



Australian  
Competition &  
Consumer  
Commission

## **Consumer Product Safety Recall Guidelines**

**What a supplier is required to do when conducting a  
product safety recall**

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Australian Competition and Consumer Commission

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# Introduction

## What is the purpose of these guidelines?

The purpose of the product safety recall guidelines (the Guidelines) is to provide guidance to suppliers on how to conduct a product safety recall.

The Guidelines are provided for guidance only and are not legally binding.

The Guidelines have been developed by the Australian Competition and Consumer Commission (ACCC) in consultation with state and territory product safety regulators.

The system a supplier has in place to ensure the recall of unsafe consumer products from consumers and from within the supply chain should be tailored to the type of product and the risk they pose to consumers. A supplier may seek its own independent advice (including legal advice) regarding the system it develops/has in place for conducting a consumer product recall.

## What is the scope of these guidelines?

The Guidelines have been developed to help suppliers plan for, and respond to, an incident where the recall of potentially unsafe consumer products is required. It does this by setting out:

- the legal requirements for suppliers in relation to a consumer product recall specified in the *Trade Practices Act 1974* (TPA)
- the role and responsibilities of suppliers and government agencies when a recall is necessary
- requirements for conducting a recall, including:
  - notification
  - recall strategy
  - retrieval of the product
  - reporting on the recall

# Background

A consumer product safety recall occurs when a problem, that may mean that the consumer good presents a hazard, is identified.

Many recalls are initiated by suppliers when they become aware of safety issues. Product recalls may also be negotiated with suppliers by the ACCC or other regulators when they identify a safety issue or following enforcement or compliance action.

As a last resort, the ACCC may recommend that the Commonwealth Minister for Competition Policy and Consumer Affairs (the Commonwealth minister) order a compulsory recall to protect the public from an unsafe good: section 65F. When this happens, the ACCC will direct the manner in which the recall is to occur and will enforce compliance.

## Why is the ACCC involved in consumer product recalls?

Suppliers have an obligation under the Trade Practices Act to notify the Commonwealth minister when they undertake a recall.

The ACCC receives the notification on behalf of the Minister and oversees the recall to ensure that it effectively removes the unsafe product from the marketplace and the hands of consumers.

The ACCC enforces and administers the TPA, which applies to corporations and other entities engaged in trade and commerce whose activities cross state boundaries or take place within a territory or are conducted by electronic means such as e-commerce.

The range of goods covered under the TPA, and to which the product safety requirements apply, is broad and covers any product that is used in personal, domestic or household consumption.<sup>1</sup>

Goods that are monitored by other specialist Commonwealth regulators, such as the Therapeutic Goods Administration (TGA), the Australian Pesticides and Veterinary Medicines Authority (APVMA), Foods Standards Australia and New Zealand (FSANZ) and the Department of Infrastructure, Transport, Regional Development and Local Government (Infrastructure), also fall within the jurisdiction of the ACCC. However, as a matter of administration and in recognition of the mandate and specialist expertise of those agencies, goods regulated by the other specialist Commonwealth regulators are normally not considered for direct action under the TPA.

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<sup>1</sup> See s. 4 of the TPA, which defines goods to include: ships, aircraft and other vehicles; animals, including fish; minerals, trees and crops, whether on, under or attached to the land or not; and gas and electricity.

On occasion, the ACCC has become involved in specialist matters when a specialist regulator's powers have not been able to satisfactorily address safety issues. In addition, the breadth of the definition of goods under the TPA allows the ACCC to act as a 'safety net' and ensure that there are no gaps in Commonwealth regulatory coverage.

## **Section 1 –Legal requirements, Roles and Responsibilities**

### **Legal requirements**

#### **Trade Practices Act Recall Provisions**

Section 65R of the TPA requires suppliers voluntarily recalling products for safety-related reasons to notify the Commonwealth minister responsible for consumer affairs in writing within two days of initiating the recall.

The notice must state that the goods are subject to a recall and set out the nature of the defect in, or dangerous characteristic of, the goods.

A supplier who fails to notify the Commonwealth minister may be found guilty of an offence under s.65R(2) of the TPA.

