



NATIONAL SAFETY COUNCIL

Position/Policy Statement

Vehicle Safety Recalls

Policy/Position

The National Safety Council (NSC) supports enhanced efforts to increase awareness surrounding vehicle safety recalls, boost completion of repairs, and include checking for safety recalls as part of routine vehicle maintenance.

Background on Vehicle Safety Recalls

A vehicle safety recall is issued when a manufacturer or the National Highway Traffic Safety Administration (NHTSA) determines a vehicle or its equipment creates an unreasonable safety risk or fails to meet minimum safety standards.¹ Types of recalls vary, with the most serious recalls issued with a "Do Not Drive" or "Park Outside" warning. Manufacturers are required to fix the problem at no cost to the consumer by repairing it, replacing it, offering a refund, or in rare cases, repurchasing the vehicle.^{2, 3}

Fifty million, or 1 out of every 5 vehicles on the road, have unrepaired safety recalls which could cause a crash, serious injury, or death.⁴ Assessments of available data show that vehicle safety recalls disproportionately impact vehicle owners in communities of color and low-income communities⁵ Addressing vehicle recalls is an urgent and serious risk to drivers, passengers, and all roadway users.

Since 2014, nearly 67 million vehicles have been recalled, due largely to the Takata air bag malfunction that may cause these airbags to explode when deployed.⁶ In the United States, 27 people have been killed and over 400 injured by defective Takata air bags.⁷

¹National Highway Traffic Safety Administration (NHTSA). "Safety Issues & Recalls." NHTSA, 2023.

<https://www.nhtsa.gov/recalls>

² Ibid.

³ NHTSA. "Motor Vehicle Safety Defects and Recalls." NHTSA, 2017.

https://www.nhtsa.gov/sites/nhtsa.gov/files/documents/mvdefectsandrecalls_808795.pdf

⁴ CARFAX. "CARFAX Free Vehicle Recall Check." CARFAX, 2023. <https://www.carfax.com/recall/>

⁵ 2023 data from Stellantis looking at open Takata recalls and completion rate by ZIP code, analyzed against 2020 Census data for income and ethnicity.

⁶ NHTSA. "Takata Recall Spotlight." NHTSA. <https://www.nhtsa.gov/equipment/takata-recall-spotlight>

⁷ Ibid.

Equity in Vehicle Safety Recalls

Urgent and potentially dangerous vehicle safety recalls disproportionately impact vehicle owners in communities of color, rural communities, and low-income communities.^{8 9} These communities may be more likely to be unaware of a recall and to face barriers around scheduling repairs or accessing authorized dealerships, among other challenges.¹⁰

A 2023 analysis of 1,000 zip codes with the most vehicles affected by the Takata airbag recall showed that the 100 zip codes with the best recall completion rates within that group have a median income of about \$81,000 and are 71% white, 9% Black, and 13% Hispanic. The 100 zip codes with the lowest recall completion rates have a median income of about \$46,000 and are about 14% white, 18% Black, and 66% Hispanic.¹¹

A 2015 survey on recalls conducted for the Alliance for Automotive Innovation found that survey respondents who identified as non-white, African American or Hispanic were 9% to 12% less likely than white respondents to fix a severe recall.¹² Furthermore, the study found respondents making under \$20,000 annually were the least likely income group to fix a severe recall.¹³ A 2016 survey conducted on behalf of Fiat Chrysler Automobiles found that people who live in small town and rural areas were 9% less likely than people who live in urban areas to check for recalls.¹⁴ The survey also found that as low as 30% of Latino respondents were likely to check for a recall compared to 41% of all drivers surveyed.¹⁵

People in these underserved communities are more likely to drive unrepaired vehicles that could cause injury or death.

The Vehicle Safety Recall Problem

Whether voluntarily issuing a recall or being required to do so by NHTSA, vehicle manufacturers have the primary responsibility for notifying vehicle owners of a recall.¹⁶ Federal statute requires registered owners to be notified of a recall via first-class mail by the manufacturer within 60 days of the manufacturer notifying NHTSA of a recall decision or NHTSA notifying the manufacturer of a recall.¹⁷ This notification includes information on the reason for the recall and how the owner can have the issue remedied or

⁸ Public Opinion Strategies, *National Online Survey*, conducted for Auto Innovators (formerly the Alliance for Automobile Manufacturers), 2015, Table 1-2.

