

Private Label Product Recall-Ready Checklist

For private label supplements, skincare and OTC products

Company / product:

Date:

Completed by:

Code → Map → Notify → Verify

- | | |
|---------------|--|
| Code | Legible lot code on every unit and case. |
| Map | Distribution records link each lot to every account and ship date. |
| Notify | Written procedure, decision-maker and draft notice templates. |
| Verify | Run a mock recall: trace one lot from components to customers. |

Recall-ready checklist

- ☐ Lot code on every unit and shipping case (supplement lots must be assigned one; OTC lot numbers must trace the batch history; cosmetics: advised)
- ☐ Lot code format agreed with your manufacturer and printed in the same place on every SKU
- ☐ Expiration or “best by” date printed only where testing supports it (required for OTC drugs)
- ☐ Distribution records linking lot → account → ship date, including 3PL and marketplace orders
- ☐ Written recall procedure naming the decision-maker and the person who contacts FDA
- ☐ Draft notification letter and press release templates on file
- ☐ Supply agreement states recall roles, cost sharing and how fast lot records are delivered
- ☐ COA and batch record available for every lot you’ve sold
- ☐ Supplements: reserve samples identified by lot and held for the required period
- ☐ One mock recall completed, with the time it took recorded and gaps fixed

Notes: