

PROTOCOL # 237-D

TOILET_BOWL_BRUSH

Performance Test	Test Method	Samples	Requirement	Rating (Section or exec. Summary which failed items can be referenced)
Initial Package				
Label Verification				
Labeling / Packaging Review	FPLA 16 CFR 500 & 19 CFR 134	All Samples	<p>Should be legibly marked with the following information:</p> <ul style="list-style-type: none"> - Distributor's name, trademark or other means of identification of the manufacturer or packer & address (City, State & Zip) - Product identification - Net quantity of the contents in terms of weight, measure or numerical count (Metric & US Standard) or a combination so as to give accurate information and facilitate value comparison by the consumer - Country of origin (if imported) 	
Verify Label Claims	Visual Check	All Samples	The labeling must comply and valid with all claims.	
Adult Tracking Label: **If space limitations exist, contact Kohl's Quality Assurance & Product Integrity teams to discuss m required information (MR.QA.PI@kohls.com)	Kohl's Requirement	All Samples	Can be included on packaging when necessary: Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC #	
Import Permit (For Natural Materials Only)	US Department of Agriculture Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ)	All Samples	<p>Product shall not have prohibited materials present per US Department of Agriculture, Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ)</p> <p>Documentation and/ or proper permit(s) for specific product shall be supplied along with Testing Request form and samples.</p> <p>Permit information may be found at: https://www.aphis.usda.gov/wps/portal/aphis/home/</p> <p>It is the vendor's responsibility for the compliance to relevant requirements.</p>	
EPA TSCA Title VI – Composite Wood - Sample Declaration Form and Mill Certificate (if applicable)	40 CFR 770	All Samples	<p>If wood of any type is present in the sample, submitter shall provide a completed and signed Sample Declaration Form. Sections A, B, and E of the Sample Declaration Form must always be completed.</p> <ul style="list-style-type: none"> • If regulated composite wood is not present in the sample, result is N/A. • If regulated composite wood is present in the sample: <ul style="list-style-type: none"> - Submitter shall provide a copy of the certificate issued by the Third Party Certifier (TPC) for the mill(s) from which the raw panels were purchased - All information on the certificate shall be consistent with the Sample Declaration Form - Section D of the Sample Declaration Form must also be completed <p>Notes:</p> <ul style="list-style-type: none"> • Include a copy of the Sample Declaration Form in the report <ul style="list-style-type: none"> • Regulated composite wood includes: <ul style="list-style-type: none"> - Hardwood plywood (HWPW) - Medium-density fiberboard (MDF) - Thin medium-density fiberboard (Thin MDF) - Particleboard (PB) • Mill certificate must indicate compliance with TSCA Title VI. It is no longer acceptable to have the certificate indicate compliance with CARB's ATCM for formaldehyde in lieu of compliance with TSCA Title VI. 	
EPA TSCA Title VI – Composite Wood - Raw Panel Labeling (if applicable)	40 CFR 770.45(a)	All Samples	<ul style="list-style-type: none"> • Panels or bundles of panels must be labeled with the following: <ul style="list-style-type: none"> - The panel producer's name - The lot number - The number of the EPA TSCA Title VI Third Party Certifier (TPC) - A statement of compliance to denote that the panels comply with TSCA Title VI <p>Notes:</p> <ul style="list-style-type: none"> • A panel producer number may be used instead of a name to protect identity • Raw panels are regulated composite wood products that have not been used to create a finished good • The compliance statement must denote compliance with the TSCA Title VI. It is no longer acceptable to have the panel labeled as compliant with CARB's ATCM for formaldehyde in lieu of TSCA Title VI compliance statement. 	
Formaldehyde Emission of Composite Wood Product - State of California (if applicable)	Airborne Toxic Control Measure (ATCM), California Code of Regulations, Title 17, § 93120	All Samples	<p>Composite wood products include finished goods composed of or containing hardwood plywood (HWPW) made with either a combination core (CC) or a veneer core (VC), particleboard (PB), and medium-density fiberboard (MDF), or finished goods composed of such products made with no-added formaldehyde based (NAF-based) resins or ultra-low emitting formaldehyde (ULEF) resins, shall not release formaldehyde exceeding the regulatory limits.</p> <p>In lieu of testing, valid certificate or test report or certificate can be submitted if dated within one year.</p>	

