Product Recall Report

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

Key Take-Aways for 2024

- The number of recalls and alerts have -• Fruit & Veg was the category with highest increased in EU RASFF, UK FSA, Australia and New Zealand.
- US FDA food recall events in 2024 were virtually the same in number to the 4 year high seen in 2023. However the number of different products recalled within those events fell by 34% this year.
- There has been an 80% increase in the number of FDA recall events caused by microbiological contamination whilst the average number of different products that each event affected fell significantly.
- Despite a reduction in the number of Class I & II recalls for the USDA the average number of different products recalled per event was 25.
- Highest number of EU food RASFF notifications in past 8 years.

- number of RASFF Alerts by a significant margin.
- UK FSA alerts remained low in 2024 however the number of products recalled per event is 2.5 times higher than 2023 with just 3 alerts implicating 424 products.
- Allergen related labelling errors were the top cause of recall for both the FSA and FSANZ Australia.
- Both Australia and New Zealand saw their largest recall figures since 2020.
- The average proportion of recalls that are "Never Events" across all regions is just over a quarter.
- · Variation seen globally may be influenced by: Growing/processing techniques, Market surveillance, Regulatory resources, Legislative requirements, Risk assessment, Risk appetite, Innovation, Consumer trends.



"Number of different products recalled" versus "Product quantity affected"?

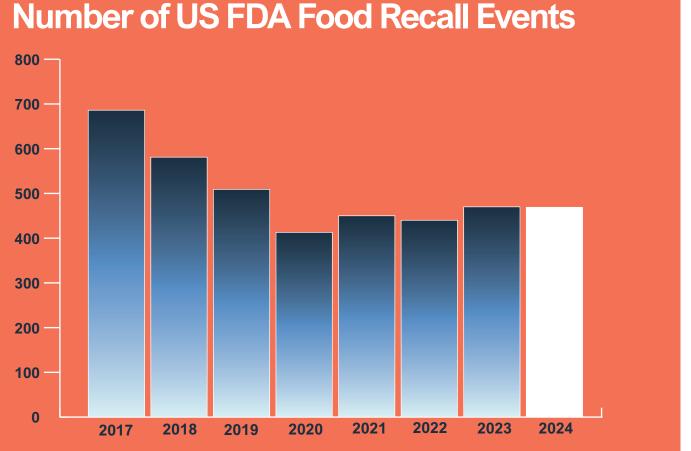
In our analysis of food recalls, we often assess the number of different products impacted by a recall event. This is reported directly by the US FDA but for other agencies we have extracted the different products metric via data analysis.

An example would be contaminated onions where the onions have been used in a number of different products such as pizzas, sandwiches, salads and ready to cook lasagne meals. Each of these counts as a different product. If different brands of pizza are impacted, this also counts as a different product. This is very different from the number of units impacted. The product quantity affected is sometimes referenced by the FDA such as number of units or cases or packs, and sometimes it is not quoted at all. It is rarely quoted by non-US agencies so the total number of units impacted by recalls in a year cannot be determined accurately. We therefore rely on the "number of different products" which is either reported by the agency or we can determine it via our analysis.

