

*Panel: Improving Product
Safety Enforcement
– Learning from others
in North America*

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Overview

- Health Canada rolling surveillance programme (Cyclical Enforcement - CE) and standards compliance verification projects (GP Projects) .
- USA and Canada cooperation on Joint Recalls.

Health Canada's Rolling Surveillance Programme & Standards Compliance Verification Projects



Planned Market Surveillance Programme

- Background: *Canada Consumer Product Safety Act (CCPSA)* and the *Food and Drugs Act (FDA) (Cosmetic Regulations)*
 - Post-market regulatory regime
- Reactive vs. Proactive Compliance Activities
 - Cyclical Enforcement (CE) projects
 - GP/Standards Projects
 - Establishment Projects



CE Projects to Enforce 33 Regulations...

1. Asbestos Products Regulations Candles Regulations
2. Carbonated Beverage Glass Containers Regulations
3. Carriages and Strollers Regulations
4. Cellulose Fibre Insulation Regulations
5. Charcoal Regulations
6. Children's Jewellery Regulations
7. Children's Sleepwear Regulations
8. Consumer Chemicals and Containers Regulations, 2001
9. Consumer Products Containing Lead (Contact with Mouth) Regulations
10. Corded Window Covering Products Regulations
11. Cribs, Cradles and Bassinets Regulations
12. Expansion Gates and Expandable Enclosures Regulations
13. Face Protectors for Ice Hockey and Box
14. Lacrosse Players Regulations
15. Glass Doors and Enclosures Regulations
16. Glazed Ceramics and Glassware Regulations
17. Ice Hockey Helmet Regulations
18. Infant Feeding Bottle Nipples Regulations
19. Kettles Regulations
20. Lighters Regulations
21. Matches Regulations
22. Mattresses Regulations
23. Pacifiers Regulations
24. Phthalates Regulations
25. Playpens Regulations
26. Residential Detectors Regulations
27. Restraint Systems and Booster Seats for Motor Vehicles Regulations
28. Science Education Sets Regulations
29. Surface Coating Materials Regulations
30. Tents Regulations
31. Textile Flammability Regulations
32. Textile Floor Coverings Regulations
33. Toys Regulations
34. + Cosmetic Regulations

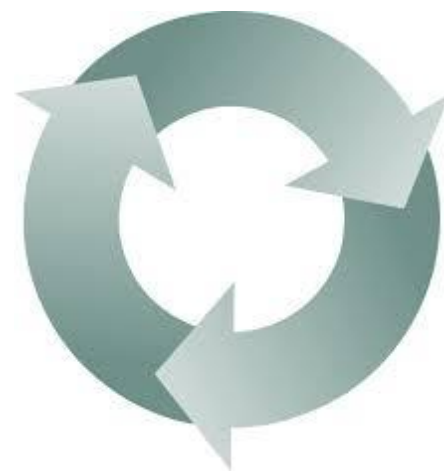
CE Projects

- Planning:
 - 33 product-related regulations under the CCPSA
 - Priorities: non-compliance in regulated product categories
 - Six Year Cycle
 - Factors for establishing/modifying cycles
 - Planned yearly CE activities & long-term CE plan
 - Decision Process: CE schedule & CE planning committee



CE Projects

- Factors for establishing/modifying cycles: The frequency of reviews is termed the “enforcement cycle”. The CE policy discusses the following factors which considered when establishing or modifying enforcement cycles:
 - Type of product;
 - Nature of industry and historical level of compliance;
 - Vulnerability of the product users;
 - Recent and historical incident and injury data; and
 - Nature of the hazard.



