

Product Recall Bulletin 2022

Annual Report



Welcome to the RQA Group Product Recall Bulletin including data up to the end of 2022. This includes the latest recall data and trends in product recall in food, consumer products and automotive covering US, Canada, UK, EU and Australia.

We have assessed the recall data from January to December 2022 published by regulatory authorities and compared to previous years data to identify any trends or highlights.

Highlights

In some products and territories recall numbers for 2022 are going up and in others they are still low and have not returned to pre-pandemic levels. For example USDA FSIS recalls are still very low and the number of FDA Food recall events is also relatively low. However, the number of different food products recalled by FDA per recall event is at the highest level for 5 years; suggesting the prevalence of larger scale recalls. Food recalls in Canada, the UK and Australia are also low compared to historic years. In contrast, the EU RASFF system reported the second highest number of food recalls in the past 6 years.

In the US and the UK, Never Event food recalls due to labelling errors resulting in allergen risk are on the rise. This is an area where focused effort in manufacturing could result in a significant reductions in the numbers of food recalls. It is actually difficult to identify a single area that could make more difference on reducing product recalls.

Consumer products largely tells a different story with the number of recalls from US CPSC and EU Safety Gate (RAPEX) at their highest.

For automotive, for all territories assessed, US, UK, EU and Australia, the number of recalls was lower in 2022 compared with 2021.

We all know that recalls can be extremely costly activities but they are a critical element of the product supply business, and the final line of defence to keep consumers safe. Manufacturers are under extreme pressures unlike anything we have seen in recent times; factors include war, adverse weather, import/export controls, competition, energy and labour market shortages. All these push prices and costs to an all-time high. As budgets are cut, and some companies struggle, there is the risk, even unintentionally, of a knock-on effect on quality, safety and ultimately recall. Preventing product recalls and being prepared to manage them is part of the role of all those involved in product manufacturing and supply. We know that manufacturers take these responsibilities very seriously but sometimes accidents happen or mistakes are made.

About RQA Group

RQA Group works globally with product manufacturers to help them prevent and prepare for product recalls. As preferred consultants to many of the world's leading product recall insurers, RQA Group works with insured companies providing a wide range of product safety and risk management services as well as urgent support during a potential recall incident.



As well as our consultancy and training, we also produce risk engineering reports that are available to purchase

- **Autonomous Vehicle Risks**
- **Electric Vehicle Safety and Recall Risks**
- **Lithium Ion Battery Risks (reports on Battery Developments, Manufacturing Risks, and Recall Data)**
- **Chilled Ready to Eat Dips Recall Risk**
- **Pharma – Recall Risk Assessment**

For more information on these reports or to request a preview get in touch on the email address below

contact@rqa-group.com

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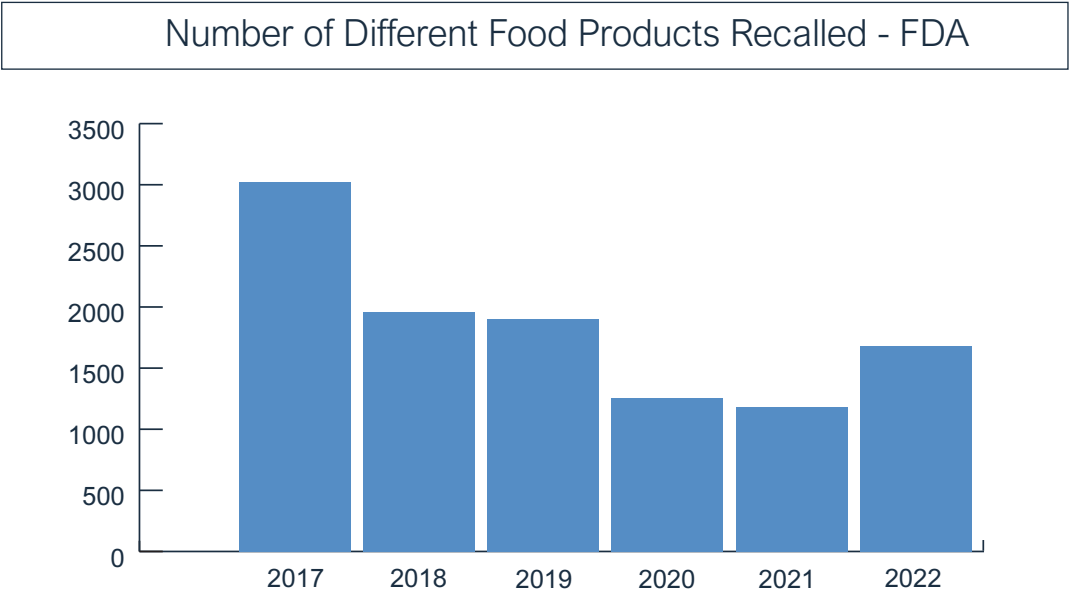
Food Recalls

Food Recalls as reported by the US FDA

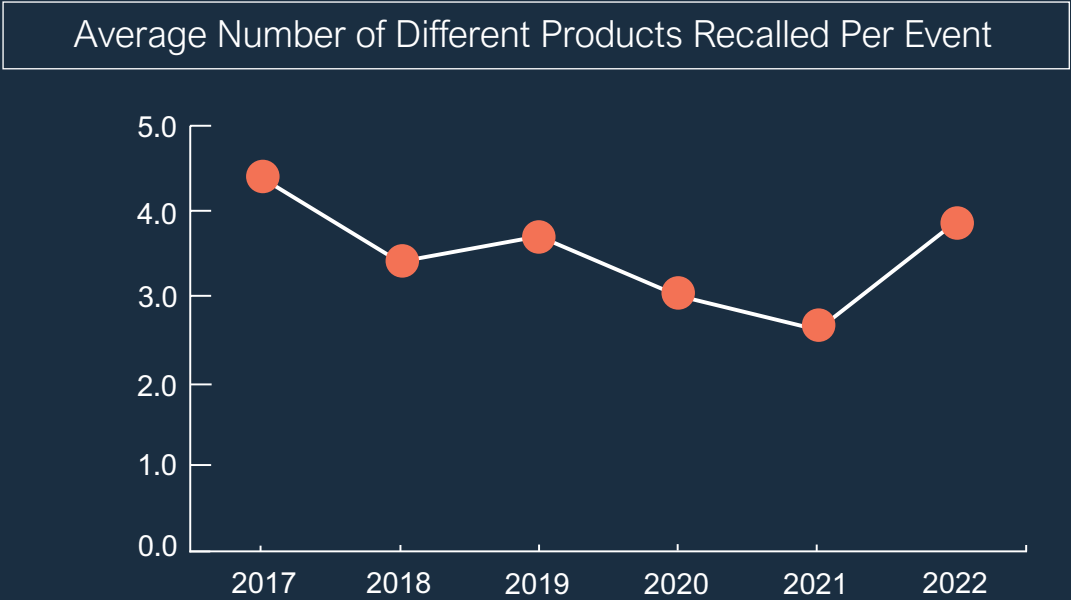
Key points:

- Total number of FDA recall events in 2022 are the second lowest in the past 6 years. Only in 2020, at the height of the pandemic, were recall numbers lower.
- The number of different products recalled in 2022 ended the year higher than the two previous years but still quite a way down on pre-pandemic numbers.
- The number of recalls due to avoidable labelling issues “Never events” is increasing; accounting for over a quarter of all recall events in 2022, compared with 20% in 2021.
- Pathogens remain the most common contaminant responsible for FDA reported recalls, with *Listeria monocytogenes* causing the most recalls and *Salmonella* sp. second.
- Following large scale recalls of fresh produce, the US FDA have begun to implement more stringent controls at farm level on agricultural practises such as irrigation and crop testing controls - this may help to reduce recall numbers in this category in 2023 and beyond.

