



Product Recall Bulletin October 2022

RQA Group
Your product risk experts.

Welcome to the latest RQA Group Product Recall Bulletin, focusing on January to September 2022. This includes the latest recall data and trends in product recall in food, consumer products and automotive published by regulatory authorities in US, Canada, UK, EU and Australia.

A few highlights

- US CPSC projected to have the highest annual number of recalls in 2022, since 2017
- NHTSA - 2022 is likely to be the year with one of the highest number of recalls in the last decade
- USDA, CFIA, and UK FSA food recall numbers are still below pre-pandemic levels
- Australian food recall numbers were not affected during the pandemic, but 2022 is likely to have the lowest number of recalls since 2017
- Never Event recalls are up in both the US FDA and UK FSA

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Consumer Product Recalls in US, Canada, and EU



Automotive Recalls in the US



Food Recalls

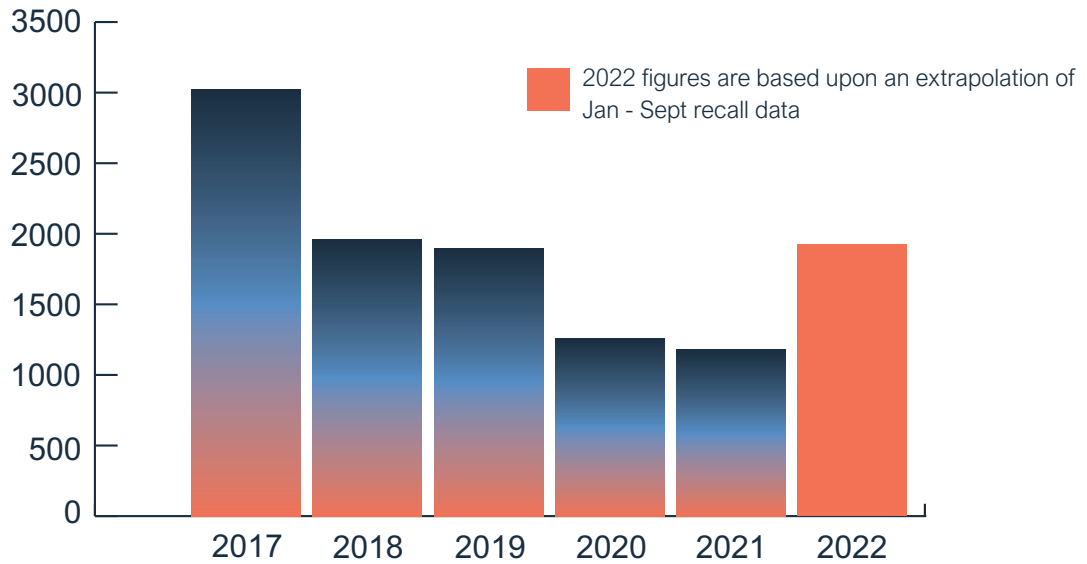
Food Recalls as reported by the US FDA

Key points:

- Total number of FDA recall events in 2022 likely to be highest since pre-pandemic
- Number of different products recalled in 2022 will be over 60% higher than 2021
- The number of recalls due to avoidable labelling issues, “Never events”, is increasing; accounting for nearly a quarter of all recall events in 2022, compared with 20% in 2021
- Pathogens remain the most common contaminant responsible for FDA reported recalls

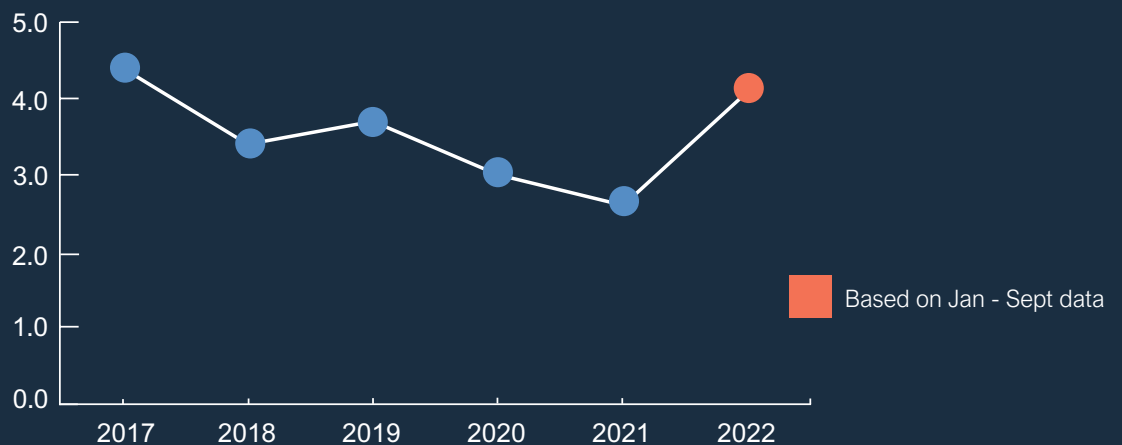
The graph shows that the expected number of different food products recalled in the full year 2022, is likely to be over 60% higher than in 2021.