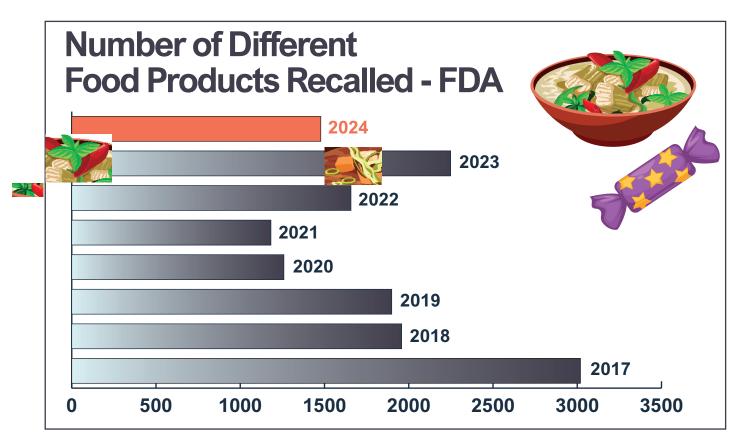


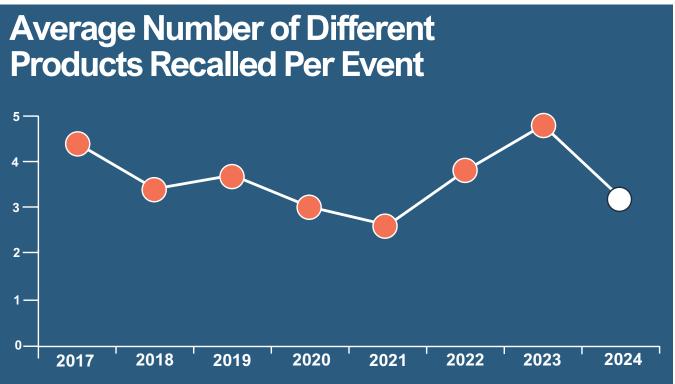
FDA

• In 2024 FDA recall event numbers remained consistent with 2023's figures which were the highest in 5 years.



• Looking at the number of different food products recalled from all FDA food recall events, the rise in product numbers back in 2023 has not continued into 2024. In fact, there has been a 34% reduction in the number of different products recalled resulting in a reduction in the average products per event as displayed in the two graphs below.





• A number of largescale recalls due to listeria monocytogenes contamination led to the spike in 2023. Interestingly, there have been more

recalls due to microbiological contamination in 2024 than 2023. More on this later...



FDA Recalls – Product Category Top 10

• Confectionery has regained it's top spot as the leading recalled product category with Cereal & Bakery products now a very close second.

Product type	2024 position	2023 position	Change from 2023
Confectionery	1	2	🕇 UP
Cereals & Bakery	2	4	🕇 UP
Prepared dishes, pasta, noodles	3	1	🕂 DOWN
Fruit & Veg	4	3	🕂 DOWN
Non alcoholic beverages	5	10	🔶 UP
Dairy	6	17	🕇 UP
Soups, Broths, Sauces & Condiments	7	9	🔶 UP
Nuts, seeds & snacks	8	5	🕂 DOWN
Nutritional products	9	7	🕂 DOWN
Food additives & flavourings	10	17	↑ UP

 As the table below shows, microbiology was the number one cause of FDA food products to be recalled. This has been consistent across many years as a single ingredient or components have the potential to be used in many different finished products.

Recalled Products by Contaminant type	2024 position	2023 position	Change from 2023	\sim
Microbiology	1	1	NO CHANGE	
Allergens	2	2	NO CHANGE	
Foreign body	3	3	NO CHANGE	
Processing error	4	6	UP	
Unapproved Product	5	7	UP	









- Although products recalled for allergen issues are second in line, it continues 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 percentage of all recalled products that have been the result of a 'Never Event' has decreased in 2024 down to 27%.

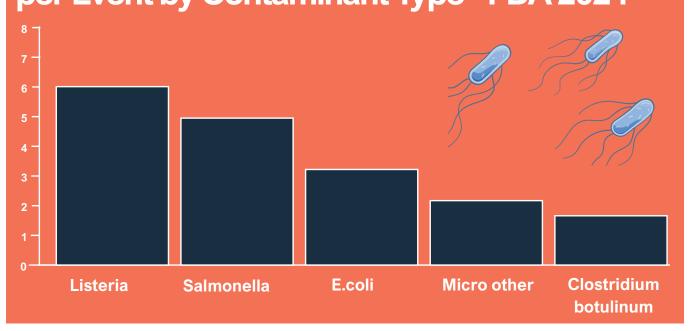
Note: A 'Never Event' recall is defined by RQA as a recall that can cause serious harm and should be easily prevented. E.g. Wrong label on pack or product put in wrong packaging with allergen safety implications.



- As displayed in the table below, there has been an 80% increase in the number of recall events caused by microbiological contamination Interestingly and despite the increase, it's resulted in 426 fewer recalled products this year. The average number of products recalled per micro event is now significantly lower than in 2023, demonstrating the difference only a few largescale recalls can make.
- There could be several reasons for the increase in recalls caused by microbiological contamination:
 - Detection methods improving
 - An inability for manufacturers to prevent food pathogens and subsequently regulators overreacting to manufacturers dealing with contamination
 - High profile cases bringing greater scrutiny to food manufacturing¹.

Microbiological Recalls	Total Events	Number of Different Products	Average Number of Products Per Event
2023	80	1141	14.3
2024	144	715	5.0

Average Number of Food Products Recalled per Event by Contaminant Type - FDA 2024



 Unsurprisingly, Listeria monocytogenes has affected the largest number of food products per recall but only by a small margin compared with last year's figures. As listeria tends to favour cold and damp environments it is usually associated with fresh salad, produce and ready to eat foods. Because these have a tendency to have multiple, similar SKUs e.g. lettuce and cucumbers going in as components to sandwiches and salads in multiple varieties, then it is no surprise that these tend to drive higher recall numbers in this data set. Additionally, pressures on clean downs, turnarounds and change overs may be challenged thereby reducing the necessary 'fire-break' style cleans to knock back growth and contamination to a not detected level in product. Note the requirements for listeria to be not detected in the US was more stringent than for other agencies.

