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FOOD RECALL REGULATIONS

IN INDONESIA, THAILAND, AND VIETNAM

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Introduction

Food safety incidents can emerge without warning, requiring businesses to act swiftly to protect consumers and comply with regulatory obligations. Across Southeast Asia, Thailand, Vietnam, and Indonesia have each developed comprehensive food recall frameworks designed to ensure rapid removal of unsafe products from the market while holding businesses accountable for compliance failures.

While these three jurisdictions share common objectives—protecting public health and ensuring food safety—each has crafted distinct regulatory approaches reflecting their unique administrative structures, enforcement priorities, and legal traditions. Understanding these differences is essential for food businesses operating in the region, as recall procedures, timelines, reporting requirements, and penalties vary significantly across borders.

This article examines the food recall regulations in Thailand, Vietnam, and Indonesia, providing practical guidance on legal requirements, procedural steps, and compliance obligations in each market.

INDONESIA

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Food recall rules in Indonesia are overseen by the National Agency of Drug and Food Control (*Badan Pengawas Obat dan Makanan* or "BPOM"). A new BPOM regulation in July 2025 updated these rules, replacing the country's first food recall rules, from 2017.

The latest rules address the recall and destruction of processed food, including food additives, raw materials, auxiliary materials, food packaging, labels, and/or other materials used in the processed food production process. In order to avoid a recall, producers, importers, and distributors of processed food must comply with the following:

- Food Safety and Quality Standards;
- Labelling rules; and
- Food advertising rules (new in the 2025 BPOM regulation).

In addition, these business actors must have a Business License to Support Business Activities (PB-UMKU).

There are two types of food recall: mandatory and voluntary.

Mandatory and Voluntary Recall

Mandatory recalls can be implemented based on:

- Sampling and testing results;
- Label monitoring;
- Advertising monitoring;
- BPOM's Rapid Alert System for connecting with domestic authorities and authorities in other countries regarding food that does not meet safety, quality, and label requirements;
- Food-poisoning outbreaks;
- Verified public complaints;
- Results of studies on food safety or quality;
- Inspection findings;
- Expiration and nonextension of the PB-UMKU;
- Revocation of the PB-UMKU; and
- Lack of a required PB-UMKU for food business activities.

If a mandatory recall is ordered, business actors must conduct the recall and issue a recall notice to their distribution facilities based on the relevant instructions from BPOM.

Voluntary recalls are carried out by business actors based on their own risk assessments. In such cases, business actors should issue a recall notice. The notice must at least identify the food, provide the reason for recall, and define the recall period and scope. The notice must be delivered to any distribution facilities and to the head of BPOM or the provincial government, with a copy sent to the other authority.

To support the recall procedure, business actors must have a food traceability system (or refer to an internationally applicable system) as a basis for effective recalls, as well as a written recall procedure to monitor and evaluate the effectiveness of the recall implementation.

Recall Classification

Indonesian law defines three different classes of food recalls:

- **Class I** – When consumption or exposure to the food may cause serious health problems or even death.
- **Class II** – When consumption or exposure to the food may cause temporary health problems, there is only a low possibility of causing serious health problems, or the food is of inadequate quality.
- **Class III** – When consumption or exposure to the food will not cause health problems, but there is a violation of laws and regulations other than those covered by class I and class II recalls.

Class I recalls must be completed no later than 14 calendar days from the date that BPOM issues the recall instruction. The deadlines for class II and class III recalls are 30 and 180 calendar days, respectively, from the date the recall instruction is issued.

Recalls are conducted in distribution facilities and can be extended to the consumer level if the recall is due to the risk of serious health problems or death. Retailers must ensure that all recalled food is not sold or displayed at the point of sale and is kept separate from other food. Business actors must provide a means for returning food products recalled from consumers.

Report and Publication

Business actors must submit a report regarding the food recall to the head of BPOM, and under the 2025 regulation now have the option of also sending it to the head of the relevant provincial government.

For class I food recalls, business actors must also publish an announcement regarding the recall within 24 hours of the recall instruction—a requirement that the 2025 notification has carried over from the 2017 regulation.