A voluntary recall occurs when the supplier for a consumer product initiates the recall and voluntarily takes action to remove it from distribution, sale, and/or consumption. A voluntary recall may also be negotiated with a supplier by the ACCC following enforcement or compliance action. The use of the word 'voluntary' does not correspond to whether or not the distribution network/chains can choose to remove the product from sale. When a recall occurs, all of the particular consumer product subject to the recall must be removed from the market place.

Section 65F(1) of the TPA empowers the Commonwealth minister responsible for consumer affairs to order a supplier to recall goods which will or may cause injury to any person if it appears to the minister that the supplier has not taken satisfactory action to prevent the goods causing injury. The minister's recall order will stipulate the manner and timing of the recall. These are known as 'compulsory' recalls.

Section 65F(7) of the TPA requires a supplier who undertakes a voluntary or compulsory recall to give written notice to any person outside of Australia to whom they have supplied the goods within 10 days of initiating the recall.

Depending on the consumer product that is the subject of the recall, suppliers may also have obligations to notify other specialist Commonwealth regulators when they initiate a recall. A list of the organisations that are required to be notified of a recall of specific product groups are provided in Section 2 of these Guidelines, as well as on the Recalls Australia website at <http://www.recalls.gov.au>

# Supplier Responsibilities

## Responsibility for the supply of safe products

A supplier is the entity having primary responsibility for the supply of safe consumer products in Australia. ‘Suppliers’ include manufacturers, importers, distributors and retailers. There will often be more than one supplier responsible for a particular product.

Individual suppliers are responsible for the investigation and rectification of safety related hazards in products that they supply. A safety related hazard may be identified by many means, including:

- detection by the supplier undertaking the recall or another supplier within the supply chain
- complaint from a consumer
- detection by an industry body or consumer organisation
- detection by the ACCC, other specialist Commonwealth regulator or State or Territory product safety regulator.

An unsafe product may result from a manufacturing or production error; that is, where the manufacture of the product departed from its design or material specifications during production.

An unsafe product may also result from a design defect; that is, a product may be unsafe even if the product is manufactured exactly in accordance with its design and specifications. A design defect may also be present if the risk of injury occurs as a result of the operation or use of the product, the reasonably foreseeable use of the product, or the failure of the product to operate as intended.

Where the ACCC detects or becomes aware of a safety related hazard it will attempt to identify the supplier at the highest level in the supply chain in order to assist the supplier to ensure all relevant suppliers from within the supply chain, including international recipients, are identified and advised of the safety related hazard relating to the product.

## Supplier Recall Responsibilities

A supplier has the following general responsibilities in relation to a recall:

- conduct a comprehensive risk analysis of the safety related hazard
- stop distribution of a product that has been identified for recall
- cease production or modify the manufacturing process for a product that has been identified for recall

- remove the unsafe product from the marketplace
- notify the relevant regulator/s
- notify the public
- notify international product recipients
- notify others in the domestic supply chain
- facilitate the return of recalled products from consumers
- store and dispose of recalled products safely
- have a written recall strategy/plan
- maintain records and establish procedures that will facilitate a recall (records should be in a form that can be quickly retrieved)
- provide progress reports on the conduct of the recall to relevant regulators

In some cases the risk analysis may determine that it is not necessary to retrieve products from consumers, however to mitigate the safety risk some other action by the supplier is required. These other actions may include a trade level recall or issuing a safety alert.

Where a supplier initiates a trade level recall, the same general responsibilities would apply except the supplier would not be required to notify the public. Likewise when issuing a safety alert, a supplier would have the same general responsibilities, however, it would not be required to remove the unsafe product from the marketplace.

## Section 2 – Mitigating a product safety risk

### Identifying a consumer product safety hazard

Where a supplier becomes aware of a possible safety hazard in a consumer product that may cause injury to a person, it should immediately conduct the following assessment:

- gather and assess the reliability of all available information about the potential hazard
- identify how the problem occurred
- conduct a comprehensive risk analysis
- look at all possible ways to address the safety related hazard and decide whether it can be repaired or modified.

