

**Unclassified**

**English - Or. English**

**9 October 2020**

**DIRECTORATE FOR SCIENCE, TECHNOLOGY AND INNOVATION  
COMMITTEE ON CONSUMER POLICY**

**Working Party on Consumer Product Safety**

**Policy guidance on maximising product recall effectiveness**

**JT03466658**

## *Foreword*

Timely and efficient product recalls are a key process for ensuring that consumers are protected from unsafe consumer products available in the marketplace.

This policy guidance provides advice for governments and businesses about how recalls can be designed and implemented more effectively, including by incorporating consumer behavioural insights. It is also intended to support countries in their implementation of the product recall provisions of the OECD Recommendation on Consumer Product Safety [[OECD/LEGAL/0459](#)].

The policy guidance was prepared by Thyme Burdon and Chandni Gupta under the supervision of Brigitte Acoca of the OECD Secretariat. It was approved and declassified by the Committee on Consumer Policy by written procedure on 2 October 2020 and prepared for publication by the OECD Secretariat.

This document, as well as any data and any map included herein, are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area.

© OECD 2020

You can copy, download or print OECD content for your own use, and you can include excerpts from OECD publications, databases and multimedia products in your own documents, presentations, blogs, websites and teaching materials, provided that suitable acknowledgement of OECD as source and copyright owner is given. All requests for commercial use and translation rights should be submitted to [rights@oecd.org](mailto:rights@oecd.org).

# Contents

Foreword	2
Policy guidance on maximising product recall effectiveness	4
I. Introduction	4
II. Objectives	5
III. Scope	5
A. Enabling a multi-faceted approach to measuring recall effectiveness	6
B. Facilitating recall identification and management	7
C. Facilitating a global and multi-stakeholder approach	8
D. Enhancing communications to consumers	10
E. Raising awareness of product recalls	12
References	15
Notes	16

## *Policy guidance on maximising product recall effectiveness*

### I. Introduction

1. Every year, businesses recall millions of consumer non-food products, ranging from complex automotive and electronic products to toys and childcare items. Such recalls are both an important corrective action for mitigating the risks posed by unsafe products to consumers and a critical part of risk communication to consumers.

2. Growth in regulatory oversight and transparency of consumer product recalls has not only helped enhance business and consumer awareness of product recalls, but is also one of the factors that has led to an increase in the volume of recalls over the past decade (OECD, 2018<sup>[1]</sup>). Moreover, many of these recalls are now taking place in a more complex, global and digital marketplace, creating significant challenges for businesses, governments and consumers alike worldwide.

3. While some businesses may tend to perceive recalls as damaging to their brand and reputation, a 2018 survey on consumer behaviour and product recalls effectiveness (hereafter “2018 EC consumer survey”) commissioned by the European Commission found that 54% of consumers surveyed declared that their confidence in a business increased after a product recall (European Commission, 2019<sup>[2]</sup>).

4. The Working Party on Consumer Product Safety (WPCPS) assessed the situation during 2017 and 2018 via:

- an informal roundtable on the challenges faced by product safety authorities, businesses, and other stakeholders in measuring and maximising the effectiveness of product recalls, at domestic and global levels
- a survey on how product safety agencies measure and manage recall effectiveness within their jurisdictions
- an OECD Workshop on Measuring and Maximising the Impact of Product Recalls Globally (OECD, 2018<sup>[3]</sup>), which brought together representatives from OECD Members and non-Members, as well as business and consumer organisations.

5. In light of the discussions and findings from the above activities, an analytic report on *Enhancing product recall effectiveness globally* was released in November 2018 (OECD, 2018<sup>[1]</sup>), which notes the following:

- While response rates vary across product categories, the level of consumer reaction generally remains low in most jurisdictions.
- A variety of factors can impact recall effectiveness, ranging from product traceability, price and lifetime, to the level of risk, severity of an injury, and the quality, nature and frequency of communication with consumers.
- Behavioural biases (OECD, 2010<sup>[4]</sup>) (OECD, 2017<sup>[5]</sup>) also play a salient role in consumer inaction to recalls. Information overload and complexity, as well as recall fatigue, are often to blame as the number of products recalled continues to grow each year, making it difficult for consumers to identify the recalls that apply to the products they have purchased or otherwise have in their homes. Consumers may also disengage if the remedy is impractical, or inconvenient to access (OECD, 2018<sup>[1]</sup>).