Rolling Market Surveillance Programme (CE)

- CE Implementation and Monitoring
 - Establishment Compliance vs. Specific Product Compliance.
 - Long-term CE Schedule (dynamic)
 - CE Project (duration of 3 to 12 months) general steps:
 - product scoping, targeting methodology, market analysis, inspections, compliance and enforcement actions, and reporting.
 - CE Reports/ Annual CE Report
- Validation & Improvement of the CE process
 - Performance Management (CPSP Performance Measurement Strategy)



Standards Compliance Verification Projects (GP Projects)

- Background:
 - Section 7 of the CCPSA (General Prohibition/ Danger to Human Health or Safety - DHHS)
 - Role of Industry
- Enforcement of the General Prohibition and Standards
 - “Unregulated” consumer products
 - General Prohibition (GP) projects assessing the use of standards to support the compliance and enforcement
 - Compliance and Enforcement Actions
- Beyond standards



Example: Seasonal Lights

- Background:
 - Electrical Requirements/Certification Process in Canada
 - Seasonal Lights Incidents and Risk Assessment

- Test Plan:
 - Determination of DHHS
 - Standards Requirements

OVERHEATING tests failed

- Enforcement Plan:
 - Enforcement Matrix
 - Ad-hoc

OVERHEATING tests failed <i>Failed wire gauge size AND XRF test</i>	STOP SALE	RECALL	RECALL
<i>Failed wire gauge size OR XRF test</i>	STOP SALE	RECALL	RECALL
NONE	No Action	STOP SALE	STOP SALE
	NONE	<i>Failed lampholder OR vertical flame test</i>	<i>Failed lampholder AND vertical flame test</i>

FLAMMABILITY tests failed

- Results:
 - 15 establishments inspected and 20 products samples tested.

Example: Seasonal Lights

- Results:

	Phase		Total
	Planned	Ad-hoc	
Establishments inspected	15 (no product found at 3 establishments)	9 additional (plus 2 establishments were inspected again)	24
Products sampled and tested	20	19	39
Products with failures	9	13	22 (56%)
Different manufacturers tested	12	4 additional manufacturers	16

- **5 out of 16 (31%) of the manufacturers had product that failed at least one test (Table 2).**
- **4 out of 16 (25%) of the manufacturers had copper composition failures**

- Impact:

- **27** different importers were named on postings;
- Over **250 different models** of light strings were recalled; and
- Over **2.7 million units** of light strings were recalled.

Establishment-Based Inspection

- Compliance Verification Inspections
 - Looking at an establishment's processes to assess their ability to meet requirements under the CCPSA
- Mandatory Incident Reporting Inspections
 - Looking at industry's compliance to their reporting obligations



Recalls in USA and Canada



Objectives of a Recall

- To locate and remove or correct hazardous products as quickly as possible
- To communicate accurate and understandable information to the public in a **timely** manner about the hazard and what action should be taken

Mandatory Reporting Requirement

Both HC and CPSC have Mandatory Reporting Requirements provided in their legislation:

- Section 14 of the CCPSA for Health Canada
- Section 15 of the Consumer Product Safety Act for CPSC

