



Product Recall Report

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Food recalls in US, Canada, UK, EU and Australia

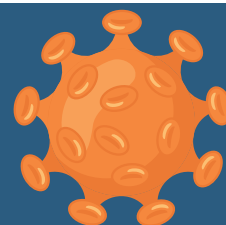
Key Take-Aways for 2023

- Increases in recalls and alerts have been seen from the US and EU agencies with a potential pattern emerging for recovery following the post pandemic slump.
- Highest number of FDA reported recall events and USDA recalls since 2019.
- Highest annual number of different products recalled in past 6 years (FDA).
- Highest average number of different products recalled per FDA recall event since before 2017.
- Highest number of EU food RASFF notifications in past 7 years.
- However this is contrasted by a significant drop in recall numbers from the UK, Canadian and Australian agencies.
- Lowest number of UK FSA alerts and Canada CFIA food recalls since before 2017.
- Equal lowest number of food recalls in Australia since 2017.
- The main root cause drivers are microbiology and allergens across most agencies and, especially in the case of microbiology, we see a large spread in numbers of products affected per event as commodity items are used in multiple end products.
- We are pleased to see some significant drops in **Never Event** numbers across most agencies apart from US FDA which has increased.
- There is more evidence of a joint approach being taken by the different US authorities, CDC and FDA notices are becoming much more obviously aligned.
- It will be interesting to see if US FDA recalls start to decrease now that FSMA is well established.
- For both food and consumer products, additional work on labelling management would reduce the number of recalls substantially.

FDA

Top Causes of Recall with FDA, FSA, Canada and Australia

Analysis of data across US FDA, UK FSA, CFIA and FSANZ show that microbiology and allergens dominate the top two causes of food recalls.



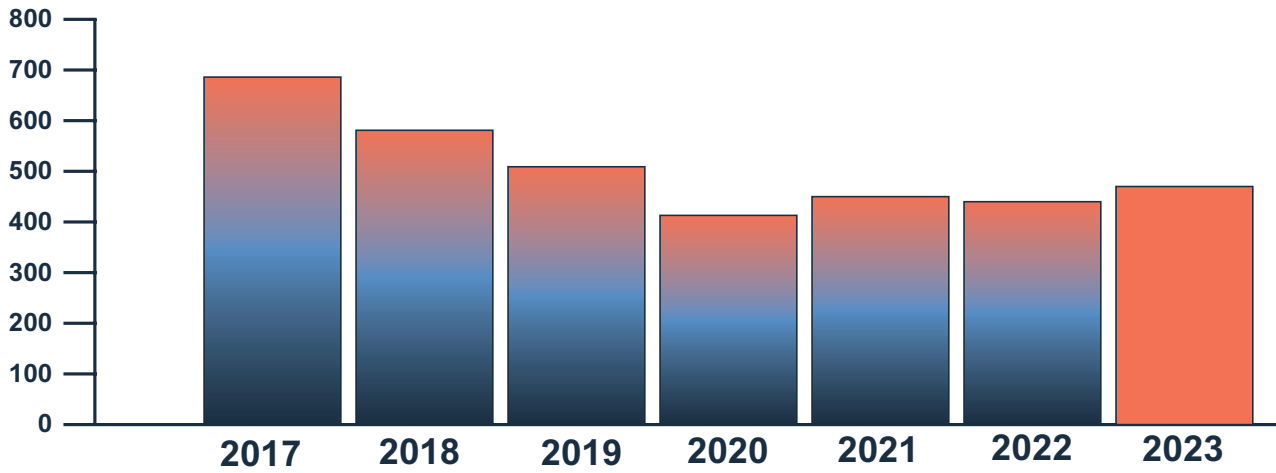
Top 5 Recall Causes	FDA	FSA	CFIA	FSANZ
Microbiology	1	3	1	2
Allergen	2	1	2	1
Foreign body	3	2	3	3
Unsanitary conditions	4	*	*	*
Labelling error - non allergen related	5	*	*	4

*not included in top 5

- FDA recall event numbers finished 2023 higher than 2022 and at their highest since 2019, up by approximately 7% on 2022. This is still not back up to pre-covid numbers

(approx. 8% lower still) but recall numbers starting to trend upwards after having dropped slightly in 2022 compared with 2021.

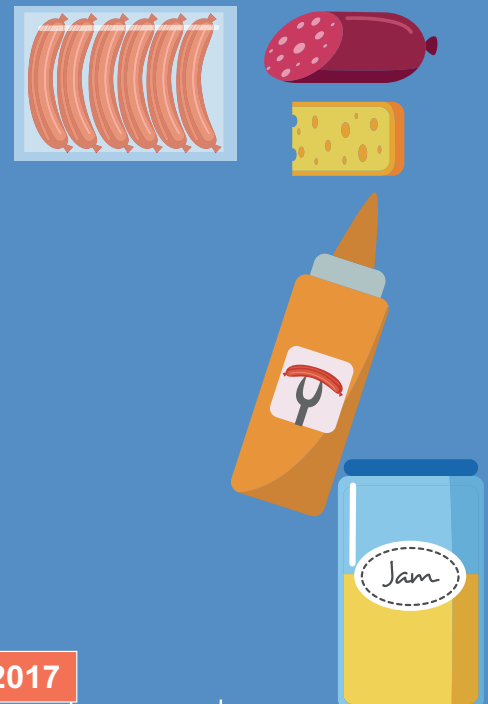
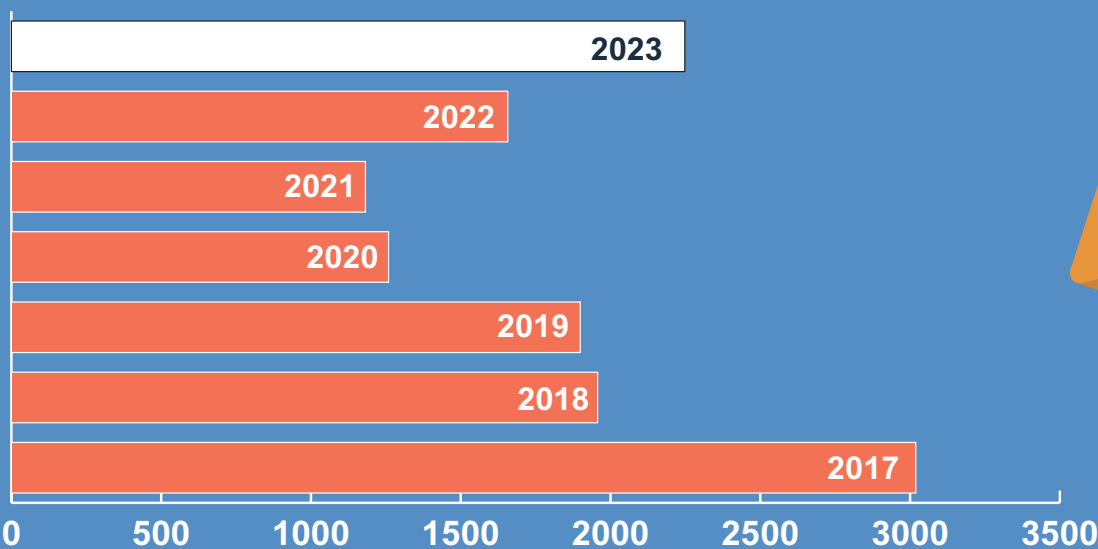
Number of US FDA Food Recall Events



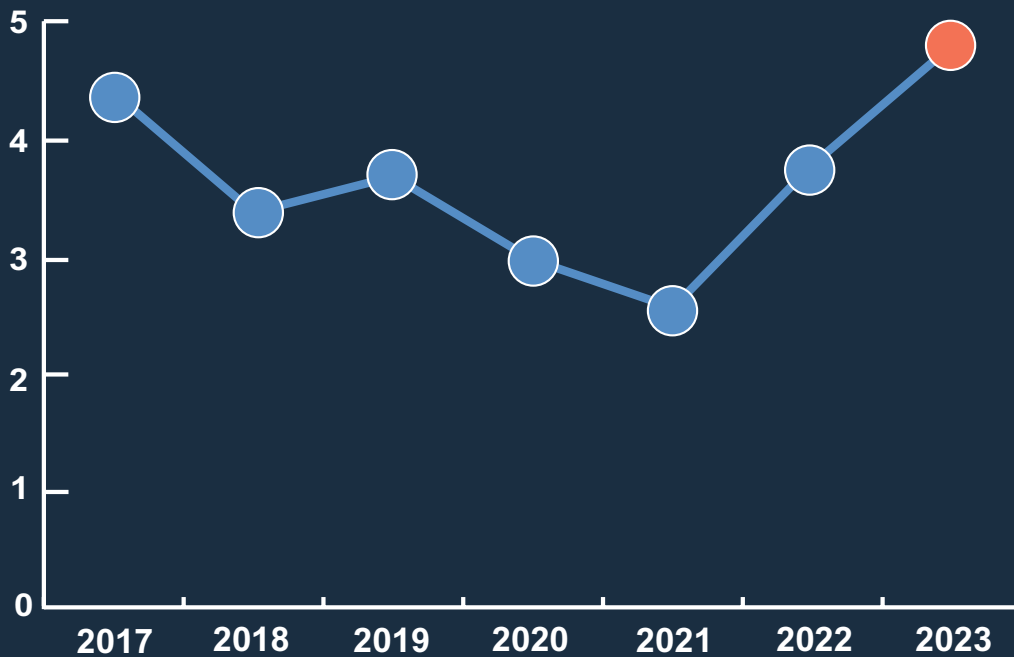
- Looking at the number of different food products recalled from all FDA recall events, the rise in product numbers in 2023 paints a bleaker picture with numbers at their highest since the peak back in 2017. These numbers

show a 36% increase from 2022 data. This means that on average, more products are involved in single recall events. This is also shown in the chart below, “Average Number of Different Products Recalled Per Event”.

Number of Different Food Products Recalled - FDA

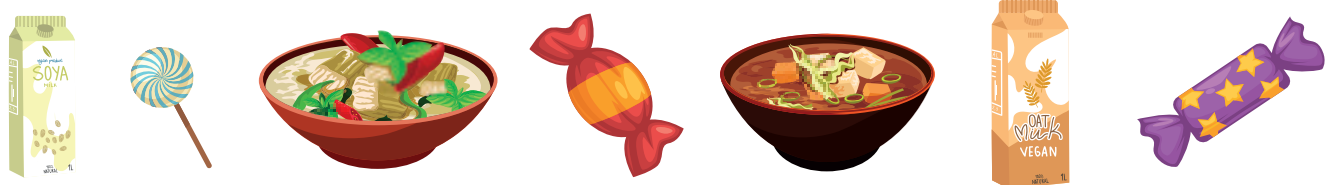
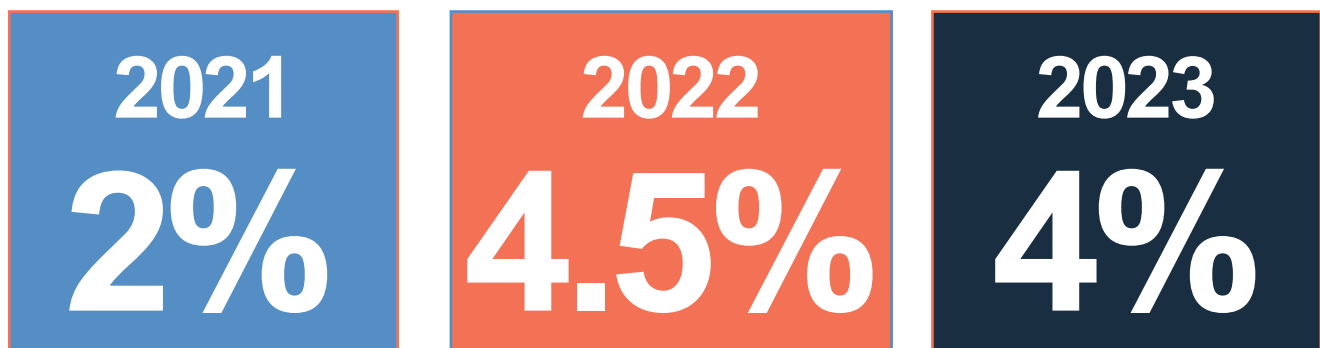


Average Number of Different Products Recalled Per Event FDA



- The continuing occurrence of broader recalls and a few exceptionally large recalls is a message of caution to all food companies – if you have a recall there is a chance that a single event could have a devastating impact on your business.
- Vegan and vegetarian specific products remain quite static as compared to 2022 data. It is difficult to know if this is higher than would be expected based upon market size for such products.

