


PROTOCOL # 433-E

Collapsible Ottoman (Indoor)

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)	
Uniform Law Labels for Bedding & Upholstered Furniture <i>See continuation below</i>	IABFLO	All Samples	All filling materials must have a securely affixed label which contains the following information: The statement "UNDER PENALTY OF LAW THIS TAG NOT TO BE REMOVED EXCEPT BY THE CONSUMER"; A description of the filling contents preceded by the statement "ALL NEW MATERIALS consisting of "; The assigned state registration number*, for example in Pennsylvania, the number is preceded by the abbreviation REG. NO. PA (the # symbol is not accepted); and The statement: Certification is made by the manufacturer that the materials in this article are described in accordance with the law. For animal or fowl or any other material requiring sterilization, the tag must also bear the following information: A permit number of the sterilizer, only if sterilized new material is used; and The statement "CONTENTS STERILIZED" (this is not acceptable in California). The statement of MADE BY (for manufacturer) or MADE FOR (for importer or distributor) with full street address The statement of "Finished Size", "Net Weight of Filling Material", "Cover:" (client's requirement)	
Uniform Law Labels for Bedding & Upholstered Furniture (continued)	IABFLO	All Samples	The statement of country of origin. e.g. MADE IN CHINA The tag must be constructed of white linen cloth or spun bonded olefin having a minimum size of 2in x 3in, (the length starts at the beginning of the word "UNDER" and ends at the country of origin on the bottom of the law label), and must be printed in black ink with a minimum type height of 1/8 inch (3.2millimeters). Some states may require additional information such as DATE OF DELIVERY.	

CA Technical Bulletin 117 Labeling (if applicable)	Visual Check	All Samples	<p>(a) 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: 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 shall be one-eighth inch in height. All type shall be in capital letters. But the "flame retardants chemical statement" need not be in all capital letters.</p>	
Instructional Literature (Assembly Instruction) (Needs to be provided – Lab HOLD if not provided)	Visual Check / Actual Use	All Samples	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
Maximum Weight Capacity	Visual Check	All Samples	Shall be displayed on the product conspicuously. Record data.	
Fiber Content & Care Label (Upholstery Only)	FTC	All Samples	The labeling must include and comply with the claim.	
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>	

<p>CARB ATCM for Formaldehyde – Composite Wood</p> <p>Finished Good Labeling</p>	<p>Title 17, California Code of Regulations Section 93120.7(d)</p>	<p>All Samples</p>	<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: 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</p> <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. 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.</p>	
<p>Care label & Fiber Content (Upholstery Only) (If Applicable)</p>	<p>FTC</p>	<p>All Samples</p>	<p>The labeling must include and comply with the claim's</p>	
<p>Verify Label Claims</p>	<p>Visual Check</p>	<p>All Samples</p>	<p>The labeling must comply and valid with all claims.</p>	
<p>*FSC Logo Verification (if Claimed)</p>	<p>Visual Check</p>	<p>All Samples</p>	<p>Verify FSC claim from FSC Certificate Database, the certificate shall be valid</p>  <p>Take photo and include within the report if present</p>	
<p>Import Permit (For Natural Materials Only) If Applicable</p>	<p>US Department of Agriculture Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ)</p>	<p>All Samples</p>	<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>	
<p>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</p>	<p>Kohl's Requirement</p>	<p>All Samples</p>	<p>Should be rated as pass/fail Can be included on packaging when necessary: Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC #</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>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>	
Labeling for Indoor Upholstered Furniture	16 CFR 1640	All Samples	<p>Upholstered furniture must have a permanent label that states "Complies with U.S. CPSC requirements for upholstered furniture flammability".</p> <p>For submission received before June 25, 2022 non-compliance with this requirement will be rated as DATA.</p> <p>For submission received on or after June 25, 2022, non-compliance will be rated as a FAIL.</p>	

Flammability for Indoor Upholstered Furniture	16 CFR 1640	All Samples	Upholstered furniture must comply with the flammability requirements of California Technical Bulletin TB 117-2013. For submission received before June 25, 2021 non-compliance with this requirement will be rated as DATA. For submission received on or after June 25, 2021, non-compliance will be rated as a FAIL.	
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				
Physical Characteristics				
Fiber Content (Shell Fabric & Filling Materials)	AATCC 20/20A	1 Sample	Single fiber only: no tolerance 2 or more fibers blend: $\pm 3\%$ max.	
Foam Padding (Filling Material)	ASTM E 1252	1 Sample	Material identification by FTIR method.	
Fabric Weight (Oz. / Sq. Yd.)	ASTM D3776	1 Sample	As approved / as claimed / products specifications/as measured (+5% / -0%)	
Thread Count (Ends X Picks)	ASTM D3775	1 Sample	As approved / as claimed / products specifications/as measured (+5% / -0%)	
Defects	Visual Check	1 Sample	No major defects / two minor defects (max.)	
Evenness of Color	Visual Check	1 Sample	Shall provide uniform color	
Weight of Filling Material	Std. Measure	1 Sample	$\pm 5\%$ (oz, lb)	Claim: Actual:
Foam Density	Std. Measure	1 Sample	$\pm 5\%$ (lb/ in3)	Claim: Actual:
Performance				
<i>Upholstery</i>				
Length	ASTM D 5034	1 Sample	Min. 50 lbs. / In.	
Width	ASTM D 5034	1 Sample	Min. 50 lbs. / In.	
Seam Strength	ASTM D1683	1 Sample	Min. 30 lbs. / In.	
Seam Slippage	ASTM D1683	1 Sample	Min. 25lbs @ $\frac{1}{4}$ in slippage	
<i>Water Repellency Characteristics</i>				
Surface Water Repelling	AATCC 22	1 Sample	Min. 90 ratings	
Water Resistance (If Claimed Only)	AATCC 35	1 Sample	Max. 1 gm water penetration at 2 ft for 2 min.	
<i>Dimensional Change</i>				
Dimensional Change to Home Laundering, Dry- Cleaning or Spot Clean (If Applicable)	AATCC 150 (3 Washes)/ AATCC 158 (1 Cycle) Tide® Powder Detergent	1 Sample	Wovens: $\pm 4\%$ max. Knits: $\pm 8\%$ max. Flannel: $\pm 6\%$ max. (Length x Width) Dry Cleaning: $\pm 4\%$ max.	
Appearance Retention (If Applicable)	AATCC/ASTM TS-008 (Modified) Tide® Powder Detergent	1 Sample	Must meet all applicable Koh's Appearance Evaluation Requirements.	
<i>Colorfastness</i>				
Dry Crocking	AATCC 8/116	1 Sample	Min. Class 4.0	
Wet Crocking	AATCC 8/116	1 Sample	Min. Class 3.0	
Chlorine Bleach And Non- Chlorine Bleach (If Claimed)	AATCC/ASTM TS-001	1 Sample	Min. Class 4.0 (Shade change)	
<i>Abrasion Resistance (Upholstery)</i>				
Heavy Duty	ASTM D4966 for reference	1 Sample	15,000 cycles	
Medium Duty	ASTM D4966 for reference	1 Sample	9,000 cycles	
Light Duty	ASTM D4966 for reference	1 Sample	6,000 cycles	
<i>Abrasion Resistance (Leather & Vinyl)</i>				
Seating surface	ASTM-14 D4966 for reference	1 Sample	Shall withstand at least 150 abrasion cycles without any damage of print, peel off, visible hole, yarn breakage etc.	
CONSTRUCTION QUALITIES				

Kohl's Workmanship Review	Visual Check / Actual Use	All Samples	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 Product shall not contain any loose components or unsecured fastening where rigidity is required Filling material shall be free of objectionable matter and contaminants.	
PERFORMANCE (SINGLE SEATER ONLY) – SEATING LENGTH < 32" (not including armrests)				
Seat Static Load	EN 1728 Section 6.4 (Mod.)	1 Sample	No structural failure – with claimed weight or 400 lbs if not claimed of distributed weight for 1 min. Modification= Loading parameter changed	
Seat Dynamic Impact	ANSI/BIFMA X5.4 Section 14	1 Sample	A functional load applied once to each seating position shall cause no loss of serviceability. Test load (per seat): If the claimed weight is >200lbs – Test with the claimed weight If the claimed weight is 200lbs or less or no claim – Test with 200lbs The loaded test bag shall be raised 152 mm (6 in.) above the uncompressed seat and released one (1) time. Remove the bag and repeat setup and functional procedures for each remaining seating position. Modification= Loading parameter changed	
Stability	ANSI/BIFMA X5.1-17 Sec. 11.4 (Mod.)	1 Sample	Apply a vertical force of 135 lbs by means of the loading pad at a point 2.4 inch from the edge of the seat nearest the stopped feet. Apply a horizontal force of 4.5 lbf through the centre of the seat in a direction towards the stopped feet. The unit shall not tip over. Modification = Scope expanded	
PERFORMANCE (MULTIPLE SEATING STYLE) – SEATING LENGTH > 32" (not including armrest)				
Seat Static Load	EN 1728 Section 6.4 (Mod.)	1 Sample	No structural failure –with distributed weight as following for 1 min. Simultaneously on both positions for an item with two seats. Simultaneously on two adjacent seats in most adverse combination for an item with three or more seats. If the most adverse position cannot be determined the test shall be carried out at a maximum of two locations. Test load: 300lbs During the test, load the seat(s) that are not being tested with 163lbs Modification= Loading parameter changed	
Seat Dynamic Impact	ANSI/BIFMA X5.4 Section 14	1 Sample	A functional load applied once to each seating position shall cause no loss of serviceability. The test bag (225 lb) shall be raised 152 mm (6 in.) above the uncompressed seat and released one (1) time. Remove the bag and repeat setup and functional procedures for each remaining seating position. Modification= Loading parameter changed	