Number of Different Food Products Recalled - FDA



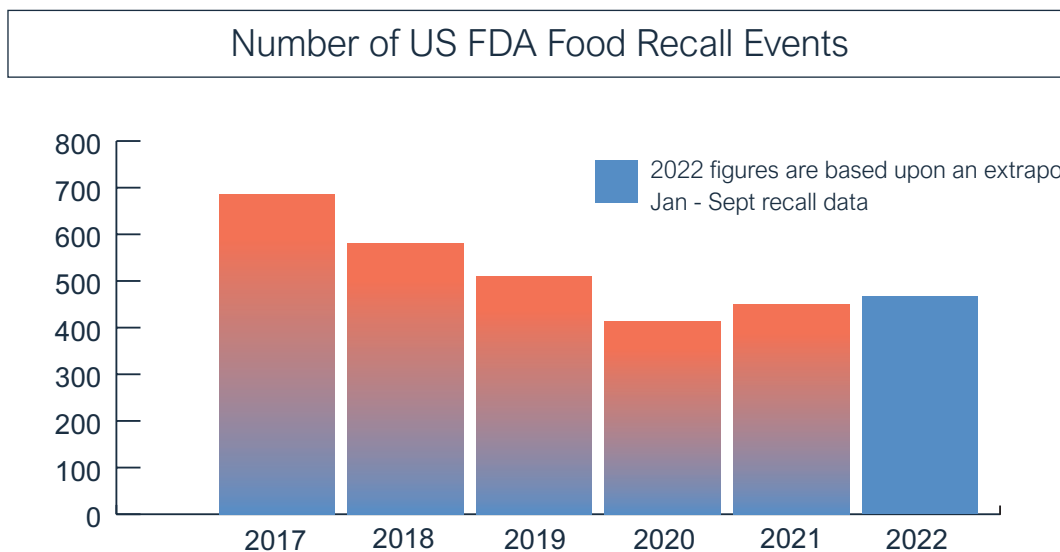
The trend is for recall events to involve different products, suggesting that recalls have the potential to be larger and more complex. If we look at the number of different products recalled per event, it is clear that the recalls in 2022 will, on average, involve more products than they have since 2017.

Average Number of Different Products Recalled Per Event



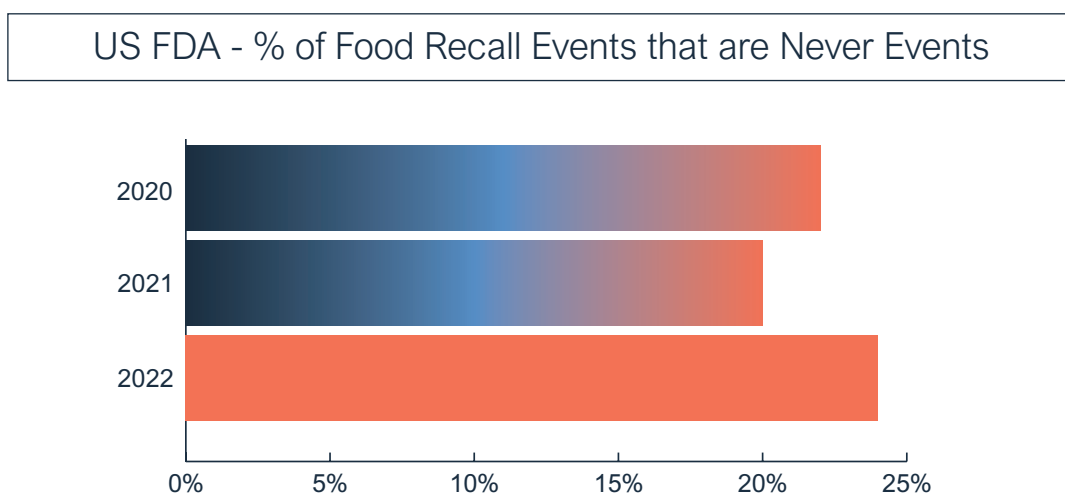
Note: The number of different products recalled per event can be distorted by a small number of recall events that involve a large number of different products. For example one recall event in 2022 for leafy greens, potentially contaminated with *Listeria monocytogenes*, involved over 70 different products.

However, whilst more products are involved in the FDA reported recalls, the recall event numbers (see graph below) suggest that the total number of recall events for 2022 will only be slightly higher than 2021 and still about 10% below pre-pandemic levels.



The number of FDA food recalls that could be classed as “Never Events” are showing an increase on previous years. In 2022, it looks like almost 25% of all food recalls issued by FDA will be “Never Events”. These are recalls identified by RQA as those that should never happen. For

example, where the wrong label has been used or the item has been put in the wrong packaging resulting in potential serious health risks due to allergens. We believe specific attention should be applied in food manufacturing facilities to prevent these recalls. [Find out more.](#)



US FDA Recall Standings by Food Type

In the standings for January to September, confectionery products are the most recalled food product type so far in 2022; owing in part to a largescale recall of chocolate containing contaminated peanut butter. It is interesting to see “Nutritional products” e.g. protein shakes and supplements, “Cereals and bakery” and “Nuts, seeds and snacks” rising up the standings.

Product Type	2022 position	2021 position	Change from 2021
Confectionery	1	1	no change ↔
Fruit & Veg	2	2	no change ↔
Nutritional Products	3	7	up ↑
Cereals & Bakery	4	6	up ↑
Nuts, Seeds & Snacks	5	9	up ↑
Prepared Dishes, Pasta, Noodles	6	3	down ↓
Non- alcoholic beverages	7	10	up ↑
Soups, Broths, Sauces & Condiments	8	4	down ↓
Dairy	9	8	down ↓
Infant Products	10	14	up ↑

Note: A company may recall multiple products in relation to a single recall event as defined by FDA. This table uses the number of all different products recalled for each product type.



US FDA Recall Standings by Contaminant Type

We have also listed the standings of the most common contaminants or causes of recalls reported by the FDA. The three contaminants affecting the most recalled products are the same in 2022, 2021 and 2020. Within microbiology, listeria monocytogenes and salmonella are always the most common pathogens.

Milk is the most common allergen. Recalls due to allergen contamination may be due to cross-

contamination in the factory or supply chain or it may be where the product has been put in the wrong pack and there is resulting allergen mislabelling. We call the latter, a “Never Event” product recall.

Plastic is the most common foreign body contaminant so far in 2022, but this can vary from year to year. For example, metal was the most common foreign body contaminant in 2021.

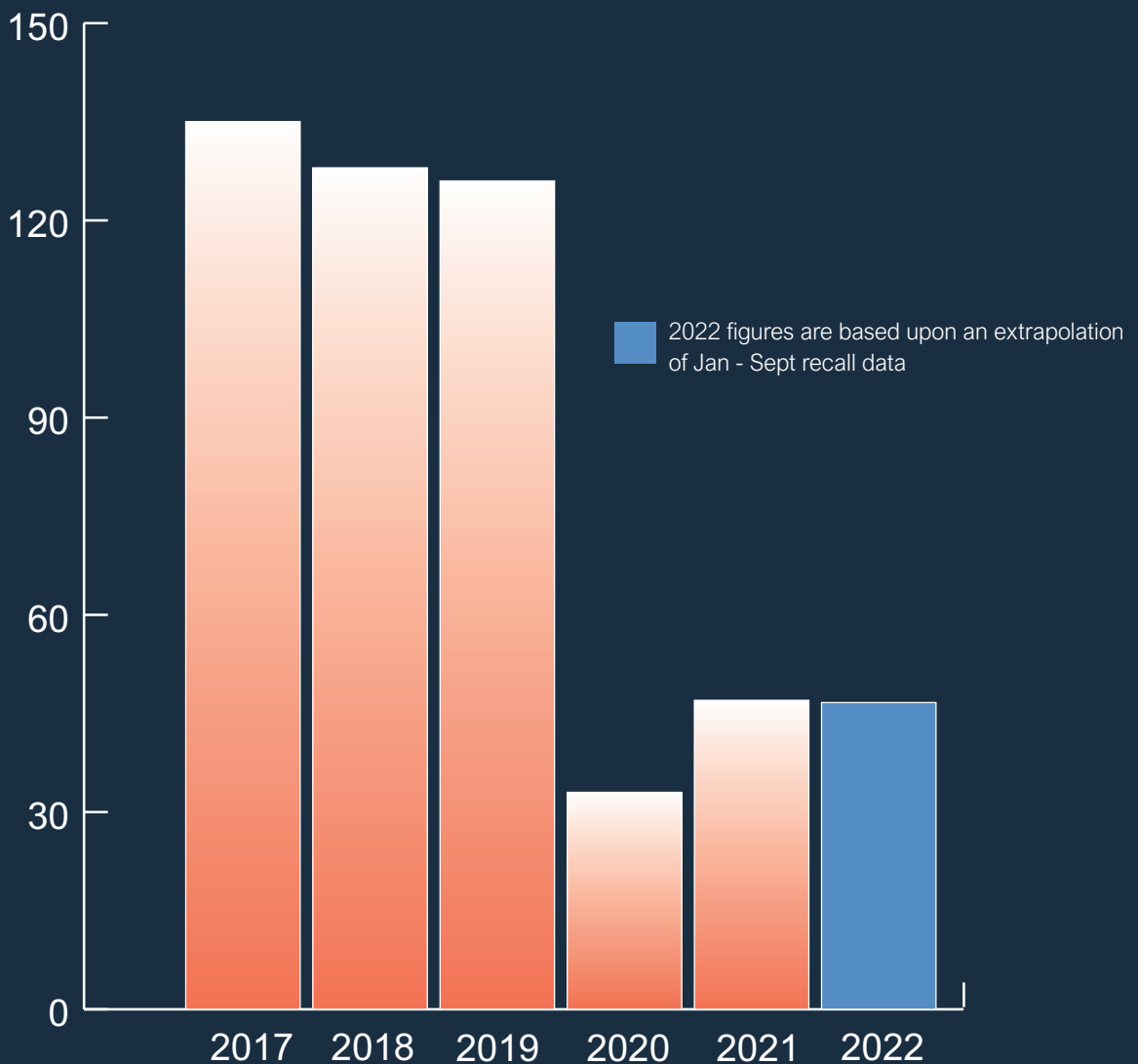
Contaminant	2022 position	Change from 2021
Microbiology	1	no change ↔
Allergen	2	no change ↔
Foreign body	3	no change ↔
Processing errors	4	no change ↔
Unapproved product	5	no change ↔

USDA FSIS Recalls

Key points:

- USDA recalls (Class I, II or III) still very low
- 2022 recall numbers are likely to be less than 40% of the numbers in 2019
- There is currently no sign that the recall numbers will be back at 2019 levels any time soon.
- One possible theory: Could this be because FSIS inspectors are not rotating to different sites as frequently as pre-pandemic?

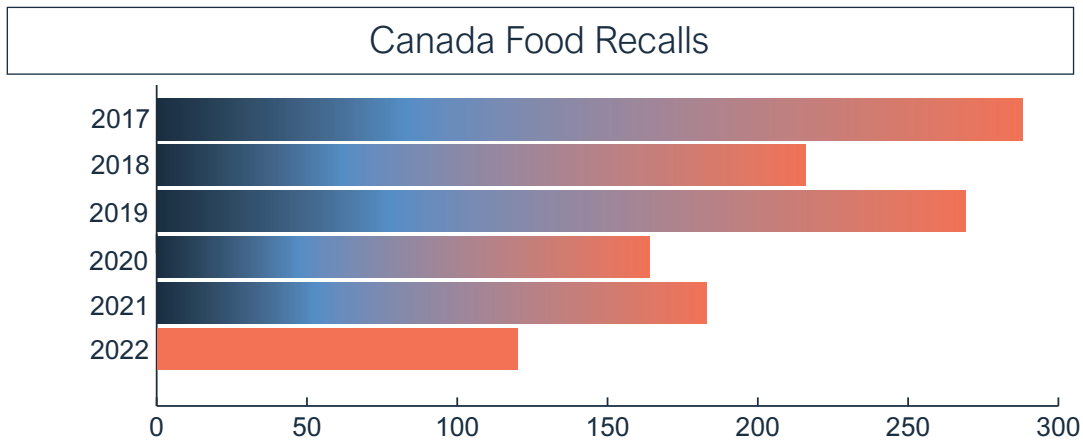
Number of USDA FSIS Food Recalls (Class, I, II or III)