## II. Objectives

6. This guidance, which builds on the WPCPS' existing work on product recall effectiveness, aims to implement the provisions relevant to product recalls that are contained in the Recommendation of the Council on Consumer Product Safety (“the Product Safety Recommendation”) [[OECD/LEGAL/0459](#)]. Its objective is to serve as a guide for governments and stakeholders to explore ways to enhance product recall effectiveness globally. More specifically, it aims to address the need for:

- a multi-faceted approach to measuring recall effectiveness
- recall identification and management
- a global and multi-stakeholder approach
- improved communications to consumers
- enhanced awareness for businesses and consumers.

## III. Scope

7. This guidance covers those consumer products supplied by businesses to consumers, including second-hand products and products purchased via e-commerce. It does not cover food, medical devices or drugs.

8. The guidance uses key consumer product safety terms, which, for the purposes of this document, are understood as follows:

- **Businesses:** All supply chain economic operators, including manufacturers, retailers, online platforms enabling third party sellers to sell products to consumers, as well as fulfilment centres. While all businesses are accountable, not all have the same obligations, which are dependent on their involvement in the supply chain.
- **Consumer response:** An action taken by a consumer in response to a product recall notice.
- **Products:** Goods intended for and/or likely to be used by consumers, with the exclusion of food, medical devices or drugs, as these products are, in a number of countries, subject to specific regulatory or policy frameworks. The definition includes products that incorporate software, as well as new technologies, such as the Internet of Things (IoT) and artificial intelligence (AI).
- **Product safety risk:** A combination of the probability of occurrence of harm and the severity of that harm.
- **Recall:** A corrective action, which incorporates notification to consumers, and is undertaken by businesses in co-operation with, or is ordered or recommended by, government bodies to address one or more safety risks in a consumer product that has been, or is being supplied to consumers. Remedies offered within this corrective action may include, but are not limited to, refunds, repair and replacement.
- **Recall effectiveness:** Relates to the degree to which safety risks are mitigated through a recall. Effectiveness may be informed by measuring return, repair or disposal rates, as well as a range of other factors.

### ***A. Enabling a multi-faceted approach to measuring recall effectiveness***

#### **Issue: Measurement factors and tools**

9. Measuring recall effectiveness is not an easy task. Few jurisdictions have developed assessment methodologies, and the concept of "effectiveness" is understood differently within and across countries.

10. Among the authorities measuring recall effectiveness, many use specific target return rates, which are in some instances solely based on the units placed on the market. Relying solely on the ratio between the number of units supplied and those returned, however, may not provide the most accurate picture of a recall's performance. Some other authorities take into account factors, such as the value of a product, complaints and/or injury data.

11. The guidance below provides best practice suggestions for implementing the following provision in the Product Safety Recommendation:

“In their frameworks, Adherents should include measures in order that business assess and report on the effectiveness of their product recalls and adapt, if necessary, their recall strategy and report to the relevant government bodies, so that the latter can assess if the situation is properly managed or if their intervention is necessary.”<sup>1</sup>

#### **Guidance**

12. Governments and businesses should put in place systems to measure recall effectiveness. They should consider developing assessment tools, which take into account a variety of factors. For example, any, all or a combination of the following factors:

- the number of units placed and those still remaining on the market
- the number of units recovered from the supply chain
- the number of units recovered from consumers or repaired in the field
- the number of unreturned recalled products disposed by consumers
- the product's price and its expected lifespan
- the timespan between when a product is supplied and when it is recalled
- whether the product can be tracked and traced across supply chains
- whether customer data is available
- communication methods used and frequency of communicating with consumers
- ease of rectifying the issue (e.g. the cost and inconvenience as well as any particular challenges certain groups of consumers may face in responding) and the range of remedies offered to consumers
- the nature of the safety defect and the severity of the injury
- the number of injuries or incidents occurring post the recall announcement
- the nature and level of risk posed to consumers.

13. When businesses report to governments on the effectiveness of their recalls, they should be transparent on the methodology used to measure the effectiveness.

## ***B. Facilitating recall identification and management***

### **Issue 1: Use of technology**

14. As technology evolves, recall strategies that focus only on traditional methods to manage a recall may miss opportunities to better mitigate the impending harm that an unreturned recalled product poses to a consumer. With growing consumer adoption of connected devices, businesses today have many more tools at their disposal to achieve enhanced recall effectiveness.

15. The guidance below provides best practice suggestions for implementing the following provision in the Product Safety Recommendation:

“In their frameworks, Adherents should encourage the continued development and use of technology as a tool to enhance consumer product safety, and ensure that appropriate steps are taken to address the risks associated with such technology, in consultation with businesses and other stakeholders.”<sup>2</sup>

### **Guidance**

16. Businesses should conduct research into new technologies that facilitate better recall outcomes for consumers.

17. Businesses should use new technologies, where appropriate, as a means to achieve recall effectiveness. This may include, where appropriate:

- identifying the need for a product recall
- encouraging convenient product registration (e.g. prior to or at the point of sale, or in the case of IoT enabled products, when they are first connected to the Internet) to facilitate direct contact with consumers for safety alerts or product recalls
- identifying and suspending the sale of a recalled product in the market
- fixing product defects remotely through software updates
- mitigating risk of harm by preventing consumers from using a recalled product (e.g. remotely switching off the device).

18. When using technology to manage a recall, businesses should also take into account those consumers who do not use or have access to such technology. To reach all affected consumers, any technology-related initiatives should be complementary to other recall strategies, as appropriate.

### **Issue 2: Ease of consumer participation in a product recall**

19. The success of a recall is often dependent on the level of consumer participation. Behavioural biases, however, can often affect a consumer’s decision to participate in a recall (see Annex A for a complete overview of such biases). Biases, such as inertia and the endowment effect, can influence consumers to remain at status-quo and consciously choose not to engage with recalls that impact them.

20. Moreover, as consumers tend to be loss averse, if the perceived inconvenience associated with returning a recalled product outweighs the compensation, consumers are less likely to return or dispose of it. In addition, when consumers face complex decisions and feel they are not adequately supported during the decision-making process, they may dismiss all possible options.

21. Furthermore, while nudging strategies may be effective for average or most consumers, they may not necessarily work for vulnerable consumers<sup>3</sup> who may not have the capacity to fully understand the information that is presented to them<sup>4</sup> (OECD, 2016<sup>[6]</sup>).

22. The guidance below provides best practice suggestions for implementing the following provisions in the Product Safety Recommendation:

- “In their frameworks, Adherents should include measures in order that businesses issue warnings, withdraw, modify, repair or replace the product concerned or prevent consumers from using it when the need for a recall and any other corrective action is identified, as soon as possible and as appropriate.”<sup>5</sup>
- “In their frameworks, Adherents should include measures in order that businesses provide consumers with adequate compensation as appropriate.”<sup>6</sup>
- “In their frameworks, Adherents should include measures in order that businesses put in place mechanisms and tools appropriate to the circumstances in order to identify and contact those consumers affected by a recall without delay.”<sup>7</sup>

### **Guidance**

23. Governments and stakeholders should take into account behavioural insights, including those specific to a jurisdiction, region or culture, to improve consumer participation in a product recall.

24. Participating in a recall should be an easy process for consumers. Remedies should be practical and accessible, and should not cause substantial inconvenience, especially for vulnerable consumers.

25. Where appropriate, businesses should consider offering incentives to motivate consumers to participate in a recall. This may include discounts, vouchers and other offers that are exclusive to those consumers impacted by a product recall. Businesses should consider offering incentives early on in a recall procedure to avoid some consumers waiting for a better offer.

26. Businesses should provide consumers with access to readily available assistance if they require information about a product recall. This includes providing a dedicated helpline and having staff able to answer specific questions about the recall, until risk to consumers posed by the recalled product is adequately mitigated. Businesses should also consider regularly reviewing the effectiveness of communication channels and methods they use for recalls in order to improve them, for example by surveying participating consumers about their experience.