Percentage of recalled products classified as Vegan and Vegetarian FDA



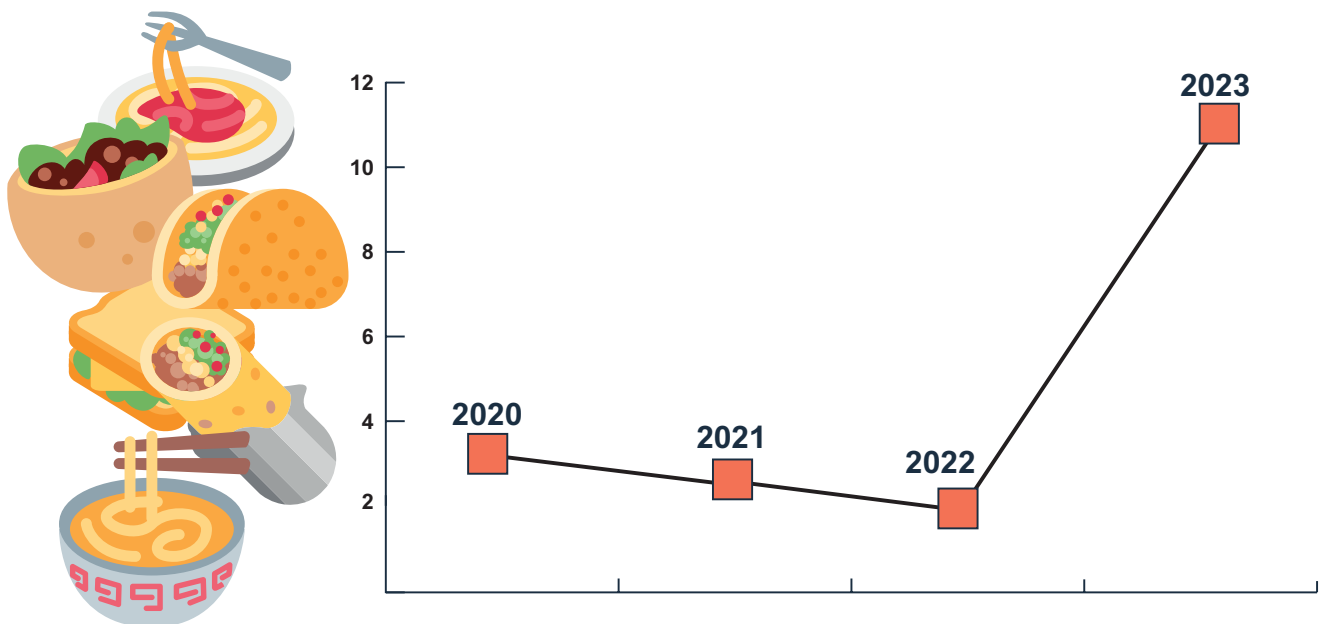
FDA Recalls – Product Category Top 10

- Throughout the year, there was an increase in product recalls in the prepared dishes, pasta & noodles category with it now as the highest category having taken over from confectionery.

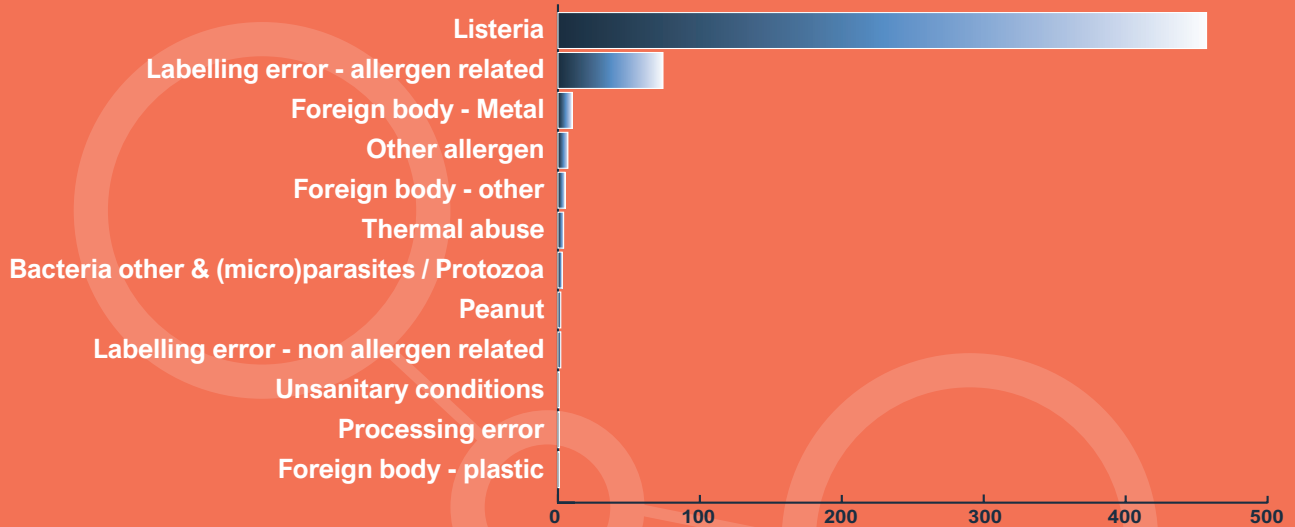
Product type	2023 position	2022 position	Change from 2022
Prepared dishes, pasta, noodles	1	7	↑ UP
Confectionery	2	1	↓ DOWN
Fruit & Veg	3	2	↓ DOWN
Cereals & Bakery	4	4	↔ NO CHANGE
Nuts, Seeds & Snacks	5	5	↔ NO CHANGE
Herbs & Spices	6	12	↑ UP
Nutritional products	7	3	↓ DOWN
Dairy	8	6	↓ DOWN
Soups, Broths, Sauces & Condiments	9	8	↓ DOWN
Non-Alcoholic Beverages	10	9	↓ DOWN

- Focusing on the prepared dishes category, we can see that in 2023 there has been a huge jump in the number of different products recalled per recall event in the prepared dishes category. Listeria is the dominating cause here but the vast majority have come from 2 large scale recall events. One involving over 300 different products (wraps, bagels, baguettes, paninis etc) and the other was over 100 (salads, sandwiches, wraps).

Average Number of Different Products Recalled Per Prepared Dish Recall Event FDA

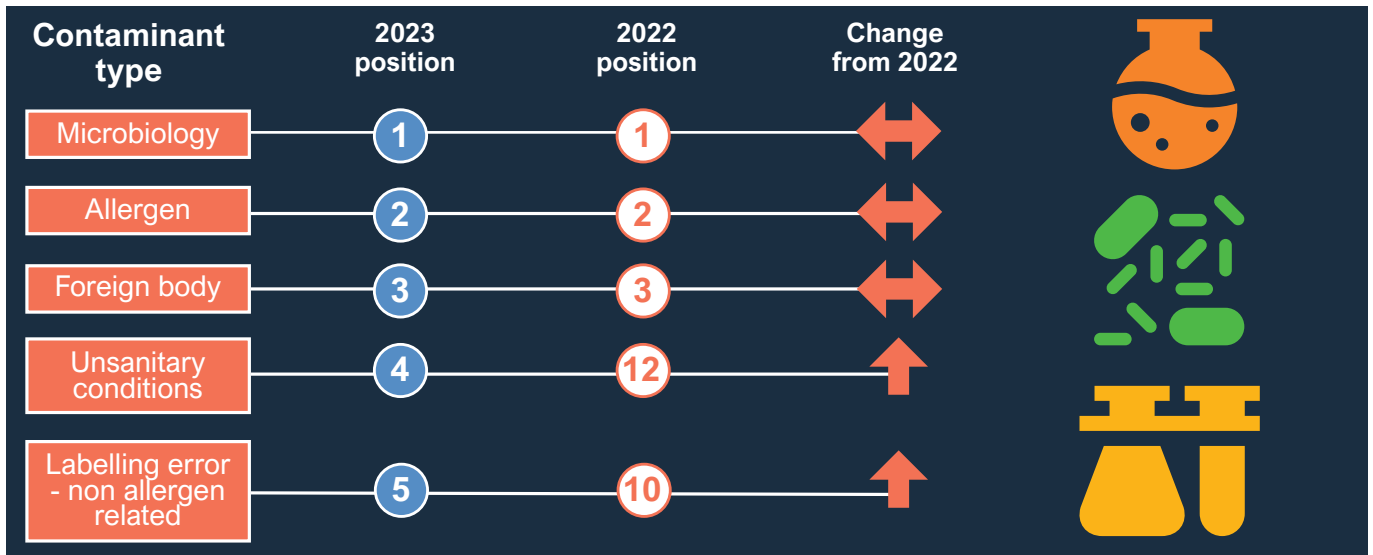


Causes of Prepared Dish Recalls 2023 - FDA



As the table below shows, microbiology was the number one cause of FDA food recalls and tends to drive a higher number of food products within discrete recall events as they are often ingredients or components which get used in many end products. For example listeria in raw materials that impacted the prepared meals category hard.

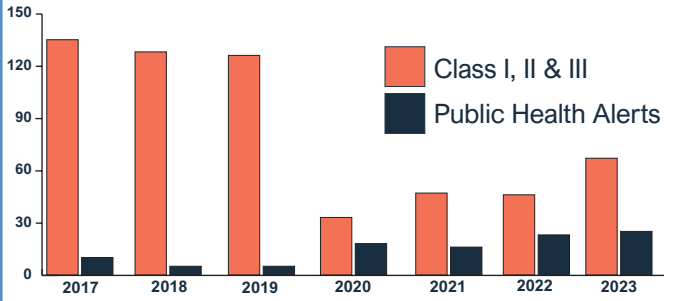
It is interesting to see a more visible, joined up, data based approach from the FDA and the CDC with regards to recalls linked to acute public health events. For example in such cases of Salmonella linked to Pet Food and Produce or Heavy Metals in Fruit Sauce Products.



- Although allergen recalls are second, they continue to pose a risk to virtually all product categories and so is a key element of food safety that all food companies must control.
- The recall numbers due to allergens, and particularly mislabelling, are shown by 46% of the FDA food recall events in 2023 being classified as a Never Event

recall. A significant increase on 2022 and perhaps reflective of the pressure on the system in general. Note: A Never Event recall is defined by RQA as a recall that can cause serious harm and should be easily prevented. E.g. Wrong label on pack or product put in wrong packaging with allergen safety implications.

