
- Fix the root cause – work out the steps to take and assess whether your fix is effective – keep good records of the steps taken.
- 

See the complete [supplier checklist](#) for conducting a product recall.

## Identify the affected product

Find out as much as you can about the affected product, including:

- the product name, make, model and any distinguishing features including manufacturing dates, serial or batch numbers, product codes, barcodes
- if the defect is caused by a part in your product – find out if the part is in other products you supplied
- how many are with consumers and/or are still in the supply chain
- the product's lifespan, retail price and how often consumers use it.



# Identify why the product is being recalled

Identify

1. the reasons why the product is unsafe (the defect or dangerous characteristic)
2. the potential harm to consumers (don't underplay it), and
3. how and when it may occur.

You may be recalling the product because:

- the product may cause injury because of a design or manufacturing issue.
- **use** or **foreseeable misuse** of the product may cause injury, or
- the product does not meet a [mandatory safety standard](#) or is [banned](#) for safety reasons under the Australian Consumer Law or other Australian law.

**'Use'** refers to using consumer products for their primary, normal or intended purpose.

**'Foreseeable misuse'** refers to using consumer products or product-related services in a way not intended, or in a wrong or improper way, but where the use is predictable or not far-fetched or fanciful in the circumstances.

For example:

- Children commonly swallow finger paint – this is recognised in the maximum level of lead (Pb) and other hazardous elements allowed in children's finger paint.
- Children may mistake liquid laundry packets for lollies and try to eat them.
- Young children often throw or drop their toys. Suppliers need to make sure that toys for children under 36 months of age don't release small parts when they break.

The hazard explains how the recalled product may cause harm.

## ▶ **Example – children's toy containing button batteries**

Defect: The button battery compartment is not adequately secured, and the button batteries are accessible.

Hazards: If young children gain access to the button batteries and ingest them, they are likely to suffer severe internal burn injuries, which can result in serious illness or death. Button batteries are also a choking hazard to young children.

Risk is the chance, whether it be high or low, that someone will be hurt using the product.

▶ **Example – children’s high chair**

Children can suffer a range of injuries in high chairs. One hazard is falling from the chair. Children are typically exposed to this hazard when trying to stand up in the chair or climb in or out of the chair. The risk of the child falling is reduced if the chair is sturdy, has a five-point restraint harness and the child is secured in it.

## Assess the risk

Build regular quality assurance and testing into your business processes. This will help you identify and address risks early for a more effective recall.

Once you decide that you need to [start recall action](#), you should have a clear strategy for assessing and addressing the risk posed by the affected product.

Risk is the chance, whether it be high or low, that someone will be hurt when using the product.

When carrying out a risk assessment:

- **use evidence** of the defect and/or harm when making decisions about your recall
- **appoint a responsible person or small team to assess the risk** – they should understand how to use the risk assessment method in your recall plan, be knowledgeable about the product and its hazards, and know to seek expert advice if needed
- **consider if you need expert advice** when assessing the risk and likelihood of occurrence – this could be from within your business or an outside consultant
- **document your risk assessments.**

When doing a risk assessment, identify the:

1. **defect** or why it is dangerous– there may be multiple
2. **hazard and how it occurs** – through use or foreseeable misuse of the consumer product
3. **intended user** and whether they will be able to recognise the hazard
4. **other users** of the product, if any – this could include any bystanders
5. **injury severity** – how serious the injuries are to the user (injuries that could be fatal or need long-term hospitalisation are a higher risk than those that would only need basic first aid)
6. **defect rate** – of the products supplied, how many are likely to be defective (more products sold and/or a higher defect rate can increase the risk)
7. **failure rate** – of the defective products supplied, how many are likely to cause injury.

Use the information from your risk assessment to decide the risk associated with the product. The higher the risk, the more urgent your recall. The outcome of your risk assessment will influence your recall strategy including how often you need to advertise your recall.

Risks may change throughout the life of a recall. Some products may become more dangerous over time, increasing the risk to consumers. It is important to review those risks, and adjust your recall strategy as needed, especially if incidents keep occurring.

See [Reassess the risk](#) to find out when you will need to reassess the risk and what actions you need to take if the risk level is higher.

## Consider our priorities

Suppliers should consult our [product safety priorities](#) when assessing risk. The factors we consider are if:

- there is a high risk to public safety due to the severity or number of injuries that may result from the product (such as an unsafe product likely to cause death or significant harm, or being widely available to consumers)
- users are unable to perceive or safeguard against the risk of the product, such as where it is difficult to detect the safety risk or identify a link between the product and possibility of injury
- the product is targeted at vulnerable users, such as children
- users of the product potentially expose other people to the risk of death or injury
- the product is subject to a safety standard, compulsory recall, ban or safety warning under the Australian Consumer Law.

## Conduct a root cause analysis

Understand the products and parts used in your supply chain and know whether you, or your suppliers, are using defective parts in your products.

Conducting a root cause analysis can reduce or eliminate the risk of the defect occurring again and the need for future recalls.

If the fault is in the design of the product, the manufacturer is best placed to address this issue.

### Identify what triggered the recall action

- What occurred, when and where.
- Keep it factual and identify any gaps in the information.
- Test the product, if needed.

### Identify the factors that led to the defect occurring

Consider making a decision tree or mapping out the events that led to the defect.

## Identify the root cause

Why did the defect happen? Some of the reasons may include:

- reduced costs due to financial pressure
- new suppliers or manufacturers
- outdated processes or quality management systems
- outdated information about safety standards
- lack of or inadequate staff training
- infrequent independent testing.

## Identify ways to prevent the issue from occurring again

Decide if these are effective.

## Identify the actions needed to correct the issue

Check to make sure that these are effective.

## Keep records of your findings and decisions

Keep detailed records of your findings.

Search online for tools to help you with conducting a root cause analysis. Example search terms include a “Fishbone diagram” or a “5 Whys analysis”.

## Tell us if the risk level changes or other products may be impacted

If you discover that other products share the defect or your analysis changes the risk level, you need to let us know.

Check whether the same faulty parts, poor design elements or manufacturing issues are in other product lines.

Advise us if you find that the unsafe product you have sourced may share its defect with other products. This includes products supplied by others. Email: [recalls@acc.gov.au](mailto:recalls@acc.gov.au)

[Reassess the risk](#) after completing a root cause analysis. After this process you should know more about the defect and hazard, which may change the original risk level.

Tell us if the risk level is higher or lower than your initial risk assessment and update your recall and communication strategy. Keep the risk level in your [recall communication](#) up to date and consistent across all your communications.

# Tools

These tools may assist to assess the risk including what information you need to gather and questions to consider.

- [European RAPEX risk assessment](#)
- Consumer product recall: Guidelines for Suppliers. [Standards Australia ISO 10393:2017](#).

# Prepare to recall

## Highlights:

- Don't delay starting the recall and telling consumers.
- Being [prepared with a recall plan](#) can save you time and lead to better results for all involved.

## Checklist items:

- 
- Take immediate recall action.
- 
- Work out if you or another supplier will lead the recall.
- 
- Activate your recall plan.
- 

See the [complete supplier checklist](#) for conducting a product recall.

## How to start a recall

**Start the recall** by taking a recall action.

A **recall action** is any activity that you take to fix a safety risk with a product that has been released into the supply chain for consumers.

A recall action includes when you:

- publicly announce that the consumer product is being removed from the retail marketplace, either online or from physical stores
- ask consumers or suppliers in the chain to return a consumer product for a refund, replacement or modification
- ask consumers to destroy or dispose a product
- give new or extra instructions on how to use the product safely, including new instructions to use personal protective equipment (PPE) when using the product
- supply new product parts to fix a safety risk
- issue a software or digital update to an internet-connected product to fix a safety risk.

## Do not delay starting a recall

Do not delay starting recall action and telling consumers about the recall. You will save time and money by starting quickly. Delays may also lead to suppliers being held responsible for failing to deal with a safety risk. This can include regulatory action.

As the supplier, you are responsible for conducting a recall in a manner that fits the risk. You are also responsible for implementing a plan that will result in the most effective recall possible. The recall process will likely be faster and cheaper if you act early.

You may be responsible for compensating a person if they suffer loss or damage caused by a product you supplied including where the product has a safety defect.

The risk of loss or damage to an individual exists as long as the product is in the consumer's possession and increases if you:

- delay recall action
- do not clearly communicate the risk of the recalled product, or
- downplay the risk of the recalled product.

Experience shows that more effort is needed to encourage consumers to return a product when they purchased it a long time ago. This leads to increased costs for your business and the increased likelihood of an incident occurring from an unreturned product. To reduce this, do not delay in starting the recall, [communicate your recall](#) as much as possible in the early stages, and make it easy for consumers to [receive a remedy](#).

Delaying or resisting a recall can also lead to regulatory action, for instance, through a [compulsory recall](#). This means that the government can direct the way a recall is conducted and how it is to be fixed.

Find out more about when a [Minister can order a compulsory recall](#).