27. Businesses should consider putting in place easy-to-use tools, such as product registration, to enable prompt and direct communication to consumers affected by a product recall. Consumer data collected via a product registration scheme by default should only be used for addressing issues with a product, and not for other purposes (such as marketing or advertising).

## ***C. Facilitating a global and multi-stakeholder approach***

### **Issue 1: Compatibility of product safety and product recall frameworks**

28. Consumers can today purchase products that are available across jurisdictions, including via online retail and marketplaces. While this environment provides consumers with greater choice, there have been situations where a product recalled in one jurisdiction was still available for sale in another, including via e-commerce.



29. The guidance below provides best practice suggestions for implementing the following provisions in the Product Safety Recommendation:

- “Adherents should explore, when developing their domestic consumer product safety frameworks, the compatibility with rules in other jurisdictions, as appropriate.”<sup>8</sup>
- “Adherents should use information sharing mechanisms available at the international level, such as the OECD *GlobalRecalls* portal, to facilitate a timely response to incidents, to help detect and deter unsafe products from being made available in other jurisdictions, including among non-Adherents.”<sup>9</sup>
- “In their frameworks, Adherents should include measures in order that businesses put in place product identifiers and tracking and traceability information, which should be made available to the relevant government bodies, as appropriate.”<sup>10</sup>
- “In their frameworks, Adherents should encourage businesses to establish and maintain adequate production and quality control records, which should be made available to the relevant government bodies, where appropriate.”<sup>11</sup>

### **Guidance**

30. Governments should work together to develop globally agreed practices on product recalls.

31. Where possible, businesses and governments should use existing global product recall standards, such as those issued by international standard bodies, to facilitate swift global action during a product recall. Use of global standards should help to promote global consistency.

32. Businesses should conduct, where relevant, a consistent recall strategy across all jurisdictions where the same product is supplied to consumers and the same risk is likely to be present, subject to applicable legislation. Where possible, governments should encourage businesses to implement consistent recall strategies.

33. Governments should encourage businesses to use globally recognised product identifiers, including batch identification numbers, to assist in the tracking and tracing of recalled products across supply chains.

34. Jurisdictions should contribute to global tools or channels dedicated to the sharing of information about product recalls, such as the OECD’s *GlobalRecalls* portal.

### **Issue 2: Multi-stakeholder collaboration**

35. Recall effectiveness requires a multi-stakeholder response. Stakeholders working in isolation may give rise to mixed messages and the implementation of inconsistent strategies, which may impact consumer participation in a recall. Governments, businesses and other stakeholders working together, striving for the same goal during the recall process, can lead to better consumer engagement and increased response rates.

36. The guidance below provides best practice suggestions for implementing the following provisions in the Product Safety Recommendation:

- “Adherents should develop, as appropriate, awareness activities aimed to alert all stakeholders about the steps they can take to identify risks and prevent injuries associated with consumer products.”<sup>12</sup>

- “Adherents should work together, as appropriate, on the development and implementation of joint surveillance and enforcement programmes, including with non-Adherents.”<sup>13</sup>

### **Guidance**

37. Governments and stakeholders should engage in a dialogue to help ensure greater transparency and co-operation during a recall.

38. Where appropriate, businesses should proactively inform governments when a recalled product in one jurisdiction is to be recalled in others.

39. Governments and businesses should seek opportunities to collaborate, where possible, to minimise the presence of recalled products, including with online marketplaces.

40. Businesses, such as online platform (including in particular, online marketplaces), should co-operate with authorities and work together with their third party sellers to ensure that recalled products are not being supplied to consumers via their platforms. They should assist and, where appropriate, directly intervene on behalf of third party sellers to effectively manage a product recall by, for example, facilitating, where appropriate, direct contact with the consumers affected by a recall, and should encourage other third-party sellers of similar products to also assess whether their products may present the same or similar safety concerns.

41. Businesses and governments should engage with consumer organisations to maximise the outreach of recall messages to consumers.