Number of USDA Recalls 2017 - 2023



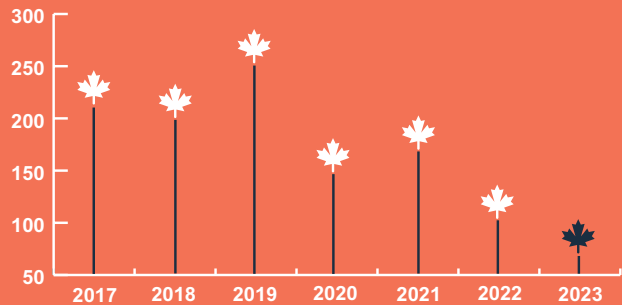
- In our USDA Class 1, 2 and 3 recall category, total numbers have increased 46% from 2022. Still only a little over half the numbers seen pre-pandemic but a very strong, rising trend. Note: the last class III recall was in 2018.
- FSIS Public Health Alerts is a category monitored as shown but may double count recalls already posted as class 1 or 2 or where no product is on the market. These numbers are also steadily increasing.

DEFINITION: The Food Safety and Inspection Service (FSIS) issues Public Health Alerts to inform the public about potential health risks in cases where a recall cannot be recommended. For example, FSIS may be aware of an outbreak of foodborne illness, but the source has not yet been identified. Or, illnesses may occur due to improper handling of a particular product, and FSIS may issue an alert to remind consumers of safe food handling practices.¹

Canada - CFIA

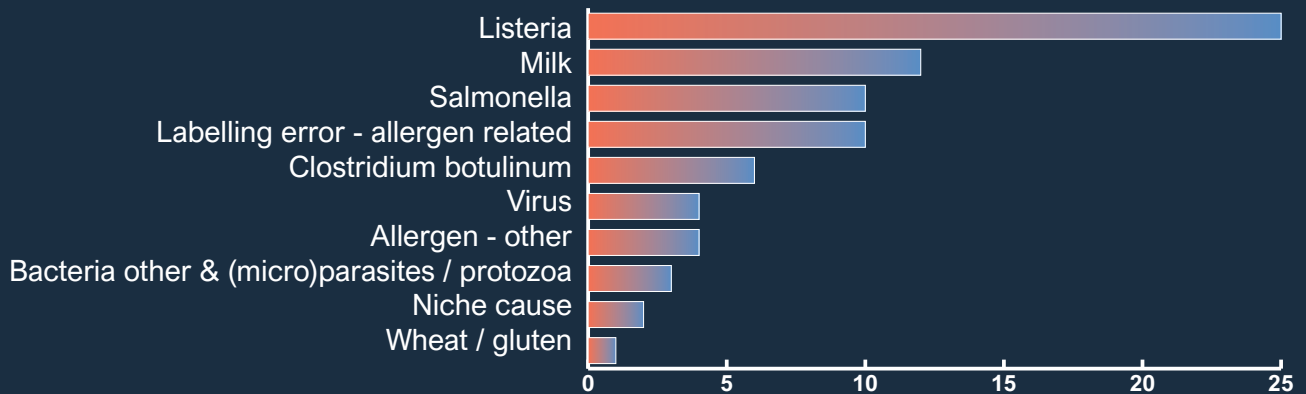
CFIA recalls ended 2023 lower than any of the past 7 years. 2023 figures show a 30% drop from 2022.

Number of Canada Food Recalls



- Breaking down the data into key causes shows microbiology dominates the landscape; with listeria being the most prevalent.
- In contrast to other countries, CFIA data seems to show relatively low Never Events numbers at only 15%.

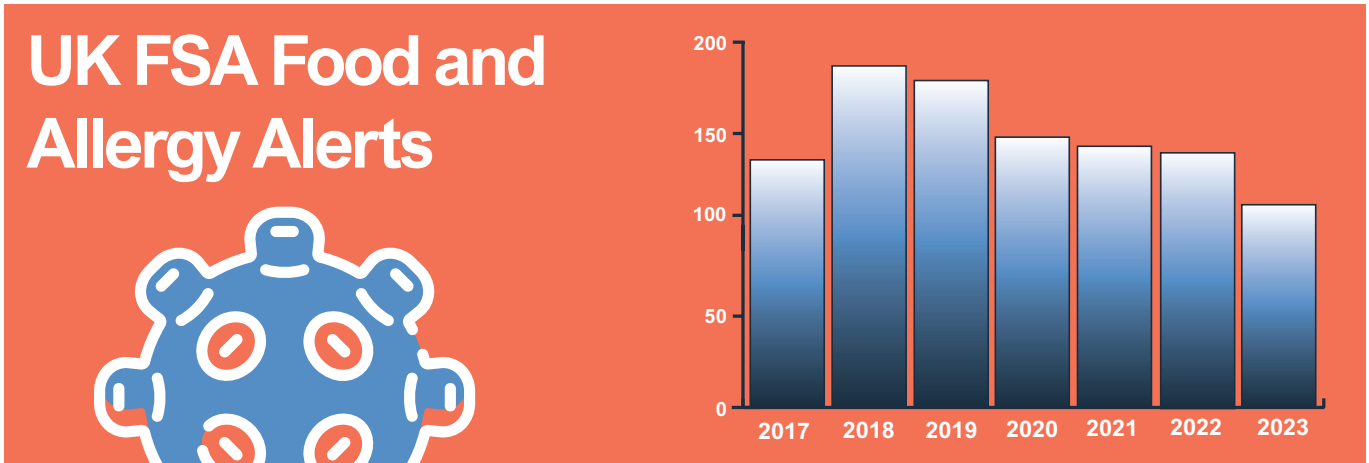
Causes of recall CFIA 2023



¹When are Public Health Alerts issued? (usda.gov)

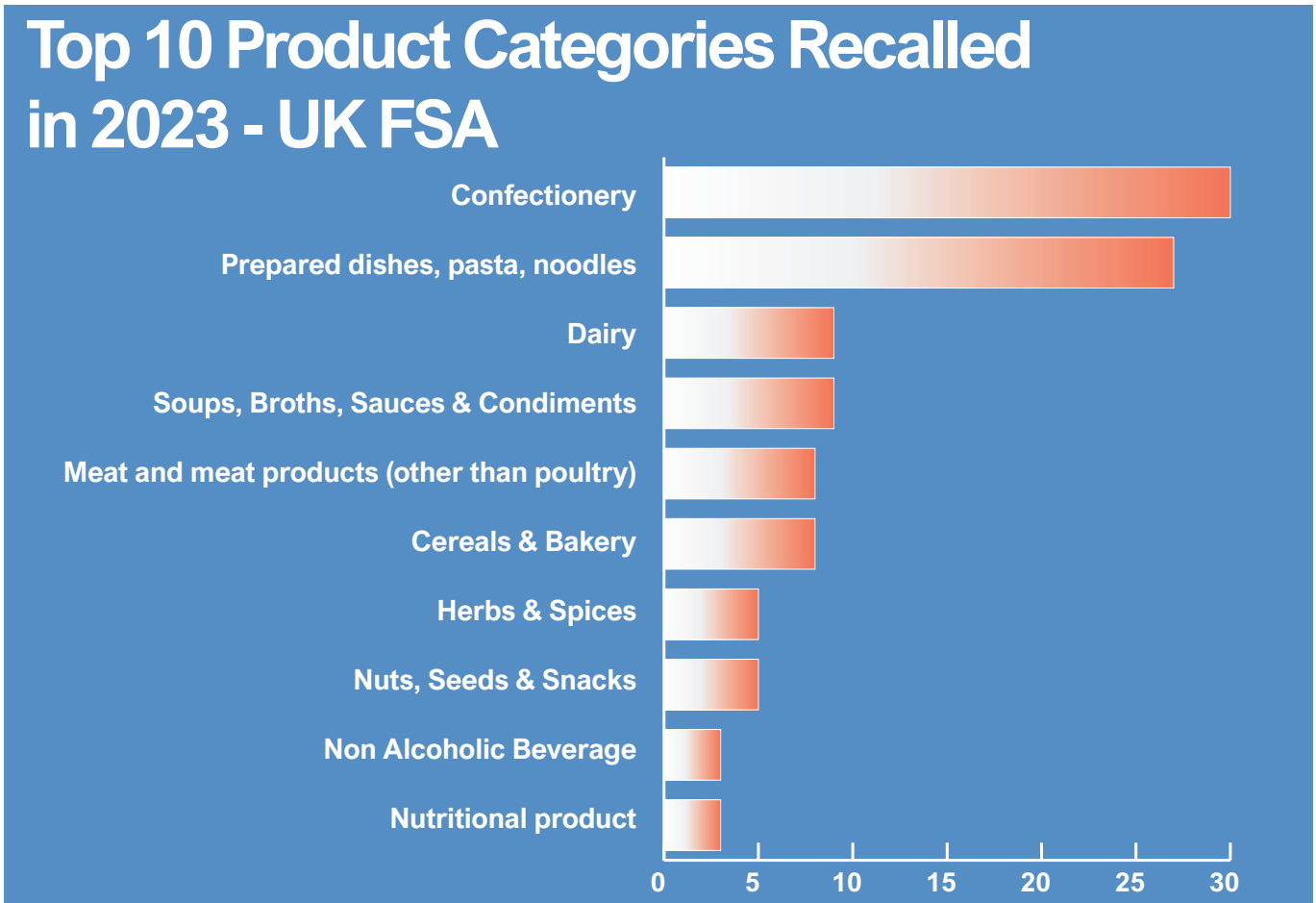
UK - FSA

- UK FSA recall numbers are the lowest seen since before 2017.
- Numbers post pandemic were steadily trending down with 2023 showing a significant drop of 21% compared to 2022.

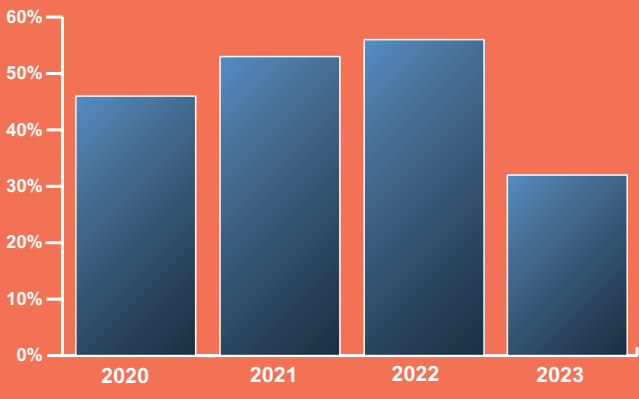


- Allergen recalls remain the leading cause of FSA alerts with foreign body then microbiology following second and third.
- These top 3 (contamination and allergen) issues are the cause of over 90% of UK food recalls.
- Similar to the US FDA data but with the top

two categories reversed, Confectionery had the highest number of recalls and alerts with our prepared dishes, pasta & noodles category second. These two categories alone account for over 51% of total numbers from FSA reports in 2023.



% of FSA recalls that are Never Events



- Never Event mislabelling historically accounted for over 40% of UK food recalls with a growing trend, however in 2023 we have seen a substantial reduction from 56% to 32%.
- This reduction in Never Events is in alignment with a drop in total number of events, we hope this demonstrates a real, positive trend which will continue and is not just due to increased pressure on local authorities and diverging policy from EU legislation and its application.
- Vegan and vegetarian products account for over 13% of UK FSA recalls. This seems like a disproportionately high number for the market share of this specific food sector but further analysis would be required to confirm that.