Additional guidance on risk analysis may be available in product safety and risk management standards such as *AS/NZS ISO 31000:2009 - Risk Management - Principles and Guidelines*.

The supplier should contact the ACCC when performing such an assessment. This will enable the ACCC to work with the supplier to determine what action (if any) is required to mitigate a safety related hazard with the product.

### Determining an appropriate course of action

Depending on the outcome of the risk analysis there are a number of possible actions a supplier may choose to take to mitigate a safety related hazard. These include:

- the calling back or withdrawal of products from the market or distribution chain;
- requesting consumers or other suppliers:
  - return products for refund, replacement or modification;
  - contact the supplier to arrange for a replacement product or part to be sent to the consumer;
- sending a service agent to a person's home or place of business to repair or modify a product;
- requesting a service agent repair or modify a product when it is next presented for servicing.

The decision about the most appropriate action to take to reduce the risk to consumers will depend on a number of factors, including the nature of the risk and distribution and lifecycle of the product. The supplier should consult with the ACCC about the most appropriate strategy.

## **Conducting a recall**

### **What are the objectives of a recall?**

The objectives of a recall are to:

- stop the distribution and sale of the affected product as soon as possible
- inform the relevant authorities of the problem
- inform the public of the problem
- effectively and efficiently remove from the market place any product which is potentially unsafe
- prevent the further distribution of unsafe products

### **Requirements for conducting a recall**

The supplier has prime responsibility for implementing a recall. A recall should be implemented in accordance with its recall policy and after consultation with the ACCC.

In order for the ACCC to be assured that a product safety risk will be effectively mitigated, it requires that the supplier undertake the following actions:

- notify the regulator/s of the recall, which includes providing details of other entities within the supply chain that have been notified of the recall
- prepare and submit a recall strategy to the regulator/s
- retrieve the affected product from consumers and from within the supply chain
- report on the recall to the regulator/s

### **Notification**

#### *Notification of Government authorities*

A supplier undertaking a safety-related recall is required by the TPA (section 65R) to notify the Minister for Competition Policy and Consumer Affairs in writing within two days of commencing a recall action.

As a matter of administration, the ACCC recommends a supplier notify the ACCC when it decides to take any one of the following actions to mitigate a product safety related hazard:

- calling back or withdrawing products from the market or distribution chain;
- requesting consumers or other suppliers:
  - to return products for refund, replacement or modification;
  - to contact the supplier to arrange for a replacement product or part to be sent to the consumer;
- sending a service agent to a person's home or place of business to repair or modify a product;
- making arrangements for a service agent to repair or modify a product when it is next presented for servicing.

A supplier will fulfil the notification requirement by completing and submitting a recall via the ACCC's online form. If a business cannot submit using the online form it should contact the ACCC on 1300 302 502.

- [Submit a recall](#)

Sometimes it will be necessary to notify another organisation, such as a state or territory consumer affairs authority, of a product recall. Contact details for state and territory product safety regulators are provided on the Recalls Australia website.

Where a recall relates to specific product groups the following organisations should also be notified:

- [Food Standards Australia New Zealand \(FSANZ\) \(for food products\)](#)
- [Department of Infrastructure, Transport, Regional Development and Local Government \(INFRASTRUCTURE\) \(for motor vehicles\)](#)
- [Therapeutic Goods Administration \(TGA\) \(for therapeutic goods\)](#)
- [Australian Pesticides & Veterinary Medicines Authority \(APVMA\) \(for agricultural and veterinary products\)](#)
- [State and territory electrical regulators \(for electrical products\)](#)
- [State and territory gas regulators \(for gas appliance products\)](#)

#### *Notification of international product recipients*

A supplier undertaking a voluntary or compulsory safety-related recall is required by the TPA (section 65F(7)) to notify in writing any person outside Australia, to whom they have supplied goods, that the goods are subject to a recall.

The notification must state that goods are subject to a recall and, if the goods contain a defect, have a dangerous characteristic or do not comply with a prescribed consumer product safety standard, set out the nature of the problem or non-compliance.