## ***D. Enhancing communications to consumers***

### **Issue 1: Content of recall notices**

42. Recall notices can often be lengthy and complex, making it difficult for consumers to identify whether a recall applies to a product they own, and if so, what options are available for them. Some recall notices also tend to minimise the risk levels associated with the product via the use of vague and complicated language. This can cause confusion amongst consumers and may demotivate them to take action. In some jurisdictions, the main elements that should be included in a recall notice are prescribed by law or government regulations. In the absence of prescribed requirements, some jurisdictions provide further guidance to stakeholders; in many others, however, such guidance is not available.

43. The guidance below provides best practice suggestions for implementing the following provision in the Product Safety Recommendation:

“In their frameworks, Adherents should include measures in order that businesses communicate effectively with consumers about a product recall without delay by providing them with clear, accurate and easy-to-understand information about the affected product and its associated risk and remedies. Such communication should, where appropriate, be coordinated with relevant government bodies and should also include information relating to the rights and obligations of the consumers affected by a product recall.”<sup>14</sup>

### **Guidance**

44. Governments and stakeholders should collaborate to develop guidance on the key elements that should be included in a recall notice.

45. Governments and stakeholders should be mindful of content in existing recall notices of the same product in other jurisdictions.

46. Businesses should apply the following principles when preparing a recall notice:
- Ensure all content is factual, easy to read, and concise.
  - Ensure the title or heading of the recall notice is direct and draws attention to the announcement.
  - Identify the product safety issue and risk faced by consumers using the recalled product, avoiding verbose and mixed messages.
  - Describe the recalled product in plain language, including, where necessary, information about whether it is used with or is part of another product.
  - Include clear and high quality images of the recalled product, and key product identifiers, such as model, batch and serial numbers.
  - Provide simple instructions on how consumers can participate in a recall, including the actions they may take to update, return or dispose a recalled product.
  - Provide contact details to enable consumers to seek further information, including through, for example, a dedicated helpline.
  - Consider providing information in relevant languages when recalled products are sold globally or to culturally diverse populations.
  - Businesses should also comply with any additional or specific recall information requirements of the jurisdiction where they are conducting the product recall.

### **Issue 2: Recall communication strategies**

47. Consumers expect that products sold in physical and online marketplaces are safe, and are generally unaware or uninterested in a product recall, making it necessary to implement effective communication strategies that are targeted and sustainable.

48. The guidance below provides best practice suggestions for implementing the following provisions in the Product Safety Recommendation:

- “In their frameworks, Adherents should include measures in order that businesses communicate effectively with consumers about a product recall without delay by providing them with clear, accurate and easy-to-understand information about the affected product and its associated risk and remedies. Such communication should, where appropriate, be coordinated with relevant government bodies and should also include information relating to the rights and obligations of the consumers affected by a product recall.”<sup>15</sup>
- “In their frameworks, Adherents should encourage relevant government bodies and businesses to establish mechanisms at domestic level, as appropriate, to alert all stakeholders about the existence of a product recall in their jurisdiction.”<sup>16</sup>

### **Guidance**

49. When planning and conducting a recall communication programme, taking into account applicable personal data regulations, businesses should consider:

- using direct and personalised communication tools to nudge consumers to react to issues that impact them directly
- using recall data, such as data on the number of injuries or deaths related to the product or the number of units affected or recovered, within their communication messages, to help raise awareness of the seriousness of a product recall

- utilising multiple communication channels to promptly contact those consumers affected by a product recall, including advertising in online and offline mass media, information on the affected business' website and at point of sale, as well as more direct forms of communication to affected consumers including via connected products, loyalty and/or reward programmes and social media
- where appropriate, collaborating with influencers (i.e. a person or a brand that can help facilitate consumer engagement, such as celebrities and bloggers) to help spread messages to relevant target audiences in an engaging format
- specific communication strategies that will facilitate the participation of vulnerable consumers in a product recall
- maintaining an adequately resourced and consistent communication programme throughout the recall process until the risk is adequately reduced and/or mitigated.

