

PROTOCOL # 434-E Clothing Storage Furniture				
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)	
Parts Labeling	Visual Check	All Samples	Shall match the content if present	
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
EPA TSCA Title VI – Composite Wood Finished Good Labeling	40 CFR 770.45(c)	All Samples	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)	All Samples	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.	
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 quality.assurance@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	• Panels or bundles of panels must be labeled with the following: - 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: • 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	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. In lieu of testing, valid certificate or test report or certificate can be submitted if dated within one year.	
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	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. In lieu of testing, valid certificate or test report or certificate can be submitted if dated within one year.	
Permanency of Labels and Warnings	16 CFR 1261	1 Sample	The warning attached to free-standing storage furniture (over 27 inches in height) shall be permanent when tested as specified in the Standard.	
Warning Label Clothing Storage Unit	16 CFR 1261	1 Sample	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.	
Warning Label	16 CFR 1261	1 Sample	Free-standing storage furniture (over 27 inches in height) shall be permanently marked in at least one place with the warnings from this section. The warnings shall be in a conspicuous location when in use; the back of the unit intended to be placed against the wall is not considered conspicuous when in use. Warnings format and content shall meet all applicable requirements as specified in the Standard.	
Consumer Information for Physical Points of Sale, Packaging, and On- product	16 CFR 1261.6 (a)	1 Sample	The manufacturer shall provide a hang tag with every clothing storage unit that provides the ratio of tip-over moment as tested to the minimally allowed tip-over moment of that model clothing storage unit. The label shall conform in content, form, and sequence to the hang tag as specified in the Standard. EFFECTIVE DATE: May 24, 2023	
*Instructional Literature (For tipover restraint)	ASTM F3096 Section 5	1 Sample	Tipover restraint used with free-standing clothing storage furniture (over 27 inches in height) shall have clear and complete installation instructions including below at a minimum: - Illustration showing method of installation; - Detailed written instructions with step by step instructions to show how to properly attach the tipover restraint. - Parts list including illustrations.	
Consumer Information Requirements for Online Points of Sale	16 CFR 1261.6 (b)	1 Sample	The manufacturer or importer of a clothing storage unit with an online sales interface (e.g., website or app) from which the clothing storage unit may be purchased shall provide on the online sales interface that offers the clothing storage unit for purchase the consumer information as specified in the Standard. EFFECTIVE DATE: May 24, 2023	
*Labeling (For tipover restraint)	ASTM F3096 Section 6	1 Sample	Each tipover restraint used with free-standing clothing storage furniture (over 27 inches in height) shall have below information: - Manufacturer's name and address; - Date of manufacture (identifying the month and year of manufacture at a minimum).	
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 burs 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:
Part Inventory	Visual Check	1 Sample	Shall meet label claims	
Defects	Visual Check	1 Sample	No major defects / two minor defects (max.)	

Performance																				
Seam Slippage/Strength Applicable to Textiles	ASTM D1683	1 Sample	Min. 25lbs @ ¼ in slippage																	
Dry Crocking Applicable to Textiles	AATCC 8/116	1 Sample	Min. Class 4.0																	
Wet Crocking Applicable to Textiles	AATCC 8/116	1 Sample	Min. Class 3.0																	
Colorfastness to Light - Textile Applicable to Textiles	AATCC 16.3	1 Sample	Min. Class 3.5 Report Actual Data at 20/40 hours.																	
Colorfastness to Water - Textile Applicable to Textiles	AATCC 107	1 Sample	Color change: Grade 4.0 min. Color staining: Grade 3.0 min.																	
Caster Performance (if applicable) For items ≤ 27"	Std. Measure	1 Sample	The casters shall have locking mechanism which can lock the rack in position; The casters shall rotate freely without any hesitation and resistance while being unlocked.																	
Caster Locking Performance (if applicable) For items ≤ 27"	Std. Measure	AATCC 107	Fully lock the casters with a the maximum claimed load, if no claim is provided 50lbs shall be used, evenly distributed over the bar in the highest position, push and pull the sample, and check that the locked wheels shall not rotate. The locking mechanism shall remain activated until the lever is released. Once the casters are unlocked, sample shall roll smoothly without resistance.																	