Destruction of Food

The destruction of food that has been recalled can be ordered by the head of BPOM or the provincial government, or business actors can destroy it voluntarily. The destruction is conducted onsite after evaluation by an inspector from BPOM or the provincial government. Both types of destruction must be witnessed by an officer from BPOM or the provincial government, and the business actor must prepare and submit a report to either BPOM or the provincial government regarding the destruction, with a copy of the report sent to the other authority.

Administrative Sanctions

Business actors that do not comply with the provisions and obligations related to food recalls are subject to administrative sanctions, including written warnings, fines, temporary suspension of activity, suspension of public-facing business activities up to six months, and revocation of the business' PB-UMKU.

THAILAND

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Thailand regulates food product recalls through the Food Act B.E. 2522 (1979) and its bylaws, along with administrative mechanisms led by the Thailand Food and Drug Administration (TFDA). While the Food Act prohibits the sale of unsafe food and grants authorities broad powers to act against unsafe and noncompliant products, Notification of the Ministry of Public Health No. 420 embeds recall readiness into food Good Manufacturing Practices, requiring food businesses to maintain recall procedures and traceability systems.

In addition, the Thailand Rapid Alert System for Food and Feed (RASFF) is an alert system for reporting imports of human food and animal feed into Thailand. The RASFF is used by various competent authorities, including the TFDA, Department of Agriculture, and Department of Livestock Development, among others.

The RASFF provides an operational platform for incident notification, risk assessment, public alerts, interagency coordination, and postincident close-out. In practice, recalls may be initiated voluntarily by operators or ordered by the TFDA when risk to consumer health or noncompliance is identified.

Legal Basis and Competent Authorities

When necessary, the TFDA can direct operators to halt distribution, withdraw products from the market, and take remedial actions to address hazards. In particular, the Import/Export Inspection Division of the TFDA is empowered to order product recalls of the imported product that are found to violate regulatory requirements.

Alongside the TFDA, the Office of Consumer Protection Board (OCPB), established under the Consumer Protection Act, plays a significant role in consumer safety. The OCPB is authorized to investigate consumer complaints, order the recall or withdrawal of unsafe or noncompliant products, and coordinate with the TFDA and other agencies to ensure effective consumer protection in food safety matters. Ministry of Public Health Notification 420 on Good Manufacturing Practice (GMP) requires food manufacturers to implement and maintain a documented recall procedure, establish a product traceability system—including batch and lot identification and distribution records—and put in place mechanisms to verify the effectiveness of recalls as part of their GMP controls. These obligations are designed to ensure the rapid removal of unsafe or noncompliant food from the market and to facilitate timely communication with authorities and supply chain partners. The Rapid Alert System for Food and Feed (RASFF), operated by the National Bureau of Agricultural Commodity and Food Standards, serves as the operational backbone for incident reporting, risk assessment, rapid response, alerts, and multiagency coordination. Key participants in this system include TFDA, the Department of Medical Sciences, and the Department of Livestock Development, among others.

Scope and Triggers

Food product recalls in Thailand can be issued for a broad range of processed and unprocessed foods, beverages, food additives, and other regulated domestic and imported food products available in the Thai market. Recalls may be triggered by a variety of situations, such as chemical or microbiological contamination; excessive levels of approved substances; unhygienic production, packing, or storage conditions; adulteration or substitution of ingredients; or quality that fails to meet TFDA standards. Other triggers include labeling or advertising violations that mislead consumers or affect the safe use of the product, the presence of expired products, and hazards related to containers or packaging materials.

In practice, recalls are often initiated following findings from sampling, testing, or inspections conducted by the TFDA or provincial public health offices. Surveillance signals and outbreak investigations, such as those related to food poisoning, can also prompt recalls. Public complaints that are verified by the TFDA or the OCPB, rapid alerts issued through RASFF (including those received via INFOSAN, the International Food Safety Authorities Network), and monitoring of labels or advertising for deceptive or unsafe information are additional common precursors.

