

WHITE PAPER • PRODUCT SAFETY

How to handle product *recalls* in the EU

A practical, end-to-end playbook for running a compliant product recall — and documenting every step.

When a product turns out to be *unsafe*.

A recall is judged on three things: **speed**, **proportionality** and **documentation**. Move too slowly and the hazard keeps reaching people; over-react and you burn trust and money; fail to document and you cannot show a regulator — or a retailer — that you acted responsibly.

This paper turns the recall from a panic into a process. It walks through the full lifecycle — detect, assess, decide, notify, communicate, execute, monitor and close out — in the EU context of the General Product Safety Regulation (GPSR) and the EU Safety Gate. Every phase comes with the concrete tasks it contains, why each one matters, and a worked example from a single running scenario: a Bluetooth kettle whose thermal cut-off can fail.

The final section shows how to run and **automatically document** the whole thing in Conphora's recall workspace — so the paper trail a recall demands is produced as a by-product of doing the work, not a scramble afterwards.

General guidance, not legal advice. Requirements vary by product type and market — confirm specifics with the competent authority (see Conphora → Tools → Compliance resources).

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Why recalls matter *now* in the EU.

Product safety in the EU has moved from a back-office obligation to a front-line condition of market access. Two forces drive it.

A stricter, broader framework

The **General Product Safety Regulation (GPSR, (EU) 2023/988)** has applied since **13 December 2024**, replacing the old General Product Safety Directive. It tightens the duties of manufacturers, importers and distributors, extends obligations to online marketplaces, and makes clear that when a product is dangerous, economic operators must take corrective action and inform both consumers and authorities — promptly and traceably.

Visible, rising enforcement

The EU's rapid-alert system, **Safety Gate**, publishes dangerous-product alerts every week and is fed by national authorities and by economic operators through the **Safety Business Gateway**. The volume is large and growing — a signal that surveillance and cross-border action are intensifying, not relaxing.

BY THE NUMBERS

4,137 Safety Gate alerts in 2024 — nearly double the 2022 figure. A single product recall can cost **millions** in direct logistics, remediation and lost sales, before reputational damage. Consumers pay a measurable premium for products they trust.

EU LAYER, KEPT HIGH-LEVEL

This paper names the framework but does not assert member-state-specific deadlines or penalties — those vary. Treat the GPSR/Safety Gate references as orientation and confirm the specifics for your product and markets with the competent authority. Conphora's *Compliance resources* links to the official portals and texts.

Recall, withdrawal, notice or *retrofit*?

Choosing the right action — the lightest one that genuinely controls the risk — starts with knowing the difference.

What a recall is — and isn't

A recall gets an unsafe product back from, or fixed in, the field. It differs from a withdrawal (removing it from sale before it reaches users), a safety notice/warning, and a retrofit/repair-in-place. Choose the lightest action that actually controls the risk.

Withdrawal

Pulling a product from sale and the supply chain *before* it reaches consumers. Appropriate when stock is still in your control — but it does nothing for units already with customers.

Safety notice / warning

Telling users how to use a product safely, or what to avoid, without taking it back. Suitable only for low-severity risks that instructions can genuinely mitigate.

Retrofit / repair-in-place

Fixing the product where it is — a replacement part, a firmware update, an on-site repair. Powerful when the fix is simple and the unit need not come back.

WORKED EXAMPLE

“Full recall for repair — a withdrawal alone won't reach units already with customers.”

When to recall — and how to *think*.

When to recall

Risk-based triggers: a hazard that can cause injury, a pattern of failures, or a non-compliance affecting safety. Decide on severity × probability × exposure, and write down the reasoning.

First principles

Act fast; be proportionate; document everything; keep traceability (batch/serial/date codes); name one coordinator; work from one written action plan.

Roles & responsibilities

Coordinator, quality/engineering, legal/regulatory, communications, logistics/reverse-logistics, customer service — agree who owns what before the clock starts.

One coordinator, one plan

Make a single person accountable for decisions and run everything from one written action plan. Recalls fail on diffuse ownership more than on technical difficulty.

WORKED EXAMPLE — RATING THE RISK

“Severity: high (burns). Probability: low. Exposure: 12,000 units sold. → Overall: medium-high.”

The eight-phase recall *lifecycle*.

Eight phases, each with its own tasks. This is the spine of a recall: creating a case in Conphora seeds exactly these steps, so nothing is missed. Each task below carries what it means and a worked example from the running kettle scenario.

1 • Detect & triage Capture the signal, log it, and decide if it needs action.

Log the safety signal / complaint

Source, date, what was reported, how many reports.

WHY Record the first sign that something may be wrong, so there is a dated, traceable starting point for the whole recall.

Assemble the recall team & name a coordinator

Quality, legal, comms, logistics, customer service.

WHY Bring together the people who will run the recall and make ONE person accountable for decisions.

Preserve evidence & affected samples

Quarantine stock; keep the defective units for analysis.

WHY Stop affected stock from moving and keep faulty units so you can investigate the root cause later.

EXAMPLE

"3 customers reported the kettle base getting hot enough to discolour the worktop; first report 12 May."

2 • Risk assessment Understand the hazard, who is exposed, and how bad it is.

Identify the hazard & failure mode

What can go wrong, under what conditions.

WHY Describe exactly what fails and the harm it can cause — the basis for every decision that follows.

Rate severity × probability × exposure

Use a documented risk matrix; record the rationale.

WHY Score how serious and how likely the harm is, and how many people are exposed — and write down why.

Define affected units (batch/SKU/serial/date range)

Trace production and distribution records.

WHY Pin down exactly which units are affected so you neither over- nor under-recall.

Decide the corrective action

Recall vs withdrawal vs safety notice vs retrofit — proportionate to risk.

WHY Choose the least drastic action that still controls the risk.

EXAMPLE

“Thermal cut-off fails to trip → base overheats → burn / fire risk.” • “Model K12, batches 2451–2480, manufactured Jan–Mar 2026, sold in DK/SE.”

3 • Decision & strategy Set the plan: scope, remedy, timeline, owners, budget.

Choose the remedy

Repair, replace, refund or destroy — and the return/reverse-logistics route.

WHY Decide what the customer gets and how the product comes back or is fixed.

Set timeline, owners & budget

Who does what, by when.

WHY Assign an owner and a date to every step so the recall keeps momentum.

Write the recall action plan

A single document the whole team works from.

WHY Capture the whole approach in one document everyone works from, so nothing is improvised.

EXAMPLE

“Free replacement base unit shipped with a prepaid return label for the old one. Notice live by 20 May; returns portal open 21 May; budget €60k.”

4 • Notify authorities & supply chain Tell the people who must know — where required.

Notify the competent authority (where required)

Use the official portal for your market(s).

WHY Where your market requires it, tell the competent authority through the official channel — usually before you go public.

Notify distributors, retailers & marketplaces

Ask them to stop sales and pass the notice to customers.

WHY Tell everyone in the supply chain to stop selling and to pass the notice on to their buyers.

Stop sales & block stock

Pull from shelves, online listings and your own channels.

WHY Remove the product from every place it can still be bought, including your own channels.

EU

In the EU, economic operators report a dangerous product and the corrective action taken through the **Safety Business Gateway**, which feeds **Safety Gate**. Notify before or as you go public, where required.

5 • Customer & public communication

Reach the people holding the product, clearly and fast.

Draft the recall notice

Product + images, identifiers, the hazard, what to do now, the remedy, how to claim, contact.

WHY Write the customer-facing notice with everything a person holding the product needs to act.

Choose channels

Website notice, email to registered owners, retailer POS, social, press, packaging.

WHY Pick the channels that will actually reach the people holding the product.

Publish the notice & open a support route

Hotline / form / page so customers can act.

WHY Publish the notice and open a way for customers to actually act on it.

6 • Execute the remedy Run the returns, repairs, replacements or refunds.

Operate the return / repair / refund process

Track each unit through the chosen remedy.

WHY Run the chosen remedy day to day and track each unit through it.

Track units recovered vs affected

Keep the recovery count current.

WHY Keep a running count of how many affected units you have recovered or fixed.

EXAMPLE

“Returns portal issues labels; replacements ship within 3 days; each RMA logged. 1,920 of 12,000 returned after week 1 (16%).”

7 • Monitor effectiveness Measure whether the recall is actually working.

Measure response / recovery rate

Is it rising? Compare against a target.

WHY Track the recovery rate against a target so you know whether the recall is working.

Escalate if response stalls

More channels, reminders, incentives; inform the authority if needed.

WHY If response stalls, add channels, reminders or incentives — and tell the authority if needed.

EXAMPLE

“Target 60% in 8 weeks; currently 38% at week 4 — on track.” · “Response flat at 40% → second email + €10 voucher; informed authority of revised plan.”

8 • Close-out & lessons learned Root cause, CAPA, final report, retain records.

Complete root-cause analysis

Why did it happen and escape detection?

WHY Establish why it happened and why it was not caught earlier.

Define & assign corrective/preventive actions (CAPA)

Stop it recurring.

WHY Define corrective and preventive actions so it cannot recur, and assign owners.

Write the close-out report

Outcome, recovery rate, costs, CAPA. Share with the authority if required.

WHY Summarise the outcome, recovery rate, cost and CAPA in a close-out report.

Archive all records for the retention period

Decisions, notices, correspondence, evidence.

WHY Archive all recall records for the period your market requires.

EXAMPLE

“Supplier changed the thermostat without notice; incoming QC didn't test cut-off temperature. Close-out: 71% recovered, no injuries, cost €74k, 2 CAPAs open with due dates.”

The recall notice — what it must *contain*.

The notice is the single most important customer-facing artefact of a recall. In plain language, prominent and accessible, it must carry everything a person holding the product needs to act.

- ☐ Product name and clear images
- ☐ Identifiers: model, batch, serial or date range
- ☐ The hazard and what could happen
- ☐ What the customer should do now (stop using it)
- ☐ The remedy: refund, replacement or repair
- ☐ How to claim, plus contact details

EXAMPLE NOTICE

"Includes photo, model/batch, the hazard, 'stop using it now', refund/replace, and a hotline."

Run — and *document* — it in Conphora.

Everything above is built into **Tools** → **Product recall**. Create a case and it seeds the eight phases and every task; work the board; record how each step was done; track recovery; and export a complete, branded report. The screenshots below walk the same kettle scenario through the product.