Where a supplier has complied with the notification requirements under section 65F(7), the supplier is required by the TPA (section 65F(8)) to provide to the Commonwealth

minister, within 10 days of providing the notice, a copy of the notice. This requirement can be fulfilled by sending a copy to the ACCC via email to recalls@recalls.gov.au.

*Other entities in the domestic supply chain*

Recall effectiveness is contingent upon the notification and cooperation between all entities in the supply chain.

The ACCC therefore requires a supplier undertaking a safety-related recall of consumer goods to notify any entity from within the domestic supply chain that a recall has been initiated in writing.

Where a supplier has complied with this requirement to notify entities from within the domestic supply chain that a recall has been initiated, the supplier should advise the ACCC.

**Recall strategy**

A supplier is required to submit a recall strategy to the ACCC on initiating a recall thereby assuring the ACCC that the product safety risk will be effectively mitigated.

A supplier should negotiate the content of the recall strategy with the ACCC prior to submitting it.

The recall strategy is the first stage of reporting in relation to a recall and will assist the ACCC to assess whether the product safety risks associated with the unsafe product will be adequately addressed.

Some elements of the recall strategy should be supplied to the ACCC at the time of initiating the recall however other elements will not become evident until the recall has progressed and are to be provided at agreed intervals.

*Elements of a recall strategy*

A supplier's recall strategy must include:

- an explanation of the problem, including the hazard associated with the product and the supplier's assessment of the risk posed by the product
- the number of units supplied to consumers and others in the supply chain
- information about any known injuries or incidents associated with the product
- information about the life cycle of the product
- information about the proposed communication with consumers, including the method of communication, frequency with which the communication will be repeated and details of the message. This should be negotiated with the ACCC. Guidance as to the types of factors that a supplier should consider when developing a communication plan is provided in attachment A

- information about the way in which the supplier will manage contact from consumers about the recalled product, including any complaint handling procedures
- information about the manner in which the recalled product will be collected, destroyed or rectified
- contact details of the manufacturer and/or importer of the product
- contact details of other entities in the supply chain to whom the recalling supplier has supplied the product
- contact details of international product recipients
- action taken by the supplier to identify and correct the cause of the hazard, including the outcome of any root cause analysis or the time period in which such analysis will occur.

### **Communication plan**

The purpose of communicating with consumers about a recall is to ensure that product related injuries are prevented through the removal or rectification of unsafe products. The goal in communicating a product recall is to ensure consumers comply with the recall notification.

Matching the communication medium to the consumer is important to achieve the objective of compliance with a recall notice. Communications regarding the recall should therefore be directed towards the particular consumer demographic for the recalled product, using an appropriate communication method.

Although there are a range of communication methods through which a supplier can communicate with consumers about a recall, there are some minimum requirements for written communication.

A written recall notice must include:

- **Product description**—a clear description of the product, including the name, make and model and any distinguishing features, batch or serial numbers. Include dates the product was available for sale
- **Picture of the product**—a photograph or drawing of the product will provide the consumer a visual representation of the product
- **Description of the defect**—a clear description of what the defect is. The defect should be described in simple terms so that the average consumer can understand. Refrain from using technical specifications wherever possible
- **A statement of the hazard**—describe the maximum potential hazard and associated risk. Where available a appropriate hazard symbol should be included

- A section titled ‘**What to do**’, which explains the immediate action the consumer is to take, for example, cease use immediately and return product to the place of purchase for a full refund. It should be clear that the consumer should return the product and not dispose of it. The supplier must ensure it minimises the inconvenience to consumers to encourage consumer compliance with the recall notice
- A section titled ‘**Contact details**’, which explains who consumers should contact to receive a refund or have the product repaired or replaced. Include business and after hours telephone numbers, preferably toll free and email and website addresses

The recall notice must **not** include the words ‘voluntary recall’.

Figure 1 is a sample recall notice



*Design of a recall notice*

The design of a newspaper recall notice must:

- be a minimum size of 12 cms x 3 columns
- use the red hatched boarder with the red safety triangle in the upper left hand corner – this is an internationally recognised safety symbol
- use the headline ‘Product Safety Recall’ in red and 16 point font
- use 10 point, Sans serif typeface in the body with bold section headings as above

- include the words ‘See [www.recalls.gov.au](http://www.recalls.gov.au) for Australian product recall information’ at the base of the notice in bold 14 point font

A supplier should place information relating to a product recall prominently on their website. The best practice for this form of advertising is to display an image of the product and the words ‘Product Safety Recall’ (or similar) in a clearly visible position on the homepage. The image or words should be hyperlinked to a page that displays the recall notice. Other online forms of communication such as SMS, web forums, blogs and social networking sites may be effective with relatively small outlay and should also be considered.

### **Retrieval of the affected product**

The ultimate goal of a recall is to retrieve as many unsafe products from the hands of consumers as possible and prevent any further distribution of the affected product in the market place.

Products that are the subject of a recall may be recovered from different entities in the supply chain or directly from consumers.

A supplier is required to make arrangements for the retrieval of the product. These arrangements should include:

- establishing collection points across the distribution network
- notifying the relevant parties, including other entities in the supply chain and consumers of the method of retrieval of the recalled product
- arrangements for disposing of the returned product—this may involve arranging for the returned product to be held and kept separate until it can be rectified or safely destroyed.

Low value products pose particular challenges for suppliers when it comes to a recall. Low value does not mean low risk and suppliers should still seek to achieve effective recalls of such products. Research conducted by the ACCC found that consumers are more likely to return a low value product if an additional incentive is provided. A supplier of low value products should consider offering incentives to consumers to return the recalled product.

### **Reporting on the recall**

#### *Progress reports*

In order to monitor the progress and enable ongoing assessment of the effectiveness of the recall the ACCC requires a supplier to provide progress reports.

The ACCC will develop a reporting schedule with a supplier at the beginning of a recall that appropriately reflects the product risk being addressed. The information the ACCC will require as part of any progress reports will be dependent on the circumstances of the recall and therefore will be negotiated on a case by case basis. Examples of the types of information the ACCC may require in a progress report include:

- the number of products returned from within the supply chain and from consumers
- the number of complaints and inquiries that have been received regarding the product and the nature of these complaints
- the number of inquiries that have been received from consumers regarding the recall and the nature of these inquiries.
- whether the supplier deviated from the original plan at all in relation to the communication strategy or any other strategies and the reasons why.

*Final report*

When a supplier has taken all reasonable steps to effectively mitigate the risk posed by the unsafe product, the recall can be closed. Closure of a recall does not affect the rights of consumers in relation to the product and the public can continue to access information about the recall through the recalls website at [www.recalls.gov.au](http://www.recalls.gov.au). However, when a recall is closed the supplier no longer needs to actively promote the recall and the regulatory oversight ceases.

The ACCC requires a supplier to submit a final report before the recall can be closed.

A supplier's final report must include:

- confirmation of the total number of product supplied and the final number of units recovered from consumers and from within the supply chain
- evidence to demonstrate that all entities from within the domestic supply chain were notified of the recall
- information about the communication strategy, including copies of any data about its effectiveness (for example, number of unique visitors to the relevant webpage)
- action taken by the supplier to identify and correct the cause of the safety related hazard in the product, including the outcome of any root cause analysis, whether the defect was a manufacturing or design or some other defect and the steps the supplier has taken to remedy such defect
- information about any known injuries or incidents associated with the product
- the final number of complaints or inquiries that have been received regarding the recall and/or the product
- information about the manner in which the recalled product has been destroyed or rectified, including evidence of the destruction or rectification of the unsafe product.

# Attachment A – Guidance to suppliers when developing a communication plan for a recall

There are a number of factors that influence the effectiveness of a recall communication, including the following:

- characteristics of consumers who originally purchased the affected product
- geographic distribution of the affected product
- nature of the hazard/risk posed by the affected product
- access to direct contact with consumers who have been supplied the affected product.

When developing its communication plan for a recall a supplier should consider these factors.

## *Characteristics of consumers who originally purchased the affected product*

A supplier needs to identify the type of consumer who was the likely purchaser of the affected product. Often when a supplier is marketing a product for sale, a specific consumer group is identified as the group that is most likely to purchase the product. It is this same consumer group that should be the target of the communication plan for the recall of the product. Once a supplier has identified the target consumer group, it should tailor the communication method to the consumer group.

