

PROTOCOL # 418-I				
COAT RACK				
Performance Test	Test Method	Samples	Requirement	Rating (Section or exec. Summary which failed items can be referenced)
LABELING				
Labeling / Packaging Review	FPLA 16 CFR 500 & 19 CFR 134	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)	
Import Permit (For Natural Materials Only)	US Department of Agriculture Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ)	All Samples	Product shall not have prohibited materials present per US Department of Agriculture, Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ) Documentation and/ or proper permit(s) for specific product shall be supplied along with Testing Request form and samples. Permit information may be found at: https://www.aphis.usda.gov/wps/portal/aphis/home/ It is the vendor's responsibility for the compliance to relevant requirements.	PASS/FAIL
Adult Tracking Label: **If space limitations exist, contact Kohl's Quality Assurance & Product Integrity teams to discuss minimum 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 #	
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
Uniform Label Law (if applicable)	Visual Check	All Samples	Label must comply with the label format. The label shall be securely affixed to the article in a location which is clearly visible to the consumer	
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 Notes: - 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 Notes: 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>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	<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	<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>	
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 - Filling material shall be free of objectionable matter and contaminants. 	
PHYSICAL CHARACTERISTICS				
Overall Dimension (W X D X H Or Diameter)	Standard Measure (in/cm)	3 Samples	Max. +5% / -0% of claimed dimension. Record actual data if there is no claim.	Claim: Actual:
Overall Weight	Standard Measure (lb/kg)	3 Samples	Max. +5% / -0% of claimed weight. Record actual data if there is no claim.	Claim: Actual:
Performance				
Flammability Of Solid	16 CFR 1500.44	1 Sample	Burn rate<0.1"/sec.	
Strength of clothes-rail supports	ISO 7170:2005 clause 6.3.1	1 Sample	No breakage after loading claimed load as close as possible to the weakest support for 1min. Loading: 4kg/dm if not claimed.	
Dislodgement of clothes rails	ISO 7170:2005 clause 6.3.2	1 Sample	Place the rail on its supports in the unit Load the rail uniformly with the claimed load and apply for 1 hour. Loading: 4kg/dm if not claimed. Shall show no breakage after test, the deflection shall not be more than span/100.	
Stability Test	Actual Use	1 Sample	The rack shall not fail at a 10o inclined plane when fully loaded on all hooks. Claimed load shall be applied wherever possible. Report actual incline angle to cause failure.	
Tipping Test	Actual Use/Client Requirement	1 Sample	<p>[For coat rack with umbrella holder]</p> <ul style="list-style-type: none"> - Load each hook with the claimed weight (or 10 lbs if no claimed), without applying weight on the umbrella holder. Shall show no tipping. - Load the top hooks with the claimed weight (or 10 lbs if no claimed), with applying claimed weight (or 30 lbs if no claimed) on the umbrella holder. Shall show no tipping. <p>Note: If no claimed loading capacity/weight on each hook is presented, load each hook with "overall claimed weight divided by the number of hooks".</p> <p>Client requirement</p>	

Humidity Test	Actual Use/Client Requirement	1 Sample	[Applicable for sample with wooden umbrella holder] Apply room temperature water on the wood components and wait for 4 hours. Remove remaining water on the sample. Shall show no visual change. Report the ambient temperature & relative humidity. Client requirement	
*Cross-cut Adhesion (Plating & Surface Coating)	ASTM D 3359-09e2 (Mod.)	1 Sample	Cut 2 in. cross - hatch pattern on surface of plated and/or painted area. Plating and/or painted surface must remain affixed. Trace peeling or removal along incision or at their intersection is accepted. Modification= Scope expanded	
*Resistance To Corrosion (Metal components Only)	ASTM B117-11 ASTM G85 (Mod.)	1 Sample	Shall withstand 24 hours in 1% salt spray (fog) with no major visual change or corrosion. Modification = % of salt spray	
*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: Actual:
ANALYTICAL				
*Lead In Scrapable Surface Coating	CPSC-CH- E1003-09	1 Sample	≤ 90 ppm (0.009% 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.	
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	
Please consult with Lab for the number of samples.				
Pricing: Please refer to Kohl's preferred third party labs for individual pricing				

Protocol Version	Description of Change	Revised by / Date	Approved by / Date
418-A	Initial Release	Elizabeth Armstrong April 7, 2015	Elizabeth Armstrong July 31, 2015
418-B	Updated AI & Tech pack testing results/rating	Elizabeth Armstrong March 14, 2016	Jeetendra Shelatkar March 14, 2016
418-C	Updated test methods for cross cut adhesion, resistance to corrosion, dislodgement of clothes rails, strength of clothes rail supports	Elizabeth Armstrong May 11, 2016	Elizabeth Armstrong May 11, 2016
418-D	Added Labeling – US EPA Formaldehyde Emission	Cindy Ng May 4, 2017	Elizabeth Armstrong May 8, 2017
418-E	Updated CARB & EPA Labeling	Elizabeth Armstrong June 22, 2018	Elizabeth Armstrong June 22, 2018
418-F	Updated Import Permit & Adult Tracking Label requirements	Jackie Deppisch April 24, 2019	Jackie Deppisch April 24, 2019
418-G	Added CARB/EPA certificate requirements, removed “data only” from adult tracking number, removed “not provided” from tech pack verification	Elizabeth Armstrong June 11, 2020	Elizabeth Armstrong June 11, 2020
418-H	Added PFAS Test Line	Kevin Makocy March 24, 2022	Kevin Makocy March 24, 2022
418-I	Updated 1800 Hardlines Regulatory Supplement for additional State & Federal Regulations	Isaac Grossman February 2025	Isaac Grossman February 2025