1. Bacteria food recalls reach five-year high in 2024

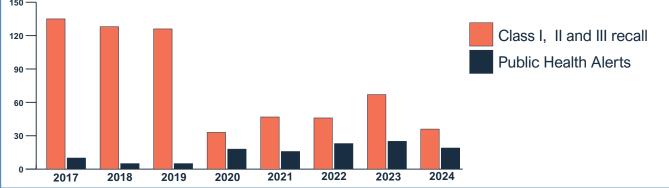


USDA

- In the USDA Class I and II recall category, total numbers are now the lowest since 2020 with a 46% reduction on last year's figures and 3.5 times less than pre-pandemic levels.
- FSIS Public Health Alerts is a category we also monitor as shown in the graph below but this may double count recalls already posted as class 1 or 2 or be where no product is on the market. This figure is also less than in previous years.

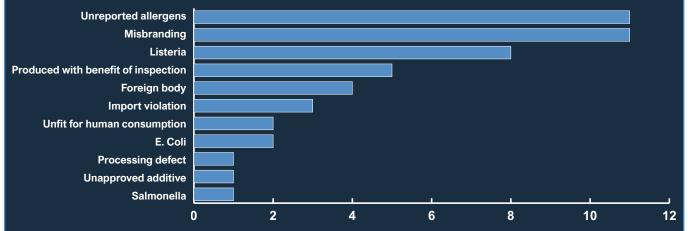
DEFINITION: The Food Safety and Inspection Service (FSIS) issues Public Health Alerts to inform the public about potential health risks in cases where a recall cannot be recommended. For example, FSIS may be aware of an outbreak of foodborne illness, but the source has not yet been identified. Or, illnesses may occur due to improper handling of a particular product, and FSIS may issue an alert to remind consumers of safe food handling practices.²

Number of USDA Recalls 2017 - 2024



 Our analysis found that there were a total of 890 different products recalled across the 36 Class I and II recall events. In fact, the highest number of different products in a single recall event was 482! • This gives us an average of 24.7 different products per event, the highest of any food agency we have reviewed.

Causes of USDA Class I & II Recalls 2024



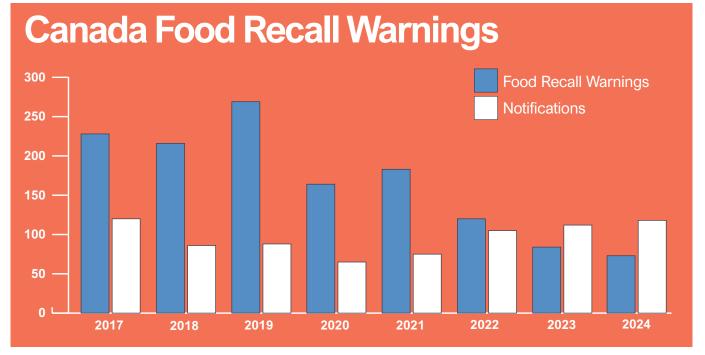
The most prominent issue causing USDA recalls is misbranding and unreported allergens either by contamination or a labelling error.

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



Canada - CFIA

CFIA Food Recall Warnings have been trending downwards for over a decade now. In 2014, the annual food recall figure was 507, in 2024 only 73 were recorded. The total number of different products affected by food recalls were 415 giving an average of 5.7 per recall event which is more than last year's 3.8 so despite there being fewer recall warnings, they affected 87 more products.



 Breaking down the data into cause, microbiology still dominates the landscape; with listeria being the most prevalent again in 2024. Canada also saw a relatively low number of Never Events, making up only 15% of all food recall warnings.



Clostridium botulinum

Bacteria other & (micro) parasites / protozoa

n

5

10

15

20

25

roup

F Coli

As you can see from the below table Fruit & Veg continues to be the leading category recalled for food safety warnings. A couple of notable jumps from prepared dishes and cereal & bakery categories.