The Recall Process

1. Stop

- Stop manufacturing, stop selling, stop retail sales

2. Fix

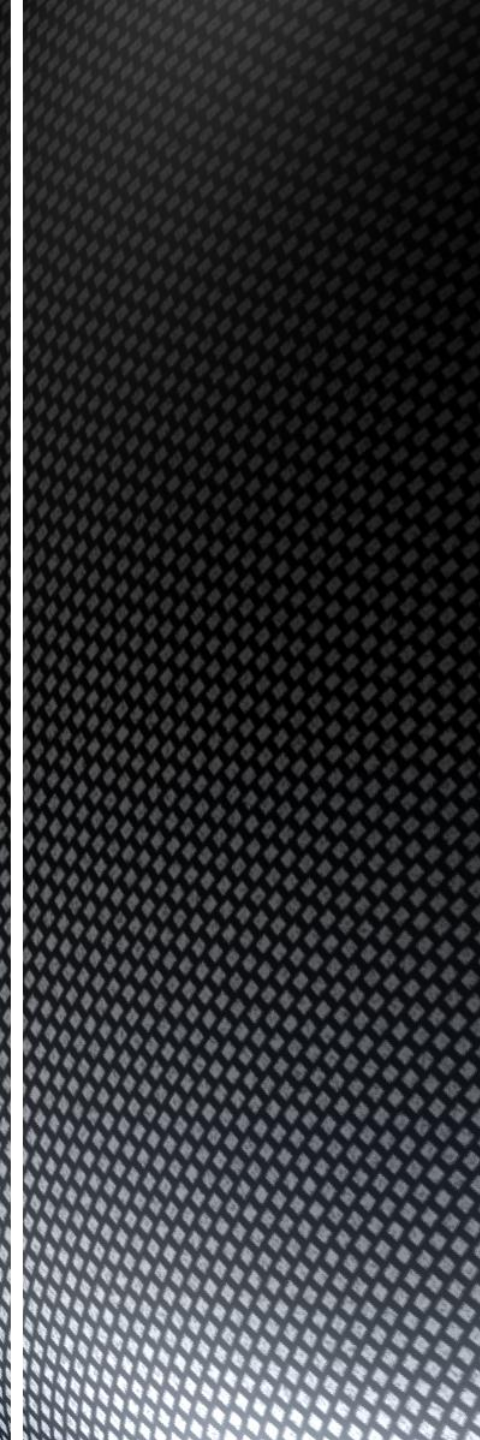
- Repair, redesign, replace, refund, dispose, relabel

3. Communicate

- To distribution chain to pull off market; to Canadians to make aware of issue and what they should do

**Recalls happen!
Planning and preparing in advance saves time and
money.**

JOINT RECALLS



Criteria for Joint Recalls



- Product sold in both countries
- Product must also be under the jurisdiction of both agencies
- Corrective measures and customer support extended to customers in both countries
- Timing works for regulator and company
- Company sharing all information with both jurisdictions early in the process
- Joint recall is conducted voluntarily

Benefits of Joint Recalls

- Reduced burden on industry
- Increase in consumer pick-up
- Leverages other regulator's resources and authorities
- Information sharing
- Strengthens border protection
- Consistent messaging across the continent

Example

UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION

Home Recalls Safety Education Regulations, Laws & Standards Research & Statistics Business Manufact

CPSC Recall API Recalls Lawsuits Recalls by Product Violations

Home / Recalls / 2015

Graco Recalls 11 Models of Strollers Due to Fingertip Amputation Hazard

Recall date: NOVEMBER 20, 2014 Recall number: 15-03

Enlarge

2 of 11 photos Previous Next

Capri Model Stroller (Century)\n

Download Share

Recall Summary

Name of product:
Aspen, Breeze, Capri, Cirrus, Glider, Kite, LiteRider, Sierra, Solara, Sterling and TravelMate Model Strollers and Travel Systems

Hazard:
The folding hinge on the sides of the stroller can pinch a child's finger, posing a laceration or amputation hazard.

Remedy: [View Details](#)
[Repair](#)

Consumer Contact:
Graco Children's Products at (800) 345-4109 from 8 a.m. to 5 p.m. ET Monday through Friday or online at www.gracobaby.com and click on the "Help Center" at the top and Recall and Safety Notifications for more information.

[Report an Incident Involving this Product.](#)

Recall Details

In conjunction with

Healthy Canadians Canada

Recalls & alerts Kids Food Your Health Environment Consumer products

Home > Recalls & alerts [Share](#) [Contrast](#) [Print](#)

ALERT: Graco Children's Products Inc. recalls strollers & travel systems

Starting date:	November 20, 2014	Report a Concern
Posting date:	November 20, 2014	
Type of communication:	Consumer Product Recall	
Subcategory:	Children's Products	
Source of recall:	Health Canada	
Issue:	Laceration Hazard	
Audience:	General Public	
Identification number:	RA-42149	

[Affected products](#) [What you should do](#)

Joint recall with Health Canada, the United States Consumer Product Safety Commission (US CPSC), Mexico's Consumer Protection Federal Agency (PROFECO) and Graco Children's Products Inc.