Labeling of Composite Wood Product - Formaldehyde Emission - State of California (if applicable)	Airborne Toxic Control Measure (ATCM), California Code of Regulations, Title 17, § 93120	All Samples	Composite wood products include finished goods composed of or containing hardwood plywood (HWPW) made with either a combination core (CC) or a veneer core (VC), particleboard (PB), and medium-density fiberboard (MDF), or finished goods composed of such products made with no-added formaldehyde based (NAF-based) resins or ultra-low emitting formaldehyde (ULEF) resins, shall be labeled in accordance with the regulations and meet all applicable requirements. In lieu of testing, valid certificate or test report or certificate can be submitted if dated within one year.	
Analytical				
*Lead In Scrapable Surface Coating	CPSC-CH- E1003-09	1 Sample	≤90 ppm (0.0090% by weight) (CPSA – 16 CFR 1303)	
* CA Prop 65	Refer to Protocol 1300	All Samples	All samples shall be reviewed against the requirements of California Proposition 65 to determine if additional testing or labeling is required.	
Refer to protocol Hardlines Regulatory Supplement for additional State & Federal Regulations	Refer to Protocol 1800	All Samples	All samples shall be reviewed against the requirements of the Hardlines Regulatory Supplemental Protocol (State Regulation Only) to determine if additional testing or labeling is required	
Physical Characteristics				
Dimensions	Std. Measure	3 Samples	As Claimed/ measured (+5%/ - 5%)	Claim: Actual:
Average bristle length	Std. Measure	3 Samples	Report average bristle length for brush. Shall meet label claims (if applicable).	Claim: Actual:
Overall Weight	Std. Measure	1 Sample	Report actual. Shall meet label claims (if applicable)	Claim: Actual:
Material Type	Visual Check	1 Sample	Report actual. Shall meet label claims (if applicable)	Claim: Actual:
Construction Qualities				
Kohl's Workmanship Review	Visual Check / Actual Use	All Samples	- All components shall be provided as claimed and shall not be deformed or fractured. - All hardware shall be provided - All welds shall be smoothly finished and free from pits and splatter - All components shall not contain any burrs or sharp edges (test by touch or sight) - Product shall not contain any loose components or unsecured fastening where rigidity is required - Product shall not tip over during casual handling	
Base Flatness	Visual Check	All Samples	Container and holder shall not be rocking or wobbling when placed on a flat surface.	
Performance				
Functionality	Actual Use	All Samples	Shall function as intended as received.	
Fit Properties	Actual Use	All Samples	Shall be suitable for use.	
Cleaning Ability	Actual Use	All Samples	Cleaning tools such as brush, broom, mop and squeegee shall function as intended with no scratching to intended surfaces after 3 times going back and forth over 6 inches.	
Effects Of Extreme Temperature/Humidity (Environmental)	Kohl's TM 30	1 Sample	24 hours @ 0° F (-18°C) and 24 hours @ 95% RH/120° F (49°C). No failure or adverse effect.	
*Cross Cut Adhesion (Applicable to metal plating and mirror tier 1ing)	ASTM D3359 Test Method A	1 Sample	Cut 2 in. cross-hatch pattern on plating surface or mirror silvering. Plating or silvering must remain affixed. Trace peeling or removal along incision or at their intersection is accepted.	
*Loading Capability (Applicable to waste can or similar container or shelf only)	Std. Measure	1 Sample	Shall withstand no. of times the volume capability or 15 lbs whichever is less for 24 hours. No failure or adverse effect. Tier 1 Tier 2 2 Times 3 Times	
*Handle strength – Static (If Applicable)	Kohl's TM 34	1 Sample	Shall withstand no. of times total weight of the product or 5 lbs at a minimum. No failure or adverse effect. Tier 1 Tier 2 2 Times 3 Times	
# Claim Verification (If Claimed)	Visual Check/ Actual Use	1 Sample	All designs and features must conform to actual claim.	
*Wood Moisture Content (If Applicable)	Std. Measure	1 Sample	Should not exceed 12% for wood based material only	
* Rust Resistance Claim Verification (If Claimed and applicable to metal components only)	ASTM B117 / Kohl's Requirement	1 Sample	Shall withstand 120 hours in 5% salt spray (fog) with rust rating 5 or above as per SGS In-house Method, check and record the evaluation every 24 hours. Note: Photograph ALL visual changes in report.	
Bristle Durability	Actual Use	2 Samples	Bristle shall withstand 50 cycles of the actual uses on skin (e.g. hand) without excessive bristle loss.	
Attachment Strength for Teeth, Bristles and Tufts	16 CFR 1500.53	2 Samples	Teeth / tufts / bristles shall withstand the following tensile force when pulled as one unit from the block: - Block type with pinch set teeth / tufts / bristles - 5 lbf. - Cushion type with push in teeth / tufts / bristles - 2.5 lbf.	
* Attachment Strength of Joint or Handle	Force Gauge	2 Samples	Joint or handle shall withstand 25 lbs pulling force for 10 seconds without separation.	
Bending Strength	Actual Use	2 Samples	Apply 5-lb force at the mid-point of the brush barrel. No damage of the brush barrel	
* Resistance to Corrosion (For metal component)	ASTM B117	2 Samples	Metal component shall withstand 24 hours in 5% salt spray (fog) with no major corrosion or visual change.	
Resistance to water leakage (for items that would come in contact with water – including toilet bowl brush holder)	Kohl's TM 39	1 Sample	Fill product with water to 2/3 of capacity. No leakage after no of hours Tier 1 Tier 2 24 hrs 36 hrs	
Surface Scratching (for holder/container) (if applicable)	Actual Use	1 Sample	No scratching of test surface (wood, glass) 3 cycles of 6 inches back and forth.	
Stability of Container/Holder (If applicable)	Actual Use	1 Sample	Free-standing article shall remain stable without tipping at 10° incline.	

In addition to this protocol, any product designed for, intended for or appealing primarily to children, requires additional testing per Kohl's Testing Protocol #601.
 KOHL'S, AGENT'S & VENDORS USE ONLY

Protocol Version	Description of Change	Revised by / Date	Approved By / Date
237-A	Initial Release	Charlene Swanson June 11, 2020	Charlene Swanson June 11, 2020
237-B	Updated adult tracking label requirements, updated composite wood testing requirements, fixed incorrect title on last page.	Charlene Swanson June 29, 2020	Charlene Swanson June 29, 2020
237-C	Updated format and updated performance rating from Tier 1/2/3 to Tier 1 and Tier 2	Violet Nelson Sept. 20, 2022	Violet Nelson Sept. 20, 2022
237-D	Added 1800 Hardlines Regulatory Supplement for additional State & Federal Regulations	Isaac Grossman February 2025	Isaac Grossman February 2025