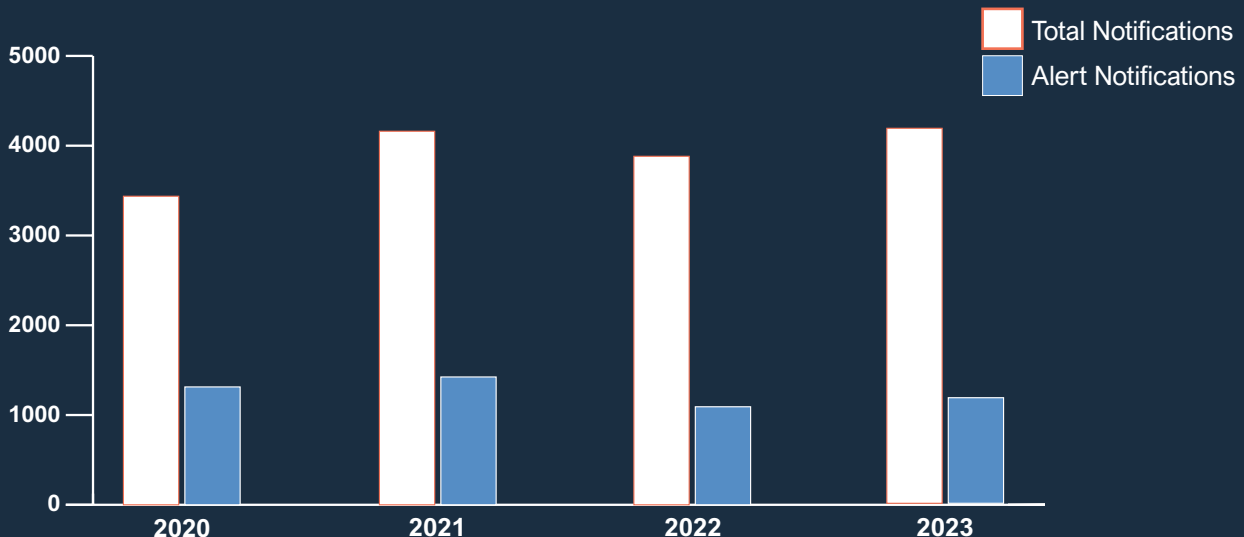
EU RASFF

- EU RASFF data ended 2023 with the highest number of total food notifications since our 2020 data began, alert numbers (most serious cases) were up from 2022 but not as high as in previous years.
- It is difficult to ascertain the main cause for the increase in EU data as RASFF covers such a large number of member states and individual event information is not always particularly detailed. There are clear variabilities with how some of this data is logged and classified, as would be expected by such a broad landscape,

which adds to the complexity of any analysis on the whole.

- It should be remembered that not all recalls reported in an individual country become RASFF notifications. It is typically when there is a multi-member state aspect that a recall becomes a RASFF notification or alert. Therefore many recalls that are not cross border, are not shown in this EU data. Also, not all notifications are recalls – notifications may be alerts, border rejections, news and others.

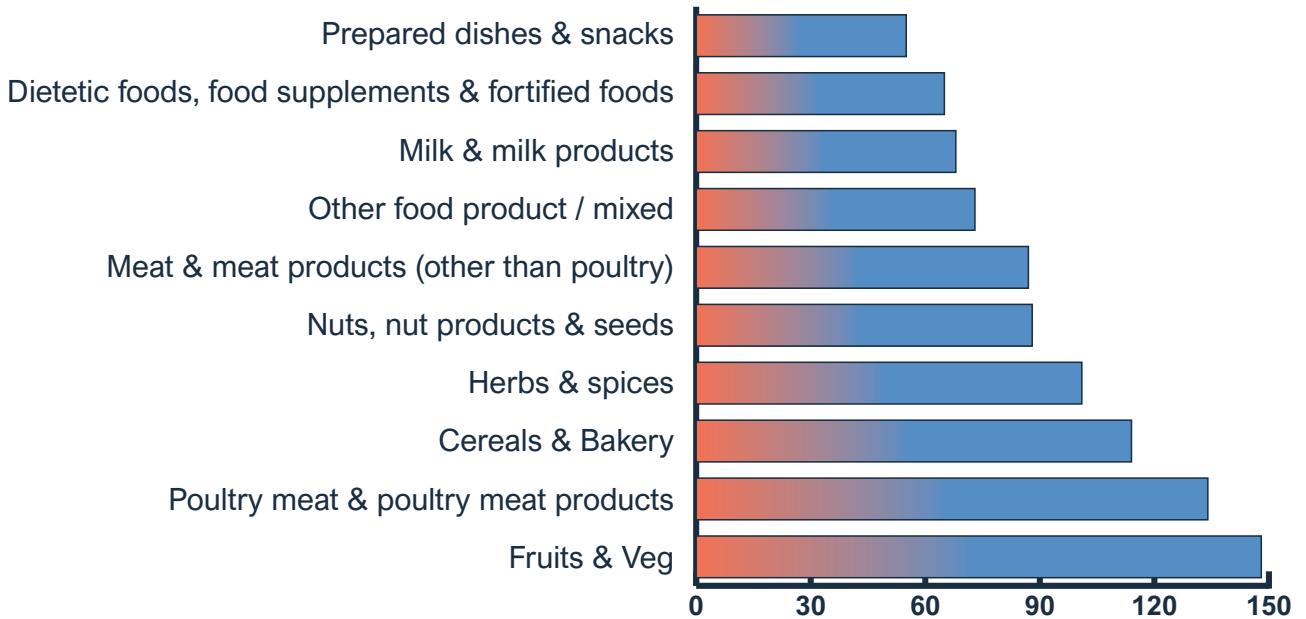
EU RASFF Food Notifications



- The top category for alerts (as defined on RASFF) was Fruit & Veg closely followed by Poultry Meats & Poultry Meat Products. Prepared dishes is 10th in contrast to the US and UK.

- These two categories made up 24% of total numbers alone and are reflective of some of the large, commodity driven recalls which we see affect multiple items.

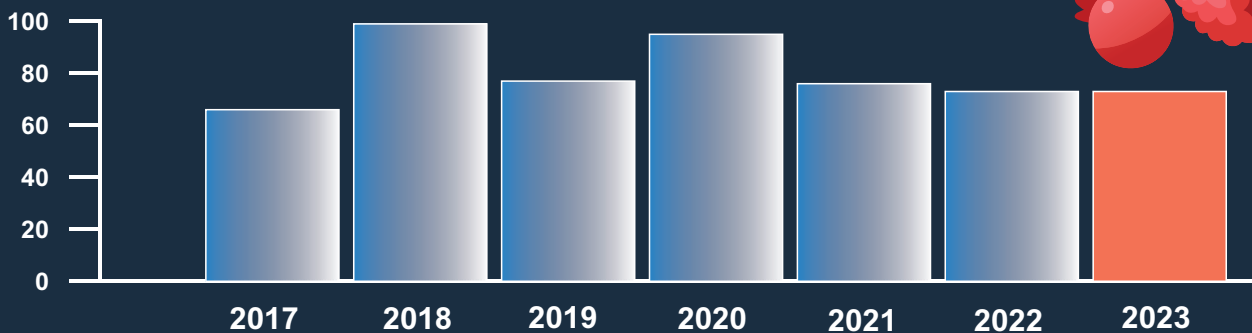
Top 10 Product Categories Recalled in 2023 - RASFF Alert Notifications



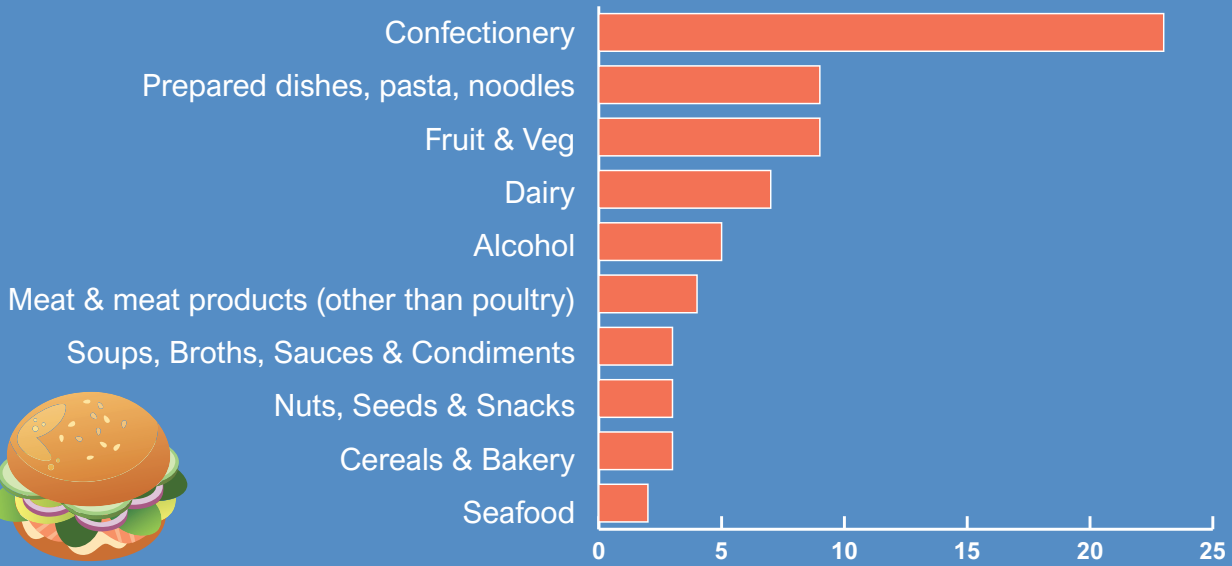
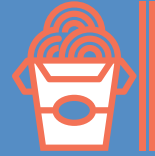
Australia & New Zealand - FSANZ

- Midway through 2023, Australia and New Zealand recalls were on the increase and predicted to reach 2020 levels again by year end (which was one of the highest in recent years).
- Due to a much quieter second half year, 2023 actually ended up on par with 2022.
- There has been little notable change in this data and numbers as a whole, compared to other countries, remain low by comparison.