Affected products

Graco strollers & travel systems

Product description

This recall involves eight models of Graco strollers & travel systems. All affected models are a single-occupant stroller with a spring-loaded fold lock on each side and a one-hand fold release mechanism on the handle. Model numbers and the date of manufacture are printed on a label located on the stroller tubing frame.

The model names and numbers included in the recall are:

Model	Model Number
Aspen	<ul style="list-style-type: none"> ▪ 6947MAN, ▪ 6954AMB.
Breeze	<ul style="list-style-type: none"> ▪ 6907JUN, ▪ 6907CYP, ▪ 6907JJJ, ▪ 7404NCB, ▪ 7464CEL, ▪ 740433, ▪ 744200.
Capri	<ul style="list-style-type: none"> ▪ 694224, ▪ 694234, ▪ 694275, ▪ 694285, ▪ 694291, ▪ 696053.

Images (select thumbnail to enlarge)

Media Contact

Please use the below phone number for all media requests.

Few Differences:



Health
Canada

Santé
Canada



Recalls: HC's Expectations

Health Canada expects **timely, efficient cooperation from companies** when carrying out **consumer product recalls**.

When planning a recall

- Notify HC
- Answer questions from Regional Inspectors
- Recall notices will be posted online

Following the Recall:

- Recall effectiveness
- Recall monitoring

Timelines for Communicating Recalls

HC has specific timelines for posting information once the decision is made to recall a product:



Key difference

	Level 1	Level 2	Level 3	Level 4
Criteria	serious and imminent <u>danger</u>	serious danger	other danger (lower risk)	no evidence of danger
Timeline	2 Days	14 days	8 Weeks	Company driven
Alert Included?	YES	MAY include Alert	N/A	N/A

Communicating: Recalls and Safety Alerts

The screenshot shows the 'Recalls & alerts' section of the Healthy Canadians website. At the top, there is a navigation bar with the Government of Canada logo and the text 'Canada.gc.ca | Services | Departments | Français'. Below this is a blue banner with 'Healthy Canadians' on the left and the 'Canada' logo on the right. A red maple leaf is centered in the banner. Underneath the banner is a secondary navigation bar with categories: 'Recalls & alerts', 'Kids', 'Food', 'Your Health', 'Environment', and 'Consumer products'. The main content area has a search bar with the text 'Search recalls and safety alerts' and a 'Search alerts' button. Below the search bar are five category icons: 'ALL CATEGORIES', 'CONSUMER PRODUCTS', 'VEHICLES', 'FOOD', and 'HEALTH PRODUCTS'. To the right of the search bar are several utility boxes: 'Featured alerts' (with a link to 'IKEA Canada recalls SMILA wall mounted lamps'), 'Access information when and where you need it', 'Add the Recall & Safety Alerts to your Web site', 'Subscribe to health and safety updates', and 'Report side effects, injuries, and other safety concerns'. Below the search bar is a section titled 'Recent consumer products recalls and alerts' with a table of four recall entries.

Government of Canada / Gouvernement du Canada | Canada.gc.ca | Services | Departments | Français

Healthy Canadians | Canada

Recalls & alerts | Kids | Food | Your Health | Environment | Consumer products

Home > Recalls & alerts

Search recalls and safety alerts

Search alerts

Search terms:
Use AND, OR, NOT or " " for phrases or specific product names to improve your results.
For example, "peanuts" OR "peanut butter"

Advanced search

Featured alerts
IKEA Canada recalls SMILA wall mounted lamps

Access information when and where you need it

Add the Recall & Safety Alerts to your Web site

Subscribe to health and safety updates

Report side effects, injuries, and other safety concerns

Want to know more?
When a product is recalled, or an advisory or alert is issued, it means our surveillance tools are working. Recalls and safety alerts are sent out when we have important information to share—meaning you can feel more secure when choosing and using products.