Height Adjustment (if applicable)	Std. Measure	1 Sample	Shall be adjusted to the maximum height as claimed Locking mechanism shall be cycled (1 cycle = open/close) 200 times and then a weight of 50 lbs. is evenly distributed over the length of the bar Shall be no damage or deterioration and the height adjustment locking mechanism shall hold																	
Loading Test - Sample with hanging bars (if applicable)	Actual Use	1 Sample	-Shall assemble per the manufacturer's instructions -Apply the manufacturers stated load capacity to each hanging bar. If no claim is made hang 13 lbs. /ft. evenly on the bar. Shall not damage or deteriorate the bar. Product shall function as intended upon completion of the testing.																	
Loading Test - Samples with shelf (if applicable)	Actual Use	1 Sample	Apply the manufacturers stated load capacity to each shelf. Allow the load to remain for 30 minutes. If no capacity is stated apply test load dependent on shelf width and depth as follows: <8 in depth (3 lb. x shelf width); 8 – 16 in depth (5 lb. x shelf width); >16 in depth (7 lb. x shelf width). Report maximum deformation. Shall not exceed 0.250in.																	
Tipover restraints	ASTM F2057 & ASTM F3096	1 Sample	Free-standing clothing storage furniture (over 27 inches in height) shall meet below requirements: - Tipover restraint shall be included for attachment by the consumer; - The tipover restraint provided shall meet all applicable requirements of ASTM F3096.																	
Hinge-line clearance (if applicable)	ASTM F963-17 Sec. 4.13.2 (mod)	1 Sample	Product having a gap or clearance along the hinge line between a stationary portion and a movable portion shall be constructed, if accessible gap at the hinge line will admit a 3/16 in. (5 mm) diameter rod, it shall also admit a ½ in. (13 mm) diameter rod at all positions of the hinge. Modification: Expanded scope to other products																	
Furniture - Leg strength (if applicable)	Actual Use	1 Sample	No structural failure at the test load applied vertically to the leg at 1 in from the end of the leg. Force is applied in the specified direction in the method. Force/ Load applied = 0.5 x (unit weight of sample, lb) + 10 lbf																	
Loading capacity (for drawers)	Actual Use	1 Sample	Maximum ¼ in deformation - measure before & after. Place 10 lb distributed load/drawer.																	
Cap removal strength - end of furniture legs (if applicable)	Actual Use	1 Sample	Shall not separate. Minimum holding force of 2.0 lb.																	
Handle attachment strength (if applicable)	Actual Use	1 Sample	Shall be capable of withstanding 25 lb removal force.																	
Protective caps on legs (if applicable)	Actual Use	1 Sample	Shall be non - marring																	
Drawer operability (if applicable)	Actual Use	1 Sample	Maximum pulling force shall not exceed 11.2 lbf. each drawer loaded with distributed load. Report the peak pulling force and the applied distributed load.																	
Pockets loading strength (if applicable)	Actual Use	1 Sample	Shall withstand distributed loading of 25kg/m for 60 minutes.																	
Static Load - Samples with Hooks and/or Pegs (if applicable)	Actual Use	1 Sample	Apply 6-lb load on each hook or peg simultaneously for 24 hours. For peg, the load shall be applied within 1 inch from the outer end. No structural damage, permanent deformation, or loss of functionality.																	
Static Load	Actual Use	1 Sample	Load bearing component of furniture, wall shelf, rack shall be subjected to 1.5 times below loading for 1 hour. Wall-mounted shelf and rack shall be mounted as instructed and subjected to 1.5 times below loading for 24 hours. No failure and no loss of functionality. <table><tr><th>Component</th><th>Loading</th></tr><tr><td>All horizontal storage area including shelf, bottom, top and flap</td><td>0.65 kg/dm²</td></tr><tr><td>Basket with internal height not more than 100 mm</td><td>0.5 kg/dm³</td></tr><tr><td>Other baskets</td><td>0.2 kg/dm³</td></tr><tr><td>Drawer with clear height not more than 110 mm</td><td>0.35 kg/dm³</td></tr><tr><td>Other drawers</td><td>0.2 kg/dm³</td></tr><tr><td>Hanging rail</td><td>4 kg/100mm</td></tr><tr><td>Suspended filing pocket</td><td>2.5 kg/100mm</td></tr></table> NOTE: Mounting hardware and instruction, if applicable, shall be provided by client.	Component	Loading	All horizontal storage area including shelf, bottom, top and flap	0.65 kg/dm²	Basket with internal height not more than 100 mm	0.5 kg/dm³	Other baskets	0.2 kg/dm³	Drawer with clear height not more than 110 mm	0.35 kg/dm³	Other drawers	0.2 kg/dm³	Hanging rail	4 kg/100mm	Suspended filing pocket	2.5 kg/100mm	
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Surface Scratching (if applicable)	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. Repeat for a total of 3 cycles over the same area.																	