The graph shows that the number of different food products recalled in 2022, was 40% higher than in 2021 but still relatively low compared with previous years.

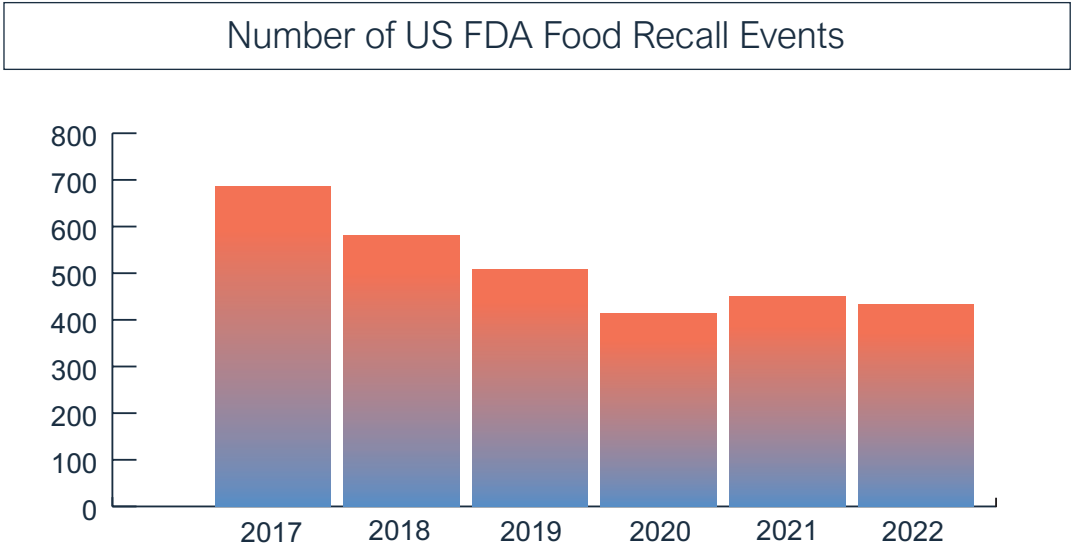


The trend is growing for individual recall events to involve more different products, suggesting that recalls have the potential to be larger and more complex. If we look at the number of different products recalled per event, it is clear that the recalls in 2022 on average involved more products than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



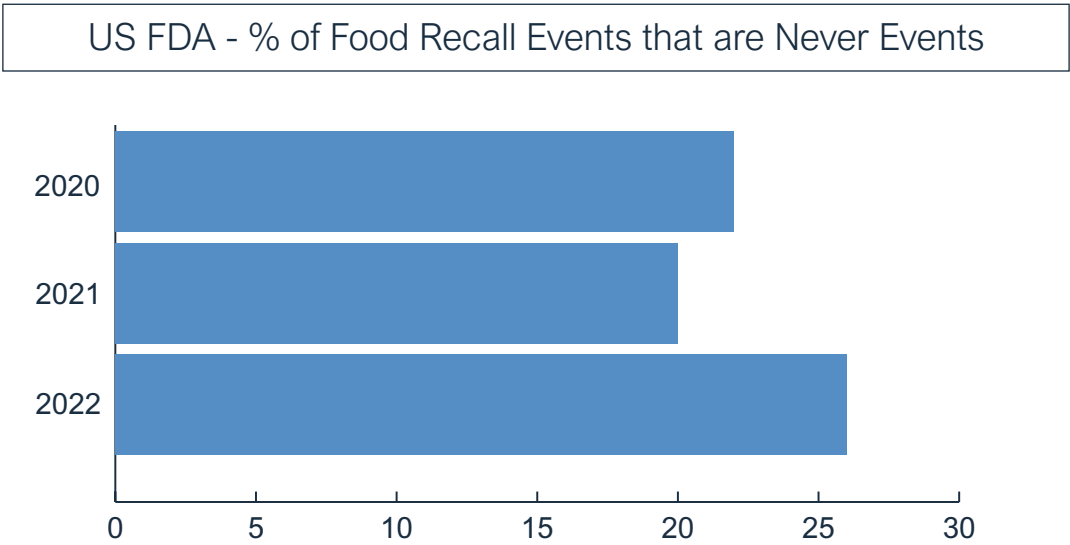
Note: The number of different products recalled per event can be distorted by a small number of recall events that involve a large number of different products. For example one recall event in 2022 for leafy greens, potentially contaminated with *Listeria monocytogenes*, involved over 70 different products.

However, whilst more different products are involved in the FDA reported food recalls, the recall event numbers (see graph below) show that the total number of recall events for 2022 were marginally lower than 2021 and still about 10% below pre-pandemic levels.



The number of FDA food recalls that could be classed as “Never Events” are increasing year on year. In 2022 over 25% of all food recalls issued by FDA were “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 increased attention should be applied in food manufacturing facilities to prevent these recalls. Click here to see how RQA has applied the Never Event Principle from the health sector to food manufacturing. [Find out more.](#)



US FDA Recall Standings by Food Type

In the standings for 2022, confectionery products are still the most recalled food product type; owing in part to large scale recall events involving many different products containing *Salmonella* contaminated chocolate or 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 ↑
Dairy	6	8	up ↑
Prepared dishes, pasta, noodles	7	3	down ↓
Soups, Broths, Sauces & Condiments	8	4	down ↓
Non- alcoholic beverages	9	10	up ↑
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.

- Nuts seeds & snacks – Over half of the different products recalled were linked to a large ***Salmonella*** incident. As peanut butter is not only sold as a product but also as an ingredient or component in a snack style product this incident had a greater impact than may at first be expected. Secondly, with about a quarter of different products in this category being recalled due in some way to allergen issues, it would appear that there is a real need for this to be further controlled through raw material processes and labelling control practises.
- Infant products was largely driven by microbiological contamination with ***Cronobacter sakazakii*** early in 2022. In particular, a widespread event resulted in final numbers that were disproportionate to previous years' data.
- Nutritional products – Around 25% were attributed to microbiological failures, spoilage or leaking/pinholed packaging which would also allow for spoilage. In a number of these cases there are apparent links to the peanut butter in the nuts & seeds category and/or the large spoilage issue (***Cronobacter sakazakii***) in infant formula. It should be noted that other category issues are highly indicative as potential issue generators in this category due to reliance on shared materials and processes. Interestingly ***Cronobacter sakazakii*** is only a specified microbe to test for in products intended for use in infants and high risk groups. As these are longer shelf life products however it was also reported that ***Clostridium botulinum*** was detected.
- Over half of the nutritional products recalled were allergen related, and around 70% of these were due to milk or egg.



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. As mentioned above, we call the latter, a “Never Event” product recall.