Food & Grocery Recalls - Australia and New Zealand



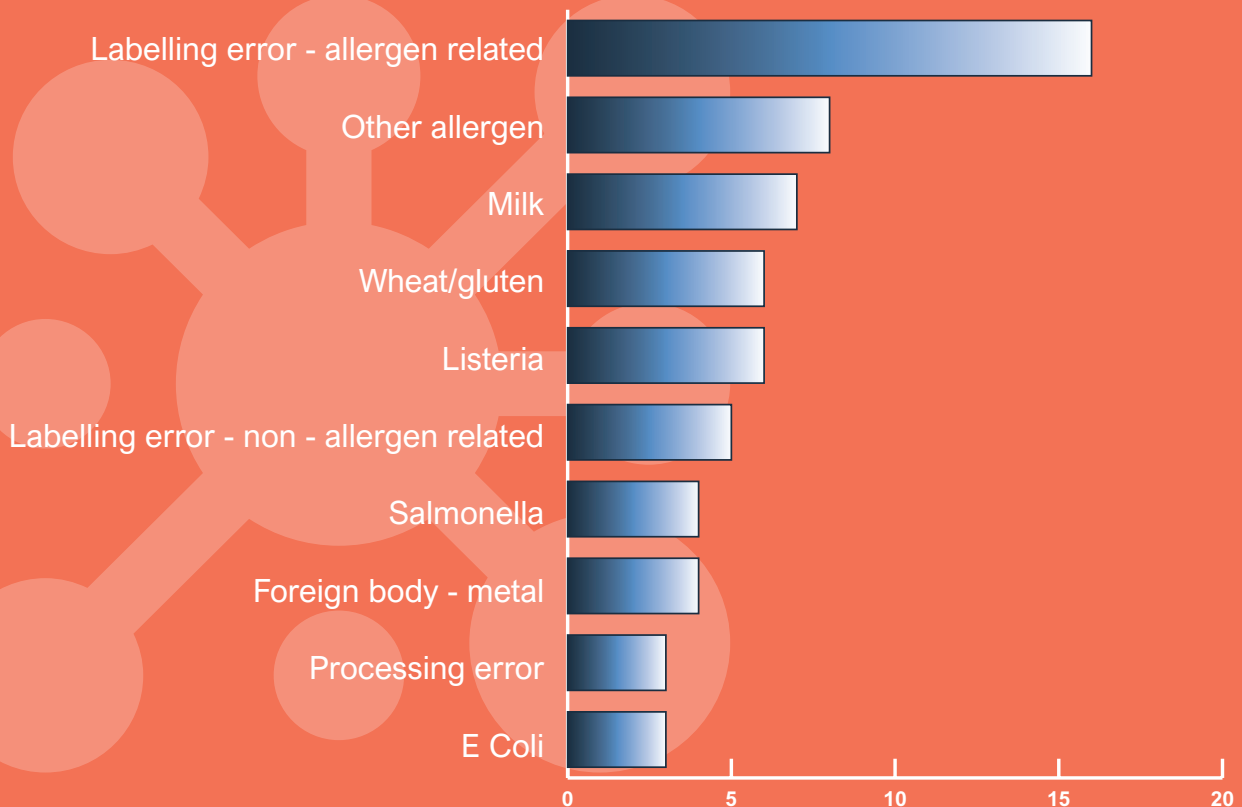
Top 10 Product Categories Recalled FSANZ 2023



• Interestingly, the FSANZ data has the same top 2 product categories as per the UK FSA and the US FDA which perhaps shows the effect of globalisation or perhaps those products that are higher risk for recall!

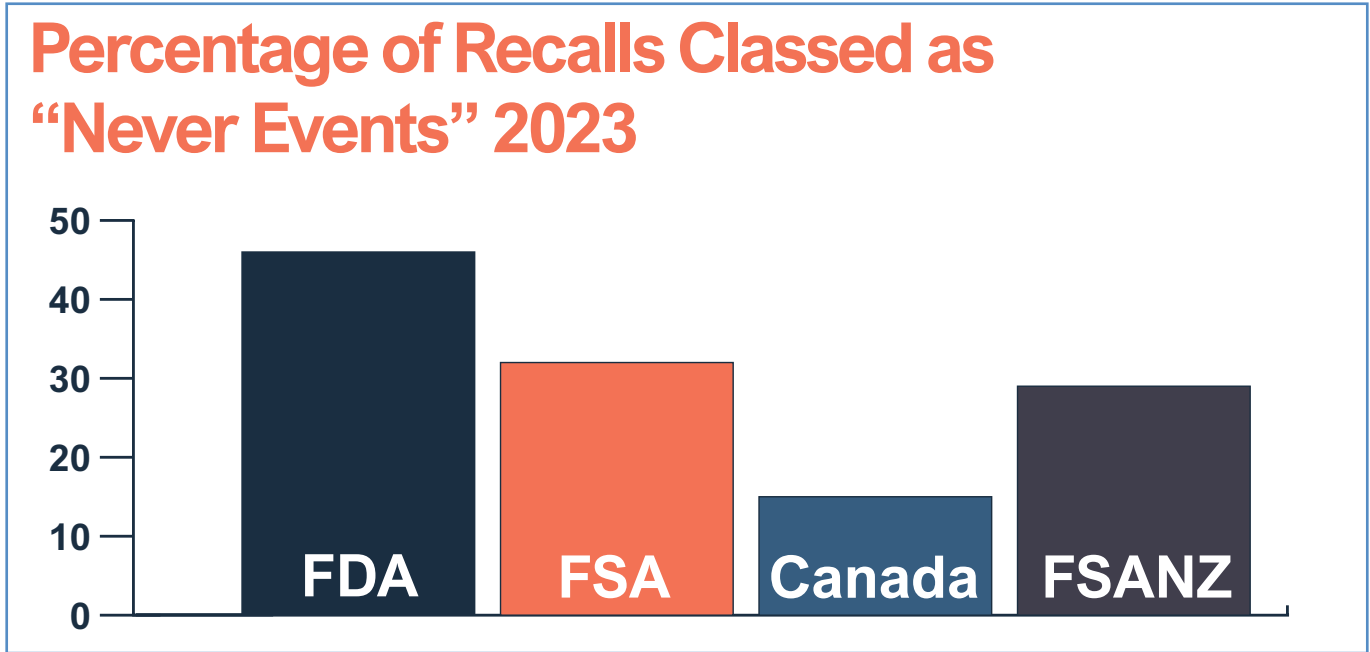
• However, the causes are slightly different with labelling error being the top cause. This can be split as shown and the main reason for recall due to these errors was allergen related risk.

Leading Causes of Recall - FSANZ 2023

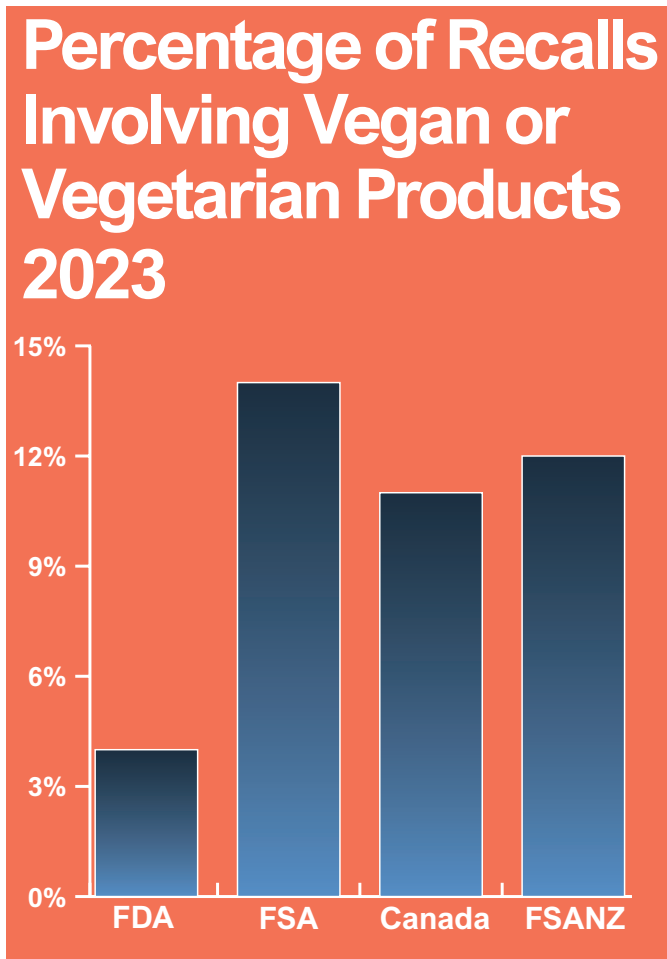


Comparative Analysis in Food

- Where it is possible to align the data, we have done some interagency comparisons on the data for all of 2023.



- The US FDA recalls have the highest number of Never Events, above 45% which is where the UK used to sit. It will be interesting to see over the coming year or two if this number reduces now FSMA is becoming more established.



As allergen recalls and incidents remain a hot topic across all territories, we also monitor the Never Events aspect of this; where an allergen risk arises from product having the wrong label. This graph shows the percentage of food recalls that could be classed as Never Events in specific countries around the world. With more focus on allergen risk and packing control, it should be possible to significantly reduce these types of recalls.

We also looked at the recalls of products that could be classed as vegan or vegetarian. Whilst the FDA level is lower, the percentage of recalls that involve this class of products is relatively high in UK, Canada and Australia. It is not clear at this stage if this is disproportionately higher than would be expected based on market size for these products.



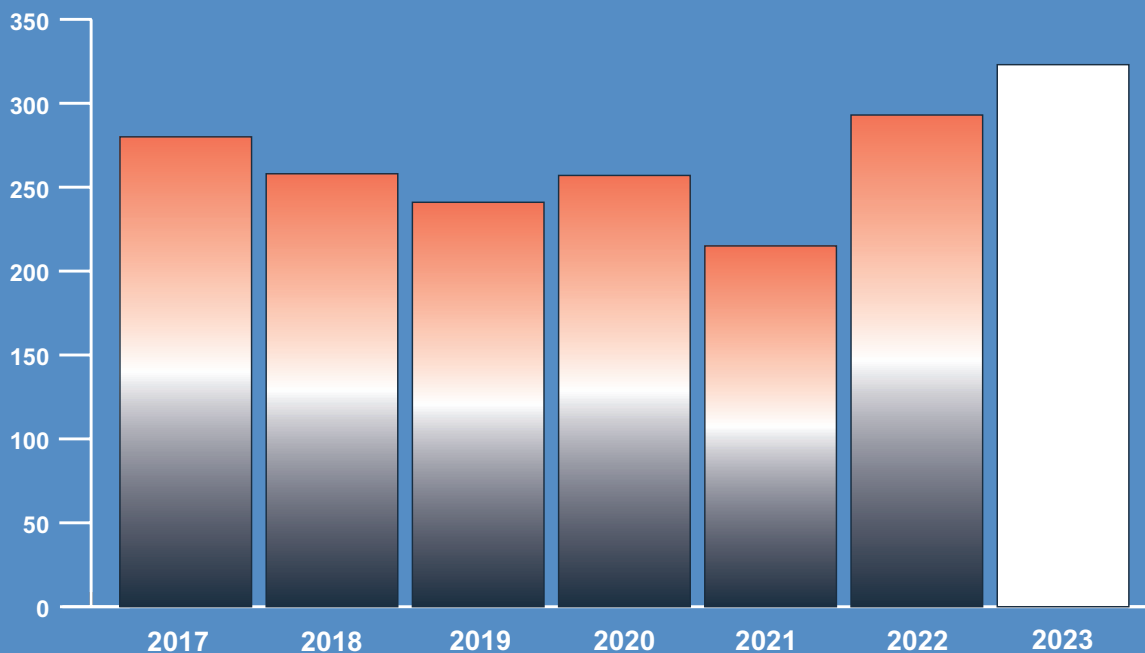
Consumer Products in US, Canada, EU

Key Take-Aways for 2023

- Recall numbers rising substantially.
- Most CPSC recalls in past 7 years.
- Over 134 million units of products recalled in US under CPSC. 108 million units were from only 10 recalls.
- 63% more EU consumer product notifications in 2023 than 2022.
- Health Canada – highest number of recalls in past 7 years.