## Identify suppliers in the supply chain

**If you are the recalling supplier**, it is your responsibility to ask all suppliers in the supply chain to:

1. locate the product and advise how many were supplied
2. advise if they have direct consumer contact details. This will help you reach consumers and conduct an effective recall
3. find out if the product was purchased, installed and/or serviced by a tradesperson or qualified technician.

**If you are a supplier in the supply chain** and are participating in the recall, make sure that you:

1. respond to the recalling supplier's requests for any information about the recall
2. communicate the recall to your consumers, including any consumers you have direct contact details for, on your social media accounts, instore and on your website
3. tell the supplier conducting the recall about any complaints you receive about the recall.
4. understand your [mandatory reporting obligations](#) for reporting serious injury, illness or death.
5. keep in contact with the recalling supplier for any updates about the recall.

Businesses in the supply chain can include manufacturers, importers, producers, distributors and retailers.

Identify if the affected products were supplied in other distribution channels such as online marketplaces.

Contact the ACCC if a supplier in the supply chain has different views about whether a product should be recalled. Email [recalls@accc.gov.au](mailto:recalls@accc.gov.au).

## Work out which supplier will lead the recall

When there is more than one [supplier of a product](#), such as a product manufacturer, importer and distributor, decide which supplier will lead the recall and agree on what each supplier is responsible for.

If no other supplier is taking responsibility, you must take responsibility for what you supply.

The ACCC expects and encourages recalls to be led by those with primary responsibility for addressing the risk, which will generally be those who manufactured or imported the product.

A supplier higher up in the supply chain may be able to give a consistent recall strategy across the supply chain, including retailers.

You may also need to manage the recall with the help of your downstream suppliers. This can include:

- advising your downstream supplier of the number of affected consumers in their marketing area, if known
- supporting your downstream supplier to manage problems, such as a shortage of replacement parts, with mass media communication and any necessary financial support
- ensuring consistent communication of the recall to consumers
- where your downstream supplier has supplied the product to a person outside of Australia, ensuring they tell the people overseas of the recall and then give us a copy of the notice within 10 days.

You also need to be aware of your obligations under the Australian Consumer Law. Some goods may fail to meet one or more of the [consumer guarantees](#) due to a manufacturing defect or issue that would otherwise be the manufacturer's fault.



The consumer can ask the seller to provide a remedy, and the seller is required by law to help. The seller cannot refuse to comply on the basis that someone else in the supply chain may also be responsible. In this situation the [manufacturer must reimburse the seller](#) in accordance with the Australian Consumer Law.

## Talk to your supplier

[If you are a retailer](#) and you think you need to recall a product, talk to the manufacturer or importer to work out if they are better placed to tell the ACCC and lead the recall. This may change the steps that you need to take. But do not delay starting a recall if you cannot reach a quick agreement. The priority is consumer safety.

Contact us on 02 6243 1262 or by email at [recalls@acc.gov.au](mailto:recalls@acc.gov.au) if you are aware that more than one business is likely to be affected by a recall and are not sure if:

- a notification has been submitted, or
- you need to submit a recall.

If you are responsible for conducting the recall, you should [tell the ACCC](#) and have a [recall plan](#) in place.

## Products supplied using online marketplaces

If you, or others in your supply chain, supplied the affected product using online marketplaces, contact the marketplace as soon as you identify the need to recall. The marketplace may have policies in place to identify consumers who purchased the affected product and maybe able to contact them on your behalf. Marketplaces maybe able to assist you in providing a remedy to consumers and tracking how many consumers have responded to the recall.

Keep in contact with the marketplace throughout your recall and update them with any new information you have about the recall.

Each marketplace will have different policies and procedures in place, so make sure you contact all the marketplaces you used to supply your product.

# Activate your recall plan

Having a recall plan will save you time and money when you need to recall consumer products.

Start with the [supplier checklist for recalls](#). There is also a more detailed [sample recall plan](#) you can use.

When creating a recall plan, consider the following questions:

- How are you going to remove the hazard from consumers as quickly as possible?
- Do you have contact details of consumers that you can use to contact them directly to recall the products?
- Did you supply your product on an online marketplace, and can you use the marketplace to contact consumers directly?
- How will you advertise your recall in the most effective manner?
- Are you using the same channels you used to market the products to recall the products?
- What problems could you face when recalling your products, and how can you overcome them?
- Who is the responsible person/s in your business to lead the entire recall process?
- How will you review, measure, adjust and report how your recall is tracking?

You should review and update your recall plan and communication templates so when you need to do a consumer product safety recall, you can run it effectively.

We understand that it is not always possible to achieve a 100% return rate for all recalls. The higher the risk associated with your recalled product, the more you should try to get close to a 100% recall rate, or otherwise account for close to 100% of the goods supplied.

Sometimes not all products can be retrieved, so there are things you need to consider when [deciding if you have done enough](#) to reduce the risk to consumers.

# Choose the remedy

## Highlights:

- Providing a suitable remedy helps achieve the objective of a recall, which is to remove the hazard from consumers and the marketplace as quickly as possible.
- Offering a remedy under a recall does not remove the consumer's rights to an alternative remedy under the consumer guarantees in the Australian Consumer Law.
- Keep the recall process simple and minimise the number of steps for consumers to receive a repair, replacement or refund.

## Checklist items:

- 
- Decide on a suitable remedy – be consistent with [Australian Consumer Law remedies](#).
- 
- Plan how you will recall products that have been sold second-hand. This includes any products that contain a recalled part.
- 
- Give instructions to those in the supply chain about the remedy.
- 
- Plan how you will dispose of the affected product or faulty part.
- 

See the [complete supplier checklist](#) for conducting a product recall.

## Select a suitable remedy

Your recall remedy can offer to:

- **repair** the product to remove the hazard
- **replace** the product with a similar one that doesn't have the hazard
- **refund** the full amount paid when the product is returned
- **issue** warning labels or updated instructions about how to use the product safely
- **arrange** a software patch or update.

When you recall a product, plan how you'll:

1. have the product returned and/or disposed of
2. supply the remedy
3. make it easy for consumers to receive the remedy
4. complete the process in a timely manner
5. keep proper records to show all steps in the recall.

# Consider consumer guarantees when selecting a remedy

Consumer guarantees give consumers rights that the products they buy are safe, durable, free from defects and do what consumers normally expect them to do, among others.

Where there is a failure to meet a [consumer guarantee](#), a consumer is entitled to a [remedy](#).

**Your remedies should be consistent with the consumer guarantees.** This extends to covering reasonable costs that consumers incur when returning a product.

Consumer guarantees cannot be taken away by anything a business says or does. This can include a business putting a specific time limit on when a consumer can seek a remedy.

Offering a remedy under a recall does not remove the consumer's rights to an alternative remedy under the consumer guarantees in the Australian Consumer Law.

If there is a major failure to meet a consumer guarantee, including if the goods are not of acceptable quality because they are unsafe, consumers can reject the goods and ask for a replacement or refund. The supplier must give a full refund if the consumer chooses it and cannot scale down the refund. For example, reduce the refund based on age or condition of the product.

If we think your proposed remedies are insufficient or unsuitable, or if a remedy is not offered at all, we will contact you about other remedies to supply to consumers under the recall.

Your remedy may change during the recall. This may be because you learn that the one you are offering is not suitable, such as a repair not fixing the issue or a replacement also has a defect. Keep your consumers up to date with any changes to the remedy. Tell us if you change your remedy so we can update your recall notice. You'll also need to update any recall advertisements.

See [Consumer rights and guarantees](#) and [Repair, replace, refund, cancel](#) for more information about the remedies that you are required to provide.

## Make it easy to receive a remedy

Keep the recall process simple – minimise the number of steps for consumers to receive a repair, replacement or refund. Make sure the remedy is suited to the product.

Some options to consider:

- Ask consumers to **return the product** to the place of purchase or take the product to a repairer.
- **Organise a courier** service to collect the product – this is useful for large products.
- Send a **prepaid envelope or reply paid package** that the customer can use to return the product.
- If partial disassembly is easy and safe, ask consumers to **return a small, but significant part** of the product so it cannot be used. Then give a refund. Make sure the part is [allowed to be sent by mail](#).
- Ask consumers to **destroy part of the product** and supply photographic evidence, only if it is safe and easy for them to do so.

- If **items are large or bulky**, send a technician to repair onsite or remove the product and fix any damage to the property that was caused by the removal. Consider setting up collection or repair dates and times for the consumer to choose.
- For simple repairs only, send **repair parts and detailed instructions** for consumers to follow when it is safe to do so. Give consumers detailed instructions – preferably illustrated – that explain how to conduct the simple repair. Provide any hardware and tools needed for the repair. Offer an alternative for those consumers who are unable to do the repair themselves.
- Send out **updated instructions** on how to use the product safely. Confirm these have been received by the consumer.
- If you are recalling a product because the product **did not meet a mandatory standard labelling requirement**, supply labelling information to your consumers, but also give the option for a refund or replacement.
- **Offer an extra incentive**, such as a gift or discount voucher, as well as the recall remedy. This option is suited to low value products, where a suitable alternative is more expensive than the affected product, or where consumers may decide to continue to use the product instead of returning it. You must continue to provide remedies for your affected product for as long as the recall is open and incomplete.