Canadian Food Inspection Agency (CFIA)

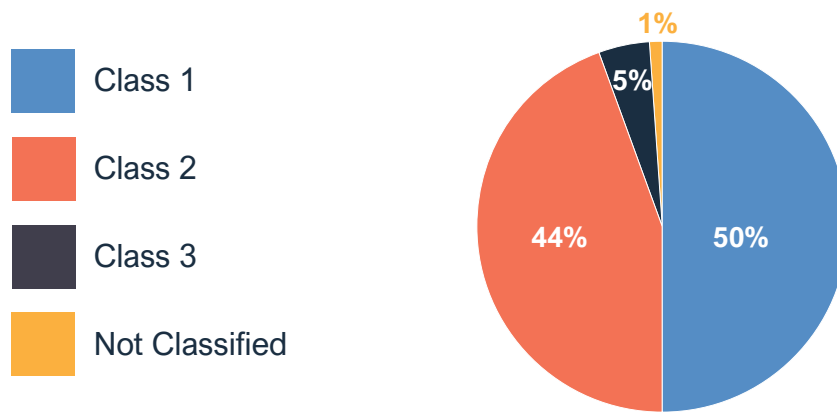
Key points:

- Recalls still at lowest numbers in a decade
- A reduction in recall numbers was seen between July to September compared with Q1 and Q2 of 2022
- Total food recall numbers in 2022 expected to be less than 50% of pre-pandemic levels in 2019
- Half of the food recall warnings issued by CFIA in 2022 are Class 1 (high risk)



2022 figures are based upon an extrapolation of Jan - Sept recall data

Canada Food Recall Warnings (Class, I, II or III) Jan - June 2022



Definitions of Canada Food Recall Warnings:

Class I: There is a high risk that consuming the food may lead to serious health problems or death

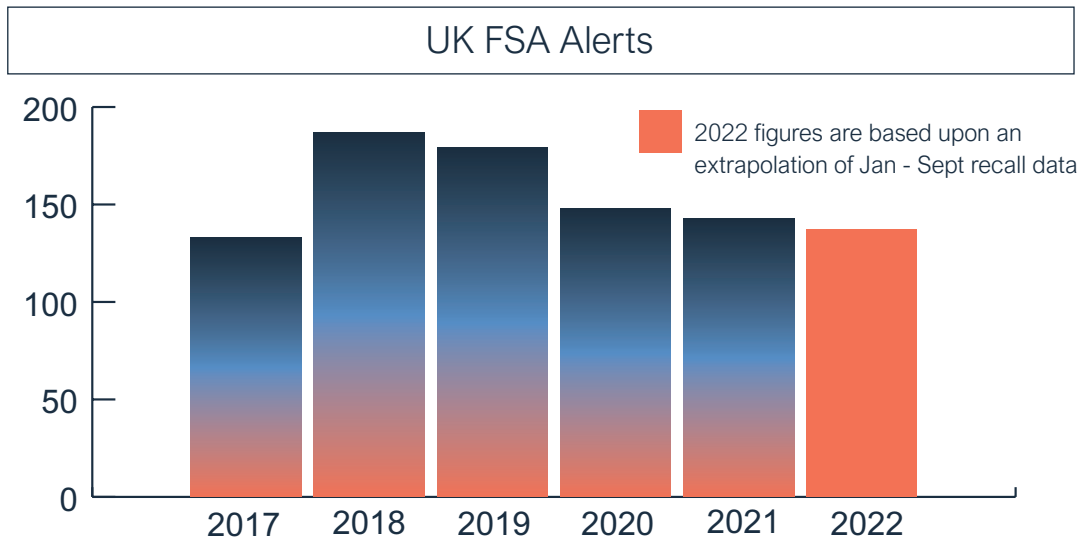
Class II: There is a moderate risk that consuming the food may lead to short-term or non-life threatening health problems

Class III: There is a low risk that consuming the food may result in any undesirable health problems. This class also includes food that do not pose a health risk, but that do not comply with legislation

UK Food Standards Agency

Key points:

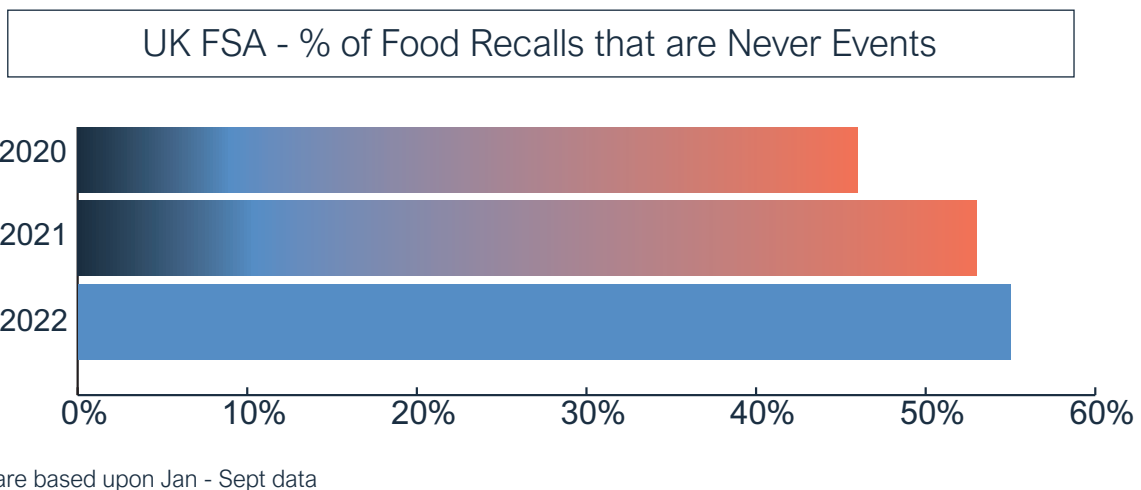
- Due to a significant reduction of reported recalls in the past quarter, recalls numbers for 2022 are now projected to be the lowest since 2017
- Over 60% of alerts are allergy related alerts; compared to 40% food (non-allergy related) alerts
- Over 50% of all recalls could be classified as “Never Events”, similar to findings from 2021.