Product type	2024 position	2025 position	Change from 2023
Fruit & veg	1	1	NO CHANGE
Prepared dishes, pasta, noodles	2	4	🚹 UP
Confectionery	3	3	NO CHANGE
Meat and meat products (other than poultry)	4	9	🚹 UP
Cereals & bakery	5	12	JOWN
Nuts, seeds & snacks	6	7	🚹 UP
Seafood	7	10	🚹 UP
Non alcoholic beverages	8	6	JOWN
Soups, broths, sauces & condiments	9	5	🛃 DOWN
Nutritional product	10	14	T UP

*graph based on RQA Classification

UK - FSA

• UK FSA 2024 recall numbers maintained the lower trend seen in 2023.



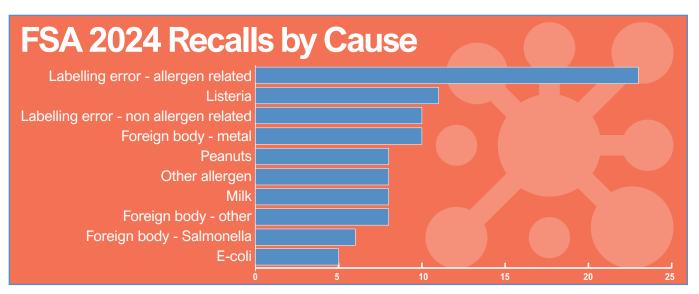
 These figures demonstrate the number of unique alerts (excluding updates). This avoids artificially inflating the total annual figure by including "alert updates" that may only include updated lists of batch codes affected. Therefore, it looks on the surface to be a fairly unremarkable year for UK recalls; It's only when examining the size of the recalls that a different picture emerges.

	2023	2024
Total Products	293	766
Average Number of Products per Alert	2.6	6.7

The number of different products recalled is not a metric summarised by the FSA on their website and so this analysis was conducted by RQA counting the number of products implicated in each recall alert and it's updates.

- This table above demonstrates that there has been a serious increase in the number of products affected. There were 473 more different products recalled in 2024 than there were in 2023, resulting in a 2.5 times increase in the average number of products implicated in a recall event.
- The rise is largely due to a few largescale recall alerts; just 3 alerts were responsible for 424 of those products.





• Allergen recalls remain the leading cause of FSA alerts with Listeria in second. Non-allergen related labelling errors and metal foreign body contamination are equal 3rd.

Product type	2024 position	2023 position	Change from 2022
Prepared dishes, pasta, noodles	1	2	🚹 UP
Confectionery	2	1	DOWN
Meat and meat products	3	6	🚹 UP
Soups, broths, sauces & condiments	4	3	DOWN
Nuts, seeds & snacks	5	7	🚹 UP
Cereals & bakery	=6	5	DOWN
Dairy	=6	4	🚹 UP
Fruit & veg	8	12	🚹 UP
Non-alcoholic beverages	9	10	🚹 UP
Seafood	10	14	UP

 The product category totals show a familiar picture of prepared dishes and confectionery proving the most commonly recalled. Interestingly, FSA alerts do not continue the



trend seen elsewhere of fruit & veg recalls being in the top 3.

• Meat and Meat products have also made a notable rise.



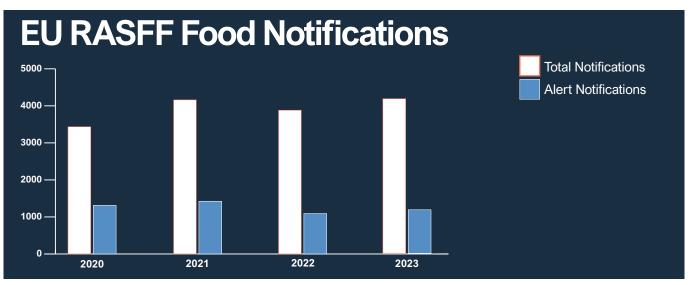
- Never Event mislabelling alerts have historically accounted for over 40% and 50% of overall recall alerts. However, in the past 2 years there has been a good reduction.
- Is it that Never Events are becoming less common or is it possible that Never Events are becoming harder to spot from the information that is released by the FSA? The recall will cite the issue but not always the root cause making identifying Never Events more difficult to detect!