Types of Recalls: Voluntary and Mandated

Recalls in Thailand can be initiated voluntarily by food business operators or mandated by the authorities (e.g., TFDA). Voluntary recalls typically arise when operators, through internal risk assessments, self-inspections, complaints, or notifications from their supply chain, identify a potential risk and act to remove the affected products from the market. Ministry of Public Health Notification No. 420 requires that operators be prepared to execute such recalls effectively and promptly. On the other hand, when the TFDA identifies a significant risk or a legal violation, it has the authority to mandate a recall—or in the worst-case scenario, market withdrawal. In these cases, the TFDA may order the cessation of distribution and direct the necessary recall or withdrawal steps. For the most serious hazards, the TFDA can escalate its response by issuing public alerts, seizing products, and ordering their disposal or destruction to ensure consumer safety.

Classification and Timelines

In operational practice, recalls are classified into three levels based on the degree of risk involved:

- **Level I** recalls are reserved for situations where there is a serious risk of severe health effects or even death.
- **Level II** recalls address risks that may cause temporary or reversible health effects or that involve other significant noncompliance issues.
- **Level III** recalls are generally for cases where the health risk is low, such as labeling or marking irregularities or other legal noncompliance that does not pose a material health hazard.

Timelines for managing recalls are clearly defined to ensure swift action. For level I recalls, initiation must occur within 24 hours of awareness, with completion expected within 10 working days of the publication of the recall notice. Level II recalls should be initiated within 48 hours and completed within 20 working days, while level III recalls are to be initiated within 72 hours and completed within 30 working days.

Throughout the recall process, progress reports must be submitted to the regulatory authority (e.g., TFDA) at regular intervals, such as every 3 days for level I, every 7 days for level II, and every 15 days for level III, continuing until the recall is officially closed. These timeframes, while standard, may be adjusted by the authorities depending on the specifics of each case to ensure the effectiveness of the recall.

Recall Readiness: GMP Requirements

To ensure recall readiness, Ministry of Public Health Notification No. 420 requires domestic food business manufacturers and importers to maintain comprehensive written recall procedures. These procedures must address all aspects of recall decision-making, clearly define roles and responsibilities, outline communication strategies, and detail the logistics for retrieving affected

products, verifying the effectiveness of the recall, and determining the final disposition of the products.

A robust traceability system is also essential, enabling rapid identification of raw material inputs, processing batches, distribution lots, customer accounts, and the geographical reach of each product—at a minimum, manufacturers must be able to trace one step forward and one step back in the supply chain. Distribution and production records must be kept in sufficient detail to identify affected lots and their destinations, and these records should be retained for a period adequate to support any recall and subsequent investigation.

When a recall is necessary, the first step is immediate risk control. This involves ceasing the production and distribution of the affected products and segregating the relevant lots under hold or quarantine. Distributors and retail partners must be promptly informed to stop the sale and display of the affected products, and arrangements should be made for their withdrawal from the market. In cases involving high-risk issues, a consumer-level recall may be initiated, providing clear instructions for product return or refund. The next step is to notify the TFDA, providing initial facts and contact points. A detailed recall plan must then be submitted, outlining a number of important details about the company and the recall.

Public communication is a critical component. These notices typically include product identification (with images where possible), lot or batch details, hazard information, instructions not to consume or use the product, steps for return or refund, and company contact information. During the execution phase, products are retrieved from distribution facilities and, if necessary, from consumers. Quantities produced, distributed, recovered, remaining in the market, and in consumers' hands are tracked and reconciled against production and distribution records. Periodic progress reports are submitted to TFDA according to the recall classification until the recall is complete.

Product Disposition

Once products have been recalled, their final disposition must be determined. For foods that are unsafe or adulterated, and for products posing a serious risk, destruction or harmless disposal is required, often under the supervision of the TFDA or relevant provincial public health office. In cases where the issue is limited to labeling noncompliant items that do not pose a health risk, corrective relabeling may be permitted, subject to the direction of the TFDA. Such products may only be returned to the market after all defects have been remedied and corrective actions have been clearly communicated where necessary.

Recordkeeping and Postrecall Close-Out

Throughout the recall process and after its completion, meticulous recordkeeping is essential. Records should be maintained for at least two years, or longer if required by product-specific regulations, and should cover all relevant details, including product identity and batches, distribution lists, retrieval logs, communications, testing and analysis results, disposal certificates, and assessments of recall effectiveness. At the conclusion of the recall, a final

report must be submitted to the TFDA, summarizing the root cause of the incident, the scope of the recall, quantities recovered, corrective and preventive actions (CAPA) taken, and measures implemented to prevent recurrence.

Preparation and Mitigation

For business operators, several practical steps are essential to ensure readiness and compliance on food product recall. Maintaining up-to-date recall standard operating procedures (SOPs) aligned with the Food Act and MoPH Notification 420 is an important element, as is training cross-functional teams—including those in quality assurance, legal and regulatory affairs, supply chain, sales, and customer service—on their roles in a recall. Operators should also preapprove public notice templates and trade letters and map out media channels to ensure comprehensive coverage across all affected provinces. Establishing robust recall service logistics for consumer returns, such as toll-free lines, dedicated websites, return points, and refund mechanisms, as well as systems for retailer retrieval, will facilitate an effective recall process. Finally, conducting thorough root cause analysis and implementing effective and verifiable CAPA should be documented in detail for TFDA review.

While many recalls are initiated voluntarily by businesses, the TFDA also has the power to direct recalls and determine product disposition whenever public health is at risk. To meet regulatory expectations and effectively manage risk, operators must maintain strong traceability systems, comprehensive recall procedures, and well-developed communication plans, in addition to having practical SOPs in hand.

VIETNAM

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Recent high-profile food safety violations in Vietnam have led to urgent food recalls, underscoring the risks businesses face when safety standards are not rigorously followed. Such incidents have raised awareness about the importance of having clear, effective regulatory frameworks and compliance mechanisms to manage food recalls swiftly and transparently.

The discussion below provides an overview of Vietnam's food recall regulations, highlighting key legal requirements, procedural steps, and potential consequences of noncompliance. For businesses operating in the food sector, understanding these regulations is vital to protecting consumers, safeguarding brand reputation, and avoiding significant legal penalties.

Cases Requiring Food Recall

The Law on Food Safety stipulates cases where food recall must be carried out, including:

- Food that has expired but is still sold on the market;
- Food that does not comply with relevant technical regulations;
- Food that is a new technological product that has not been permitted for circulation;
- Food that is damaged during storage, transportation, or trading;
- Food that contains prohibited substances or contaminants that exceed prescribed limits; and
- Imported food that is alleged by a competent authority of the exporting country, another country, or an international organization to contain contaminants that are harmful to human health and life.

There are different forms for voluntary and compulsory recalls, as stipulated in the Law on Food Safety, Circular 23/2018/TT-BYT, and Circular 43/2018/TT-BCT.

Voluntary Food Recalls

For voluntary recalls conducted upon self-discovery or after receiving feedback from an entity regarding an unsafe product, food registrants have a number of notification obligations.

Within 24 hours from the time of discovery or receipt of information regarding unsafe products, if the product is to be recalled, the product registrant must:

- Instruct their entire production and business system (production facilities, distribution channels, agents, stores) via phone, email, or other appropriate forms of notification, and then in writing, to stop production and relevant operations and conduct the recall of the product.
- Notify provincial and municipal mass media agencies and other relevant agencies and organizations in writing in accordance with the Law on Consumer Rights Protection. If the recall is conducted in two or more provinces, written notification must be sent to central-level mass media agencies.
- Notify the Vietnam Food Authority or the relevant provincial Subdepartment of Food Safety and Hygiene of the product recall in writing.

In the written notifications, the product registrant must clearly state:

- Name and address of the product importer,
- Owner and manufacturer,
- Product name,
- Packaging specifications,
- Production batch number,
- Production date and expiry date,
- Quantity,

- Reason for product recall,
- List of locations for gathering and receiving recalled products, and
- Time of product recall.

After completing the recall, the product registrant must, within three days, report the recall results to the food safety authority and propose postrecall product handling measures. The authority will not provide an opinion on the proposed measures, provided they comply with the legally prescribed options as detailed in the section below.

Compulsory Food Recalls

Compulsory recalls may be ordered by the food registration authority (e.g., the Vietnam Food Administration, provincial Subdepartments of Food Safety and Hygiene) or another agency empowered to sanction administrative violations of food safety, such as the national or provincial inspectorate and national or provincial market surveillance agencies.