Research shows that different demographic groups have different preferences when it comes to communication methods. Table 1 provides a summary of the different demographic groups and their preferred communication methods.<sup>2</sup>

**Table 1: Summary of study of demographics and communication**

Consumer group	Preferred communication method
Nation builders (65+)	<p><i>Television and radio</i>—tend to view/listen throughout the day so flexible as to the timeslot</p> <p><i>Newspapers</i>—thorough readers, need not be a front page notice</p> <p><i>Websites</i>—general web browsing, particularly news and weather</p> <p><i>Email</i></p>

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<sup>2</sup> Note: This research was conducted in 2009 and that over time the demographic groupings and preferred communication methods may change.

<p>Baby boomers (46–65)</p>	<p><i>Drive time radio</i></p> <p><i>Television</i>—evening news, current affairs and evening viewing</p> <p><i>Newspapers and catalogues</i>—but needs to be a reasonably prominent notice</p> <p><i>Websites</i>—general web browsing is popular, with some limited use of blogs and social networking</p> <p><i>Email</i></p>
<p>Generation X (31–45)</p>	<p><i>Word-of-mouth chat groups</i></p> <p><i>Television</i>—news and evening entertainment</p> <p><i>Drive time radio</i></p> <p><i>Social networking</i>—there is a more significant take-up of social networking in this generation</p> <p><i>Websites</i>—blogs increasingly popular</p> <p><i>Email</i></p>
<p>Generation Y (18–30)</p>	<p><i>Evening entertainment television</i>—news much less popular</p> <p><i>Websites</i>—general entertainment and as a primary source of news</p> <p><i>Blogs and microblogging</i>—a large take-up on sites such as Twitter</p> <p><i>Social networking</i>—a rapid take-up</p> <p><i>Email</i></p> <p><i>Newspapers</i>—possible resurgence</p>
<p>Higher income earners and lower income earners</p>	<p><i>Higher incomes</i>—significantly increased use of online communication: websites, social networking, blogs and email</p> <p><i>Lower incomes</i>—much less internet communication; favours television, radio and newspapers (age depending)</p>
<p>Families with children</p>	<p><i>Television, radio and newspapers</i>—generally popular given spread of ages across household</p> <p><i>Internet communication</i>—significantly more likely to have the internet; age depending, higher popularity of websites, social networking and blogs</p>
<p>Gender</p>	<p>Little effect on internet use, although men are statistically slightly more likely to use internet communication; largely depends on age and whether the product is gender oriented</p>

#### *Geographic distribution of the affected product*

A supplier needs to determine the geographic markets the affected product was supplied to. Was the affected product supplied in metropolitan areas, or regional areas/towns or both? Was the affected product supplied within one state or territory or multiple states and territories?

The distribution area of a product can assist a supplier when determining the communication method to use for a recall. For example, if a product has only been distributed in selected regional areas, and the use of newspapers may be considered an appropriate communication method for advertising the recall, a supplier may target their communications by advertising the recall in a local/regional newspaper rather than a national paper.

A supplier who can access information in relation to the distribution of a product that is the subject of a recall has the ability to focus its efforts when communicating the recall.

#### *Nature of the hazard/risk posed by the affected product*

Risks can arise in a variety of ways such as in a product's contents, construction, finish, packaging, warnings, and/or instructions. Suppliers need to conduct a comprehensive risk analysis of the hazard posed by the affected product. The communication plan must address each of the significant risks identified during the risk analysis process.

#### *Supplier's access to direct contact with consumers with the affected product*

Recalls have the highest success rate if consumers can be contacted directly. Consequently, suppliers should endeavour to contact all consumers directly where possible. Suppliers can collect consumer contact information in a number of ways:

- at point of sale
- warranty cards
- customer loyalty programs
- online product registration.

Alternative methods of tracing products to consumers could also include the use of credit card records. In such cases, the supplier could ask the card operator to forward correspondence relating to a recall to all of its customers who had purchased the product.