

PROTOCOL # 419-M

HEADBOARD AND FOOTBOARD

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)	
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
Care label & Fiber Content (Upholstery Only) (If Applicable)	FTC	All Samples	The labeling must include and comply with the claim.	
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)		<p>Finished goods containing regulated composite wood shall comply with the labeling requirements found in 40 CFR 770.45(c).</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: 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).</p> <p>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.</p> <p>Rating Schedule:</p> <p>On or after June 1, 2018:</p> <p>Compliant submission shall be rated as pass Non-compliant submission shall be rated as fail</p>	
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 	

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>	
CA Technical Bulletin 117 Labeling	Visual Check	All Samples	<p>Upholstered articles conforming to Section 1374 (a) shall have a label attached to the surface area of the article, in plain view, stating the following</p> <p>Implement on and after January 1, 2020</p> <p>NOTICE</p> <p>THIS ARTICLE MEETS THE FLAMMABILITY REQUIREMENTS OF CALIFORNIA BUREAU OF HOUSEHOLD GOODS AND SERVICES TECHNICAL BULLETIN 117-2013. CARE SHOULD BE EXERCISED NEAR OPEN FLAME OR WITH BURNING CIGARETTES.</p> <p>The following "flame retardant chemical statement" should be added on the bottom of CA Technical Bulletin 117 label.</p> <p>"The upholstery materials in this product: ____ contain added flame retardant chemicals ____ contain NO added flame retardant chemicals</p> <p>The State of California has updated the flammability standard and determined that the fire safety requirements for this product can be met without adding flame retardant chemicals. The state has identified many flame retardant chemicals as being known to, or strongly suspected of, adversely impacting human health or development."</p> <p>A manufacturer of covered products shall indicate the absence or presence of added flame retardant chemicals by placing an "X" in one of the appropriate blanks.</p> <p>Minimum size of the label shall be 2x3 inches and the minimum size of the type</p>	
CARB ATCM for Formaldehyde – Composite Wood Finished Good Labeling	Title 17, California Code of Regulations Section 93120.7(d)		<p>Finished goods containing regulated composite wood shall comply with the labeling requirements for fabricators found in §93120.7(d).</p> <p>A finished good containing regulated composite wood requires the following:</p> <p>At a minimum, the label must be on the product OR the packaging</p> <p>The label shall be applied as a stamp, tag, sticker, or bar code</p> <p>The label shall include, at a minimum:</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 the ATCM <p>Example: XXX Company MM/YYYY California 93120 phase 2 compliant for formaldehyde</p> <p>Notes: If a finished good is labeled with the EPA compliance statement, a separate statement of compliance to the CARB ATCM is not required.</p> <p>It is not required for the label to state the level of emissions (Phase 2, NAF, ULEF).</p> <p>Labels for finished goods should not include the number of the TPC associated with the composite wood products contained in the finished good.</p>	

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 quality. assurance@kohls.com	Kohl's Requirement	All Samples	Can be included on packaging when necessary: Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC #	
Construction Qualities				
Kohl's Workmanship Review	Visual Check / Actual Use	All Samples	#ERROR!	
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:
UPHOLSTERY (IF APPLICABLE)				
Fiber Content (Shell Fabric & Filling Materials)	AATCC-13 20/20A-14	1 Sample	Single fiber only: no tolerance 2 or more fibers blend: ± 3% max. Functional fiber i.e. Spandex: ± 2% max.	
Colorfastness to Rubbing	AATCC 8-13	1 Sample	Dry: Min class 4 Wet: Min class 3	
Defects	Visual Check	1 Sample	No major defects / two minor defects (max.)	
Evenness Of Color	Visual Check	1 Sample	Shall provide uniform color	
CALIFORNIA TECHNICAL BULLETIN 117				
*Cover Fabric				
Section 1	C.T.B. 117- 2013	1 Sample	(See attached test results / requirements)	
* Barrier Materials:				
Section 2	C.T.B. 117- 2013	1 Sample	(See attached test results / requirements)	
* Resilient Filling Material				
Section 3	C.T.B. 117 - 2013	1 Sample	(See attached test results / requirements)	
* Decking Material				
Section 4	C.T.B. 117 - 2013	1 Sample	(See attached test results / requirements)	
Performance				
Horizontal Static Load Test (Headboard) (Applicable to Headboard installed with a Bed frame)	BS 8509:2008 +A1: 2011 Section 21 (Mod.)	1 Sample	Apply a horizontal backward force 110 lbs to the center of headboard for 1min, then check if the headboard is demounted to the bed frame and without any breakage and permanent deformation. Modification = Expand scope to other products, test load, test location and test duration	
Distributed Static Load Test (applicable to headboard installed with a bed frame)	Actual Use	1 Sample	Single – 500lbs Queen, King – 800lbs No failure after 30 minutes	
Flammability of Solid	16 CFR 1500.44	1 Sample	Burn rate<0.1"/ sec	
Functionality	Actual Use	1 Sample	Shall function as intended as received. Report details of evaluation (Materials used/ features tested/ consumables/methods/etc)	
*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 Back/Base/Leg	Std. Measure	1 Sample	Should be between 6-10% for solid wood 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)	
*Formaldehyde (Applicable To Upholstery Shell Fabric Only)	prEN ISO TS 17226 ISO 14184-1 Part 1	1 Sample	<75 ppm	
*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
419-A	Initial Release	Elizabeth Armstrong Sept 15, 2015		Elizabeth Armstrong Sept 15, 2015
419-B	Updated AI & Tech pack testing results/rating	Elizabeth Armstrong March 14, 2016		Jeetendra Sheltakar March 14, 2016
419-C	Updated test methods for resistance to corrosion, cross-cut adhesion, horizontal static load test, CF to rubbing, fiber content	Elizabeth Armstrong May 11, 2016		Elizabeth Armstrong May 11, 2016
419-D	Added Labeling – US EPA Formaldehyde Emission	Cindy Ng May 4, 2017		Elizabeth Armstrong May 8, 2017
419-E	Added CA Prop 65 req if applicable	Elizabeth Armstrong June 9, 2017		Elizabeth Armstrong June 9, 2017
419-F	Updated CARB & EPA Labeling	Elizabeth Armstrong June 22, 2018		Elizabeth Armstrong June 22, 2018
419-G	Added Import Permit & Adult Tracking Label requirements	Jackie Deppisch April 24, 2019		Jackie Deppisch April 24, 2019
419-H	Updated TB 117-2013 Requirements	Charlene Swanson November 26, 2019		Charlene Swanson November 26, 2019
419-I	Added TB 117 testing lines	Charlene Swanson December 2019		Charlene Swanson December 2019
419-J	Added CARB/EPA certificate requirements, removed “data only” from adult tracking, removed “not provided” from tech pack verification	Elizabeth Armstrong June 11, 2020		Elizabeth Armstrong June 11, 2020
419-K	Added PFAS Test Line	Kevin Makocy March 24, 2022		Kevin Makocy March 24, 2022
419-L	Added modification information for horizontal static load test, updated email address for adult tracking labels	Charlene Swanson May 2024		Charlene Swanson May 2024
419-M	Updated 1800 Hardlines Regulatory Supplement for additional State & Federal Regulations	Isaac Grossman February 2025		Isaac Grossman February 2025