⁹ National Safety Council, *Re: Docket No. DOT-OST-2021-0056*, July 21, 2021, pages 5-6.

¹⁰ Ibid.

¹¹ 2023 data from Stellantis looking at open Takata recalls and completion rate by ZIP code, analyzed against 2020 Census data for income and ethnicity.

¹² Public Opinion Strategies, *National Online Survey*, conducted for Auto Innovators (formerly the Alliance for Automobile Manufacturers), 2015, Table 1-2.

¹³ Public Opinion Strategies, *National Online Survey*, Table 1-4.

¹⁴ Public Opinion Strategies, *National Online Message Testing Survey*, conducted for Fiat Chrysler Automobiles, 2016, Table 1-2.

¹⁵ Public Opinion Strategies, *National Online Message Testing Survey*, Table 1-1.

¹⁶ NHTSA. "Motor Vehicle Safety Defects and Recalls." NHTSA, 2017, pages 10-11.

https://www.nhtsa.gov/sites/nhtsa.gov/files/documents/mvdefectsandrecalls_808795.pdf.

¹⁷ NHTSA. "Roles in the Recall Process." <https://www.nhtsa.gov/recalls>

repaired free of charge at an authorized car dealer.¹⁸ Free recall repairs are guaranteed for vehicles less than 15 years old on the date of the defect being determined.¹⁹

In 2021, NHTSA administered over 1,000 safety recalls affecting nearly 35 million vehicles and other equipment, but only 52% of vehicles recalled that year were remedied.²⁰ Millions of vehicle recalls go unrepaired or unaddressed by vehicle owners and custodians every year.²¹

Notifying owners becomes challenging as vehicles age and pass to subsequent owners. While the average completion rate for passenger vehicle recalls is 75 percent, that rate varies widely depending on the age of the vehicle recalled.²² For newer vehicles, the completion rate averages 83 percent, and the rate falls almost by half to 44 percent for vehicles 5-10 years old.²³ Today's average vehicle age is 11.4 years.²⁴ Studies indicate completion rates drop again by 15 percent for vehicles older than 10 years.²⁵

This may be due to a variety of reasons. For example, as vehicles age, they may be more likely to change owners or experience a lapse in registration or insurance coverage. This means manufacturers may not have the correct contact information for the latest owners to make recall notifications.²⁶

Additionally, when recall notifications are made, parts needed to fix those recalls may not be available because vehicle manufacturers are required to issue the recall notice as soon as the defect is discovered and confirmed.²⁷ If the part is not available, owners should be attentive to the safety issue and try to repair the vehicle as soon as possible. Owners should contact their local dealer and the manufacturer directly with specific questions and concerns.²⁸

Additional Challenges

Even if vehicle owners are aware of a recall and the part is available, survey data and anecdotal reports suggest a variety of reasons why owners may not prioritize recall repairs.^{29 30 31}

- Owners do not have time.
- Recall is not of concern.

¹⁸ Alliance for Automotive Innovation. "Recall Policy Recommendations." Alliance for Automotive Innovation, March 2022. Page 1. <https://www.autosinnovate.org/resources/downloads-for-press/March%202022%20AFAI%20Recall%20Policy%20Recommendations.pdf>

¹⁹ NHTSA. "Motor Vehicle Safety Defects and Recalls." NHTSA, 2017, page 13.

https://www.nhtsa.gov/sites/nhtsa.gov/files/documents/mvdefectsandrecalls_808795.pdf

²⁰ NHTSA. "NHTSA 2022 Annual Report Safety Recalls." NHTSA, published March 2023, page 9.

https://www.nhtsa.gov/sites/nhtsa.gov/files/2023-03/2022-Recalls-Annual-Report_030223-tag.pdf

²¹ NHTSA. "Vehicle Safety Recalls Week." NHTSA, March 2023. <https://www.nhtsa.gov/recalls/vehicle-safety-recalls-week>

²² Alliance for Automotive Innovation. "Recalls." Alliance for Automotive Innovation.

<https://www.autosinnovate.org/recalls>

²³ Ibid.

²⁴ Ibid.

²⁵ Ibid.

²⁶ Burretta, *Update on the State of the Takata Airbag Recalls*, 14.

