

PROTOCOL # 242-C

Writing Board Tier 1_2

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 • 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><i>In lieu of testing, valid certificate or test report or certificate can be submitted if dated within 1-3 years.</i></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	<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 be labeled in accordance with the regulations and meet all applicable requirements.</p> <p><i>In lieu of testing, valid certificate or test report or certificate can be submitted if dated within 1-3 years.</i></p>	

EPA TSCA Title VI – Composite Wood – Finished Good Labeling (if applicable)	40 CFR 770.45(c) / 40 CFR 770.45(e)	All Samples	<p>Finished goods containing regulated composite wood shall comply with the labeling requirements found in 40 CFR 770.45(c) unless the finished good qualifies for the de minimis exception found in 40 CFR 770.45(e).</p> <p>•A finished good does not require labeling per 40 CFR 770.45(c) if the finished good does qualify for the de minimis exception in 40 CFR 770.45(e). If the finished good does qualify for the de minimis exception, result is N/A.</p> <p>•A finished good does require labeling per 40 CFR 770.45(c) if the finished good does not qualify for the de minimis exception in 40 CFR 770.45(e).</p> <p>-At a minimum, the label must be on the product OR the packaging</p> <p>-The label may be applied as a stamp, tag, or sticker</p> <p>-The label shall include, at a minimum, in legible English text:</p> <ol style="list-style-type: none"> 1. Fabricator's name 2. Date the finished good was produced (in month/year format) 3. A statement of compliance to denote that the finished good complies with TSCA Title VI <p>Example: XXX Company MM/YYYY EPA TSCA Title VI compliant for formaldehyde</p> <p>Notes:</p> <p>•A de minimis amount of regulated composite wood is defined as regulated composite wood content not exceeding 144 square inches, based on the surface area of the largest face of the finished good.</p> <p>•The de minimis exception is not available to finished goods or component parts that are designed to be used in combination or in multiples to create larger surfaces, finished goods, or component parts.</p> <p>•When a statement of compliance is necessary, the statement must denote that the finished good complies with TSCA Title VI. It is no longer acceptable to have the product labeled as compliant with CARB's ATCM for formaldehyde in lieu of a TSCA Title VI compliance statement.</p>	
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	Report Actual. Shall comply with any claims (if applicable)	Claim: Actual:
Overall Weight	Std. Measure	3 Samples	Report actual. Shall meet label claims (if applicable)	Claim: Actual:
Material Type	Visual Check	1 Sample	Report Actual. Shall meet label claims	
Flammability				
Flammability of Solids (if applicable)	16 CFR 1500.44	1 Sample	Shall not burn at a rate exceeding 0.1 in./sec.	
Construction Qualities				
Kohl's Workmanship Review	Visual Check / Actual Use	All Samples	<ul style="list-style-type: none"> - 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 	
*Sharp Points & Edges (if applicable)	16 CFR 1500.48 & 49	1 Sample	Products intended for children shall not exhibit non-functional sharp points and edges.	
Performance				
Functionality	Actual Use	1 Sample	Shall function as intended as received.	
Writing Board Surface Quality	Actual Use	1 Sample	Shall be easy to write on the writing board with writing instruments supplied or as indicated on instructions.	
Wall Mounting Device or Hardware (if applicable)	Actual Use	1 Sample	Instructions shall provide detailed procedures for proper mounting.	
Erasing Performance on Board	Actual Use	1 Sample	Shall be easy to remove markings on the writing board as intended.	
Effects of extreme temperature/humidity (environmental)	Kohl's TM 30	1 Sample	24 hours @ 0°F (-18°C) 24 hours @ 95% RH/120°F (49°C) – no failure or visual change.	
Resistance to Corrosion (metal components only)	ASTM B117	1 Sample	Shall withstand 24 hours in 1% salt spray (fog) with no major corrosion or visual change.	
*Wood Moisture Content (if applicable) (for wood products only)	Standard Measure	1 Sample	Should not exceed 12% for wood based material only.	
#Claim Verification (if claimed)	Visual Check / Actual Use	1 Sample	All designs and features must conform to actual claim	Claim:
<i>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.</i> KOHL'S, AGENT'S & VENDORS USE ONLY				
Protocol Version	Description of Change		Revised by / Date	Approved By / Date
242-A	Initial Release		Charlene Swanson December 2020	Charlene Swanson December 2020
242-B	Updated format, performance rating from Tier 1/2/3 to Tier 1 and Tier 2, and added test method for finished good labeling		Violet Nelson Sept. 20, 2022	Violet Nelson Sept. 20, 2022
242-C	Added 1800 Hardlines Regulatory Supplement for additional State & Federal Regulations		Isaac Grossman February 2025	Isaac Grossman February 2025