The number of FSA recalls that could be classed as “Never Events” are increasing year on year, from an already high level. In 2022, it looks like over 50% of all recall alerts issued by FSA will be “Never Events”. As mentioned in the FDA section, these are recalls identified by RQA as

those that should never happen. For example, where the wrong label has been used or the item has been put in the wrong packaging resulting in potential serious health risks due to allergens.

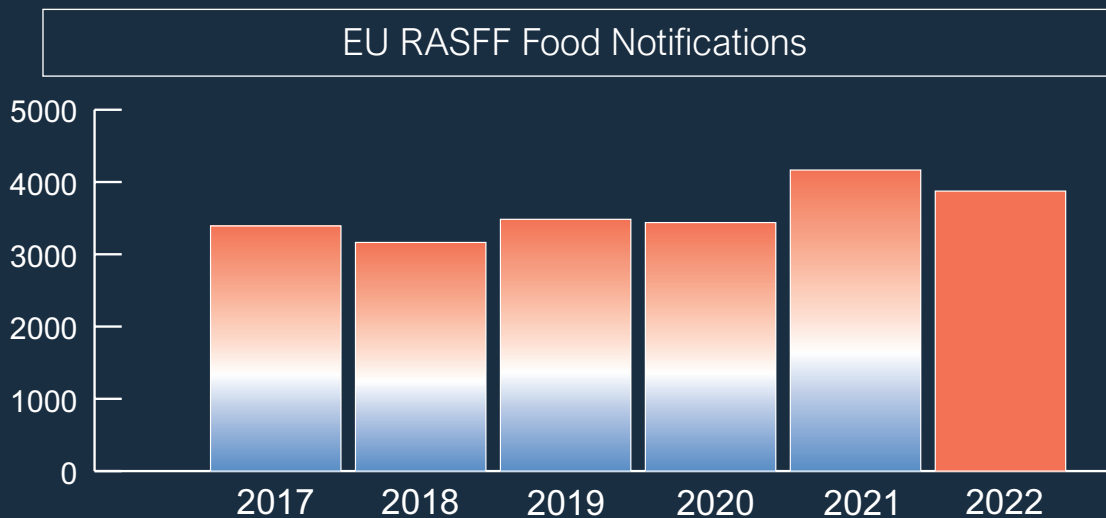
[Find out more.](#)



European Rapid Alert System for Food and Feed (RASFF)

Key point:

- Although RASFF notifications are set to be higher than in most previous years in 2022, they are not set to equal the record total in 2021.



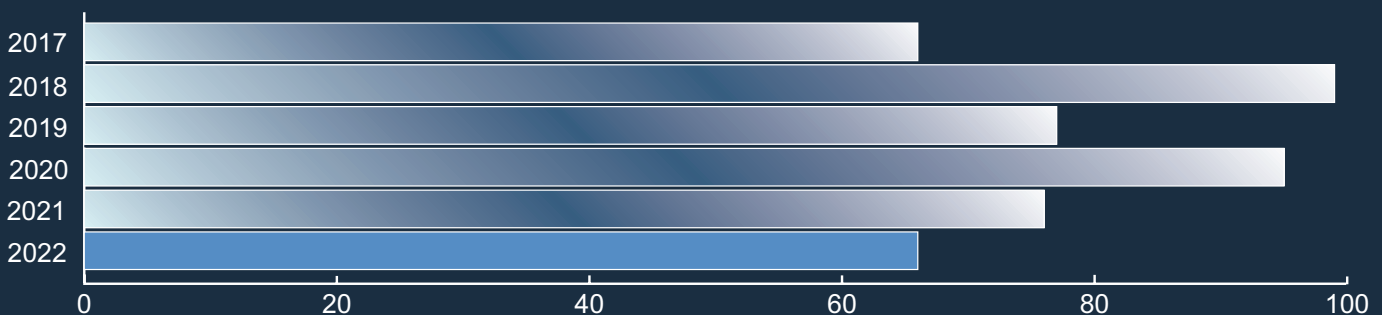
2022 figures are based upon an extrapolation of Jan - Sept recall data

Product Safety Australia

Key points:

- Food recall numbers in Australia were largely unaffected by the pandemic in 2020 but numbers have been decreasing since then.
- Food recall numbers continue to decline in 2022, with lowest figures since 2017.