US CPSC

US CPSC Product Recalls

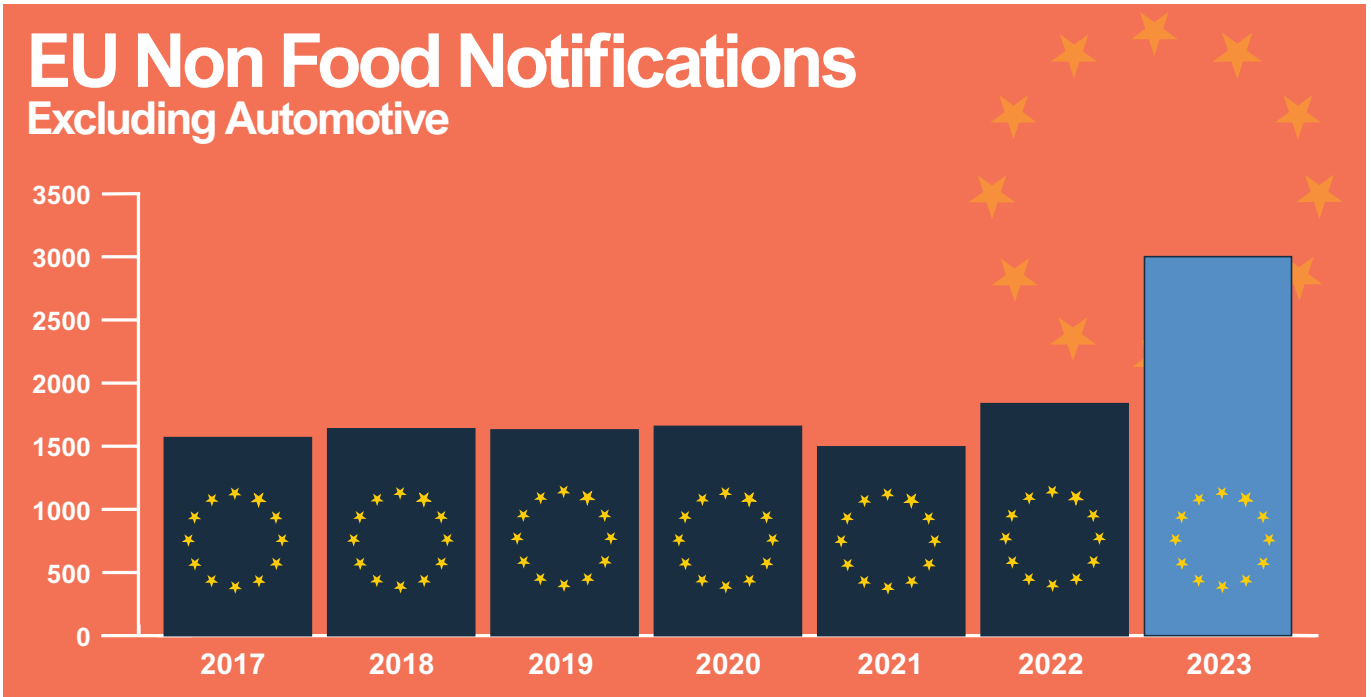


- US CPSC data shows a significant increase in number of recalls and alerts.
- There were over 10% more recalls than 2022 and that year was already a record high year in the US.
- There were over 134 million units of consumer products recalled in the US in 2023 with an average of over 400,000 per recall.
- In 2023 the raw data showed that there were over 17000 total reported issues / incidents with a product giving an average of 55 reports per recall event.

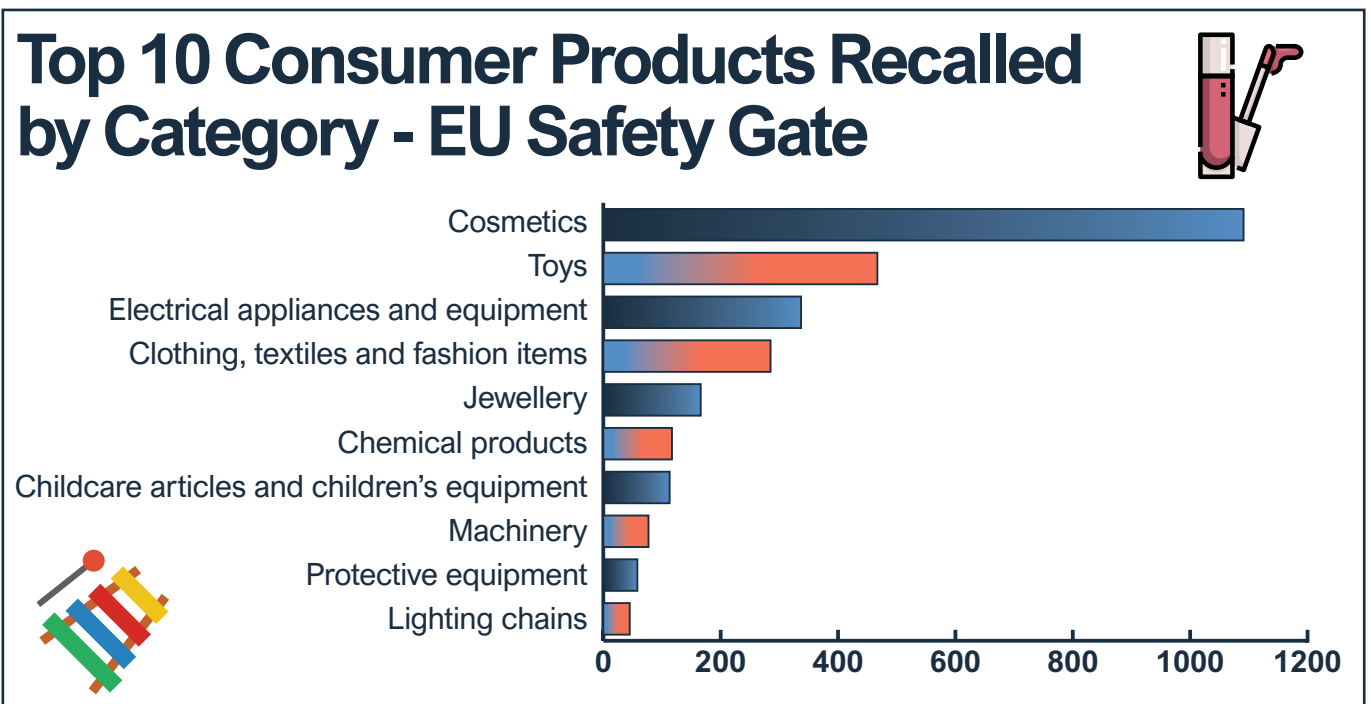


EU Safety Gate

- EU Safety Gate (formerly RAPEX) has shown a marked rise with a dramatic, over 63% increase on 2022 figures. From the graph below it can be seen that 2023 was an exceptional year.
- Cosmetics recalls went from just over 200 in 2022 to over a thousand in 2023, mainly caused by large scale perfume recalls due to an unapproved ingredient, BMHCA, which was banned in 2022.

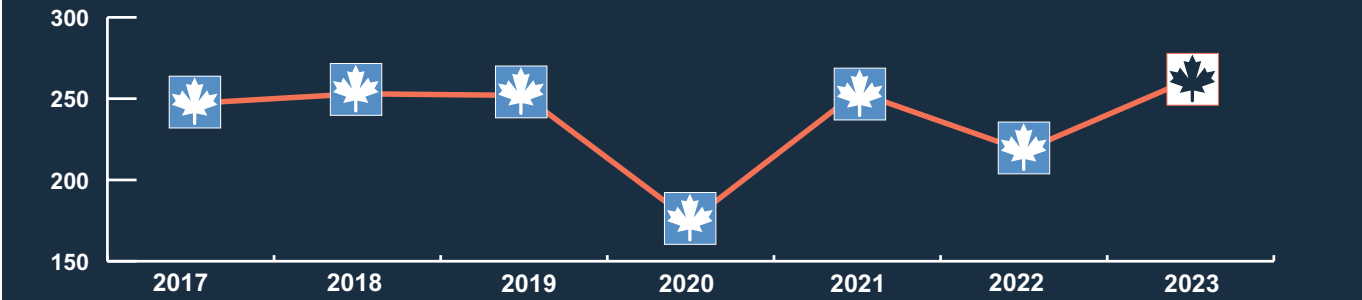


- As mentioned, the leading product category was cosmetics accounting for over a third of all the notifications. Toys is second followed by electrical appliances and equipment. Clothing and textiles which historically often had one of the highest number of recalls comes 4th. Those 4 categories are responsible for over 70% of the total notifications.



Canada

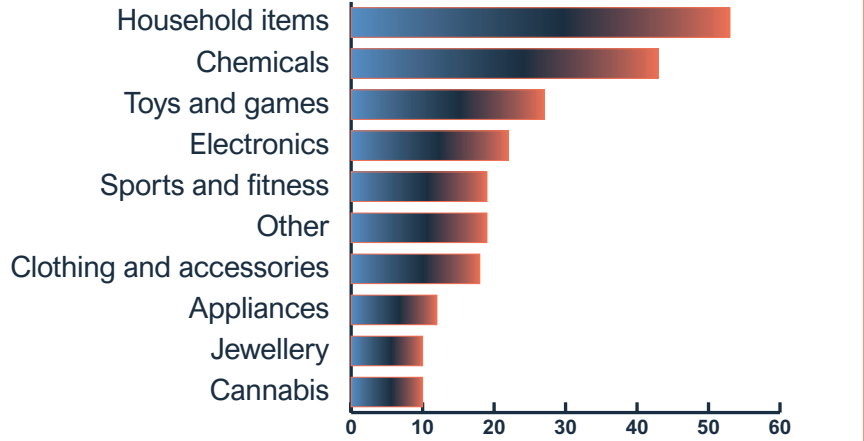
Number of Consumer Product Recalls (Canada)



- Canadian recalls of consumer products ended 2023 at the highest since our records began in 2017.
- There were quite a few more recalls in the second half of 2023. If the number of recalls in the first half had been repeated, the yearly

total would have been 5th highest out of the last 7 years. This highlights how recalls can be unpredictable even at an individual company level, just because there have been no recent recalls, doesn't mean there won't be any in the future.

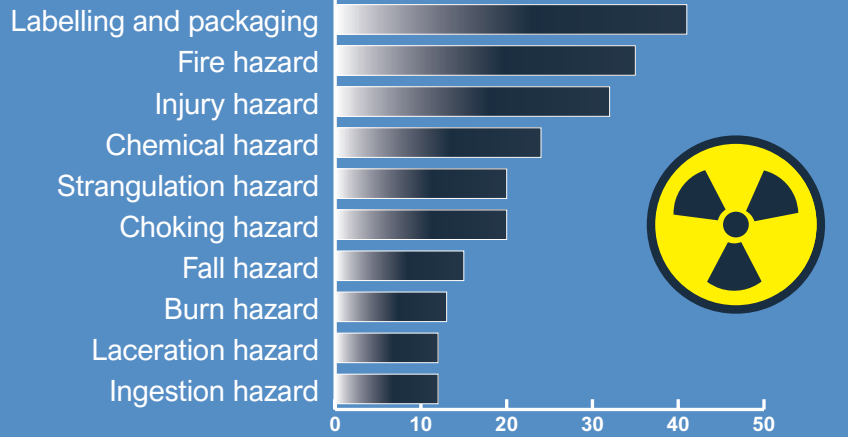
Top 10 Product Categories - Canada Consumer Products 2023



- Household items were the leading cause for recalls, these include furniture, small appliances, home furnishings and kitchenware closely followed by chemicals.