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

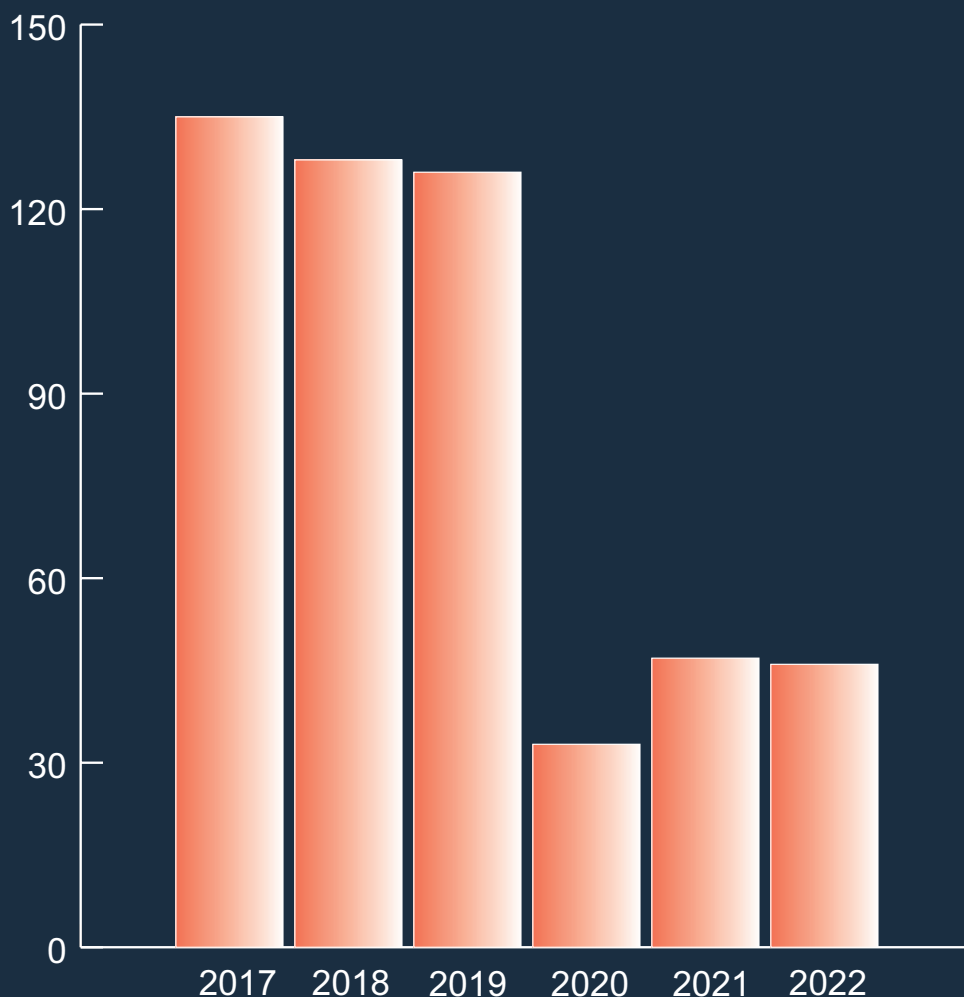
Contaminant	2022 position	Change from 2021
Microbiology	1	no change ↔
Allergen	2	no change ↔
Foreign body	3	no change ↔
Processing errors	4	no change ↔
Unapproved product	5	no change ↔

USDA FSIS Recalls

Key points:

- USDA recalls (Class I or II) still very low.
- There have been no Class III recalls since 2018.
- 2022 recall numbers have remained almost the same as 2021. This is still 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.
- Well over a million pounds of meat were recalled in 2022 with an average of around 26,000 pounds per recall.
- Why have FSIS recalls not recovered to pre pandemic levels? Could this be because FSIS inspectors are not rotating to different sites as frequently as pre-pandemic? Could it be due to funding or staffing issues?

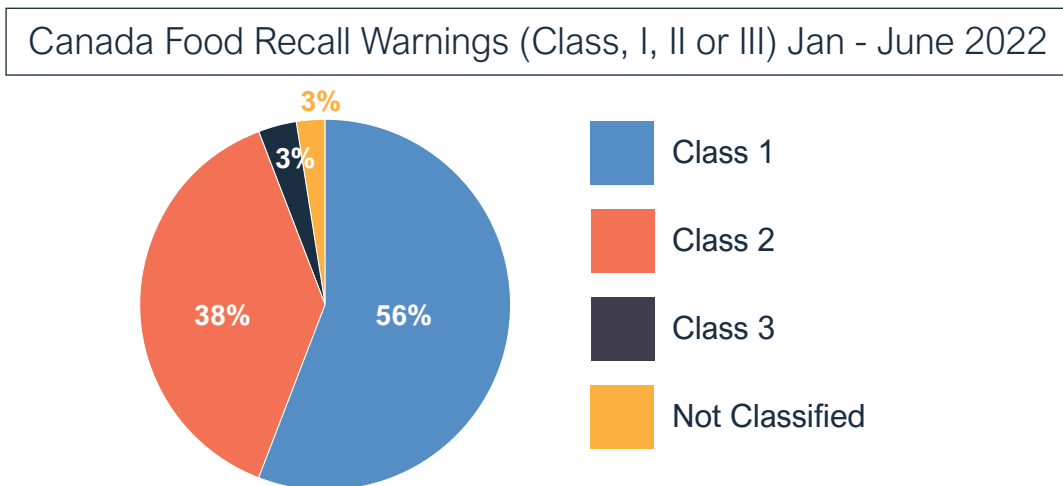
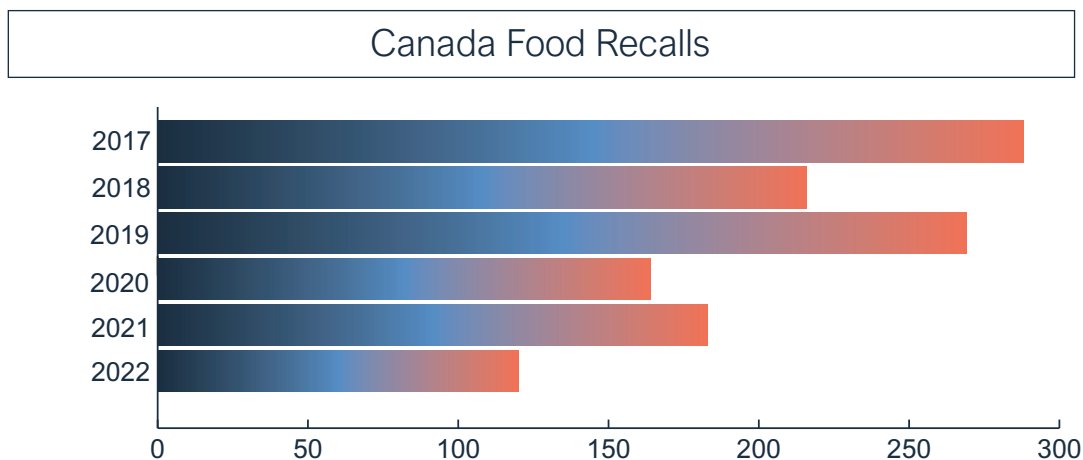
Number of USDA FSIS Food Recalls (Class, I, II or III)



Canadian Food Inspection Agency (CFIA)

Key points:

- Food recalls still at lowest numbers in a decade.
- A reduction in recall numbers by 35% was seen between 2021 and 2022
- Total food recall numbers in 2022 were less than 50% of pre-pandemic levels in 2019
- Well over half of the food recall warnings issued by Health Canada in 2022 are Class 1 (high risk). This is as might be expected where the greater severity from any potential issue would generally be more impactful to health if left on the market – there is very little change in this split to previous years as a result