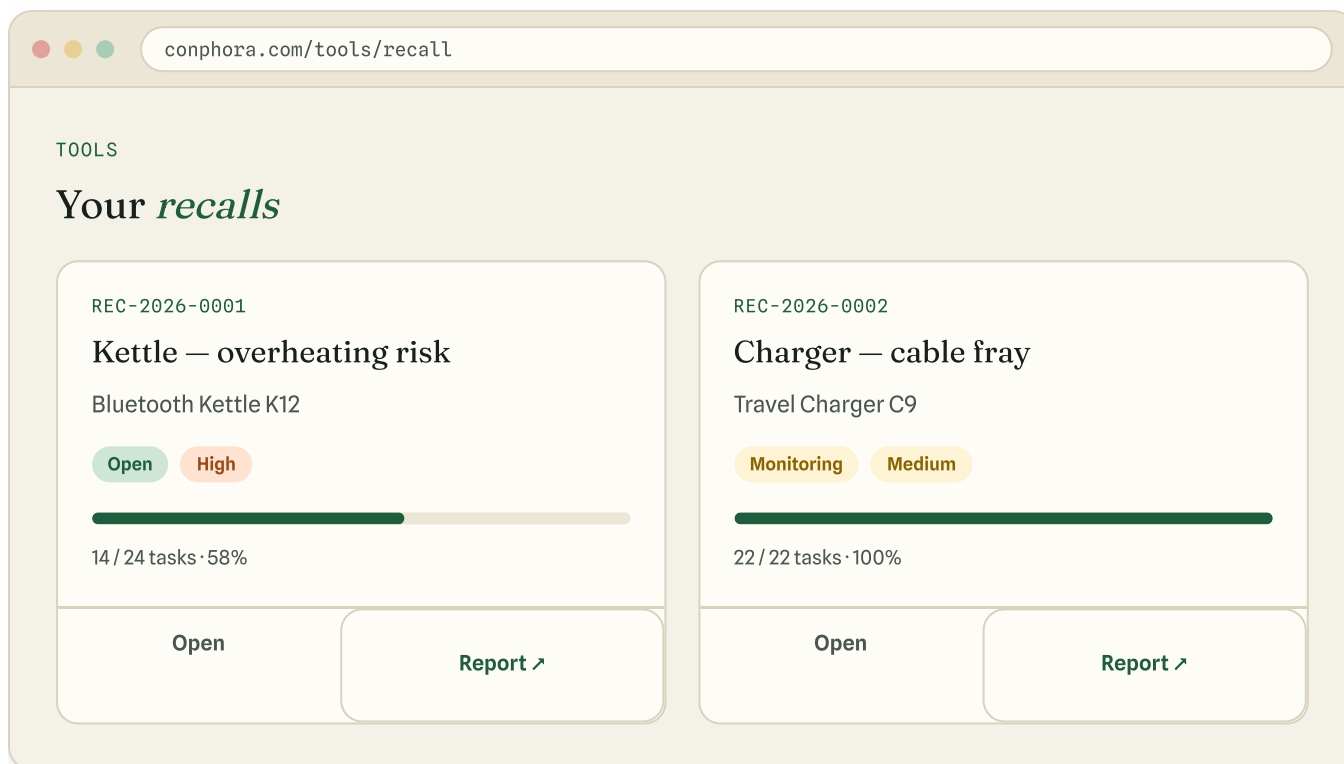


FIGURE 1. EVERY RECALL IN ONE PLACE, WITH LIVE STATUS, RISK AND PROGRESS.

conphora.com/tools/recall · New recall

Title: Kettle — overheating risk

Product name: Bluetooth Kettle K12

Product identifiers: K12 · batch 2451–2480

Markets affected: DK, SE

Hazard / defect: Thermal cut-off fails to trip → base overheats → burn / fire risk

Risk level: High

Create & open →

FIGURE 2. OPEN A CASE IN SECONDS – IT SEEDS THE FULL PHASED TASK LIST AUTOMATICALLY.

conphora.com/tools/recall/REC-2026-0001

2 · Risk assessment

Understand the hazard, who is exposed, and how bad it is.

- Identify the hazard & failure mode** (Done) ☆
What can go wrong, under what conditions.
- Rate severity * probability * exposure** (In progress) ☆
Use a documented risk matrix; record the rationale.
- Define affected units (batch/SKU/serial/date range)** (To do) ☆
Trace production and distribution records.
- Decide the corrective action** (To do) ☆
Recall vs withdrawal vs notice vs retrofit.

FIGURE 3. THE EIGHT-PHASE LIFECYCLE, AS A WORKING CHECKLIST WITH PER-TASK STATUS AND ASSIGNMENT.

conphora.com/tools/recall/REC-2026-0001 · task “i”

Rate severity * probability * exposure ⓘ

WHAT THIS MEANS Score how serious and how likely the harm is, and how many people are exposed — and write down why.

EXAMPLE *“Severity: high (burns). Probability: low. Exposure: 12,000 units sold. → Overall: medium-high.”*

NOTES

Risk matrix v2 applied. Severity high (burns), probability low, exposure 12,000. Signed off by Quality + Legal on 14 May.

FIGURE 4 & 5. EACH STEP EXPLAINS ITSELF WITH A WORKED EXAMPLE (THE “I” ICON), AND A NOTES FIELD RECORDS HOW IT WAS ACTUALLY DONE — YOUR AUDIT TRAIL.

conphora.com/tools/recall/REC-2026-0001

UNITS

affected recovered

12,000 Update 1,920 Update

16% recovery · 1,920 / 12,000 recovered

FIGURE 6. TRACK RECOVERED AGAINST AFFECTED UNITS IN REAL TIME — THE NUMBER THAT TELLS YOU WHETHER THE RECALL IS WORKING.

conphora.com/tools/recall/REC-2026-0001 · Timeline

● Created recall REC-2026-0001	12 May, 09:14
● Identify the hazard & failure mode → done	13 May, 11:02
● Note on “Rate severity * probability * exposure”	14 May, 15:40
● Updated unitsRecovered	21 May, 17:23

FIGURE 7. EVERY CHANGE — STATUS, NOTE, FIELD EDIT — IS LOGGED AUTOMATICALLY INTO AN APPEND-ONLY TIMELINE.

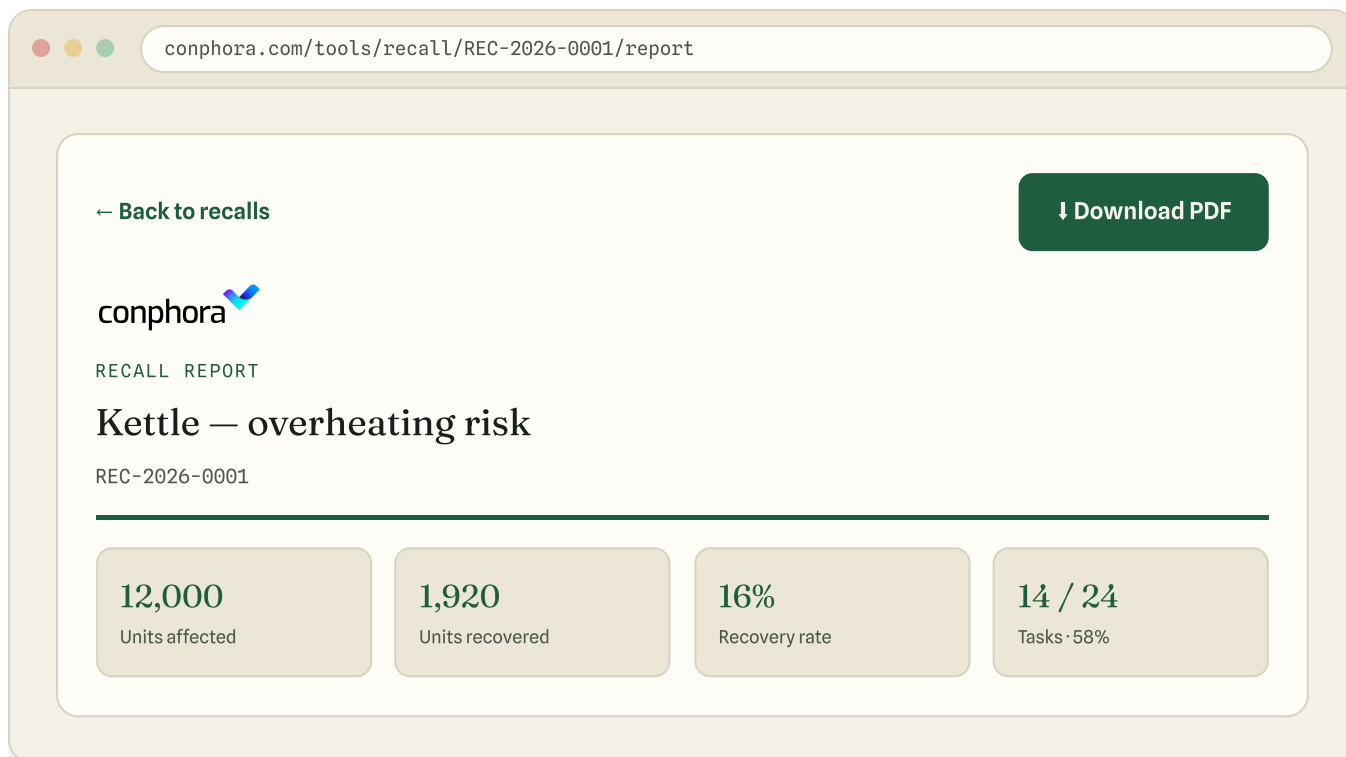


FIGURE 8. ONE CLICK TURNS THE WHOLE CASE — OVERVIEW, EVERY TASK WITH ITS NOTES, AND THE FULL TIMELINE — INTO A DOCUMENTED, CONPHORA-BRANDED PDF.

Common *pitfalls*.

- **Moving too slowly.** The hazard keeps reaching people while you deliberate. Act fast, then refine.
- **Underestimating scope.** Define affected units precisely from batch/serial/date records — guessing low leaves dangerous units in the field.
- **Vague notices.** If a customer can't tell whether they're affected or what to do, the notice has failed.
- **No single owner.** Diffuse ownership stalls decisions. Name one coordinator.
- **Stopping at “announced”.** A recall is done when units are controlled, not when it's published — keep measuring recovery.
- **Poor record-keeping.** If you can't show what you did and when, you can't demonstrate you acted responsibly.

Turn the next recall into a *process*, not a panic.

Conphora's recall workspace gives your organisation the eight-phase plan, the audit trail and the one-click documented report — all in the design and language your team already uses.

[Start at conphora.com/tools/recall →](https://conphora.com/tools/recall)

Sources & framework. General Product Safety Regulation (EU) 2023/988 (via EUR-Lex); European Commission — Safety Gate & Safety Business Gateway; and Conphora's regulation-agnostic recall framework (Tools → Product recall). General guidance, not legal advice — confirm specifics with the competent authority.