Food & Grocery Recalls - Product Safety Australia



2022 figures are based upon an extrapolation of Jan - Sept recall data



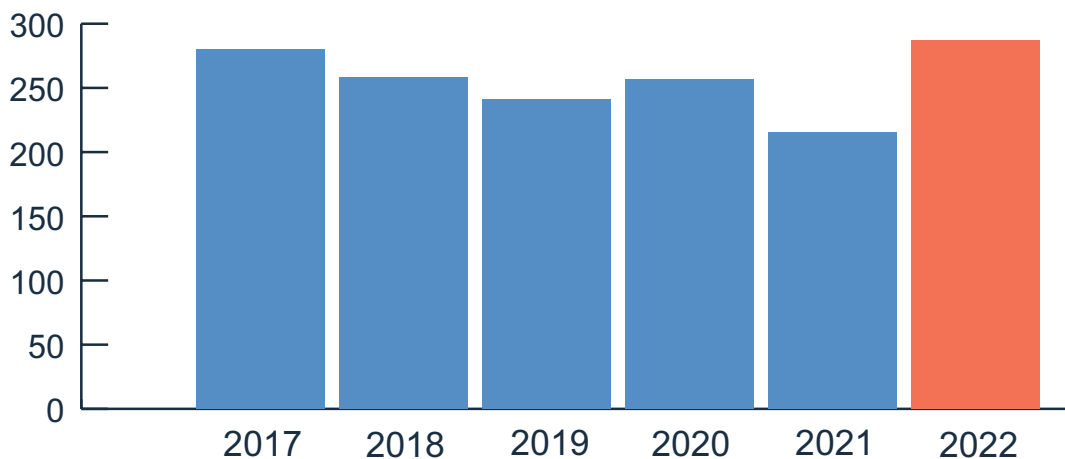
Consumer Product Recalls

US Consumer Product Safety Commission

Key Points:

- Projected for highest number of recalls since 2017
- 2022 recall numbers are expected to be a third higher than 2021

US CPSC Product Recalls

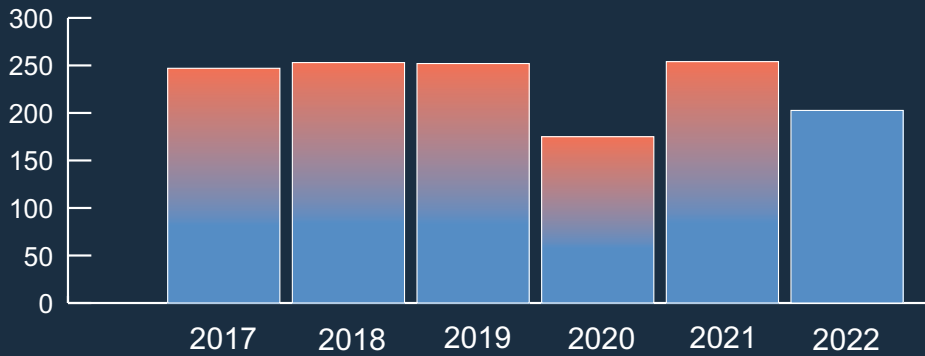


2022 figures are based upon an extrapolation of Jan - Sept recall data

Key points:

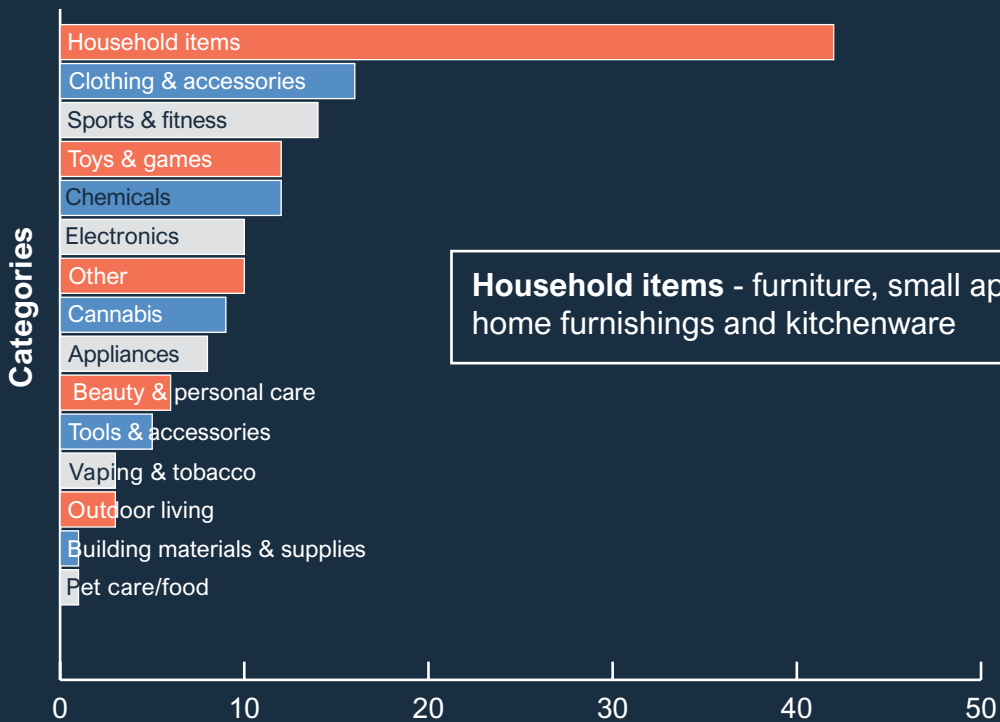
- Reduced recall numbers expected for 2022 despite seeming to recover from pandemic in 2021
- Household items are still on track to be the largest category of recalled consumer products in 2022 making up nearly a third of all consumer product recalls

Number of Consumer Product Recalls (Canada)