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

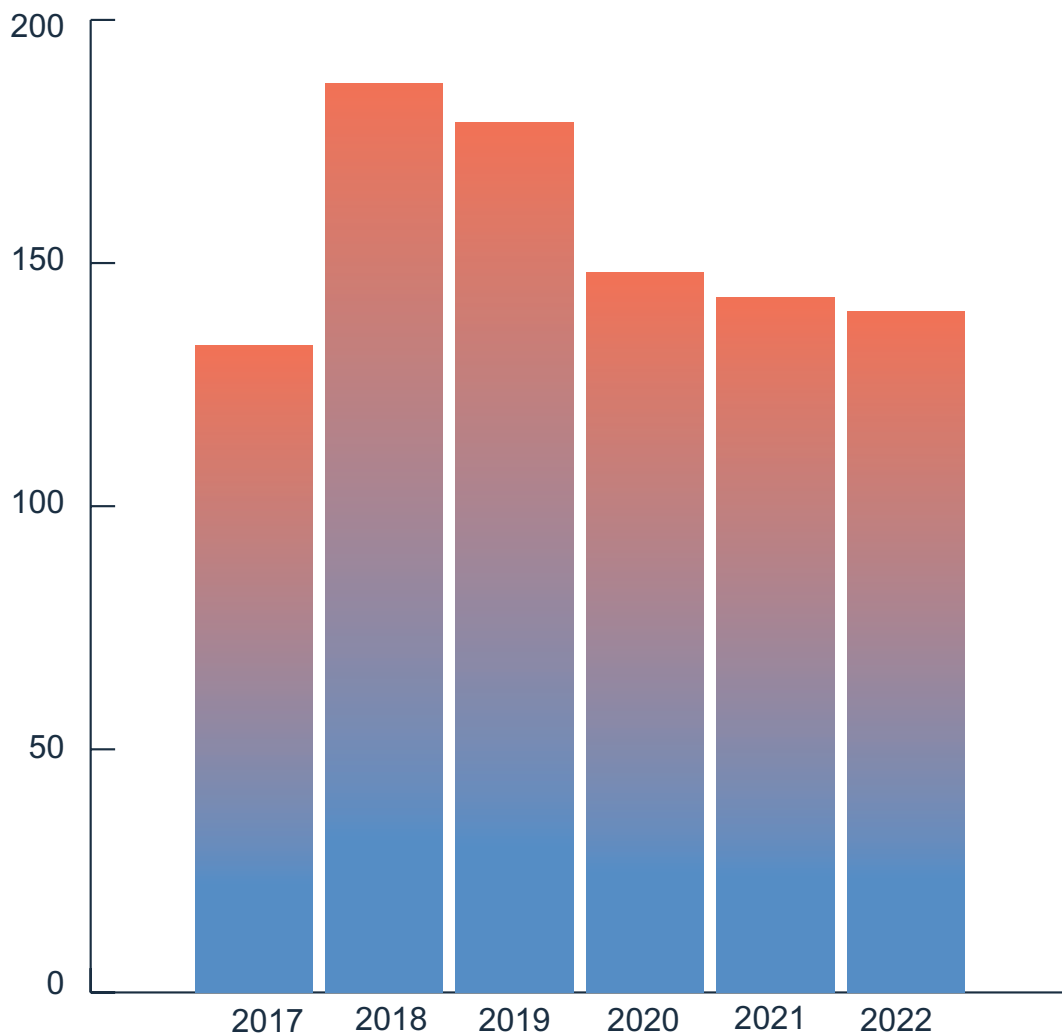
Class III: There is a low risk that consuming the food may result in any undesirable health problems. This class also includes food that do not pose a health risk, but that do not comply with legislation

UK Food Standards Agency

Key points:

- Recall numbers for 2022 are at their lowest since 2017. The number of recalls for the past three years have been almost the same, suggesting the number of recalls may have reached a natural limit. However this can only be confirmed with more data from future years.
- 50% of alerts are allergy related
- Over 50% of all recalls could be classified as “Never Events”, similar to findings from 2021.

UK FSA Alerts

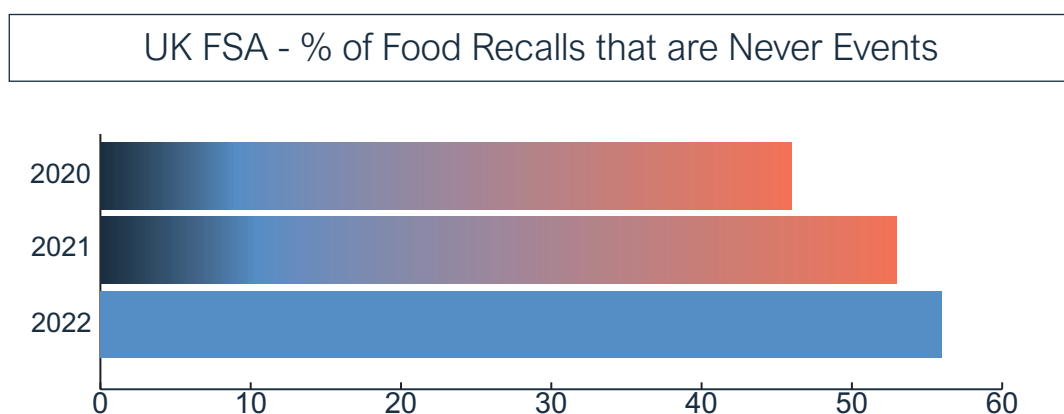


Half of the recalls were in some way either directly or indirectly allergen related. At least 9 of these are described in the recall notice as having a product claim attached such as “free from”, “vegetarian”, or “vegan” and this may be indicative of lack of legislation over some of these terms plus confusion and misunderstanding both within manufacturing and consumer sectors. Certainly, with non-vegan ingredients such as milk and egg being (added together) the greatest cause for allergen recall, this should be duly noted as a key consideration to reduce risk in 2023.

20% of FSA recalls can be attributed to microbiological spoilage or risk. Interestingly 6 of these are in products that would typically be cooked by the consumer which, if validated instructions were followed, may render these safe. This move by the FSA and UK markets is perhaps reflective of the 2020 updated section 3.6 Codex Alimentarius guidelines (General Principles of Food Hygiene CXC 1-1969) around HACCP whereby any potential misuse as well as most likely intended uses should be considered as part of a food safety plan¹.

A notable addition in 2022 is pet food, accounting for 10% of microbiological recalls across a broad range of different products. The microbiological risks may be passed on to the owners/handlers or children playing through infected faeces, dog licks or handling of food in areas used to cook for the family. This could be indicative of the rise in dog ownership following lockdown and remote working along with the rising trend to feed ‘raw’ diets to dogs. The segregation of raw dog food and human food in the consumer homes can be blurred and both veterinary guidance and legislative guidance remains at odds depending on source material reviewed.

Several recalls were very wide reaching as they were part of highly publicised confectionery recalls and others were linked to nuts/seeds and pulses. In both cases, historical recalls have frequently occurred through under processing or poor hygiene controls.



The number of FSA recalls that could be classed as “Never Events” have increased year on year, from an already high level. In 2022, over half of all recall alerts issued by FSA were “Never Events”. As mentioned in the US 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.](#)

1. https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCXC%2B1-1969%252FCXC_001e.pdf

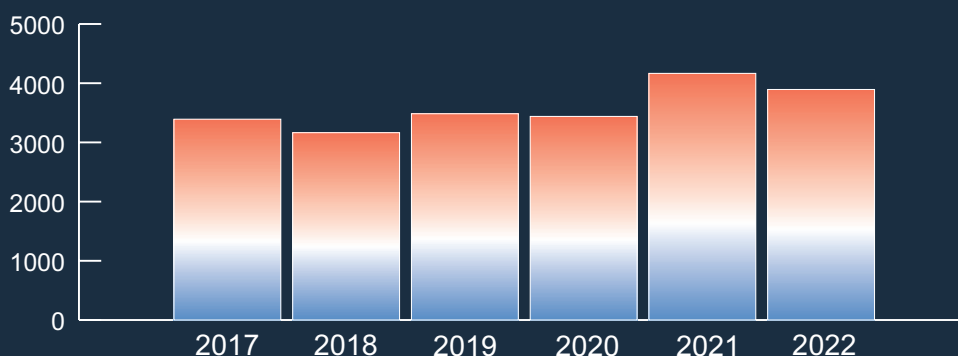
European Rapid Alert System for Food and Feed (RASFF)

Key point:

- Although RASFF notifications are higher than in most previous years in 2022, they are not set to equal the record total in 2021. However we must bear in mind that following BREXIT,

UK figures are now not included so there is a sizeable amount of data discrepancy here. It is likely that 2022 was in effect very similar to the high of 2021.

EU RASFF Food Notifications



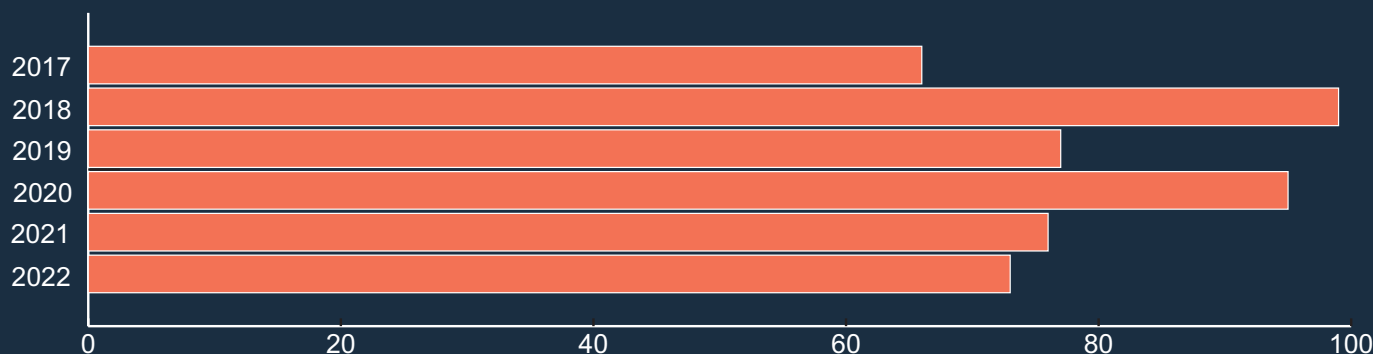
Product Safety Australia

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 continued to decline in 2022, with lowest figures since 2017 however

this slowing down has decelerated and the trend for large decreases in numbers has ended. This suggests 2023 will have similar numbers to 2022 or possibly increased numbers but surely not fewer.

Food & Grocery Recalls - Product Safety Australia





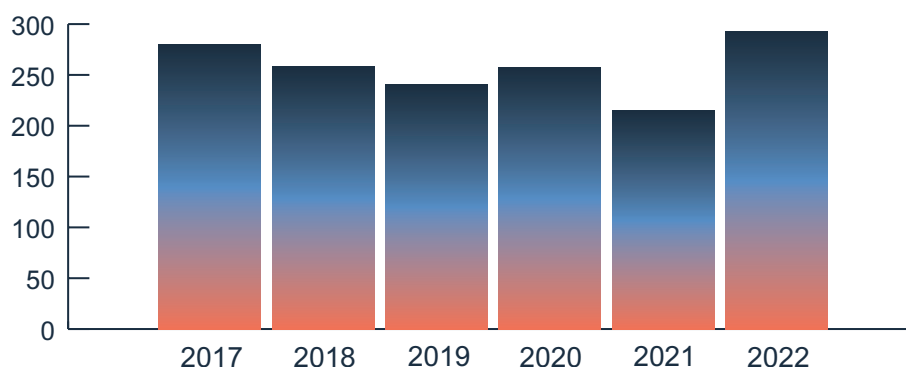
Consumer Product Recalls

US Consumer Product Safety Commission

Key Points:

- 2022 had the highest number of recalls since our records began in 2017
- Possible reasons again could be socio-economic pressures as mentioned in the introduction section of this bulletin, pressure on businesses financially and with a tougher labour market and some down-scaling. As with all industries, if companies scale back on staff training, investments and quality developments, such pressures can indirectly impact quality and safety.
- There has also been higher direct & indirect costs impacted by crude oil prices. There is a heavy reliance on petrochemicals in this industry or products derived thereof such as polymers and plastics as well as fuel to run the plants and associated logistics.

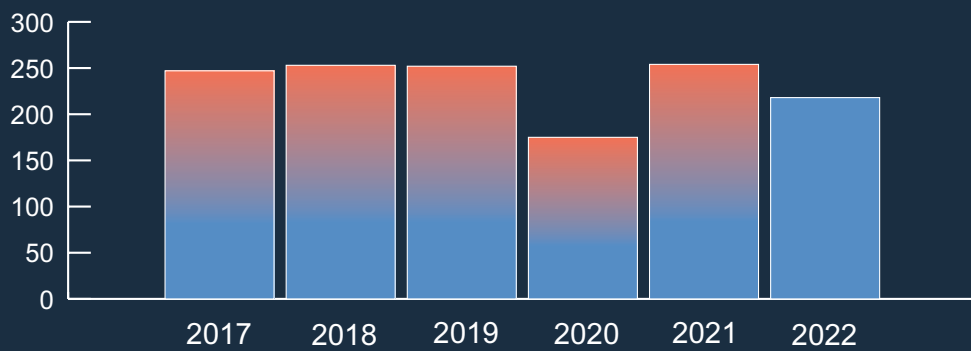
US CPSC Product Recalls



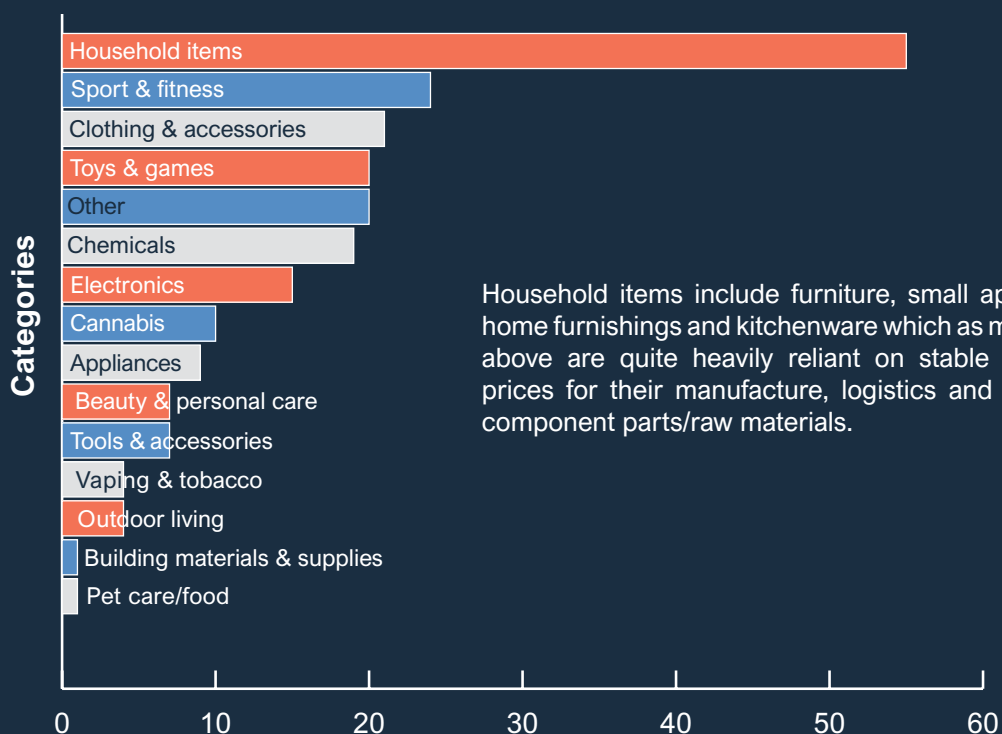
Key points:

- Recall numbers dropped 14% in 2022 compared to 2021
- Household items were the largest category of recalled consumer products in 2022 making up about a quarter of all consumer product recalls

Number of Consumer Product Recalls (Canada)



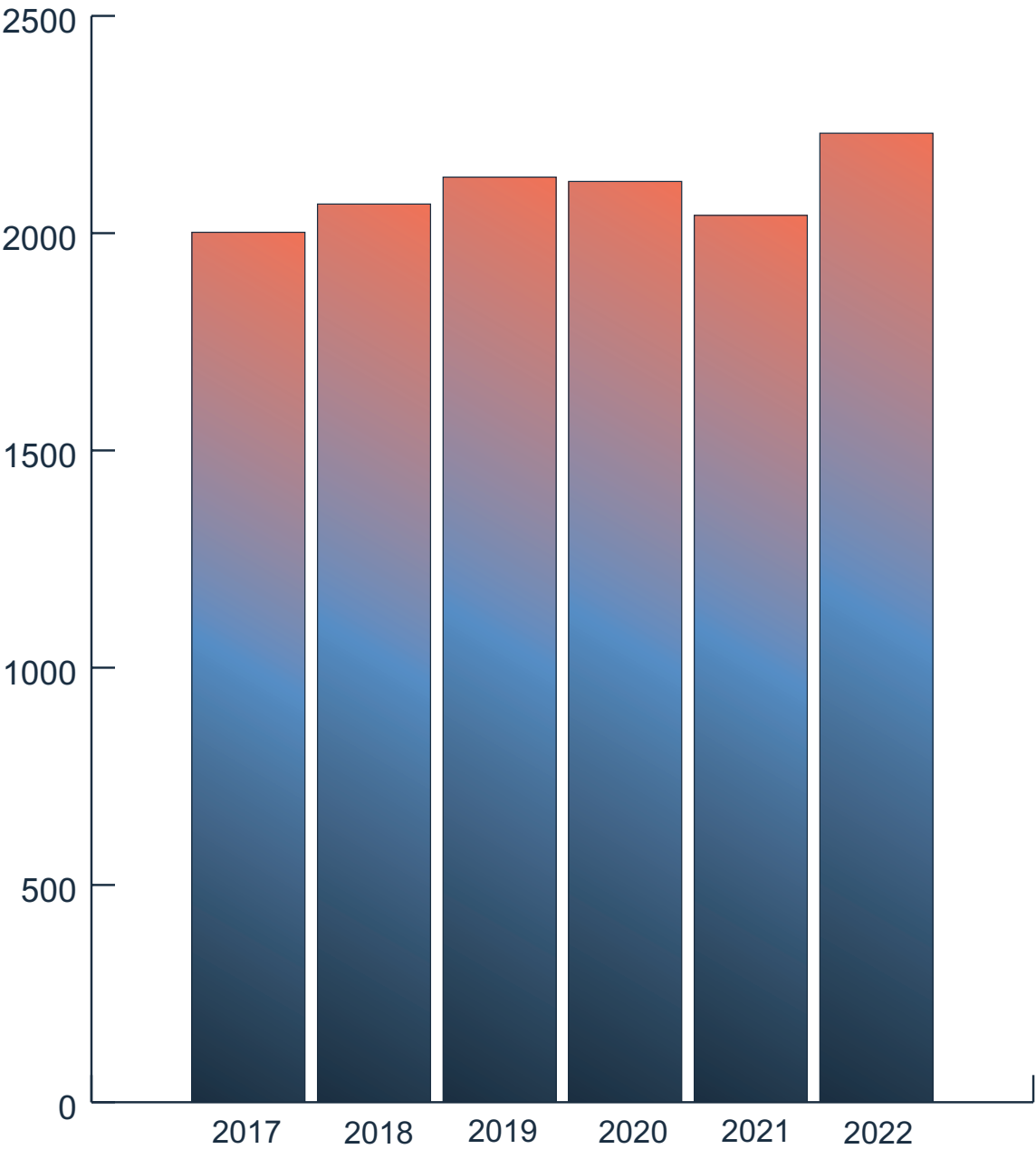
Number of Consumer Product Recalls by Category 2022



EU Safety Gate

The EU Safety Gate system, (formerly RAPEX) is the EU rapid alert system for dangerous non-food consumer products. Recall notifications rose by 6% to its highest level, although year on year changes are relatively small compared to other agencies.