Suppliers are responsible for covering reasonable costs that consumers may incur when seeking a remedy. This can include prepaid envelopes or courier services.

Tell the ACCC if you change your remedy so we can consider whether it is suitable. We may update your recall notice on the Product Safety Australia website.

### Consumers don't need to provide a receipt to receive a remedy

You can ask consumers for proof of purchase to confirm that the affected product is one you supplied.

But consumers don't always need to supply a receipt to be eligible for a remedy. They may have received your product as a gift or purchased it a long time ago.

Proof of ownership can be:

- a receipt
- a bank statement
- returning part or all the product
- warranty registration details
- a photo of the product in their possession
- loyalty program details.

# What to do when a remedy is not yet available

Minimise the wait time for consumers to receive a remedy – the longer you take, the less likely consumers will respond to the recall.

Sometimes it takes time for parts to be available to repair the product. In this case, be open and upfront with your consumers:

1. **Give interim updates on your website** about the unsafe product what are the potential consequences of using the product, and when the final remedy will likely be available.
2. **Ask consumers to register their details** with you so you can tell them about any updates including when a remedy becomes available.
3. **Let consumers know what they should do** until the product is repaired, such as how to continue to use the product safely before parts are available or if consumers should stop using the product immediately. You may also need to offer an interim arrangement such as loaning them a replacement product.

Send us your [recall notification](#) even if you haven't decided the remedy yet.

If you used an online marketplace to supply a product that you have recalled, the marketplace may be able to help you with contacting consumers about the recall and supporting consumers to receive a remedy.

# Plan how you will communicate the recall

## Highlights:

- You need clear and direct communication for your product recall to be effective.
- Consumers need to find out about the recall and know what they need to do.

## Checklist items:

- 
- Identify how you will tell consumers about the recall.
- 
- Gather contact details for consumers, those in the supply chain, manufacturers, importers and overseas recipients you have supplied.
- 
- Create your recall advertisements and messages. Consider social media, in-store, online advertising, emails and text messages. Plan when and how often you will advertise and how long you'll promote them for.
- 
- Communicate early and often with consumers and those in the supply chain
- 
- Give information about the recall to your supply chain. Include how to communicate the risk, advertise, and other steps to improve the recall's effectiveness.
- 
- Set up multiple ways for consumers and those in the supply chain to contact your business about the recall.
- 
- Set up a dispute resolution process to address consumer complaints about the recall – keep records.
- 

See the [complete supplier checklist](#) for conducting a product recall.

## Prepare a communication plan

Prepare a communication plan to tell consumers, suppliers in the supply chain including retailers, and the ACCC about the recall.

Your communication strategy should be suitable to the risk to consumers.

Your plan should include the communication strategies you used to promote your product when selling it, and the channels you used. Engage your internal marketing/advertising team or consider engaging an external agency to assist with developing and planning your recall communications.

Our [sample recall plan](#) includes a table to help you plan when and how often to communicate your recall.

You need to regularly review and update your plan, including when you get new information about a safety risk or have a low recall response rate for some consumers.

## Create your recall communications

Communicate clearly and simply. Use the words that were agreed to on the recall notice published on the Product Safety Australia website in all your communications.

When telling consumers about your recall:

1. **Describe the product** including the name, make, model and any distinguishing features, including batch or serial numbers. Give the dates the product was sold.
2. **Give clear images** of the product and any unique markings to help consumers identify the product.
3. **Explain the immediate action** consumers should take, such as 'Stop use immediately and return the product to the place of purchase for a full refund'.
4. **Describe why the product is being recalled** in simple terms so consumers can understand it. Avoid technical language. Tell consumers how to recognise the fault and if it can occur without warning.
5. **State the potential harm** by describing the **maximum potential hazard** and associated risk. For example, "You are at risk of death or serious injury if you continue to use this product". Even when there is a relatively small risk of a fatality, you must communicate the risk of death in your recall communications.
6. **State if injuries or incidents have occurred**. For example, 'incidents have occurred and users have suffered burns'.
7. **Personalise** by using the consumer's name in recall communications, where possible.
8. **Tell consumers what steps to take to receive a remedy** and what the remedy is.
9. **Give contact details** in case the consumer has questions about the recall.
10. **Avoid using words or phrases that downplay the risk** to consumers in your communications. Our [recall communications package](#) includes words and phrases you should avoid.
11. **Use a range of contact methods**, such as paid social media, advertising, posters and, where contact details are available, emails, letters, telephone calls, text messages and personal visits.
12. **Use designs for your communication that consumers will notice**, including the company's brand and a font that is easy to read.

Some communication methods such as social media posts and SMS messages have limited space for you to provide all this information, so give a link to the recall advertisement on your website.

Create your recall communications using the examples in our [recall communication package](#).



# Reach affected consumers

Communicate early – the longer you delay telling consumers about your recall, the less likely they will respond. Use direct communications where possible and a range of communication methods to reach as many people as possible.

## Use direct communications where possible

Consumers prefer suppliers contact them directly about a recall. The most effective direct communication channels are:

- email
- text message
- letter
- phone call.

While direct communication works best, **use multiple channels to maximise the number of consumers you reach and the response rate.**

**Use direct communication methods** if you, or the retailers who sold the affected product, have consumer contact details.

Obtain contact information from loyalty programs, online checkouts, email subscriptions and warranty registrations. They give the best response rate and helps you track how many people have viewed your communications and have responded.

**Be aware of privacy obligations you and others in the supply chain have.** You may need to ask for retailers who sold the affected product to send out communications on your behalf instead of providing you with this information.

Doing the following will improve the effectiveness of a recall and result in more people seeking a repair, replacement or refund:

- include all channels that were used to promote and market the product being recalled
- contact early and often – you may need to send out your recall communication several times. The research tells us that it can take 4-6 times before consumers will act
- still no response? Switch your contact method. You may need to call consumers directly
- use a combination of channels to improve how effective your recall is
- combine direct communication with the other contact methods
- reassure consumers that personal information you collect as part of the recall will not be used for other purposes such as marketing.

## Use other contact methods

If you **do not know who or where your customers are, advertise more widely** based on where your consumers are located so your recall is effective. Tell people about your recall using the same advertising methods you used to sell the product.

Consumers expect to see information about recalls:

- **On social media** – a combination of paid advertising, pinned posts on your own pages and in groups work best. For example, parenting groups to promote baby and kids' product recalls
- **In-store** – located in highly visible, high traffic areas of your stores, in a format so they can easily read it, and in their own language. For example, A4 size advertisement on a notice board that is next to the checkouts, and where the product was displayed in store.
- **Online** – make it easy to find on your website. See [Use your online spaces to promote your recalls](#) for more information.

If you supplied the recalled product on an online marketplace, contact the platform who may be able to assist you with contacting your consumers directly.

Use different ways to advertise, suitable to the size of your recall and risk to consumers.

Options you can use are:

- alerting industry bodies
- social media channels
- website
- search engine optimisation
- electronic direct mail (EDM) and e-subscriptions
- paid online advertising
- blogs
- media release
- magazine articles
- newspaper advertisements
- radio
- television
- catalogues
- community groups
- markets that sell second-hand goods
- online marketplaces
- online communities and groups
- influencers.

Ask consumers how they found out about your recall when they return the product to you. This will help you understand which ways of communicating are working best.

## Use your online spaces to promote your recalls

Promote your recall on your online spaces for the life of the recall so it's easy for consumers to find.

1. Create a product safety recall page. Include all the information that is in the recall notice published on the [Product Safety Australia website](#). It should also display well on mobile devices. Visit [business.gov.au](#) for information about [setting up a website for your business](#).
2. Add a banner to your home page with a hazard symbol, the words 'product safety recall' and a link to your product safety recall page. Place links to recall notices in the top third of your homepage.
3. Ask retailers who sold your recalled product to add the recall advertisements to their own online spaces.

## Set up a complaint process about your recall

Set up a complaint process for consumers to contact you.

- Use what you learn from your complaint process to understand where issues are occurring and fix them. Complaints may come from consumers or your supply chain.
- Create a space online to address frequently asked questions about the recall. This will reduce the number of similar calls. Include a link to this in your online recall information and recall communications. Share it with your sales staff (and contact centre), and all suppliers of the affected product.

## Tell affected retailers, franchisees and distributors

Identify and tell all businesses in your supply chain about the recall.

