

PROTOCOL # 428-G

Shoe Rack

Performance Test	Test Method	Samples	Requirement	Rating (Section or exec. Summary which failed items can be referenced)
Initial Package				
Label Verification				
Label Review	Care Labeling 16 CFR 423 16 CFR 300/ 19 CFR 134 Textile Fiber Products Identification Act 16 CFR 303 Wool Products Labeling Act	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	Information and instructions shall provide safe use, or proper assembly or both, and care instruction. Shall be legible and easy to read.	<input type="checkbox"/> Provided <input type="checkbox"/> Verified <input type="checkbox"/> Not Provided
Verify Label Claims	Visual Check	All Samples	The labeling must comply and valid with all claims.	
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 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.	
Adult Tracking Label: **If space limitations exist, contact Kohl's Quality Assurance & Product Integrity teams to discuss minimum required information MR.QA. P!@kohls.com	Kohl's Requirement	All Samples	Should be rated as pass/fail Can be included on packaging when necessary: Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC #	
EPA TSCA Title VI – Composite Wood - Sample Declaration Form and Mill Certificate (if applicable)	40 CFR 770	All Samples	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. • If regulated composite wood is not present in the sample, result is N/A. • If regulated composite wood is present in the sample: - 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 Notes: • Include a copy of the Sample Declaration Form in the report • Regulated composite wood includes: - 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 Notes: <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.
EPA TSCA Title VI – Composite Wood Finished Good Labeling	40 CFR 770.45(c)	All Samples	<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 The label may be applied as a stamp, tag, or sticker 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). 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: On or after June 1, 2018: Compliant submission shall be rated as pass Non-compliant submission shall be rated as fail</p>
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	<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>
Physical Characteristics			
Dimensions	Std. Measure	1 Sample	Report overall dimensions; shall meet label claims (if applicable).
Weight	Std. Measure	1 Sample	Report overall weight; shall meet label claims (if applicable).
Material Type	Visual Check	1 Sample	Report actual. Shall meet label claims (if applicable).
Number of tiers	Visual Check	1 Sample	Report actual; shall meet label claims. (If applicable).
Number of racks	Visual Check	1 Sample	Report actual; shall meet label claims (If applicable)
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

Performance				
Loading capacity - Top	Actual Use	1 Sample	Max. ¼ In. deformation when 50 lb is loaded evenly on the top area (or claimed weight)	
Loading Individual Rack	Actual Use	1 Sample	Max. ¼ In. deformation when 25 lb is evenly distributed (or claimed weight)	
Surface scratching	Actual Use	1 Sample	Slide the sample 6 in. (± 1/4 in) forward, in the most unfavorable orientation to make the worst effect, at a rate of approximately 1 in/s and then repeat in reverse direction. Apply force as close to the base of the sample as possible to maintain contact between the sample base and the test surface during sliding.	
Tilt resistance	Kohl's TM 36	1 Sample	Shall not tip over at 8 degree incline plane in the direction of least stability	
Wall Mounting Hardware (If Applicable)	Actual Use / Kohl's TM 40	1 Sample	Shall withstand 120% of the claimed capacity or twice the product weight if no such claim for 1 hour when the sample is fixed/attached as intended on a drywall panel. The application of test load shall be evenly distributed to the shoe rack.	
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	
Moisture content (if applicable)	Std. Measure	1 Sample	Shall be between 8% - 12%.	
#Claim Verification (If Claimed)	Visual Check / Actual Use	1 Sample	All designs and features must conform to actual claim	Claim:
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	1 Sample	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	
PRICING AND ADDITIONAL NOTE:				
*Please refer to Kohl's preferred third party labs for individual pricing and sample size				

Protocol Version	Description of Change	Revised by / Date	Approved By / Date
428-A	Initial Release	Elizabeth Armstrong Feb 1, 2018	Elizabeth Armstrong Feb 1, 2018
428-B	Changed req for load capacity to have weight evenly distributed instead of placed in the middle of the rack	Elizabeth Armstrong March 5, 2018	Elizabeth Armstrong March 5, 2018
428-C	Updated CARB & EPA Labeling	Elizabeth Armstrong June 22, 2018	Elizabeth Armstrong June 22, 2018
428-D	Added Import Permit & Adult Tracking Label requirements	Jackie Deppisch April 24, 2019	Jackie Deppisch April 24, 2019
428-E	Removed "data only" from adult tracking label, removed "not provided" from tech pack verification. Added EPA/CARB certification requirements	Elizabeth Armstrong June 11, 2020	Elizabeth Armstrong June 11, 2020
428-F	Added PFAS Supplemental Protocol testing requirement	Charlene Swanson March 2022	Charlene Swanson March 2022
428-G	Updated 1800 Hardlines Regulatory Supplement for additional State & Federal Regulations	Isaac Grossman / Feb 2025	Isaac Grossman / Feb 2025