2022 figures are based upon an extrapolation of Jan - Sept recall data

Number of Consumer Product Recalls by Category (Canada) Jan - Sept 2022



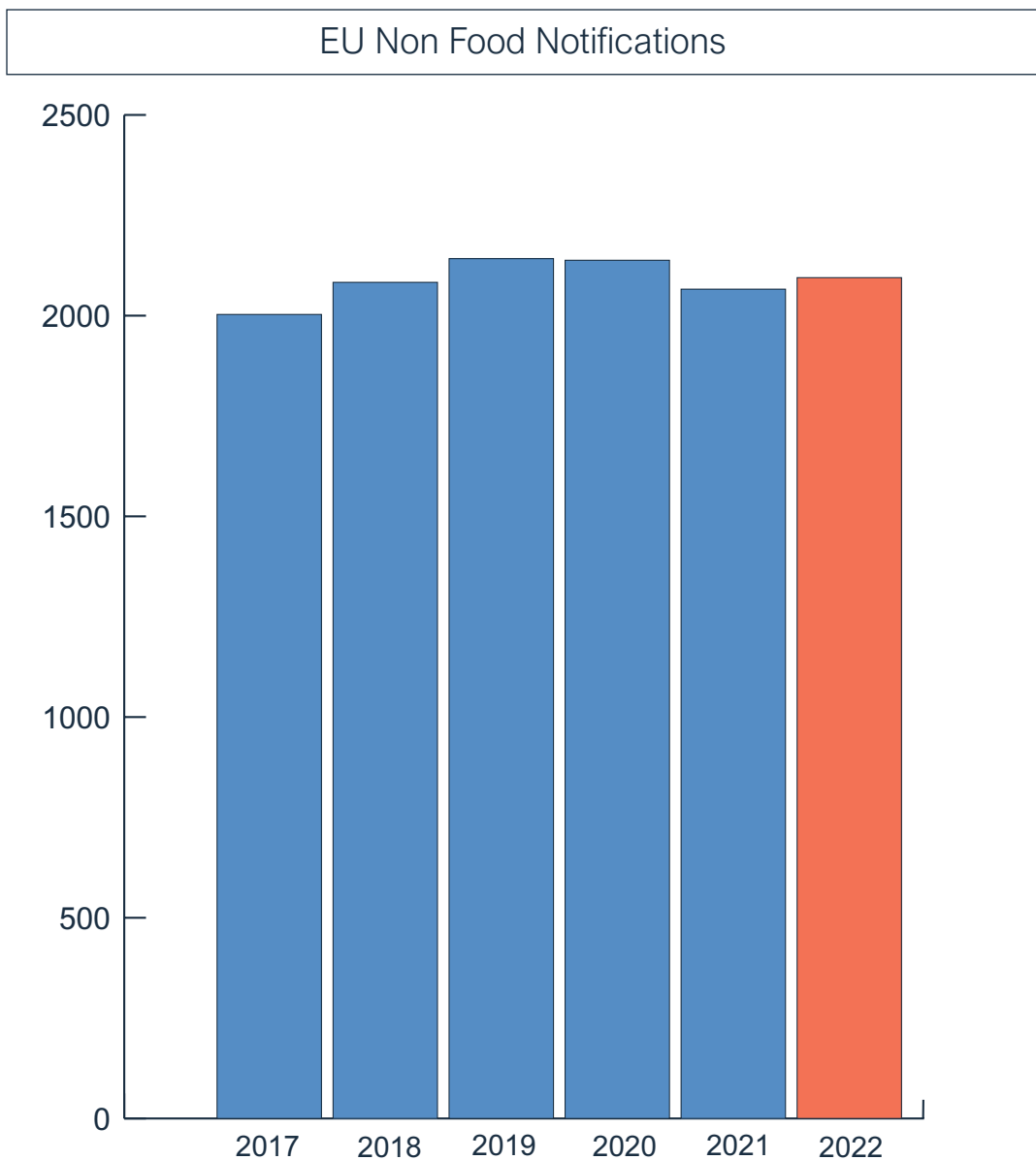
Household items - furniture, small appliances, home furnishings and kitchenware

EU Safety Gate

The EU system, formerly known as RAPEX is now “Safety Gate: the EU rapid alert system for dangerous non-food products”.

Key point:

- **EU Safety Gate recall notifications set to be consistent with previous years**



2022 figures are based upon an extrapolation of Jan - Sept recall data

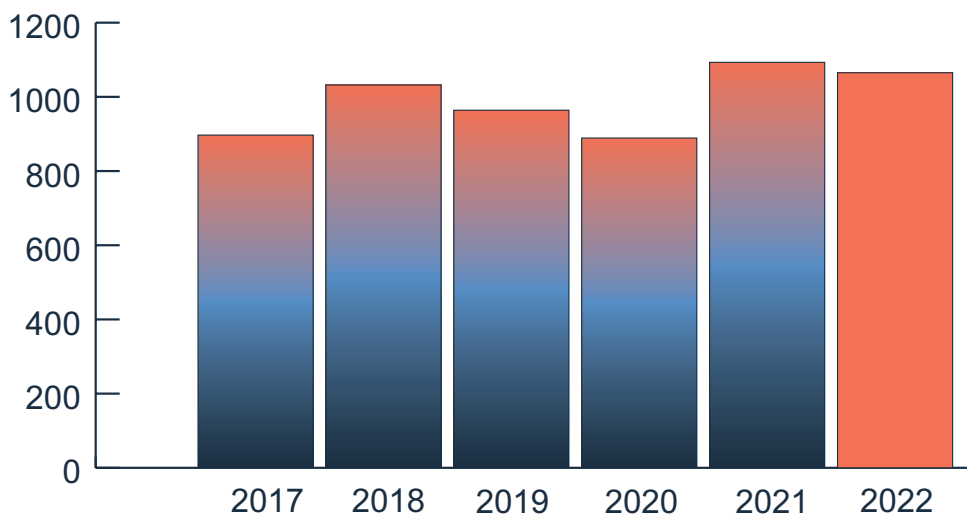


Automotive Recalls

Key points:

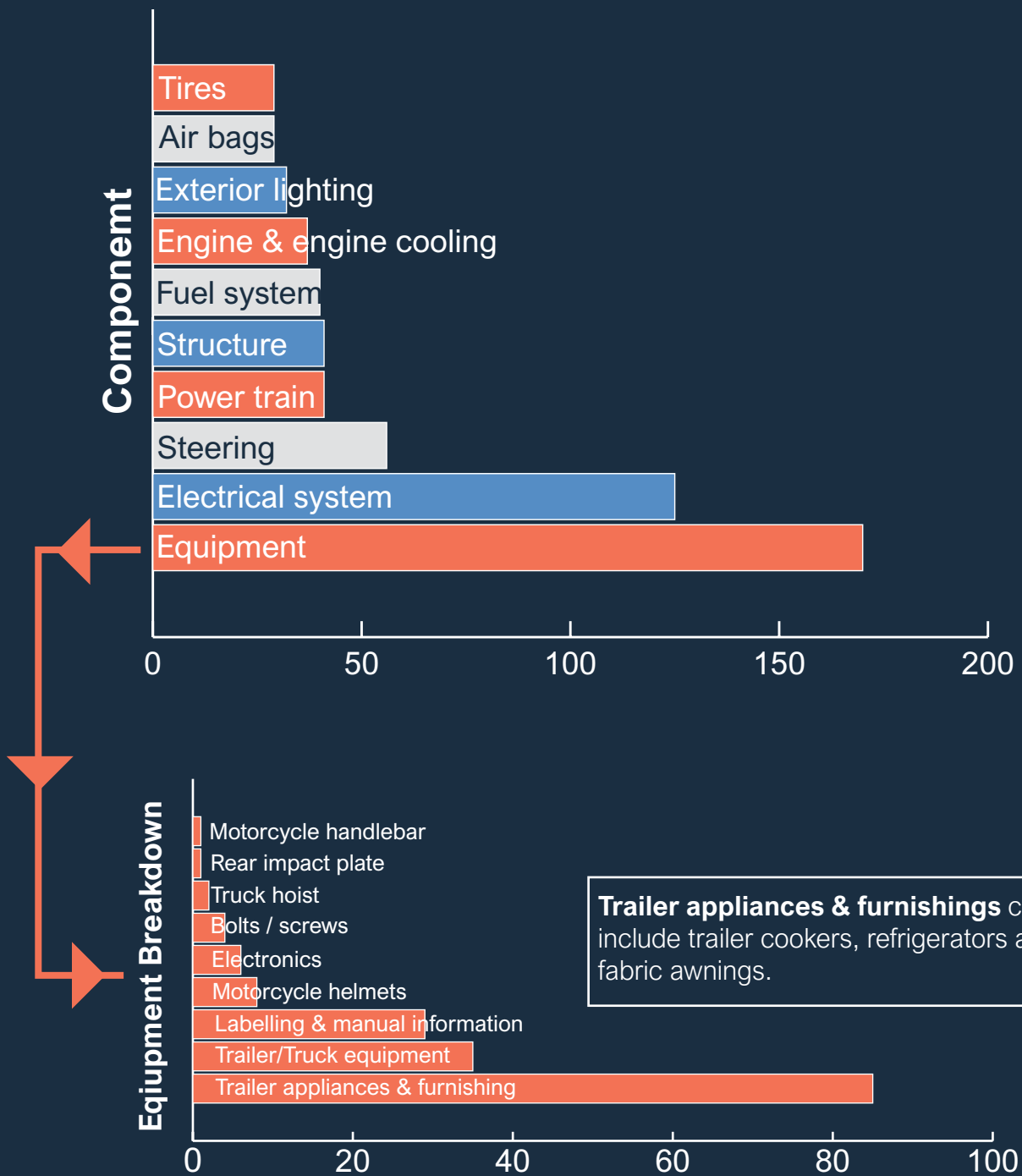
- We are seeing US automotive recalls returning to the high levels prior to 2020
- 2022 is likely to end up with one of the highest number of recalls in the last decade.
- Due to Equipment covering a broad range of components, “Electrical systems” is the category with perhaps the highest recall risk based on the table below.
- The scale of automotive recalls is very broad with one recall involving almost 3 million units and quite a few involving less than 10 units.

NHTSA Safety issues - recall



2022 figures are based upon an extrapolation of Jan - Sept recall data

Top 10 Components involved in NHTSA reported recalls Jan - Sept 2022



We now look at the scale of the recalls caused by these components. The table below shows the number of recalls in 2022 by component at fault and the total number of potentially affected units involved in those recalls. It also shows the average number of units per recall by component as well as the maximum and minimum numbers of units involved in the recalls.

Top 10 number of recalls by component and units affected
Jan – Sept 2022

Contaminant	Rank by recall numbers	Number of recalls	Total of all potentially affected units	Average units per recall	No. of units involved in recall	
					Minimum	Maximum
Equipment	1	170	610,154	3,589	1	99,190
Steering	3	56	295,475	5,276	1	105,271
Tires	9	29	417,397	14,393	8	173,237
Structure	4	41	630,872	15,387	1	257,998
Fuel systems	6	40	709,894	17,747	1	215,171
Electrical system	2	125	3,720,401	29,763	1	817,143
Engine & engine cooling	7	37	1,435,132	38,787	1	917,106
Air bags	10	29	1,208,712	41,680	5	410,619
Exterior lighting	8	32	1,579,616	49,363	2	740,581
Power Train	4	41	4,245,821	103,557	1	2,925,968

Note: NHTSA refers to “units” in their data. This often also relates to vehicles.

A few observations:

- Whilst “equipment” is the component category with the most number of recalls, it actually has the lowest average units per recall, i.e. small recalls.
- The component that causes the largest recalls (most affected units per recall) on average is “power train”. However, a single power train recall involved almost 3 million units, greatly affecting the average for this component. Without that single recall, the average number of units involved per recall would be lower than the “equipment” average.
- “Electrical system” is the category ranked as 2nd for the number of recalls, it is 2nd for the total of all affected units (3.7 million) from those recalls and it is 3rd in the list of highest number of units involved in a single recall. This suggest higher risk of recalls for some components within this category.
- Interestingly, all component categories shown have at least one recall where less than 10 units are affected.



We hope you have found this bulletin useful and interesting, please let us know if there is any data that you would like to see in the next bulletin and we will do our best to incorporate this.

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