²⁷ <https://www.consumerreports.org/cars/car-recalls-defects/what-to-do-when-theres-no-fix-for-your-cars-recall-a8065377336/>

²⁸ Ibid.

²⁹ Kelley Blue Book (KBB). "Vehicle Recalls: Why Consumers Don't Take Action and What Dealerships Can Do about It." KBB, February 16, 2023. <https://b2b.kbb.com/fixd-ops-advantage-blog/view/how-to-capture-more-vehicle-recall-work/>

³⁰ Public Opinion Strategies, *National Online Survey*, conducted for Auto Innovators (formerly the Alliance for Automobile Manufacturers), 2015

³¹ Public Opinion Strategies, *National Online Message Testing Survey*, conducted for Fiat Chrysler Automobiles, 2016

- Owners are waiting for the safety risk to be more obvious.
- Owners do not place importance on recall.
- Vehicle is needed by owner and other users.
- Repair location is inconvenient.
- Owners do not understand that the repair is free.

Enhancing Awareness of Vehicle Safety Recalls

A coalition of automakers, federal, state, and local governments, and non-profit organizations have been urging vehicle owners to prioritize free repairs through a variety of outreach tactics including advertising, mailing notices, calling vehicle owners, and conducting door-to-door canvassing. These efforts have led to more than 45 million repairs related to air bags alone.³²

In 2017, NSC and founding coalition partner Fiat Chrysler Automobiles, now known as Stellantis, launched the [Check To Protect](#) initiative to address the high number of vehicles with unrepaired recalls.³³ Check To Protect is a public awareness and educational campaign supported by several automobile manufacturers that encourages vehicle owners to check their vehicles for open safety recalls and schedule free repairs at an authorized dealership. Check To Protect strives to streamline this process and make identifying vehicle recalls as easy as possible for the consumer. This includes a website that enables vehicle owners to check for recalls by either VIN or license plate, including by simply uploading a picture of a license plate.

State level grants provided by NHTSA have also helped reach vehicle owners and boost repairs by giving states funding to build recall notifications into existing systems for vehicle inspection and registration renewals. In 2017, NHTSA granted Maryland \$222,300 for this purpose. This relatively modest investment greatly increased recall repairs. Over the course of two years, 4.6 million vehicles went through the registration renewal process, and 456,000 vehicles were notified of open recalls, leading to 40% of recalls being addressed.³⁴ Continued engagement with state regulators could provide similar results.

Recommendations

1. Encourage all vehicle owners to regularly check for and repair safety recalls;
2. Streamline information needed to check if a vehicle is under recall by either using a vehicle identification number (VIN), license plate information or other unique identifier;
3. Urge companies that deal with customers' vehicles to help inform them about unresolved safety recalls, like insurance companies, repair shops, state and local agencies;
4. Increase community specific communication from the private sector, government and other stakeholders to emphasize the importance of and understanding about vehicle recalls, especially as it relates to the risk of injuries or death;
5. Communicate clearly to consumers about availability of parts to repair recalls and when parts are unavailable, when they will be available;
6. Make recall notices available in multiple languages with appropriate cultural context;
7. Ensure the ability to address a recall is accessible by all owners;

³² NHTSA, "Takata Recall Spotlight." Completion Rates. <https://www.nhtsa.gov/equipment/takata-recall-spotlight#completion-rates>

³³ National Safety Council, "National Safety Council, FCA US Announce New Public Awareness Campaign, Check To Protect, Focused on Auto Recalls," June 22, 2017. http://checkprotect.wpengine.com/wp-content/uploads/2017/09/Press-Release_English.pdf

³⁴ "NHTSA Announces Grant Program to Help States Inform Vehicle Owners About Safety Recalls" May 7, 2020. <https://www.nhtsa.gov/press-releases/nhtsa-announces-grant-program-help-states-inform-vehicle-owners-about-safety-recalls>

8. Diversify methods for notifying consumers of recalls, including through advertising, mailing notices, phone calls and door-to-door canvassing;
9. Support innovative solutions such as stronger recall compliance regulations and legislation;
10. Support the NHTSA grant program for state-based recall notification programs and state adoption of it;
11. Explore ways to engage state regulators;
12. Utilize innovative partnerships to expand reach of recalls, and
13. Continue research to better understand the reasons for noncompliance with vehicle recalls.

This position statement reflects the opinions of the National Safety Council but not necessarily those of each member organization.

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