- Interestingly for Canada, Cannabis (i.e. pre-rolls, edibles, vape cartridges and extract) specifically is called out and hits the top ten just creeping in at the bottom of the chart.

Top 10 Reasons for Recall - Canada Consumer Products 2023



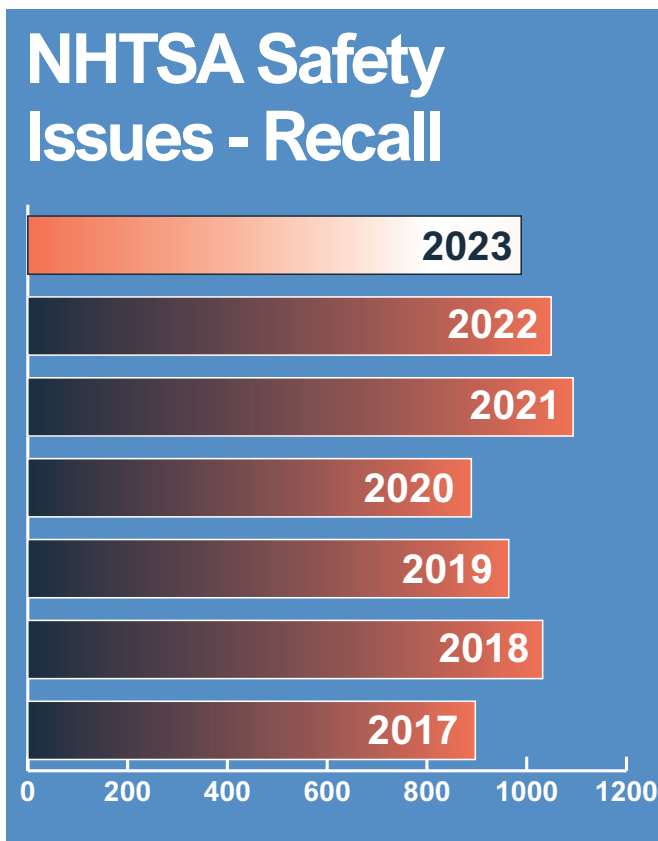
- The leading cause for recall in this data was labelling and packaging followed by a list of specific hazards which could cause harm to

consumers. Arguably the labelling and packaging failures should be the easiest to prevent when applying the Never Events principle.

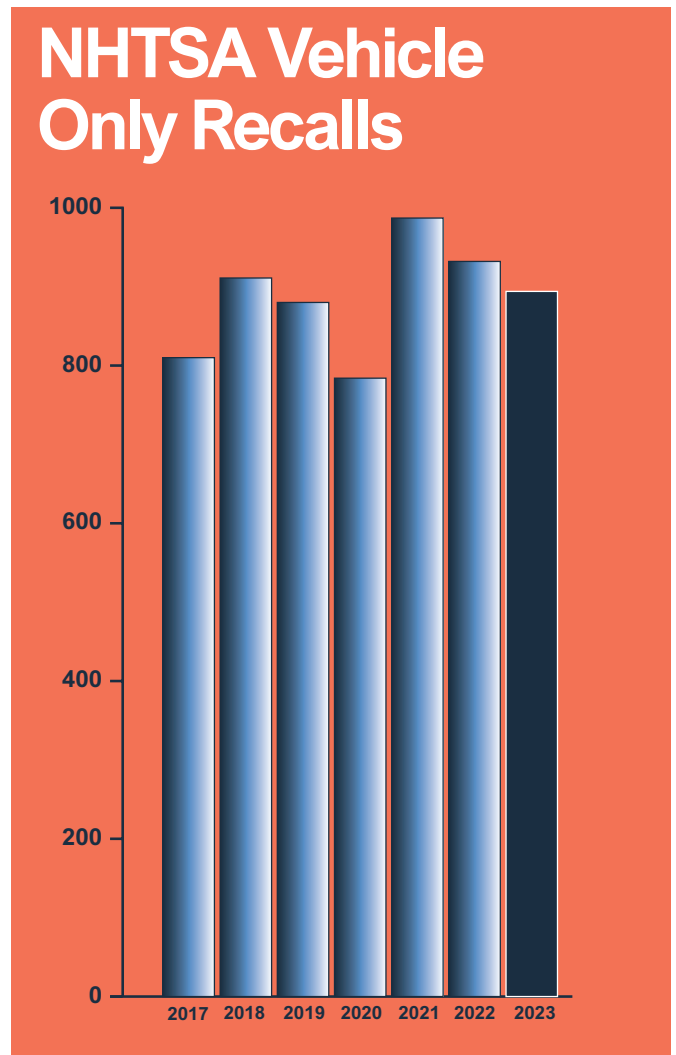
Automotive in US, Canada, UK, EU, Australia

Key Take-Aways for 2023

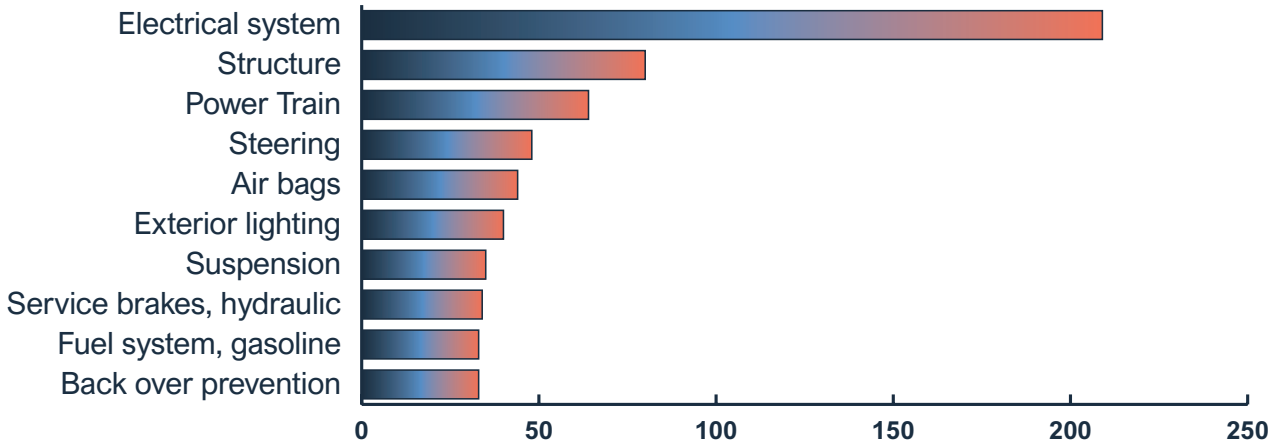
- Automotive recall numbers reported by NHTSA and the UK were down on 2022 whilst Australia, Canada and the EU were up.
- NHTSA reported over 39 million potentially affected units in 2023 with an average of over 40k units per recall event.
- The UK DVSA has reported the lowest number of Vehicle and Equipment recalls since before 2017.
- Although EU Safety Gate Automotive recalls are up on 2022, it is still the second lowest total since our data began in 2017 and significantly lower than the peak in 2021.
- Australian vehicle recall numbers are the second lowest level since 2018.



The third year in a row where the number of NHTSA recalls has reduced. When this happened previously in 2018 to 2020, there was a big jump in the following year. Will 2024 be a big year for NHTSA recalls?



NHTSA 2023 Recalls by Component at Fault

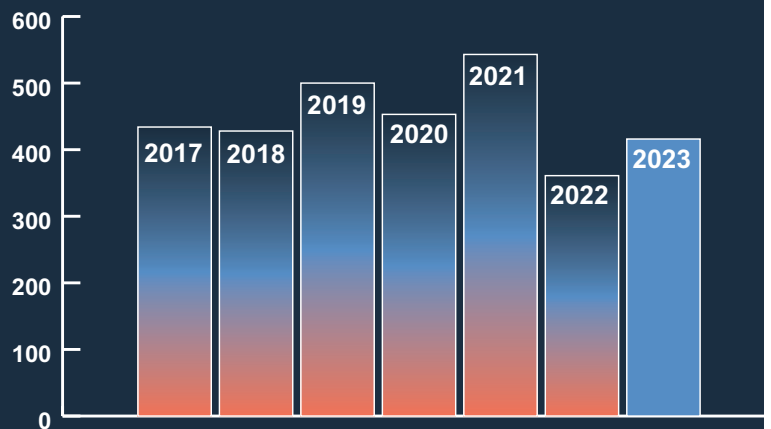


In 2023 the electrical system was responsible for the most recalls. This is common as it is a wide category that affects many aspects of the vehicles.

NHTSA does not classify “software” as a component and so it does not list software

as a “component at fault”. However, software errors are of course responsible for recalls. For example, in 2023 a recall where brakes was listed as the component, was due to settings on the ABS control module software, potentially resulting in delayed braking.

EU Safety Gate - Motor Vehicles Recalls



2023 was the year with the second lowest number of automotive recalls in the past 7 years.

The EU system identifies the risk type in relation to the component failure. Not surprisingly, “injuries” and “fire” are the two highest risks or potential injury types from the automotive recalls in 2023.

The EU Safety Gate reports automotive recalls that are due to failures in components or manufacturing. This also includes recalls that are the result of software errors which can result in safety issues, or even environmental risks.

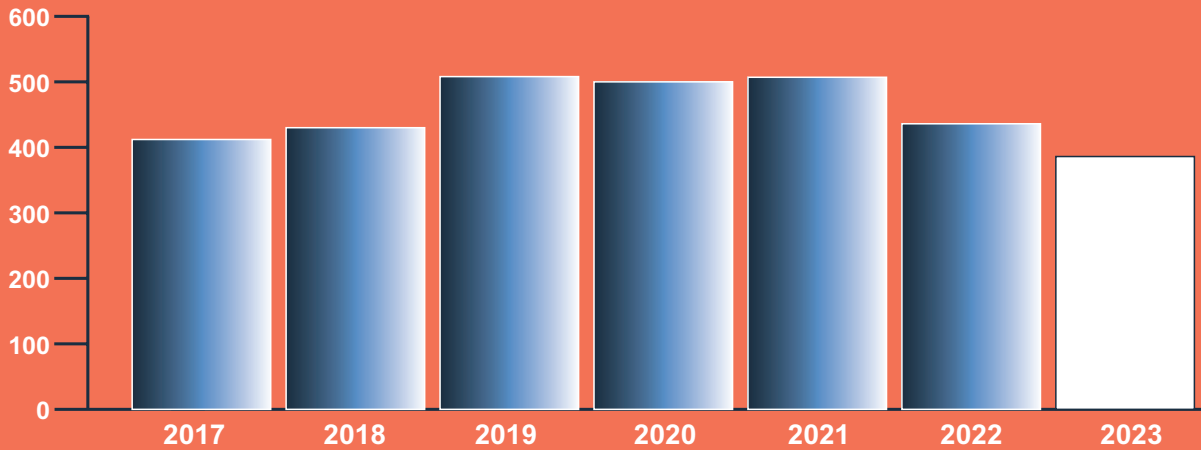
For example:

“A software error in the brake control module can lead to a loss of braking power, creating a risk of an accident”.

“Due to a software error, the light beam is adjusted upwards. This may result in other road users being dazzled, increasing the risk of an accident”.

“A software error in the engine control unit prevents the malfunction indicator light (MIL) from switching on if the urea injector stops working. This can lead to higher emissions and poses a risk to the environment”.