50. Governments should, where possible, complement a business' recall communication programme by implementing communication strategies to help raise awareness of those recalls that are underperforming and posing serious and/or imminent risk of harm to consumers.

51. Governments should, where possible, use their existing databases (e.g. vehicle licencing databases), to effectively reach consumers during a recall, subject to any consumer data protection laws.

### ***E. Raising awareness of product recalls***

#### **Issue: Fostering consumer and business awareness**

52. Governments and other stakeholders can play a salient role in improving the consumer product industry's approach to implementing recalls. In particular, they should be cognisant of the dangers of "recall fatigue" for consumers, and ensure that any decisions that require recalls to be undertaken are based on proper assessment of the risks faced by consumers.

53. The guidance below provides best practice suggestions for implementing the following provisions in the Product Safety Recommendation:

- "In their frameworks, Adherents should encourage government bodies, businesses and other stakeholders to work together on the development of guidelines and international standards for planning, launching and conducting recalls, promoting their use and communicating effectively to consumers about them." <sup>17</sup>
- "Adherents should develop global awareness campaigns on consumer product safety and encourage businesses and other stakeholders to participate in such activities." <sup>18</sup>

#### **Guidance**

54. Governments and stakeholders should actively raise awareness of the importance of product recalls with consumers using relevant and accessible communication channels.

55. Governments should implement communication strategies that help raise awareness and understanding of businesses' obligations when conducting a recall, including the importance of proactive recall planning.

56. Businesses should play an educative role to ensure that operators in their supply chains or their third-party operators (in the case of online marketplaces) are aware of their

product safety requirements and do not sell products that are recalled at domestic or global levels.

57. Businesses should review and update their recall strategy periodically, including when introducing a new product range.

58. Governments should regularly review their product recall guidance to ensure it addresses current product recall trends and challenges.

## Annex A. Consumer behavioural biases applied to product recalls

The following is an abridged extract on behavioural biases and their applicability to product recalls from the publication *Enhancing product recall effectiveness globally: OECD background report* (OECD, 2018<sup>[1]</sup>).

**Information overload:** If recalls contain too much information or consumers feel overwhelmed with information on recalls, they may disengage and not take action, especially if they are also time poor. With the growing number of product recalls in countries, consumers may suffer from "recall information" fatigue, and may not pay attention to the recall alerts that are relevant to them.

**Framing effects:** Consumers are influenced by how information is presented. Presenting an option in a certain way may induce consumers to evaluate the choice from a particular reference point. For example, consumers are less likely to respond to voluntary recalls if the potential hazards are not clearly stated. They are also less likely to follow instructions, including the steps they should follow to return the product, if such instructions are presented in a complex and lengthy message.

**Inertia:** With an inherent fear of the unknown, when consumers face complex products or a bewildering array of choices, they may ignore possible choices or choose not to choose. Consumers may also rely on simple "rules of thumb" to avoid change or are guided by the values, actions and expectations of a particular society or group.

**Endowment effect:** Consumers often demand much more to give up an object than they would be willing to pay to acquire it. A consumer's value of a product increases when it becomes part of their endowment, so if the perceived inconvenience associated with returning a recalled product outweighs the compensation (i.e. return, refund or replacement), consumers are less likely to return it. This is because naturally humans tend to be loss averse, even if it is in relation to a recalled product.

**Over-optimism:** Consumers tend to think that they are more likely to experience an outcome that is better than the average expected outcome. This may cause them to miss or ignore warnings, or negative messages. Consumers may also be more inclined to keep using unsafe products, particularly if these products have been used for a long time without injury caused to them or to someone they know.

**Time inconsistency:** Consumers may make choices that are not consistent across time periods due to conflicts between short-term urges and long-term interests.