EU RASFF

- There has been a 15% increase overall in RASFF food notifications; an unprecedented change that has seen notifications figures greater than any other year in our records by a comfortable margin.
- Contrastingly, the number of alert notifications (in blue in the graph below) which are the most serious type, have remained fairly consistent.
- 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

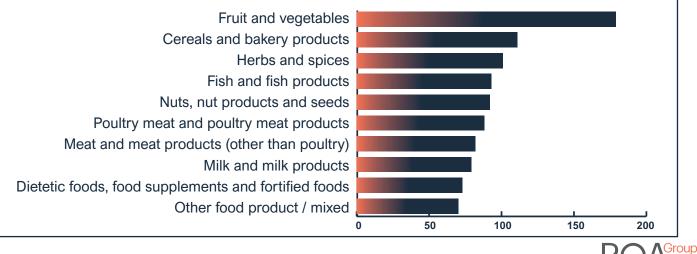
some of this data is logged and classified, as would be expected by such a broad landscape, which adds to the complexity of any analysis on the whole.

 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 these EU data. Also, not all notifications are recalls – notifications may be alerts, border rejections, new and others.



• The top category for alerts (as defined on RASFF) was Fruit & Veg by a fair margin, infact it equated to 14% of all alert notifications.

Top 10 Product Categories Recalled in 2024 - RASFF Food Alert Notifications



Australia

• Australia's recall numbers, reported by FSANZ, are the highest since 2020.



FSANZ 2024 Food Recalls Top 10 Product Categories



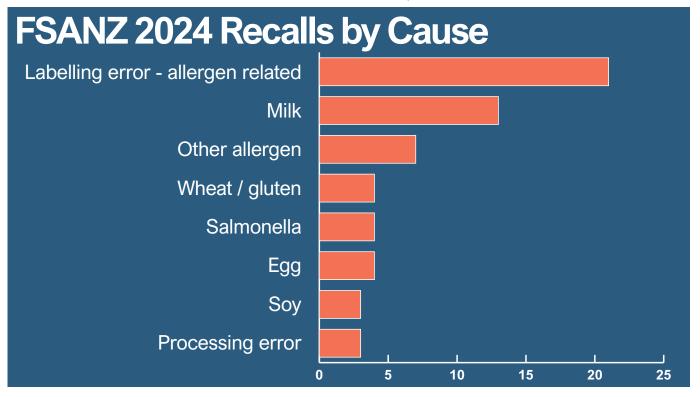
- RQA's classification showed that a quarter of the year's recalls were for prepared dishes, pasta and noodles.
- Again in 2024, Australia had allergenic labelling errors as the leading cause. In fact, they had the highest proportion of Never Events of any of the regions we analysed at 28%.

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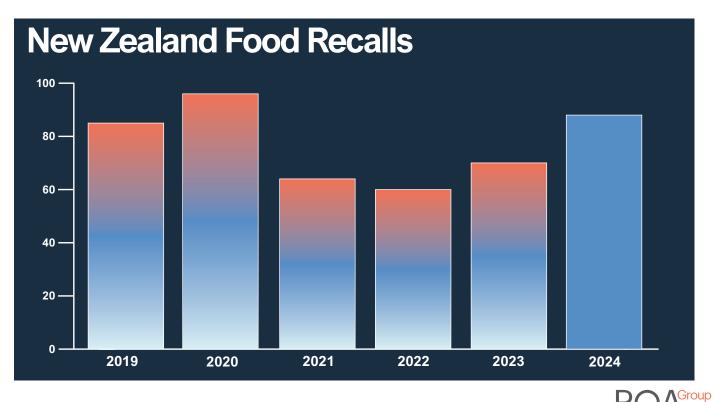
 It is also noteworthy that the recall landscape has been entirely dominated by allergens which is inconsistent with other regions which have a much greater presence of microbiological recalls. In 2023, the most prevalent microbiological cause (Listeria) was in 4th place in the leaderboard, all places above were allergen contamination and allergen mislabelling.

• In 2024, the first non-allergen cause is Salmonella in 5th place.



New Zealand

The number of food recalls reported in New Zealand has also risen this year and is the highest since 2020.



Consumer Products in US, Canada, EU

Key Take-Aways for 2024

- Recall numbers are remaining high across all regions
- US CPSC has recorded the 2nd highest recall figures since our records began in 2017.
- Over 127 million units of products recalled in US under CPSC.

US CPSC

- **US CPSC** Product Recalls 350 300 250 200 150 -100 -**50** 0 2017 2018 2019 2020 2021 2022 2023 2024

- US CPSC data shows a slight decrease on the peak seen in 2023 but still one of the highest years for recalls in recent times.
- US CPSC appears to be undergoing some work on their recall notification platform and possible scope for further analysis in future editions.
- There were over 127 million units of consumer products recalled in the US this year which was a decrease on 2023's figures. However the average number of units affected per recall was remarkably consistent at over 400,000 per recall event.

There was a 26% increase in EU Safety Gate

Health Canada – highest number of recalls in

(excluding automotive) recalls this year.