- Provide recall advertisements to display on their shop counter, website, and social media pages.
- Ask retailers if they have the contact details for their consumers. If so, ask them to contact these consumers directly about the recall. You can give them emails, letters, and text messages to use.
- Let them know what remedy to provide and how to dispose of the recalled product or if they need to return it to their supplier or the manufacturer.
- Tell them that they need to keep track of the number of products that they have remediated.
- Advise how you'll compensate them for any expenses they incur because of the recall, such as refunds, or costs to dispose of the product.
- If you know that the fault is in a part used by a different supplier or businesses, alert them to the safety issue as they may also need to recall their product. You can also report the issue to us by [reporting an unsafe product](#).

## Products supplied using online marketplaces

Many online marketplaces have policies and procedures in place to support suppliers when recalling a product.

Contact all of the online marketplaces you used to find out what help they can give you when recalling a product. This may include identifying and contacting consumers who purchased a recalled product, and support consumers with accessing a remedy.

Many online marketplaces have processes in place to remove listings for products that have been recalled.

# Support consumers within our diverse community

Identify if your consumers are:

- Aboriginal, Torres Strait Islander and Tiwi people
- from multicultural communities
- vulnerable, including older Australians and people living with a disability, or
- living in lower socio-economic communities.

About one fifth of Australians speak a language other than English at home (Australian Bureau of Statistics (ABS) 2017). If your consumers are from culturally and linguistically diverse communities, **translate your recall communication into their languages** and use the channels and social media platforms your consumers use.

**Tailor your communications to reach different sections of the community.** If you know the postcodes where your products were most likely sold, visit [Search Census data](#) at the [Australia Bureau of Statistics](#) to find out more about those consumers. They may speak another language or live in a low socio-economic area.

If you have supplied the recalled products to Aboriginal, Torres Strait Islander and Tiwi people living in remote communities, **tailor your recall strategy to reach them** and make it easy for them to access the remedy.

## Tools

Find out [how to reach affected Aboriginal, Torres Strait Islander and Tiwi people, and multicultural communities](#).

See our [recall communications package](#) for guidance and samples to [make your recall communication accessible to people who are deaf or have low vision](#).

[Search Census data](#) at the [Australia Bureau of Statistics](#).

# During the recall: track, review, report and adjust

## Highlights:

- To make your recall successful, track, review and adjust what you are doing throughout the recall.
- Whenever there are changes to the risk assessment, you need to let us know.
- If you find your recall is not effective, or consumers are not responding to your recall, revisit your communication plan.
- Keep your messages consistent with the approved words from your recall notice.

## Checklist items:

- 
- Keep track of how many products you and others in the supply chain have provided a remedy for – submit a recall progress report one month after your recall is published and then at agreed times.
- 
- Monitor and track incidents.
- 
- Reassess or review risk.
- 
- Regularly review and update your strategy to know if your communication is effective.
- 
- Keep recall communication current and consistent. Update messages when there is a change to the defect or hazard or how to receive a remedy. Tell the ACCC so we can update the Product Safety Australia website.
- 
- Tell the ACCC of any issues or changes with the recall.
- 

See the [complete supplier checklist](#) for conducting a product recall.

# Track the number of remedies you provide

During the recall, you need to record products remedied and returned and submit reports to us on how the recall is progressing.

## Track product remedies you provide and returns

Keep records during the recall. Track how many products have been:

- remedied
- returned from the supply chain.

Find out if there are consumers who still have the product and how many. Follow up on all reports of injuries, incidents and complaints about the recall.

Track how many remedies you have provided and compare this to earlier progress reports. [Repeat your consumer communications](#) if the number of remedies you have provided is slowing down.

Submit a [mandatory report](#) within 2 days of becoming aware of death, serious injury or illness.

You can also report a near miss, or injury or illness that doesn't meet the threshold for a mandatory report in your regular [progress reports](#) or using the [voluntary supplier report](#) on our website.

## Track how many consumers you have reached

Keep records of how many consumers you have told about the recall. If you have told consumers but are not getting a response, then you may need to review your communications. [Our communication package](#) has sample messages you can use.

If you are providing updated instructions or warning labels, keep track of how many people you have given this information to.

## Submit progress reports to us

Once [we publish your recall](#) we will write to you to tell you how often you should [submit a progress report](#) to us and what information we need. The frequency of reporting may vary depending on our risk assessment.

You will get a reminder email a week before a progress report is due, with a link to the form for you to fill in.

If you need help completing the progress report, email [recallsmonitoring@acc.gov.au](mailto:recallsmonitoring@acc.gov.au).

## Reassess the risk

You are responsible for ongoing risk assessment. There are times when you will need to reassess the risk during the recall. Whenever there are changes to the risk assessment, you need to let us know.

Reassess the risk when:

- you learn new information about the defect or product – this includes when an overseas regulator issues a safety warning or a compulsory recall
- you learn that more products you have supplied are also affected by the recall
- a consumer is injured in Australia or overseas
- consumers are not responding to the recall messages, or
- you have only supplied a low number of remedies.

There may be other situations where you need to reassess the risk.

Tell us as soon as possible if you reassess the risk, and the risk level is higher or lower than initially assessed.

If the risk is higher, you'll need to:

- update the [wording in your communications](#) to consumers and advertisements and make sure the messaging is consistent
- advise if your recall notice on the Product Safety Australia website needs updating
- review your [communication plan](#), contact methods, and frequency of contact
- contact your consumers again with the updated information
- review other aspects of your strategy for conducting the recall, such as instructions for your downstream suppliers and managing availability of spare parts.

Find out more about [assessing the risk](#) and [conducting a root cause analysis](#).

## Review the progress of your recall regularly

If you find your recall is not effective, or consumers are not responding to your recall, revisit your communication plan.

Look for ways to make it easier for consumers to access the remedy or contact you.

If we think that a recall is not performing adequately to address the risk, we may ask that you do more to improve the effectiveness of the recall.

A recall is effective when:

- your recall advertising is clear, accessible and uses the same words as the recall notice
- affected consumers are aware of the recall and are following your instructions on the recall notice
- unsold stock has been removed from the supply chain

- other businesses in the supply chain are aware of the recall and have informed their customers
- you don't receive any complaints about your recall, such as consumers not being aware of the recall or experiencing issues or delays in receiving a remedy
- no incidents or injuries are occurring.

More information can be found in the [monitoring and escalating a recall](#) section of this guide.

## Repeat your recall communication

Repeat your recall communication across different channels. Keep your messages consistent with the approved words from your recall notice.

If you have not received a response after multiple attempts then you may need to change your contact method or communication style.

Review your [communication plan](#). For the duration of your recall, you can:

- keep posting recall information on your social media platforms
- add recall information in your email newsletters (in addition to your initial email about the recall) – mark emails as 'important'
- display your recall advertisements in high traffic areas in all retail stores that sold your recalled products. Make it highly visible.

In your follow up communications, add more information to encourage consumers to engage with the recall, including how many consumers have already received a remedy. You can find examples in the [recall communications package](#).

Keep copies of your recall advertisements and communications. We may ask for copies when we assess how effective the recall has been.



## We assess and can escalate the recalls we monitor

### We assess the recall

Our focus is firstly on publishing your recall notice on the Product Safety Australia website so consumers are notified as quickly as possible of the defect, hazard and action they should take.

We will then write to you to let you know how often you should [submit a progress report](#) to us and what information we need.

For most recalls, we will ask you to send your first progress report one month after the recall is published on the Product Safety Australia website.

The frequency of reporting varies and depends on our assessment of your recall and its risk, and how it compares to other recalls notified to us. We assess:

- the risk to a person from your product – the severity of injury, or likely injury, likelihood of the hazard occurring, and likelihood of a person recognising the hazard and being able to act to avoid or reduce the injury
- the risk to the public from your product – the number of affected products with consumers
- the risk in executing the recall – this involves an assessment of your engagement with us and any challenges you are experiencing with the recall. Examples are:
  - the product has characteristics that make it harder to carry out an effective recall
  - you do not have consumer contact details
  - your consumers mainly come from groups that tend to be less responsive to recalls.

Some of the things we consider when assessing your recall are:

- the number of affected products still with consumers
- the defect rate and failure rate
- the performance of your recall compared to other similar recalls and your earlier recalls
- complaints or injury reports received or other stakeholder concerns
- the level of risk to consumers and if this has changed
- the effectiveness of your communication strategy, and the wording used in communications to consumers
- issues with publishing your recall notice, including if your remedies are suitable.

We may also begin a review of your recall at other times to assess its effectiveness, including when:

- you are not responding to us when we contact you
- you are not providing progress reports
- we have received a mandatory report, a complaint or other information relevant to the risk of your product and effectiveness of your recall.

## Possible outcomes of our assessment

We use our [Product Safety Priorities](#) to prioritise what we will escalate.

If we decide that we need to intervene in a recall, we can ask you to:

- revise your recall advertisements and consumer communications so they are consistent with your recall notice
- change your remedy, including adding extra incentives for consumers to return the recalled product
- improve the process for how your consumers receive the remedy
- repeat your recall communications, including your in-store advertising, social media posts, and emails to consumers
- meet with us to discuss your strategy.

As a result of our assessment, we may change the frequency of progress reports we need from you. This can include increasing or decreasing the frequency of reports or we may no longer need progress reports.

If you do not agree with our assessment of your recall's performance, you can ask that we review your case. Email the Director, Monitoring and Recalls at [recallsmonitoring@accc.gov.au](mailto:recallsmonitoring@accc.gov.au) and include the reasons for your request.

## Other actions we can take to reduce the risk to public safety from your product

We may also consider:

- adding a message to your recall notice on our website to include our view of the recall
- issuing a safety alert
- issuing a media statement about our assessment of the risk and concerns about the product
- requiring that you give information to us under a compulsory information notice
- enforcement action for engaging in misleading or deceptive conduct, or for making a false or misleading representation that the products are of a particular standard. See our [Compliance and Enforcement Policy](#) for how we approach enforcement action
- recommending that the Commonwealth Minister issues a safety warning notice. This is a formal warning that tells consumers and suppliers about consumer goods or product-related services that may cause injury or are under investigation
- recommending that the [Commonwealth Minister issues a compulsory recall](#).

The reasons used to decide when to escalate and intervene in a recall are set out in the [Product Safety Priorities](#). As a supplier, you are responsible for the performance of your recall. Managing your recall poorly can impact your business' reputation and increase your legal risk.

# Finalise the recall

## Highlights:

- There is no set timeline for how long you should conduct a recall. This is because products are different in how they are used and misused, their defects and hazards.
- Consider if you have done enough to remove the risk from consumers.
- We will let you know when regular progress reports are no longer needed.
- Review and update your recall plan after your recall has been closed or moved to 'not reporting' status.

## Checklist items:

- 
- Continue to provide remedies to consumers until all products are accounted for.
- 
- Tell us when all products have been accounted for.
- 
- When not all products can be retrieved or accounted for, tell the ACCC and we will consider the next steps. We may decide you no longer need to report, or we may have other suggestions to encourage consumers to respond to the recall.
- 
- Update your recall plan to include any lessons learned from the recall.
- 

See the [complete supplier checklist](#) for conducting a product recall.

## Consider if you have done enough

We understand that it is not always possible to achieve a 100% return rate for all recalls.

When you cannot retrieve all affected products, you need to decide if you have done enough to reduce the risk to consumers.

Some reasons that you should consider are:

- Has your product caused an injury or is it continuing to cause injuries?
- What is the likelihood that the products still with consumers will fail? You can test the recalled products that are returned to you to find out.
- Have you taken all reasonable steps to remove the risk to public safety that was caused by the affected product?

Ask yourself – Have I:

- communicated well with suppliers in my supply chain, so that they understand the recall process by returning the product back to me?
- communicated well with consumers, which included advertising multiple times using a range of communication channels?
- achieved a return rate that fits the risk to consumers and the lifespan of the product?
- worked out the failure rate by testing a sample of the returned product to see how many were likely to cause an injury if they were still in use?

Even if the recall is finalised, you may be required by law, including the Australian Consumer Law, to continue to provide remedies for your affected product.

## Our actions when a recall is in the final stages

### **We will let you know when regular progress reports are no longer needed**

We will ask you to stop submitting progress reports to us if we consider that you and the suppliers in your supply chain have taken all reasonable steps to recall the product and the risk to consumers has been adequately mitigated.

You can find information about what we consider when deciding whether to move your recall to 'not reporting' status in [monitoring and escalating a recall](#).

When this happens, your recall notice is still open and remains on the [Product Safety Australia](#) website.

If we receive complaints about your recall, or further injuries occur, we may ask you to submit progress reports to us again and do more to get consumers to return the product.

If you provide any remedies after your recall has moved to 'not reporting' status, you need to send us an ad-hoc [progress report](#). We use this data to update your recall and it gives us statistical evidence of how effective recalls are for the product.

### **We only close a recall when all products are accounted for**

Recalls do not expire. You should continue to provide remedies for your affected product until all products are accounted for.

We will only close a recall when 100% of products are accounted for.

# Review and update your recall plan

Review your recall plan. Incorporate what you have learned about the process to make it more effective in case there is a next time.

Review and update your recall plan after your recall has been closed or moved to 'not reporting' status.

Some businesses conduct 'mock recalls' to test the recall plan and train staff in using the plan.

Review:

- communication methods: what messages did customers respond to, what did not work
- internal procedures: quality assurance programs, internal policies or training, record keeping, your ability to track and trace your products in the supply chain
- what actions you took for this recall and the issues you solved.

You can also tell retailers and suppliers about how successful the recall was and what improvements you are making to your recall plan. Ask businesses in the supply chain for feedback to make future recalls more effective and easier to manage.

# Role of the ACCC and government in recalls

## Highlights:

- The ACCC administers the recall provisions in the [Australian Consumer Law](#). This includes overseeing the actions of suppliers conducting consumer product recalls.
- Some consumer product safety requirements are regulated by other government agencies. We work with them to identify which agency will lead the recall.
- We do not oversee the actions of those regulators that are the lead agency for those recalls.

## We help administer the Australian Consumer Law

The [Australian Consumer Law](#) applies to all businesses that operate in Australia, including overseas businesses that supply goods to Australian consumers.

The ACCC and [state and territory consumer protection](#) agencies administer the Australian Consumer Law.

Our [Product Safety Priorities](#) sets out our key areas of focus for the coming year and describes our core functions, including to:

- negotiate, assess and monitor the effectiveness of voluntary recalls
- communicate product safety risks, where we are the lead agency.

See our annual [Compliance and Enforcement Policy](#) for how we approach compliance and enforcement action.

## We receive voluntary recall notices from suppliers

Many suppliers voluntarily start recalls after becoming aware that their product presents a safety risk.

Sometimes, the ACCC or another agency becomes aware that a product is unsafe and contacts the supplier to negotiate a recall of the product.

The Australian Consumer Law requires suppliers to notify the Commonwealth Minister within 2 days of taking recall action. The ACCC receives your recall notice on behalf of the Commonwealth Minister.

Once received, we [assess the notice](#) and publish the recall on the Product Safety Australia website.

# The Minister may order a compulsory recall

The Commonwealth Minister may also order a compulsory recall requiring a supplier to recall a product:

- that will or may cause injury to a person, or does not meet a safety standard or ban under the Australian Consumer Law
- when the Minister considers that one or more suppliers has not taken satisfactory action to prevent the goods from causing injury.

The Minister can only issue a compulsory recall notice if it appears a supplier has not taken satisfactory action to prevent the consumer goods injuring someone.

When issuing a compulsory recall notice, the Minister must:

- tell suppliers in writing of a proposed recall (a proposed recall notice) including a summary of the reasons for the proposed issue of the recall notice. This must be published on the internet.
- give suppliers an opportunity to ask for a conference with the ACCC about the proposed recall notice to present their case, unless there is an imminent danger to the public. Suppliers can review documents about the recall during this conference.

As soon as practical after the conference, the ACCC can recommend the Minister either:

- issue a compulsory recall notice with no changes to the draft version
- issue a recall notice with modifications as specified by the ACCC, or
- not issue a recall notice.

If the Minister decides to act otherwise than in accordance with the recommendations, the Minister must publish a written notice on the internet setting out the reasons for their decision.

Using a compulsory recall notice, the Minister can require suppliers to:

- recall the consumer goods
- tell the public, or a particular group of people, that the consumer goods have a defect or dangerous characteristic, and what the defect or dangerous characteristic is
- tell the public, or a particular group of people, the circumstances when a reasonably foreseeable use or misuse of the goods is dangerous
- explain to the public, or to a particular group of people, how to dispose of the goods.

State and territory ministers can also issue a compulsory recall notice for products supplied in their jurisdiction. Refer to the state and territory consumer protection agencies to find out more what their requirements are when issuing a compulsory recall.

## Case study

In 2018 the Government announced the compulsory recall of vehicles fitted with defective Takata airbags on the basis that:

- they may cause injury or death to drivers and passengers
- suppliers of vehicles with defective Takata airbags had not taken satisfactory action to prevent those vehicles causing injury or death to drivers and passengers.

The compulsory recall required suppliers to:

- recall all affected vehicles on a rolling basis and replace the airbag at no cost to the consumer and arrange towing/transporting a vehicle or providing loan cars in certain circumstances. Priority was given to replacing airbags that presented the highest safety risk
- contact affected consumers directly in line with an approved communication and engagement plan
- publish a vehicle identification number search tool on their website to allow consumers to identify if their vehicle is affected
- publish a recall initiation schedule on their website to advise consumers when vehicles were recalled
- report to the ACCC on progress
- replace all Takata airbags in Australian vehicles by 31 December 2020.

Suppliers have an ongoing obligation to replace any remaining defective Takata airbags until they reach 100% completion.

## We receive progress reports during the recall

Suppliers send us [regular progress reports during the recall](#).

