



Assemble recall management team

- » Designate executives responsible for decision-making, technical advisory, customer relations, media communications and legal processes.

Identify defect

- » Create an internal document capturing product details including nature of the defect, quantity manufactured, dates and channels of distribution, etc.

Get recall management procedure underway

Identify products to be recalled

- » Identify the likely location of the defective products (i.e. with distributors, end consumers etc.).
- » Identify, segregate and detain defective products which are in your control (i.e. on-site, warehoused etc.).

Handle recalled products

- » Repair, replace or repossess and destroy.
- » Designate a drop off point for surrender of products.
- » If a company technician is required to remove an installed product, specify details to register a service request.

Distribute information

» Regulators

- » Inform the relevant regulatory authority in writing of the defect and remedial measures being undertaken. Reporting in prescribed format is mandated in certain sectors (such as for food products and medical devices) and is undertaken as industry practice in others (such as automobiles). Inform the Bureau of Indian Standards (BIS) if your product holds a Standard Mark.

» Customers

- » Issue a press release and/or paid advertisement, and put in place a telephone hotline to handle enquiries.
- » While sending communications using telecom resources, be mindful of regulations prohibiting Unsolicited Commercial Communications.

» Supply chain

- » Direct retailers, stockists etc., through written communication not to further distribute the defective product.

Control defective product

- » Set up an electronic database to identify accounts that received the defective product (i.e. manufacturer, distributor, retailer accounts).
- » Update records to monitor and reconcile quantities distributed and products attended to.
- » Recover all recalled products to a central site, and arrange for these to be effectively destroyed.

Control communications

- » Filter all messaging through your legal department, and control statements made on public record.

Abide by privacy and data protection obligations

- » Ensure, at each stage, that all communication of third party personal information and protected data is in compliance with applicable Indian privacy laws.

Prepare for claims

- » Be prepared for legal actions. Brief legal counsel as soon as possible and keep them in the loop on the recall processes.
- » Put contingency plans in place to handle civil claims (civil compensation, damages, tort claims) and criminal actions (if death or injury is caused).
- » Preserve documents and information for your defence. Maintain a list of all available information and officers who will corroborate it.