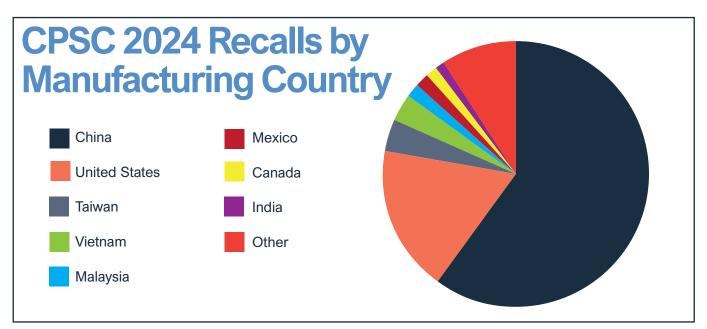
past 8 years.



16

Number of units affected (in USA only)	2023	2024
Average units affected per recall event	41,632,28	4,169,68
Total units recalled	134,474,017	127,175,371

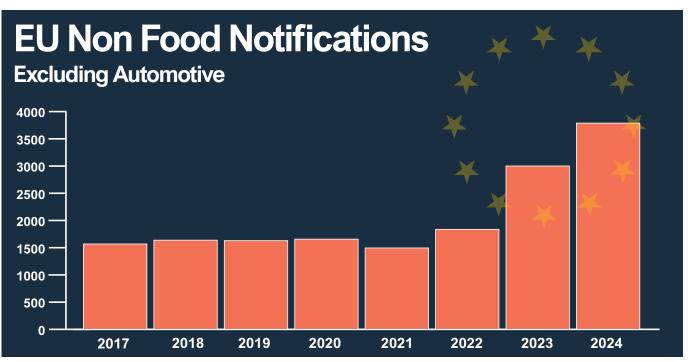
• 60% of the products recalled were manufactured in China and 18% in the United States. See below pie chart.



EU Safety Gate

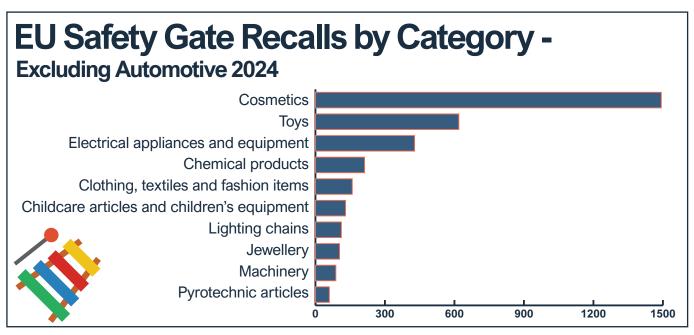
• EU Safety Gate has shown another substantial increase despite the incredibly high record set in 2023.

There was a 26% increase on 2023's total and these notifications have more than doubled since 2022.



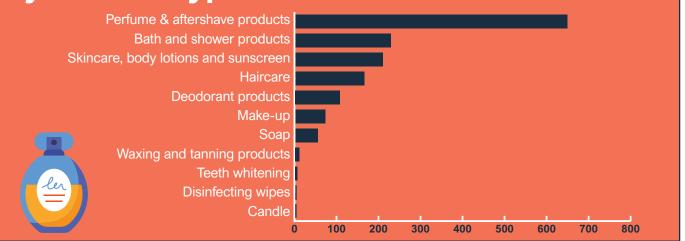


When we examine why, it's clear to see that Cosmetics are dominating the landscape of consumer products recalls again this year. Still, toys and electrical items are also leading to hundreds of notifications within the EU which is consistent across all regions we analyse.

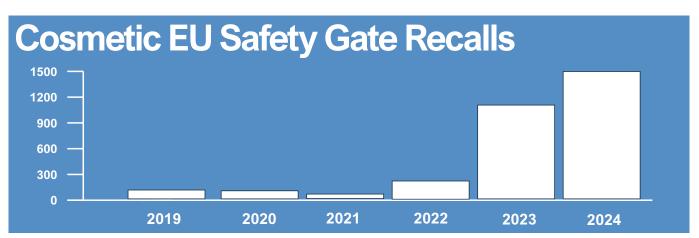


We've explored which products within the category of cosmetics are causing the most issues by assigning an additional product subcategory seen in the graph below.