UK DVSA - Vehicle and Equipment Recalls by Event

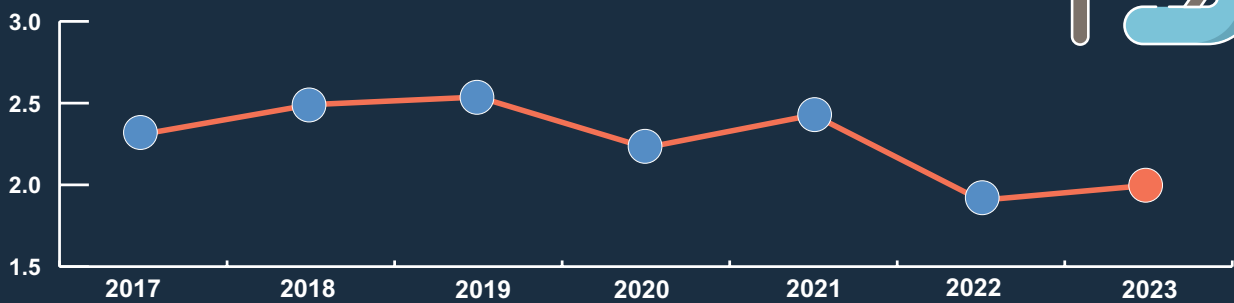


- Due to the international nature of automotive manufacture, recalls in one territory may also impact other territories. Similarly, due to combined supply chains and large OEMs producing a range of different, but similar makes and models, failure of a commonly used component can impact multiple different models and brands. This is certainly seen in UK recalls.
- In one UK reported recall event, 26 different models of the same OEM were recalled due to the same issue with an airbag.
- There was one recall event that involved three different car makes (all part of the same OEM).

This was due to an error in software related to the EV battery control unit. Again highlighting that software is a key issue and because it can be applied across multiple makes and models, which can result in larger recalls if errors occur. Of course, if the software can be fixed OTA (over the air) then this reduces the impact of such recalls.

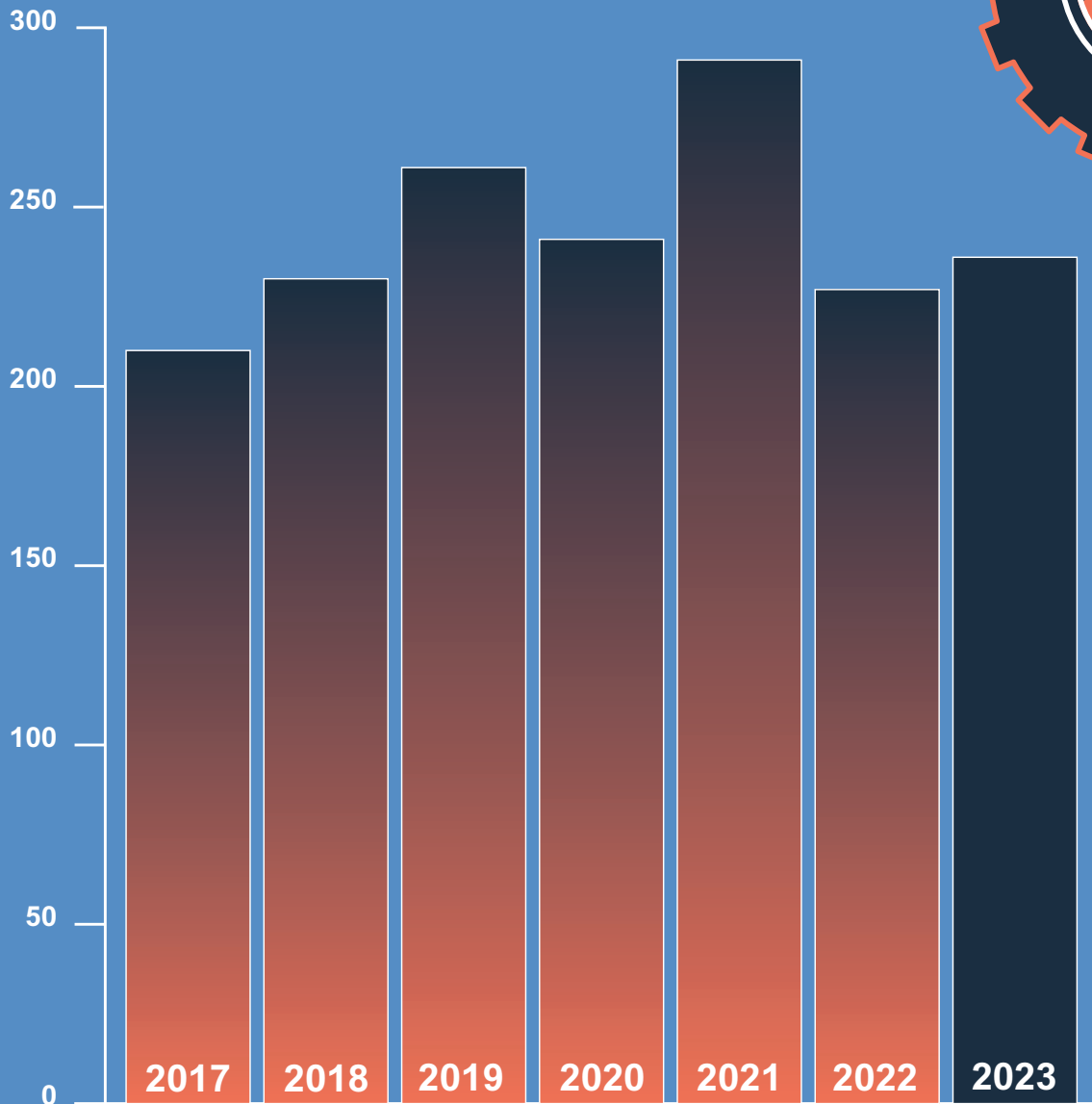
- Note, this data is reported by unique event ID occurrence and does not count total number of recalls published (e.g. where recalls are expanded or amended this would not change the count in the numbers shown).

Average Number of DVSA Reports per Recall Event



This graph shows the number of reports per recall event. The DVSA submit a separate report for each model recalled by a company but uses the same event ID much like FDA's different products per unique event ID. The average for 2023 is 2, at the low end of what has been seen in recent years.

Vehicle Recalls Australia 2017-2023

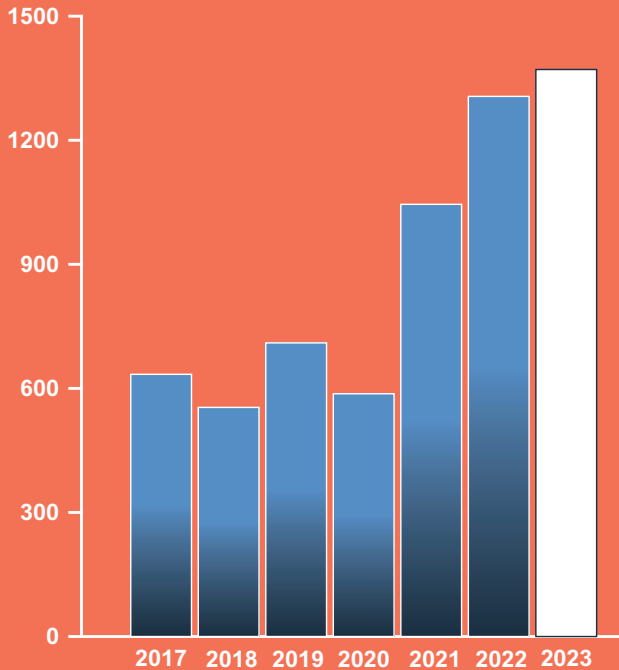


Failures due to faulty automotive components or manufacturing errors can result in serious safety recalls. However, it is not always failure of the high profile components such as brakes or airbags that lead to a safety issue. One example from Australia in 2023 highlights this:

Over 5000 vehicles were recalled because of a manufacturing defect. “The carpet underlay

may be positioned between the nut and the electrical ground stud. If the nut loosens overtime due to vibrations whilst driving, it could cause the wiring beneath the floor to overheat and it may result in a fire inside the vehicle”. A reminder of the complexity of automotive vehicles, but also that safety issues can occur due to relatively simple failures such as a nut loosening.

Canada Vehicle Recalls



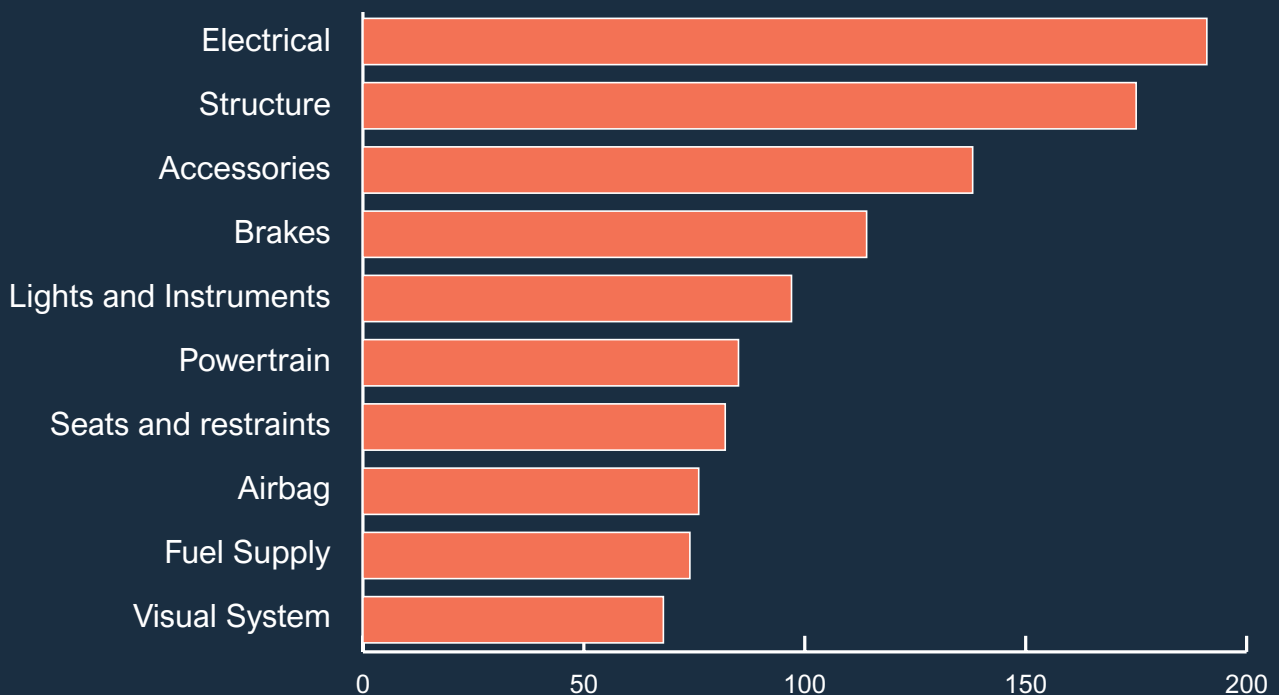
Canada is showing the strongest upward trend of all the territories we have assessed. 2023 was the 4th year in a row of increased automotive recall numbers from Transport Canada.

Similar to the NHTSA data, the Transport Canada league table for “component at fault” shows electrical system as the component category causing most recalls with “structure” coming second.

Software issues are also relevant, one example being, “a software problem could cause the lower beam headlamps not to turn on as it becomes dark”.



Component at Fault - Canada Vehicle Recalls 2023



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