After a food safety issue is discovered, the authorities will assess whether a compulsory food recall should be initiated. If a recall is deemed necessary, they must issue a recall decision within 24 hours of making that determination. Upon receiving a recall decision, product registrants must immediately follow the same procedures as for voluntary recalls described above. This includes submitting the prerecall report and then conducting the recall.

Within three days after completing the recall, the recall results must be reported to the competent food safety authority and measures proposed for handling the recalled products. The authority will issue a written notice either approving the proposed measures or rejecting them and recommending alternatives. After receiving approval or recommendations, the product registrant has three months to handle the recalled products accordingly.

Urgent Food Recall Procedures

If the product registrant fails to carry out the recall of unsafe products according to the compulsory recall decision, or in other urgent cases, the relevant authority will issue a decision to enforce the recall. The decision will state the agency or organization responsible for carrying out the enforcement, the agency or organization responsible for supervising or witnessing the enforcement period, and the measures for handling the products after the recall.

After completing the recall and handling of unsafe products, the agency responsible for carrying out the recall and handling the products postrecall will issue a written notice ordering the product registrant to pay any costs of recalling the products. The payment must be made within 15 days.

Penalties

Businesses that fail to comply with regulations on food recall within the specified time will face an enforced recall, as described in the previous section.

In addition, acts of failing to recall unsafe food in accordance with the law will be fined VND 20–30 million (approx. USD 760–1,140).

Trading products or batches of products that have been ordered to be recalled by a state agency is subject to the following penalties:

- Fines of 1–2 times the value of the violating products
- Confiscation of evidence in case of remaining evidence of violation
- Suspension of the right to use the Certificate of Receipt of Product Declaration for 20–24 months for products subject to product declaration registration, or forced withdrawal of the self-declaration of products subject to product self-declaration.

Postrecall Product Handling

Different actions are taken with the recalled products, depending on the circumstances:

- Correction of labeling errors: When products violate labeling regulations compared to the self-declaration dossier or product declaration registration dossier.
- Repurposing: When the violating product has the risk of affecting the health of consumers and cannot be used in food but can still be used in other ways,
- Reexport: When imported products have quality and safety limits that are inconsistent with the self-declared dossier or product declaration registration dossier, or affect the health of consumers,
- Destruction: When products have quality indicators or safety limits that are inconsistent with the self-declared dossier or product declaration registration dossier, affecting the health of consumers, and cannot be used for other purposes or reexported.

Compliance

Businesses operating in Vietnam's food sector must take note of the increasing regulatory scrutiny surrounding food safety and recall procedures. Recent enforcement actions by Vietnamese authorities underscore the critical importance of full compliance with food recall regulations under Vietnamese law.

As regulatory enforcement intensifies, proactive compliance with Vietnam’s food recall regulations is not only a legal obligation but also a strategic imperative to safeguard public health, protect brand reputation, and avoid costly sanctions.

Conclusion

Food recall regulations across Thailand, Vietnam, and Indonesia reflect a shared commitment to consumer protection while accommodating different regulatory approaches. All three jurisdictions employ dual-track systems allowing both voluntary and mandatory recalls, classify recalls by risk level, and require robust traceability systems as the foundation for effective product retrieval.

However, significant differences exist in administrative structures, notification timelines, and enforcement mechanisms. Thailand operates through the TFDA with multi-agency coordination via RASFF, Vietnam distributes authority among various agencies with strict 24-hour notification requirements, and Indonesia centralizes oversight under BPOM with the 2025 regulation introducing enhanced provincial involvement. Penalty structures also vary, from Vietnam's substantial fines and license suspensions to Indonesia's graduated administrative sanctions and Thailand's GMP-embedded compliance framework.

For businesses operating across Southeast Asia, these variations demand tailored compliance strategies for each market. While strong traceability systems and comprehensive recall procedures are universally essential, companies must adapt their protocols to meet country-specific requirements. Proactive recall readiness—including regular procedure testing, detailed recordkeeping, and clear regulatory communication channels—protects consumers, preserves brand reputation, and ensures operational continuity in an increasingly scrutinized regional market.

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