Stability	ANSI/BIFMA X5.1 Section 13.4 & Section 13.5.2	1 Sample	A downward force shall be applied initially at 45° ± 5° to the test platform by attaching a strap, not to exceed 76 mm (3 in.) in width, centered over the front portion of the seat. The force shall be applied until the total unit weight is transferred to the front support members. The force shall not be less than 40% of the total unit weight.	
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PERFORMANCE (GENERAL SAFETY FOR ALL SEATING)

Loading Capacity (Applicable to tray or storage unit)	Actual Use	1 Sample	No loss of serviceability – distributed load, apply 1.5 times claimed load for the intended use or 100 lbs for one min.	
Finger Entrapment	ASTM F963	1 Sample	Accessible gap along a hinge line that can admit a 3/16" diameter rod must also admit a 1/2" diameter rod at all positions of the hinge.	
Lid Safety Feature	ASTM F963	1 Sample	Lid-support mechanism shall be provided to prevent sudden collapse or dropping of the lid	
Drawer / Door / Hinge/ Lid Cycle Test	Actual Use	1 Sample	No loss of serviceability after 100 repeated open/close cycles	
Resistance To Hot Water	Fed. Spec. AA-11-001895B	1 Sample	Pour 25 ml of boiling water and allow it to cool down. Dried surface shall have no graying or spotting.	
Flammability of Solid	16 CFR 1500.44	1 Sample	Burn rate <0.1"/sec	
*Wood Moisture Content (If Applicable)	Std. Measure	1 Sample	Should be between 6-10% for wood based material only.	
*Resistance To Corrosion (Metal components Only)	ASTM B117 G85 (Mod.)	1 Sample	Shall withstand 24 hours in 1% salt spray (Fog) with no major visual change or corrosion. Modification = % of salt spray	
*Cross-cut Adhesion (Plating & Surface Coating)	ASTM D 3359 (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.	
*Effects of Extreme Temperature/Humidity	Kohl's TM 30	1 Sample	24 Hours @ 0° F (-18°C) and 24 Hours @ 95 RH/120° F (49°C). No failure.	
#Claim Verification (If Claimed)	Visual Check / Actual Use	1 Sample	All designs and features must conform to actual claim	Claim:

CALIFORNIA TECHNICAL BULLETIN 117

*Cover Fabric				<input type="checkbox"/>
Section 1	C.T.B. 117- 2013	1 Sample	(See attached test results / requirements)	<input type="checkbox"/>
*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)	

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	1 Sample	<75 ppm	
*CA Prop 65 (if applicable)	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
433 – A	1) Initial Release	Cindy Ng Oct 18, 2021	Elizabeth Armstrong Oct 2021
433-B	1) Added PFAs/PFOs Supplemental Protocol test line	Charlene Swanson March 2022	Charlene Swanson March 2022
433-C	1) Added row to indicate where 2 seater requirements started	Elizabeth Armstrong Nov 2022	Elizabeth Armstrong Nov 2022
433-D	1) Updated Stability test method to be most current 2) Updated formatting for test lines that were cut off	Charlene Swanson January 2023	Charlene Swanson January 2023
433-E	Updated 1800 Hardlines Regulatory Supplement for additional State & Federal Regulations	Isaac Grossman / Feb 2025	Isaac Grossman / Feb 2025