## *References*

- European Commission (2019), *Survey on Consumer Behaviour and Product Recalls Effectiveness*,  
[https://ec.europa.eu/consumers/consumers\\_safety/safety\\_products/rapex/alerts/repository/tips/Product.Recall.pdf](https://ec.europa.eu/consumers/consumers_safety/safety_products/rapex/alerts/repository/tips/Product.Recall.pdf). [2]
- OECD (2018), *Enhancing product recall effectiveness globally: OECD background report*, OECD Publishing, Paris, <https://doi.org/10.1787/ef71935c-en>. [1]
- OECD (2018), *Measuring and maximising the impact of product recalls globally*, OECD Publishing Paris, <https://doi.org/10.1787/23074957>. [3]
- OECD (2017), *Use of behavioural insights in consumer policy*, OECD Publishing, Paris, <https://doi.org/10.1787/c2203c35-en>. [5]
- OECD (2016), *Recommendation of the Council on Consumer Protection in E-commerce*, OECD Publishing, Paris, <https://www.oecd.org/sti/consumer/ECommerce-Recommendation-2016.pdf>. [6]
- OECD (2014), *OECD Recommendation on Consumer Policy Decision Making*, OECD Publishing, Paris, <http://www.oecd.org/sti/consumer/Toolkit-recommendation-booklet.pdf>. [7]
- OECD (2010), *Consumer Policy Toolkit*, OECD Publishing, Paris, <https://doi.org/10.1787/9789264079663-en>. [4]

## Notes

<sup>1</sup> Provision 15(f), Part II Consumer Product Safety Policy Frameworks, Product Safety Recommendation, [OECD/LEGAL/0459](#).

<sup>2</sup> Provision 7, Part II Consumer Product Safety Policy Frameworks, Product Safety Recommendation, [OECD/LEGAL/0459](#).

<sup>3</sup> Under the OECD Recommendation on Consumer Policy Decision Making (OECD, 2014<sup>[7]</sup>), the term “vulnerable consumers” is understood as those consumers who are “*susceptible to detriment at a particular point in time, owing to the characteristics of the market for a particular product, the product’s qualities, the nature of a transaction or the consumer’s attributes or circumstances*”.

<sup>4</sup> The 2018 EC consumer survey revealed that vulnerable consumers are generally less aware of product recalls and prefer to be reached via traditional media rather than online channels (European Commission, 2019<sup>[2]</sup>).

<sup>5</sup> Provision 15(a), Part II Consumer Product Safety Policy Frameworks, Product Safety Recommendation, [OECD/LEGAL/0459](#).

<sup>6</sup> Provision 15(c), Part II Consumer Product Safety Policy Frameworks, Product Safety Recommendation, [OECD/LEGAL/0459](#).

<sup>7</sup> Provision 15(d), Part II Consumer Product Safety Policy Frameworks, Product Safety Recommendation, [OECD/LEGAL/0459](#).

<sup>8</sup> Provision 2, Part IV International Co-operation, Product Safety Recommendation, [OECD/LEGAL/0459](#).

<sup>9</sup> Provision 5, Part IV International Co-operation, Product Safety Recommendation [OECD/LEGAL/0459](#).

<sup>10</sup> Provision 15(e), Part II Consumer Product Safety Policy Frameworks, Product Safety Recommendation [OECD/LEGAL/0459](#).

<sup>11</sup> Provision 18, Part II Consumer Product Safety Policy Frameworks, Product Safety Recommendation [OECD/LEGAL/0459](#).

<sup>12</sup> Provision 2, Part III Consumer Product Safety Awareness, Product Safety Recommendation, [OECD/LEGAL/0459](#).

<sup>13</sup> Provision 6, Part IV International Co-operation, Product Safety Recommendation [OECD/LEGAL/0459](#).

<sup>14</sup> Provision 15(b), Part II Consumer Product Safety Policy Frameworks, Product Safety Recommendation, [OECD/LEGAL/0459](#).

<sup>15</sup> Provision 15(b), Part II Consumer Product Safety Policy Frameworks, Product Safety Recommendation, [OECD/LEGAL/0459](#).

<sup>16</sup> Provision 17, Part II Consumer Product Safety Policy Frameworks, Product Safety Recommendation [OECD/LEGAL/0459](#).

<sup>17</sup> Provision 16, Part II Consumer Product Safety Policy Frameworks, Product Safety Recommendation, [OECD/LEGAL/0459](#).

<sup>18</sup> Provision 7, Part IV International Co-operation, Product Safety Recommendation, [OECD/LEGAL/0459](#).