We let suppliers know that progress reports are not needed when we consider that all reasonable steps to recall the product have been taken and the risk to consumers has been adequately mitigated.

When all products are accounted for, we change the status of the recall to closed. See [Our actions when a recall is in the final stages](#) for more information.

## We assess and can escalate recalls

We assess the effectiveness of the recalls that we monitor proportionate to the risk.

There are times, such as when suppliers do not supply progress reports or don't respond to us when we make contact, that will prompt us to review the recall.

There are possible outcomes and actions we can take to escalate the recall and tell consumers about the risk from a product.

See [We assess and can escalate the recalls we monitor](#) for more information.



# Sometimes another government agency leads the recall

Different government agencies are responsible for regulating the safety of different types of products including:

- agricultural products
- asbestos
- building and building materials
- chemicals
- therapeutic goods such as medicines, complementary medicines, medical devices and medical tests
- electrical goods
- food and beverages
- gas appliances
- road vehicles and road traffic safety
- smoking and tobacco
- veterinary chemical products.

Products that are covered by a specialist regime may also be a consumer good covered by the Australian Consumer Law.

## Which agency is the lead agency

The ACCC and specialist agencies have arrangements in place to identify which agency is the lead agency when a product safety issue occurs.

## Agricultural and veterinary products, food, therapeutic goods, and road vehicles

For the following products, the specialist agency, and not the ACCC, is the lead agency for the recall and other safety issues.

For these products, the specialist agency:

- assesses the recall and publishes the recall on its website
- decides whether to intervene in the recall and what actions to take.

The specialist agency's guidelines, and not these guidelines, apply to the recall. Suppliers need to check the specialist agency's recall guidelines, as updated from time to time, to understand what they have to do when conducting the recall.

Product	Specialist (lead) agency	Recall resources
Agricultural and veterinary chemical products	<a href="#">Australian Pesticides and Veterinary Medicines Authority</a>	<a href="#">Recall website</a> <a href="#">Guidelines For recalling Agricultural and Veterinary Chemical Products</a>
Food	<a href="#">Food Standards Australia New Zealand (FSANZ)</a> is the coordinating authority working with the relevant state or territory food agency	<a href="#">Recall website</a> <a href="#">Food Industry Recall protocol</a> Notification of the recall to the ACCC is done by FSANZ on behalf of the food business undertaking the recall
Therapeutic goods	<a href="#">Therapeutic Goods Administration</a>	<a href="#">Recall website</a> <a href="#">Uniform recall procedure for therapeutic goods</a>
Road vehicles and approved road vehicle parts	<a href="#">Department of Infrastructure, Transport, Regional Development and Communications</a>	<a href="#">Recalls website</a> <a href="#">Recalls policy</a> Recall notices for road vehicles and approved road vehicles parts are received by the Department, and not the ACCC, under the Australian Consumer Law

## Gas appliances, electrical and building products

For an electrical product, gas appliance or building product recall, a state or territory regulator is designated as the point of contact (home regulator).

For electrical products and gas appliances, the home regulator is usually the regulator located where the initial incident occurred or where the recalling supplier is located.

When a supplier notifies the ACCC of a recall

- the ACCC will seek advice from the home regulator to make sure that the wording in the recall notice is accurate and suitable to the risk. The ACCC will publish the agreed notice on the Product Safety Australia website
- both the home regulator and the ACCC monitors the recall. Suppliers provide progress reports to both the home regulator and the ACCC. The home regulator liaises with the other state and territory regulators
- information given to us will usually be shared with the home regulator. This is to assist us in understanding the risk, hazard, use and misuse of the product
- both this guideline and the state and territory regulator's guideline apply to the recall.

Product	Specialist agency
Building products	Contact your <a href="#">state and territory building and plumbing administrations</a> for more information. For suppliers in the Northern Territory, contact <a href="#">Northern Territory Consumer Affairs</a> .
Electrical products	Contact your <a href="#">state or territory electrical safety regulator</a> for more information. The <a href="#">Electrical Regulatory Authorities Council Recall Guidelines</a> published by the <a href="#">Electrical Regulatory Authorities Council</a> also apply to the recall.
Gas appliances	Contact your <a href="#">state or territory gas appliance safety regulator</a> for more information. The <a href="#">Gas Technical Regulators Committee Recall Guidelines</a> published by the <a href="#">Gas Technical Regulators Committee</a> also apply to the recall.

## Other products

For other products covered by a specialist regime, you need to contact the specialist agency to understand your obligations. This includes the following specialist agencies:

Product	Specialist agency
Asbestos	State or territory work health safety regulator.
Chemicals – Industrial chemicals	<a href="#">Australian Industrial Chemicals Introduction Scheme</a> .
Poisons	<a href="#">State and territory poisons regulators</a> . Some state and territory regulators may not have recall powers and may collaborate with state consumer affairs to recall a product.

You can find further information about the [Australian product safety system](#) and a list of [specialist agencies](#) on the [Product Safety Australia website](#).

# Recall tools and guidelines

Our guidelines and tools are designed to help you run a successful consumer product recall.

## Tools

### Recall planning

- [Supplier checklist for conducting a recall](#)
- [Sample recall plan](#)

### Risk assessment

- [European Union RAPEX risk assessment](#)
- Consumer product recall: Guidelines for Suppliers. [Standards Australia ISO 10393:2013](#)

### Communications

- [Recall communications package](#)
- [Example communications](#)
- [Increase the reach of your social media communication when conducting a recall](#)
- [Reaching affected Aboriginal, Torres Strait Islanders and Tiwi people and Multicultural communities](#)

## Recall guidelines

Our recall guidelines help you understand when to recall a consumer product for safety reasons and take you through the process of running a recall.

- View our Recall guidelines as web pages.

The guidelines were developed using global guidance (OECD 2018 2020), international (European Commission 2019) and [Australian](#) research, and learnings from the [compulsory recall of Takata Airbags](#).

# Research

Biddle N and Zhang J (2021) '[Application of behavioural insights to understand the Australian recall of Takata Airbags – Report 1](#)', Australian National University Centre for Social Research & Methods, accessed January 2022.

European Commission, Consumers, Health, Agriculture and Food Executive Agency (2019) '[Survey on consumer behaviour and product recall effectiveness - final report](#)', Publications Office, accessed January 2021.

OECD (2018), '[Enhancing product recall effectiveness globally: OECD background report](#)', OECD Science, Technology and Industry Policy Papers, No. 58, OECD Publishing, Paris, accessed December 2020.

OECD (2020), '[Policy guidance on maximising product recall effectiveness](#)', OECD Science, Technology and Industry Policy Papers, No. 58, OECD Publishing, Paris, accessed December 2020.

# Appendix 1: Reaching affected Aboriginal, Torres Strait Islander and Tiwi people, and multicultural communities

## Telling Aboriginal, Torres Strait Islander and Tiwi people

If you have supplied the recalled product to Aboriginal Torres Strait Islander and/or Tiwi Australians living in remote communities, tailor your recall strategy to make sure they receive your recall message and can access the remedy.

For your recall message:

- Keep it simple and practical as possible. Do not downplay the risks associated with the recalled product.
- If you are targeting a specific Indigenous community, consider using traditional language in any oral messaging. Written messaging should be in plain English.
- Consider liaising with community health centres, justice groups councils and community radio to promote recall messages.
- Consider using illustrations in your recall message to tell consumers about the affected product, hazard and risk.
- Create posters to advertise your recall and arrange for them to be displayed in Indigenous community and health centres, and on community noticeboards.
- Ask well-known, authoritative, and respected people in the community to spread your recall message. Give them information about the recall, including how to identify if a product is affected and how the consumer can receive the remedy.
- Advertise your recall on local community radio stations.

Make it easy for consumers in remote communities to return recalled products and receive a remedy. You may need to arrange for replacement goods to be picked up at a community centre instead of your store, or arrange for a repair agent to visit to repair multiple products at once.

## Telling consumers in multicultural communities

Australians have different cultural backgrounds and speak many languages. More than one fifth (21%) of Australians speak a language other than English at home (ABS 2017).

**Identify if your consumers are from multicultural communities.** If so, translate your recall advertisements into different languages. This includes any extra information you will provide about the recall, like instructions for simple repairs and frequently asked questions.

Display these messages in prominent positions in retail stores located in multicultural communities and other mediums such as community newspapers and social media groups and pages.

The Australian Bureau of Statistics (ABS) has a tool to help identify what languages are spoken in certain areas. Use this when deciding if you need to translate your recall message.

You can access the ABS tool here: <http://stat.data.abs.gov.au>.

The top languages spoken at home other than English are:

- Mandarin
- Arabic
- Vietnamese
- Cantonese
- Punjabi
- Italian
- Greek
- Hindi
- Spanish.

