

PROTOCOL # 404 - M

WINE RACK

Performance Test	Test Method	Samples	Requirement	Rating (Section or exec. Summary which failed items can be referenced)
LABELING				
Labeling / Packaging Review Instructional Literature/ Assembly Instruction (Needs to be provided – Lab HOLD if not provided)	FPLA 16 CFR 500 & 19 CFR 134 Visual Check	All Samples All Samples	Should be legibly marked with the following information: • 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) Shall provide safe use, or proper assembly or both, and care instruction. Shall be legible and easy to read.	Provided Verified Not provided
Instructional Literature /Assembly Instruction (Needs to be provided – Lab HOLD if not provided)	Visual Check	All Samples	Shall provide safe use, or proper assembly or both, and care instruction. Shall be legible and easy to read.	Provided Verified Not Provided
Maximum Weight Capacity (When Available)	Visual Check	All Samples	Shall be displayed on the product Conspicuously. Record data.	
Verify Label Claims	Visual Check	All Samples	The labeling must comply and valid with all claims.	
EPA TSCA Title VI – Composite Wood Finished Good Labeling	40 CFR 770.45(c)		Finished goods containing regulated composite wood shall comply with the labeling requirements found in 40 CFR 770.45(c). - At a minimum, the label must be on the product OR the packaging - The label may be applied as a stamp, tag, or sticker - The label shall include, at a minimum, in legible English text: 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 Example: XXX Company MM/YYYY EPA TSCA Title VI compliant for formaldehyde <u>Notes:</u> - Client does not allow the use of the de minimis exception found in 40 CFR 770.45(e). All finished goods containing regulated composite wood shall include labeling pursuant to the above requirements of 40 CFR 770.45(c). - A statement of compliance that denotes the finished good complies with CARB’s ATCM for formaldehyde will be accepted in lieu of a TSCA Title VI compliance statement until March 22, 2019. - Rating Schedule: - On or after June 1, 2018: Compliant submission shall be rated as pass Non-compliant submission shall be rated as fail	
CARB ATCM for Formaldehyde – Composite Wood Finished Good Labeling	Title 17, California Code of Regulations Section 93120.7(d)		Finished goods containing regulated composite wood shall comply with the labeling requirements for fabricators found in §93120.7(d). - A finished good containing regulated composite wood requires the following: - At a minimum, the label must be on the product OR the packaging - The label shall be applied as a stamp, tag, sticker, or bar code - The label shall include, at a minimum: 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 the ATCM Example: XXX Company MM/YYYY California 93120 phase 2 compliant for formaldehyde <u>Notes:</u> - If a finished good is labeled with the EPA compliance statement, a separate statement of compliance to the CARB ATCM is not required. - It is not required for the label to state the level of emissions (Phase 2, NAF, ULEF). - Labels for finished goods should not include the number of the TPC associated with the composite wood products contained in the finished good.	