EU Non Food Notifications





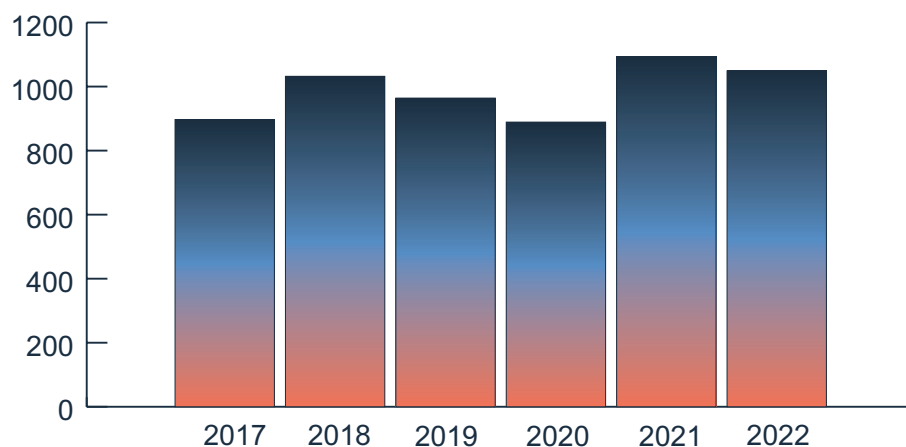
Automotive Recalls

US - NHTSA Safety issue

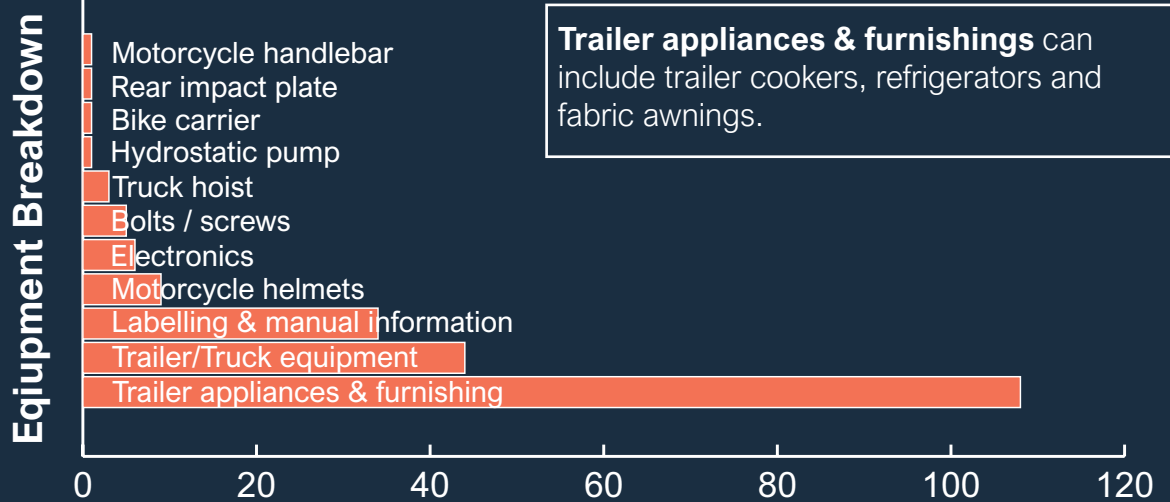
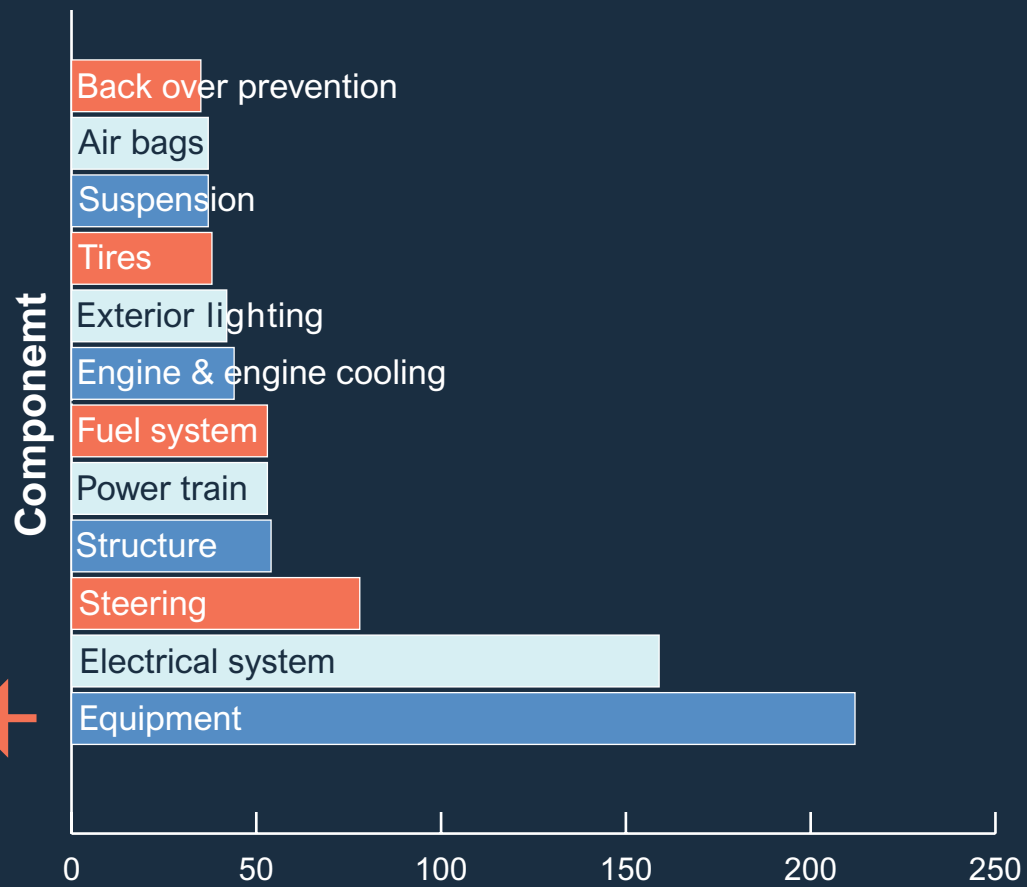
Key points:

- We are still seeing automotive recalls make a significant recovery since their slump in 2020 at the height of the pandemic however 2022 numbers are down slightly on 2021
- 2022 and 2021 are the two years with the most recalls reported by NHTSA
- 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 / vehicles.
- “Equipment” is the component that is responsible for the greatest number of recalls, but as equipment covers many items, “electrical systems” should also be considered as the major component responsible for the most automotive recalls.

NHTSA Safety issues - recall



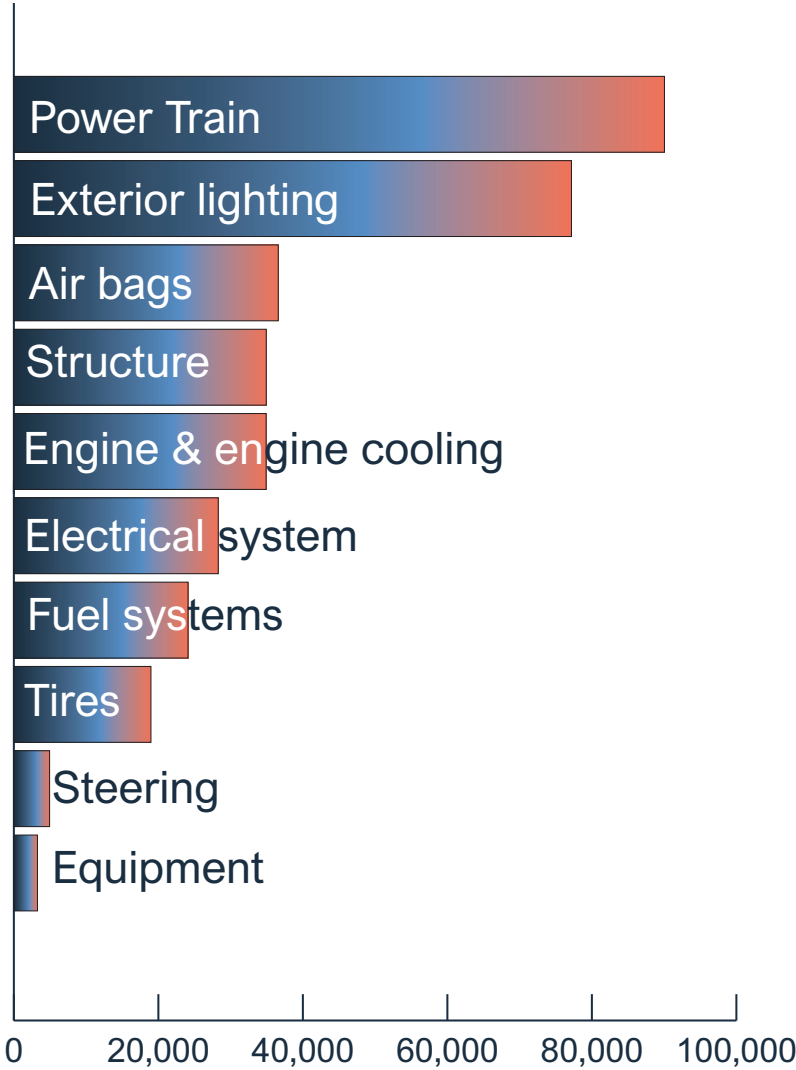
Number of recall by Component at fault - Top 12



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.

“Equipment” recalls are usually relatively small scale and usually involve small numbers of units compared to recalls resulting from faults with other component. However, the category does have the most recalls. Equipment is therefore usually a frequency issue more than magnitude.

Average number of potentially affected units by component at fault



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.