EU Safety Gate Cosmetic Recalls 2024 by Product Type

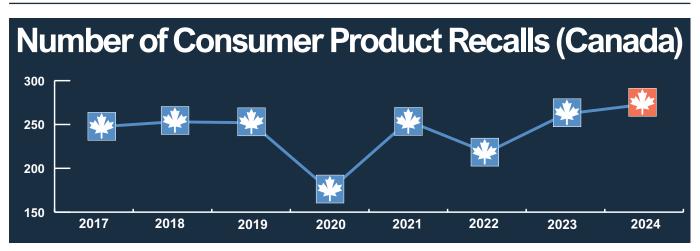


As we can see, perfume and aftershave products have dominated cosmetics recalls for the second year in a row. 636 of the 647 perfume recalls have the same or similar cause attributed, which references the presence of "2-(4-tert-butylbenzyl) propionaldehyde (BMHCA) and hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC)". These products were prohibited for use in cosmetics in this 2021 EU regulatory amendment which came into force in March 2022. <u>Click here to review</u> <u>amendment</u>. As a result, we can see in the graph below that incidents related to cosmetics skyrocketed. From being one of the smaller contributors to the annual recall figures to being the leading recalled category, this is just one example of how costly it can be to not keep up to date with the latest in regulatory compliance. As these products become higher risk within consumer product manufacturing, the issue can intensify with further testing on these products from businesses and regulators.



If you need help staying on top of regulatory changes that should be picked up on your horizon scanning, then <u>get in touch</u> and find out more about our customised quarterly horizon scanning summaries and coaching sessions.

Canada



• Canadian recalls of consumer products ended 2024 at the highest in 8 years.



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



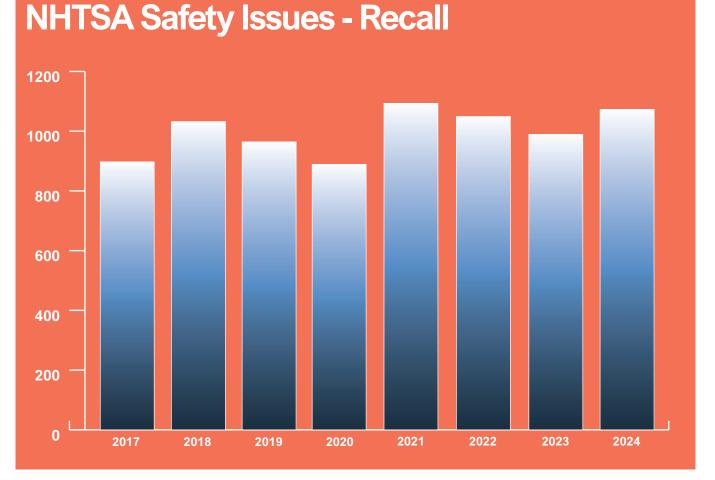
Automotive in US, Canada, UK, EU, Australia

Key Take-Aways for 2024

- Automotive recall numbers reported by NHTSA and UK showed an increase whereas Canada figures were significantly lower than in previous years.
- NTHSA report a potential of over 34 million units affected in 2024 with an average of over

32k units per recall event.

- The average number of UK DVSA reports per unique recall event was up in 2024.
- The number of EU Safety Gate Automotive recalls showed a decrease in 2024.



- Last year we theorised that it would be a big year for recalls in 2024 and that has been true with recall figures recovering from their dip in 2023.
- Interestingly, around 5 million less potentially affected units were reported and an average units per recall stands at around 8,000 less than in 2023 at 32,616 per recall event.