Other languages spoken at home other than English:

- |                                   |              |
|-----------------------------------|--------------|
| ▪ Afrikaans                       | ▪ Polish     |
| ▪ Assyrian                        | ▪ Russian    |
| ▪ Australian Indigenous Languages | ▪ Samoan     |
| ▪ Bengali                         | ▪ Serbian    |
| ▪ Croatian                        | ▪ Swahili    |
| ▪ Dari                            | ▪ Somali     |
| ▪ Dutch                           | ▪ Filipino   |
| ▪ French                          | ▪ Indonesian |
| ▪ German                          | ▪ Tagalog    |
| ▪ Hazaraghi                       | ▪ Tamil      |
| ▪ Khmer                           | ▪ Thai       |
| ▪ Korean                          | ▪ Turkish    |
| ▪ Macedonian                      |              |
| ▪ Maltese                         |              |
| ▪ Persian                         |              |

# Appendix 2: Risk assessment tool: European Union RAPEX risk assessment

The [European Union RAPEX risk assessment](#) tool assesses the risk of a product.

The following steps and guidance will assist you to conduct your risk assessment.

Consult with your staff who have knowledge and experience of the product and its hazards to carry out the risk assessment.



## European RAPEX risk assessment steps

### Step 1: Describe the product and associated hazard(s)

Product description	Describe the product
Hazard description	<p>Describe the hazard(s). A hazard is something that can cause harm. e.g.: fall, choking, fire, electric shock</p> <p>Does the hazard concern the entire product or only a (detachable) part of the product?</p> <p>Is there only one hazard concerning the product? Are there several hazards?</p>
Relevant safety standard, ban or legislation	<p>List safety standards, product bans or other legislation relevant to the product</p> <ul style="list-style-type: none"> <li>■ identify what safety laws apply to the product</li> <li>■ work out how the product, or aspects of the product, do not meet the requirements of the relevant standard, ban or other legislation</li> <li>■ does the hazard need to be addressed through re-design or testing of the product to ensure compliance?</li> </ul>

### Step 2: Identify the type of customer you want to include in your injury scenario who may be affected by the hazard(s) associated with the product

Intended user(s)	List the intended user(s). For example, consider the age group of the intended user and whether they are a vulnerable consumer e.g. A trampoline is intended for children and adults to jump on.
Intended use of the product	List the intended use of the product e.g. A trampoline is intended for jumping on by one child or adult.
Other users or different ways to use the product	List other consumers and scenarios, and different uses of the product, to capture reasonably foreseeable use and misuse of the product e.g. A trampoline is likely to be jumped on by 2 or more children or adults.

### Step 3: Describe a scenario, in which the product hazard(s) cause injury or adverse health effects to consumers who may use the product

Describe how the injury (or injuries) may occur	<p>When describing the injury, use the shortest path to the injury, or the critical path to injury (without exaggerating the details)</p> <ul style="list-style-type: none"> <li>■ Are there several paths to injury?</li> <li>■ Consider other reasons including: <ul style="list-style-type: none"> <li>- the frequency and duration of use</li> <li>- can the consumer recognise the hazard (i.e. is it visible or hidden)</li> <li>- is the consumer vulnerable (e.g. children)</li> <li>- is protective equipment involved during the use of the product</li> <li>- what the consumer was doing when the accident happened?</li> <li>- consumer's cultural background</li> <li>- other factors important for the injury to occur.</li> </ul> </li> </ul>
---	---

#### Step 4: Work out the severity of the injury

Level of severity (1-4) of the possible injury to the consumer

The level of severity is used to rate how seriously a person is likely to be hurt by the product. See [Injury Severity Table](#) for further guidance.

If the consumer suffers from several injuries in the injury scenario noted above, estimate the severity of all those injuries together.

Be objective – decide the severity of the different scenarios, not the acceptability of an injury.

#### Step 5: Work out the probability of the injury

What is the likelihood of the injury occurring (e.g. low, moderate, high)

This section is to assess how likely it is that a person will be hurt by the product (probability of the injury). Assign a probability to each step of your injury scenario. See [Probability Table](#) for further guidance.

Multiply the probability to work out the overall probability of your injury scenario.

#### Step 6: Work out the risk level

Level of risk associated with using the product (e.g. low, medium, high, serious)

This is the rating we use to measure the likelihood that the product will hurt someone and if so, how badly they will be hurt.

It is a combination of the injury severity and the injury probability. Also see the [Risk Level Table](#).

#### Step 7: Review your assessment

Is the injury severity and probability of the injury occurring accurate?

The injury severity and probability of the injury occurring should consider all hazards associated with the product which may lead to an injury. Consider how the product is used, including foreseeable use and misuse. Check that it makes logical sense.

Is the current risk level likely?

Will the risk level change if you change the severity and probability up or down?

If the risk level remains the same, you can be quite confident of your risk assessment.

If it changes, it means that your product is either at the higher or lower end of that risk rating. When this happens, select the higher risk.

Discuss the likelihood of the risk level with experienced colleagues and compare it with an actual experience using the product.

#### Step 8: Finalise, document and pass on your risk assessment

Issues or unknowns

Describe any difficulties you had when completing your assessment including when you felt you did not have enough information and had to make estimates.

Document next steps

Recall the product. Tell consumers about the hazard and risk with the product, particularly if the risk level changes.


Fix the defect or why it is dangerous and hazardous by repairing, refunding and/or replacing the product.

# Injury severity table

Injury (severity)	Consequence for consumers
4	Injury or consequence that is or could be fatal, including brain death; consequences that affect reproduction or offspring; severe loss of limbs and/or function, leading to more than approximately 10 per cent of disability.
3	Injury or consequence that normally requires hospitalisation and will affect functioning for more than 6 months or lead to a permanent loss of function.
2	Injury or consequence for which a visit to an emergency room may be necessary, but in general, hospitalisation is not required. Functioning may be affected for a limited period, not more than about 6 months, and recovery is more or less complete.
1	Injury or consequence that after basic treatment (first aid, normally not by a doctor) does not substantially hamper functioning or cause excessive pain; usually the consequences are completely reversible.


Source: [page 43 PROSAFE \(2011\)](#).

## Probability table

Probability of damage during the foreseeable lifetime of the product	
High    Low	> 50 %
	> 1/10
	> 1/100
	> 1/1 000
	> 1/10 000
	> 1/100 000
	> 1/1 000 000
	< 1/1 000 000

Source: [page 44 PROSAFE \(2011\)](#).

# Risk level table

Probability of damage during the foreseeable lifetime of the product		Severity of Injury			
		1	2	3	4
<p style="text-align: center;">High</p>  <p style="text-align: center;">Low</p>	> 50 %	H	S	S	S
	> 1/10	M	S	S	S
	> 1/100	M	S	S	S
	> 1/1 000	L	H	S	S
	> 1/10 000	L	M	H	S
	> 1/100 000	L	L	M	H
	> 1/1 000 000	L	L	L	M
	< 1/1 000 000	L	L	L	L

S	<b>Serious Risk</b>
H	<b>High risk</b>
M	<b>Medium risk</b>
L	<b>Low risk</b>

Source: [page 44 PROSAFE \(2011\)](#).

PROSAFE (Product Safety Enforcement Forum of Europe) (2011), [Consumer product safety in Europe: Correction Action Guide](#), accessed 24 March 2020 [PDF].

European Commission (2015), EU General Risk Assessment Methodology (Action 5 of Multi-Annual Action Plan for the Surveillance of Products in the EU (COM(2013)76). Vol. 2015-IMP-M. <http://ec.europa.eu/DocsRoom/documents/17107/attachments/1/translations/>.

# Appendix 3: Recall consumer communications package

## Sample messages you can use in your communications

Remember: always use the words that were agreed to from your recall notice to describe the defect, hazard and remedy.

Important: Describe the maximum potential hazard and potential risk. Even when there is a relatively small risk of a fatality, you must communicate the risk of death in your recall communications.

Select the most suitable and add an image of your product.

### For known consumers

- Our records show that you purchased the product in [Month Year (e.g. June 2020)].

### Ask consumers to check if they own the recalled product

- Do you own this product?
- Do you have a [brand] baby capsule in the backseat of your car?
- Do you have a [product] in your kitchen cupboard?
- Do you use a [brand/store] [appliance] to make dinner?
- Does your child sleep in a [brand] cot?
- Have you purchased a [product] from [store]?
- Do you have a product like this in your home?
- Check your garage/garden shed for [product].

### For consumer goods that have caused death or injury

- This product has been known to kill or injure people.
- This product has caused injuries to people.
- This product has injured a person.
- This product has been known to kill a person.
- The defect has occurred and caused injuries to [number] of consumers.

## Call to action statements

- **Stop using the [product]** immediately and return to the place of purchase for a full refund.
- **Unplug your [product]** and return it to your closest **[store name]** for a full refund. No receipt needed.
- **Stop using the [product]** and follow the link below to contact us. We'll arrange for a technician to come to you to fix the defect.
- **Remove [product]** from your child's toy box and return it to us for a replacement [product].
- **Visit our store** and we'll fix the issue for you on the spot. No bookings necessary.