Number of recalls by component and units affected - 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	212	692,423	3,266	1	99,190
Steering	3	78	385,749	4,946	1	105,271
Tires	9	38	721,009	18,974	8	224,704
Structure	6	52	1,253,339	24,103	1	521,746
Fuel systems	2	159	4,497,721	28,288	1	817,143
Electrical system	7	44	1,536,159	34,913	1	917,106
Engine & engine cooling	4	54	1,886,166	34,929	1	1,234,567
Air bags	10	37	1,353,884	36,591	5	410,619
Exterior lighting	8	42	3,241,306	77,174	2	740,581
Power Train	5	53	4,772,343	90,044	1	2,925,968

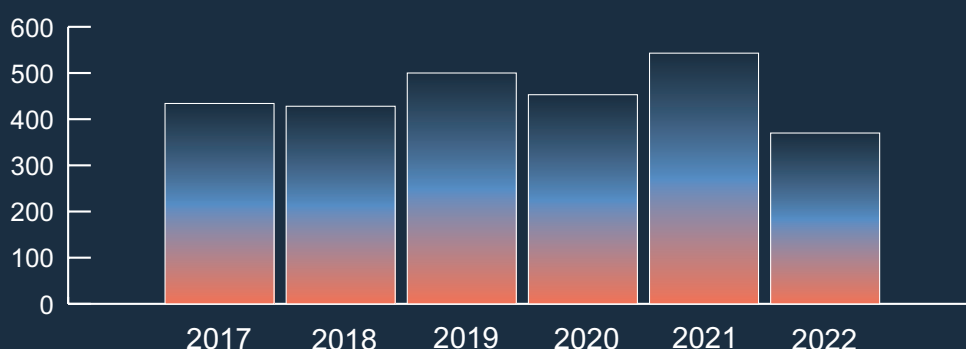
Note: NHTSA refers to "units" in their data. This often also relates to vehicles.

EU Safety Gate Motor Vehicles

Key points:

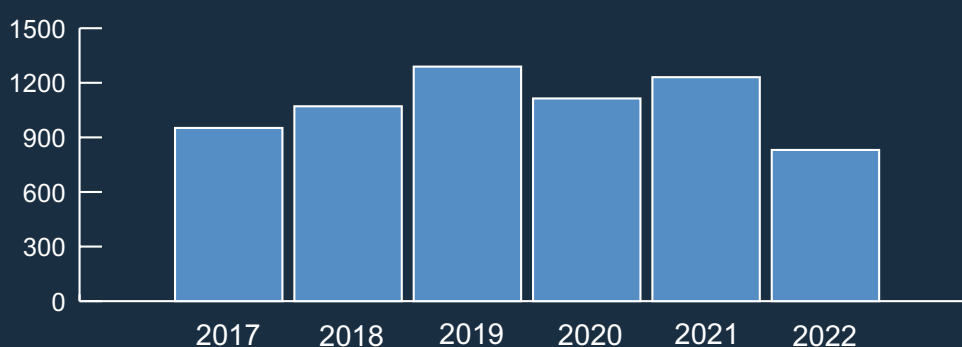
- There was a significant drop in EU safety gate motor vehicle recalls in 2022 from 2021 with 2022 having the lowest numbers recorded for 7 years

EU Safety Gate - Motor Vehicles Recalls



UK DVSA – Motor Vehicles

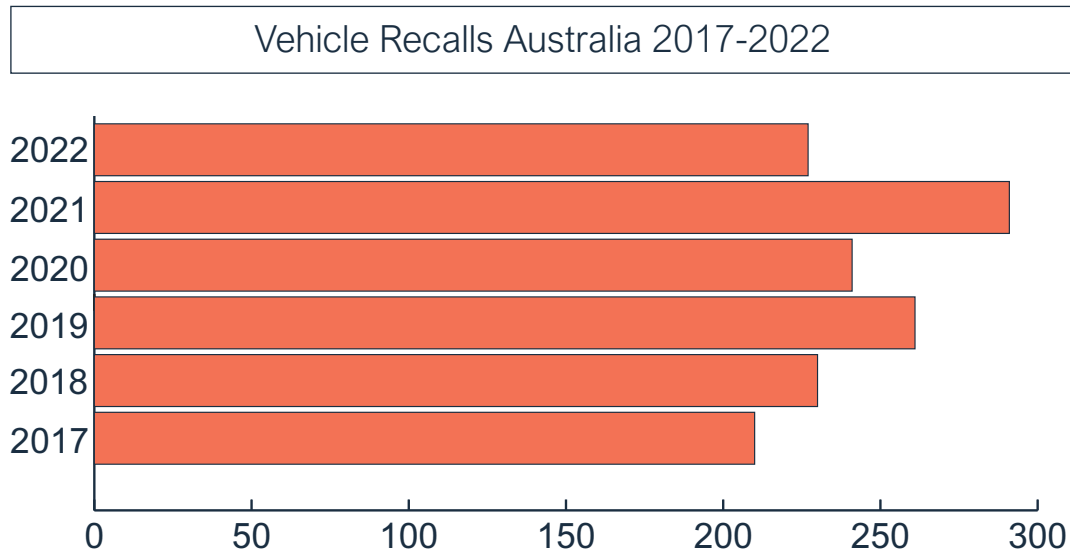
UK DVSA - Vehicle and Equipment Recalls



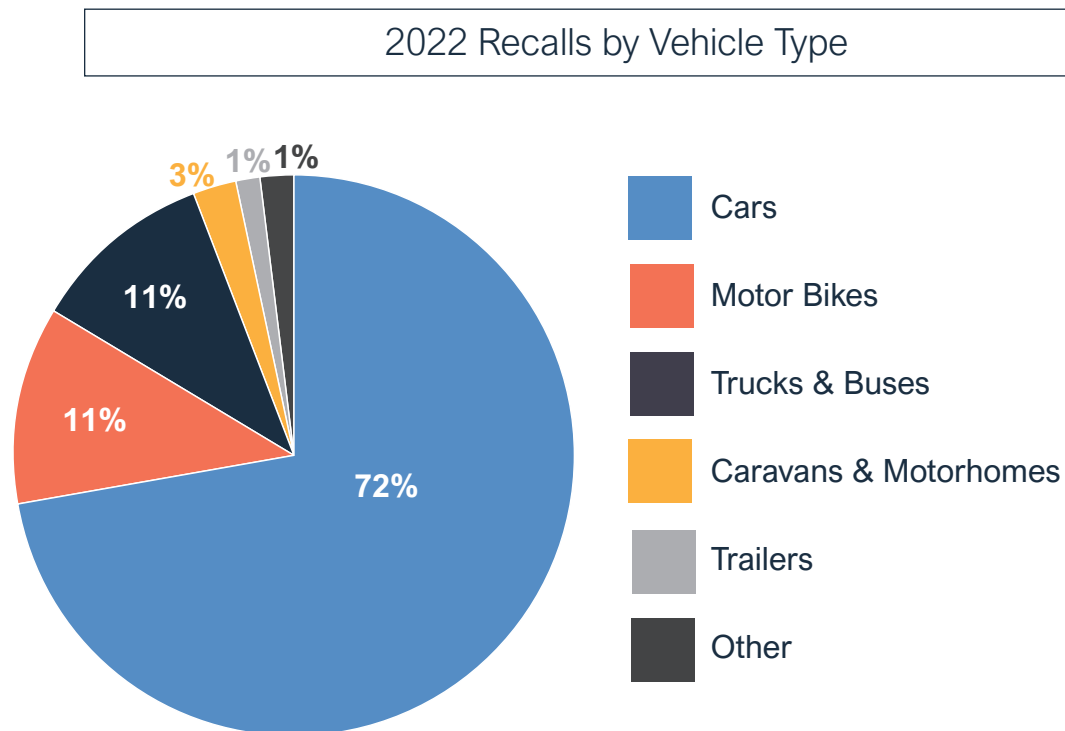
- Similarly to the EU safety gate automotive data, the UK data also dropped significantly in 2022 compared to 2021 and was the lowest number on record since 2016.
- It is unsurprising that the shape of the trends for the EU and UK would be similar as they

largely share the same products. However, the UK numbers are higher as it includes equipment recalls and the data lists individual notices by products whereas EU groups together events with various models affected.

Australia Automotive Recalls



- Australian automotive recalls have also dropped significantly in 2022 compared to 2021
- The figures are in line with trends seen in the EU and UK



- 72% of vehicle recalls in Australia were of cars



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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