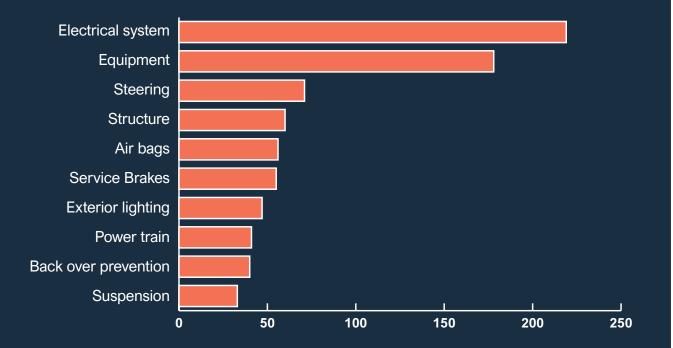






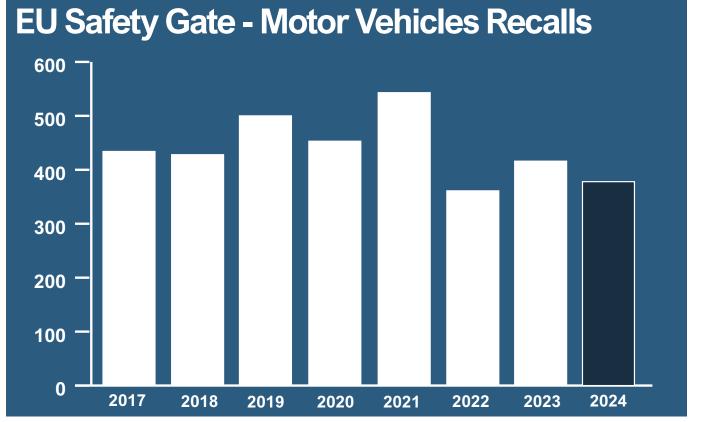


Top 10 Components at Fault -NHTSA Recalls 2024



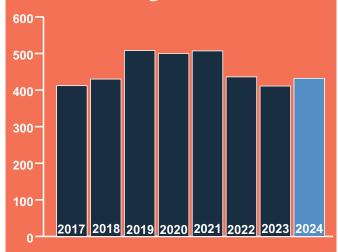
In 2023 the electrical system was responsible for the most recalls. This is common as it is a wide category that affects many aspects of the vehicles. NHTSA does not classify "software" as a component and so it does not list software as a "component at fault". However, we know that many of the electric system recalls will be attributed to software errors.

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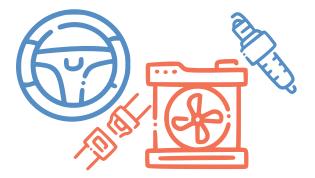


2023 ended with second lowest number of automotive recalls in the past 7 years, 2024 is lower still.

UK DVSA - Vehicle and Equipment Recalls by Event



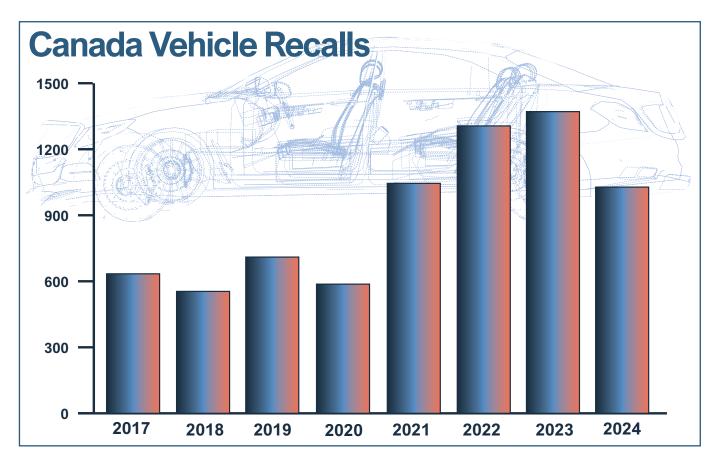
- UK DVSA recorded a slightly greater number of unique recall events than in 2023 however there was a 19% increase in the total number of reports.
- Note, this data is reported by unique event ID occurrence and does not count total number of recalls published (e.g. where recalls are expanded or amended this would not change the count in the numbers shown).



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 was just under 2, however as a result of the increase in reports, the average number of reports per event has risen to 2.25.

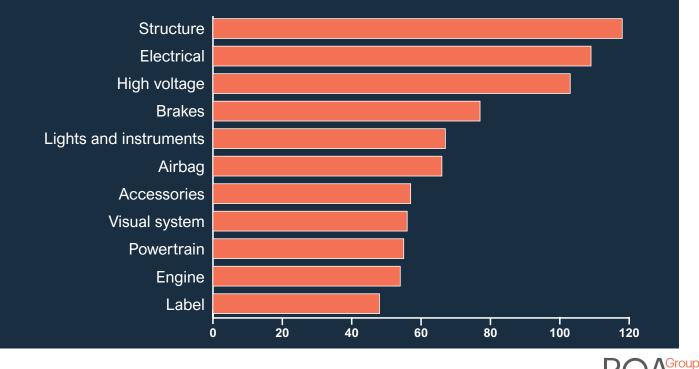




Canada's recall figures are showing some significant evidence of reducing after a period of 3 years of increases. 2024's total are the lowest seen since 2020.

The Transport Canada league table for "component at fault" shows structure as the component category causing most recalls, this is a change from 2023 in which electrical was the most common component causing recalls. Electrical systems including software issues now sits in a close second with high voltage in third.

Canada Vehicle Recalls by Issue - 2024



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