Recall Icon	Recall Description	Recall Type
	Intertek warns of counterfeit Go With Gio Halogen Heaters 2014-01-16 Consumer Products	Recall
	Honda Canada recalls Honda GCV160LA0 engine equipped MTD mowers 2014-01-15 Consumer Products	Recall
	Kama Pigments recalls Lead white oil paint and Lead white pigment 2014-01-15 Consumer Products	Recall
	WD-40 Company (Canada) Ltd. recalls WD-40 Multi-Use Product equipped with "Smart Straw" and 3-in-One Garage Door Lubricant equipped with "Smart Straw"	Recall

All Government of Canada recalls are found at
<http://www.healthycanadians.gc.ca>



UNITED STATES OF AMERICA
CONSUMER PRODUCT
SAFETY COMMISSION

Corrective Action Plan Notification Elements

- Press Release or Recall Alert
- Website posting on firm's main website
- Stop-Sale notification to all retailers, dealers, distributors
- Toll-free number with detailed scripts

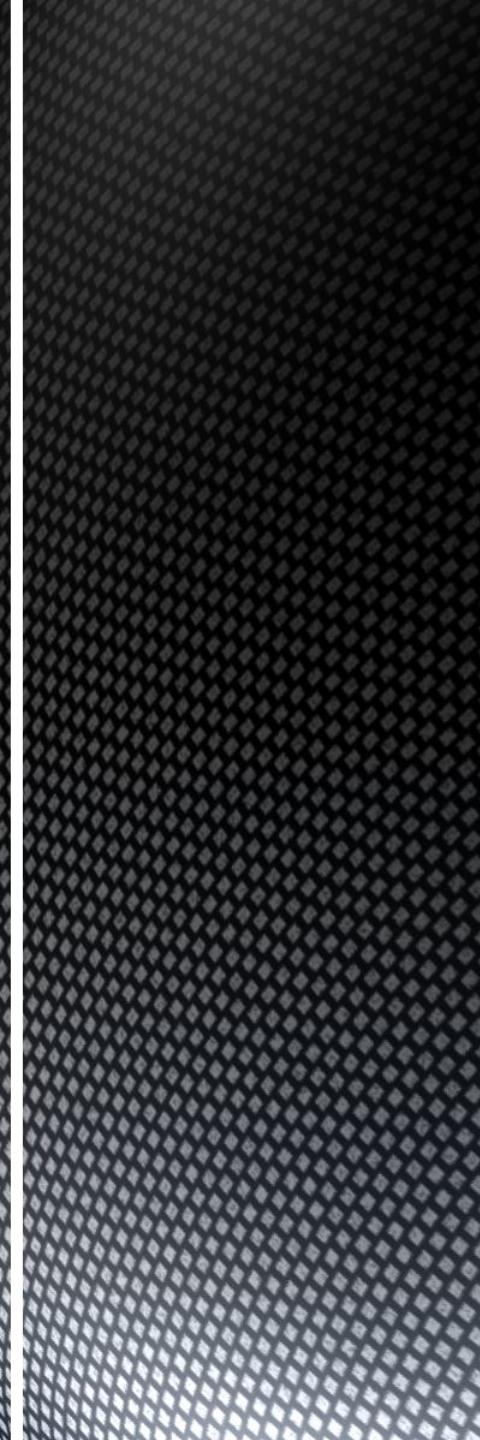
Reporting to CPSC

- Report Online via: www.cpsc.gov (Report/ Business) or www.saferproducts.gov (Business Portal)
- Report via Email: Section15@cpsc.gov

Recall Recap

- **Joint reporting**
- **Communication between regulators**
- **Clear recall communications**
 - **Standard language**
- **Early engagement**

INSIGHTS INTO RECALLS



Thank You!

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