## Example follow up messages – add to recall messages after initial message

- Since the start of the recall, we have given refunds to over **[insert amount]** consumers. If you haven't returned your product yet, you or someone you know are at risk of **[death or a serious injury]**. Return your product to us and we will give you a full refund.
- Since the start of the recall, we have given refunds to **[insert amount]** consumers. If you are unable to return the **[product]** to us, call or email us to arrange another way.
- We sent you information about a recalled product you may still have in your home but we haven't heard from you yet. *(For comms sent to known consumers.)*
- So far, we have given refunds totalling **[\$amount]** to our consumers. Check if you own this product and return it to us so we can give you a refund.
- The defect has occurred and caused injuries to **[number]** of consumers.
- People are more likely to respond if they know the majority of others are too. **Only use the below messages where a significant majority of consumers have responded.**
- We have recalled a total of **[insert number]** products. Since the start of the recall, we have given replacement products to over **[insert number]** consumers.
- XX% of consumers have already claimed their refund on the recalled **[product]**. Return yours so you too can claim your refund. *(For comms sent to known consumers.)*

## Messages to avoid

Do not use words or phrases in any of your communications that downplay the risk to consumers.

Examples of words and phrases that downplay the risk and should not be used include:

- Precautionary
- We are recalling this product for precautionary reasons
- Voluntary
- This is a voluntary recall
- Out of an abundance of caution
- It is highly unlikely the defect will occur

- The chance of injury or death is low or rare
- It is unlikely that an incident will occur
- In the unlikely event
- Low risk
- In rare circumstances/occasions
- Isolated incidents
- Extremely rare cases
- No injuries in Australia have been reported
- No injuries have occurred
- Thermal event
- Hot smoke
- Secondary impact.

# Email/letter

Subject: **Product safety recall** – [insert product name] [PRA No. XX/XXXX]

Dear [consumer's name]



## Product Safety Recall

---



**Do you own this product? (or) Our records show that you purchased this product in [Month Year].**

Product name

Product identifiers (barcode, model number)

Purchased from: [Stores where product was sold]

Dates sold

---



[Insert image of the defect if available in addition to hazard symbol]

**Why we are recalling the product**  
[insert defect information here]

**Hazard:** [insert hazard information here]

You are at risk of [death or injury] if you continue to use this product

OR

Your child is at risk of [death or injury] if they continue [play with / use] this product.

---



**1. [insert call to action statement]**

2. Contact us if you are unable to return the product or have sold it to another person.

---



[www.website.com/recall]  
[email@email.com]  
**(0X) XXXX XXXX Xam** to Xpm Monday to Friday

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Contact the **Translating and Interpreting Service (TIS)**.  
131 450 or visit [tisnational.gov.au](http://tisnational.gov.au) to book a phone interpreter and provide our phone number **0X XXXX XXXX**

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If you have a hearing or speech impairment- contact us through the National Relay Service  
**1800 555 660** and ask for **0X XXXX XXXX** or visit [RelayService.gov.au](http://RelayService.gov.au)

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See **productsafety.gov.au** for  
Australian product recall information

Yours sincerely,  
[name]  
[position]



# In store advertising poster



## Product Safety Recall

---

**Do you own this product?**

"[Click to add: Product name]"

"[Click to add: product identifiers]"

Dates sold: "[Click to add: dates sold]"

---



**Why the product is recalled:** "[Click to add: Text]"

**Hazard:** "[Click to add: Text]"

---



- "[Click to add call to action statement]"
- Send us an email or phone us if you are unable to return the product or have sold or gifted it to another person

---



Ask our staff to find out more about the recall.

[email@email.com]

"[Phone number]" Xam to Xpm Monday to Friday

---



Purchased from: "[Click to add: Text]"

---



Scan for information about this recall

[Add your own QR Code or remove if not required]

---



Set yourself a reminder to check at home

- Take a photo of this notice
- Set a reminder on your phone

---

PRA [xx/xxxx]

**See [productsafety.gov.au](https://www.productsafety.gov.au) for Australian product recall information**

# SMS

## Message for unknown consumers

From: [supplier name]

PRODUCT SAFETY RECALL:

[product].

Do you own this product?

[insert call to action]

More details: [web address].

PRA No.[XX/XXXX]

Unsub: reply STOP

## Message for known consumers

From: [supplier name]

PRODUCT SAFETY RECALL:

You bought [product] from us in [MM YY].

[insert call to action]

More details: [web address].

PRA No.[XX/XXXX]

Unsub: reply STOP

Understand your obligations under the [Spam Act 2003](#) and the [Privacy Act 1988](#) before sending an SMS to consumers.

# Social media message

## Example:

Does your child sleep in these pyjamas? Stop using the product immediately and return it to the place of purchase for a full refund. [Link to recall information]



- Include a call to action and ask a question to viewers – see examples.
- Keep your message simple with plain language, easy and short words:
  - include a clear image of the recalled product
  - add the product name
  - describe the defect – use the approved words from your recall message
  - refer to the maximum harm that can occur, which may mean specifying “death or serious injury” as the potential harm that could occur.
- **Set a schedule to repeat your message** – your social media manager or coordinator may have this available for you to use.
- **Add a Learn More or Contact Us button if the option is available** – direct consumers to the recall information on your website, the recall notice on the Product Safety Australia website, or an online form where consumers can contact you.
- **Create a story** to use in addition to your social media post:
  - include your social media image
  - ask a question to consumers (see [examples](#))
  - include the words: *Swipe up to learn more about the recall OR Swipe up to get your refund*
  - direct consumers to the recall information on your website, or your recall notice on [productsafety.gov.au](http://productsafety.gov.au)
  - the swipe up option may only be available to business social media profiles with a large number of followers.

## Increase the reach of your social media message

Social media platforms use algorithms to decide what messages are shown to followers. Use a combination of paid and organic social media posts to promote your recall message.

### Paid social media advertising

Consider paid options on social media channels (e.g. boost posts) to increase views and widen the reach of your recall message that goes beyond your immediate followers. Chances are, not all your consumers are following you on social media. Paid advertising will help you reach consumers who received the product as a gift or bought it second hand.

### Organic social media posts

There are many ways you can increase the chance of your recall message being seen by your consumers on social media platforms.

Tips to help you to get your recall message out there.

- Ask associated businesses, industry associations or groups to share your post of the recall.
- Share your message on fan groups/pages.
- Encourage your followers to share and tag friends or family who may be affected by the recall.
- Interact with comments on your recall message, including thanking people for sharing/tagging and answering any questions about the recall. Make sure you have adequate staff on standby to support this function, especially in the first few days of the recall announcement, where consumers will ask questions or request further information.
- Repost your recall message multiple times over the duration of your recall.

## Make all your recall messages accessible

- Use plain language.
- If you use hashtags, capitalise the first letter of each word. For example: #ProductSafety.
- Use emojis, not emoticons.



- Use alternative text (alt text) to describe the images. Alt text is used to describe an image and is read by screen readers. This allows for images including photographs to be accessible to a person with vision impairment.
- If using a video in your message, provide captions. Provide a transcript for audio and video content.
- Provide:
  - contact details for the Translating and Interpreting Service – you may be charged for this service
  - contact details for the National Relay Service for hearing and vision impaired consumers
  - a toll free phone number for consumers to contact your business.

# Using QR codes

You can add Quick Response (QR) codes to your communications. QR codes are a low cost and convenient way to direct consumers to recall information on your website and can be purchased online.

You can use QR codes to direct consumers to:

- frequently asked questions about your recall
- various forms including:
  - indicating they don't have the product anymore, or
  - making an appointment for the product to be repaired.

Select a dynamic code. This will direct consumers to the latest information on your website.

In addition to knowing your obligations for collecting private personal information, you need to consider the following security concerns with using third-party providers for your business:

- make sure they are trusted providers
- validate third-party privacy agreements and measures for capturing and storing customers' personal information.

The [Australian Cyber Security Centre \(ACSC\)](#) provides guidance for businesses to help protect them against cyber threats.

If you are using a QR code that directs consumers to your website, the ACSC provides the following guidance for businesses:

- Avoid services that shorten or obscure the website address.
- Test the code to make sure you are being directed to the correct website. Test before issuing the code to consumers and regularly check it throughout the recall process to make sure it hasn't been replaced with a malicious QR code.
- Place the QR code in a prominent position on your communications.
- Give a description and the website address so that consumers know what to expect. Consider providing a screenshot of the website. This also gives consumers the choice to access the website using the website address instead of the QR code.

Due to the increased use of QR codes post COVID-19, the ACSC has guidance on QR codes which can also be applied when setting –up QR codes for recall purposes. You can access the guidance here:

<https://www.cyber.gov.au/acsc/view-all-content/publications/quick-response-codes-covid-19-environment>

## Tools

[Translating and Interpreting Service \(TIS\)](#)

[National Relay Service](#)

[Census 2016, Language spoken at home: ABS.Stat](#)

[Avoid sending spam](#)

[Promoting your business through SMS and email](#)