EPA TSCA Title VI – Composite Wood - Sample Declaration Form and Mill Certificate (if applicable)	40 CFR 770	All	<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><u>Notes:</u></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	<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><u>Notes:</u></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	<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	<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>In lieu of testing, valid certificate or test report or certificate can be submitted if dated within one year.</p>	
Import Permit (For Natural Materials Only) If Applicable	US Department of Agriculture Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ)	All	<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>	
Adult Tracking Label: **If space limitations exist, contact Kohl's Quality Assurance & Product Integrity teams to discuss minimum required information (quality. assurance@kohls.com, product. integrity@kohls.com)	Kohl's Requirement	All	<p>Can be included on packaging when necessary:</p> <ul style="list-style-type: none"> - Kohl's Assigned Factory Number - Manufacture Date (Month/Year) - UPC # 	
PHYSICAL CHARACTERISTICS				
Overall Dimensions (H X W X D)	Std. Measure (in/cm)	1 Sample	Max. +5% / -0% of claimed dimension. Record actual data if there is no claim.	Claim: Actual:
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 	
PERFORMANCE				
Flammability Of Solid	16 CFR 1500.44	1 Sample	Burn rate < 0.1"/sec.	
Stability Test	Actual Use	1 Sample	<ul style="list-style-type: none"> - The rack shall not fail at a 10 inclined plane when fully loaded with wine bottles filled with water. - Extra filled bottles shall be placed on the rack wherever possible. - Report actual Incline angle to cause failure. 	
Humidity Test	Kohl's TM 31	1 Sample	95% RH @ 100° F (38° C) for 24 hours. No failure.	
*Cross Cut Adhesion (Plating & Surface Coating)	ASTM D3359 (Mod.)	1 Sample	<p>Cut 2 in. cross – hatch pattern on surface of plated item, plating must remain affixed. Trace peeling or removal along incision or at their intersection is accepted.</p> <p>Modification = Scope expanded</p>	
*Wood Moisture Content (If Applicable)	Std. Measure	1 Sample	Should be between 6-10% 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:
*Tech Pack Verification (Needs to be provided – Lab HOLD if not provided)	Visual Check / Std. Measurement	1 Sample	Verify all claims mentioned in Tech Pack File	Provided: Verified:
Tipover Restraints for Clothing Storage Unit (Expanded Scope: similar items to verified by tech spec or BOM) - State of New York (if applicable)	US State Law, State of New York, Harper's Law (Assembly Bill A4421B) / ASTM F2057 Section 4.4 & 4.5 / ASTM F3096	All Samples	Free-standing clothing storage furniture (27 inches and above in height) shall meet the tipover restraints requirements prescribed in ASTM F2057.	
Warning Label Clothing Storage Unit (Expanded Scope: similar items to verified by tech spec or BOM) – State of New York (if applicable)	US State Law, State of New York, Harper's Law (Assembly Bill A4421B) / ASTM F2057 Section 8	All Samples	Free-standing clothing storage furniture (27 inches and above in height) shall have a permanent warning label, as specified in Section 8 of the Standard, attached to the unit in a conspicuous location when in use.	
Clothing Storage Units (Expanded Scope: similar items to verified by tech spec or BOM)– Labeling (if applicable)	ASTM F2057	All Samples	Shall comply with labeling requirements as specified in the standard.	
Clothing Storage Units (Expanded Scope: similar items to verified by tech spec or BOM) - Physical & Mechanical (if applicable)	ASTM F2057	All Samples	Shall comply with physical and mechanical requirements (stability) as specified in the standards.	
ANALYTICAL				
*Lead In Scrapable Surface Coating	CPSC-CH-E1003-09	1 Sample	<p>≤ 90 ppm (0.009% by weight)</p> <p>(CPSA – 16 CFR 1303)</p>	
PFAS Supplemental Protocol	Refer to Protocol 1600	All Samples	All samples shall be reviewed against the requirements of PFAS Supplement Protocol 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	

Protocol Version	Description of Change	Revised by / Date	Approved by / Date
404 - 0	Initial Release	CY Chan Feb 10, 2004	Roger Mayerson Mar 08, 2004
404-A	Added 19 CFR 134, Instructional Literature/Assembly Instruction, Maximum Weight Capacity, Composite Wood Products Labeling. Overall Dimension Measurement, Flammability of Solid & Cross-cut Adhesion Tests. Humidity Test Become Applicable to All Construction Materials. Changed Wood Moisture Content to 6-10%. Changed Lead in Surface Coating Limit to 90 ppm. Price Adjustment. Changed protocol number from 404-1 to 404-A	Simon Leung April 1, 2010	Ro Jain April 1, 2010
404-B	Changed the Test Method for Lead in Scrapable Surface Coating from ASTM to CPSC.	Simon Leung September 15, 2011	Ro Jain September 15, 2011
404-C	Added Tech Pack Verification	Jeetendra Shelatkar Feb 4, 2014	Ro Jain Mar 7, 2014
404-D	Updated lead content pricing	Candy Chan Jul 30, 2014	Jeetendra Shelatkar Aug 4, 2014
404-E	Renamed all in-house methods	Birkoff Chen Sep. 4, 2014	Teana Robinette Oct 27, 2014
404-F	Updated AI & Tech pack testing results/rating	Elizabeth Armstrong March 14, 2016	Jeetendra Shelatkar March 14, 2016
404-G	Added Labeling – US EPA Formaldehyde Emission	Cindy Ng May 5, 2017	Teana Robinette May 8, 2017
404-H	Updated CARB & EPA Labeling	Elizabeth Armstrong June 22, 2018	Elizabeth Armstrong June 22, 2018
404-I	Added import permit req & adult tracking label	Elizabeth Armstrong April 22, 2019	Elizabeth Armstrong April 22, 2019
404-J	Added EPA certification requirements and removed “not provided” from tech pack review, removed the “data only” from the adult tracking label	Elizabeth Armstrong June 4, 2020	Elizabeth Armstrong June 4, 2020
404-K	Added in tip kit requirements	Elizabeth Armstrong Aug 20, 2020	Elizabeth Armstrong Aug 20, 2020
404-L	Added PFAS Test Line	Kevin Makocy March 21, 2022	Kevin Makocy March 21, 2022
404-M	Updated 1800 Hardlines Regulatory Supplement for additional State & Federal Regulations	Isaac Grossman/February 2025	Isaac Grossman/February 2025