Roller Performance (if applicable)	Actual Use	1 Sample	Maximum 20 lb. horizontal force is applied to move the sample (with 100 lb. total load) on smooth vinyl surface for a maximum of 10 seconds. No measurement is taken for the first 5 seconds of the test. The caster shall be oriented in a running direction throughout the test.																	
Mounting - For Over The Door Racks (if applicable)	Actual Use	1 Sample	Shall be easy to mount per instructions with provided or recommended hardware.																	
Flammability - Textile (if applicable)	ASTM D1230	1 Sample	Class 1																	

Flammability of Solid (if applicable)	16 CFR 1500.44	1 Sample	Burn rate<0.1” / sec	
Flammability of Vinyl Material (if applicable)	16 CFR 1611	1 Sample	Shall not exceed 1.2 inch/second of average rate of burning.	
*Effects Of Extreme Temperature/Humidity (For Outdoor Use Only)	Kohl's TM 30	1 Sample	24 Hours @ 0° F (-18°C) and 24 Hours @ 95% RH/120° F (49°C) - no failure Size limitation to be determined.	
Ease of Assembly/Installation (if applicable)	Actual use	1 Sample	Shall present no difficulties during assembly and installation when following instructions.	
Functionality	Actual use	1 Sample	Shall function as intended as received.	
*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	
Tipping Test	Actual Use	1 Sample	No damage when tipped from the normal use position 3 times onto a cement floor at room temperature. Indentation or chipping is permissible, but looseness of assembly or fractures is not permissible that affects performance	
Stability Rating	16 CFR 1261	1 Sample	The tip-over moment of the clothing storage unit shall be greater than the threshold moment, which is the greatest of all of the applicable moments below: - For units with an extendable element(s): 55.3 lbs times the extendable element extension from fulcrum distance in feet + 26.6 lb-ft; - For units with a door(s): 51.2 lbs times the door extension from fulcrum distance in feet – 12.8 lb-ft; and - For all units: 17.2 lbs times maximum handhold height in feet. Note: The unit is tested empty only when there are no extendible elements (drawers or pull out shelves) - Method 2. Extendible elements are tested by loading them based on their internal volume. The fill weight should be 8.5lbs/cubic feet - Method 1.	
Tipover Restraints for Clothing/Garment Rack (Expanded Scope: similar items to verified by tech spec or BOM) - State of New York (if applicable)	ASTM F3096-23 Sec. 4 (Mod)	All Samples	[Tip restraints for clothing/ garment rack equal to or more than 27 inch] The tip over restraint provided shall be tested on the recommended method of attachment. Acceptance Level: Shall withstand a pull force of 60lb for 30 s. Modification: Expanded scope to other product. Client's requirement: No Zip Tie Tip Kits allowed. If Zip Tie is present, the test should be marked as FAIL.	
Cycle Test / Test for Buttons, Switches, and/or Moving Components (if applicable)	Actual Use	1 Sample	Shall have no breakage, loss of functionality, loss of serviceability after 200 times / cycles use of buttons, switches, and/or moving components.	
Tilt Resistance (if applicable)	Actual Use	1 Sample	Put the sample without hanging/loading anything on a 10 degree slope (lock the casters if equipped), it shall not tip in any direction. Note: Product shall be tested again with the maximum claimed load hung/loaded on the product.	
*Wood Moisture Content (if applicable)	Std. Measure	1 Sample	Should not exceed 12% 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:

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 (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.	
*Sharp Points & Edges (If applicable)	16 CFR 1500.48 & 49	1 Sample	Products intended for children shall not exhibit non-functional sharp points and edges	
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
434-A	1) Initial Launch	Charlene Swanson March 2022	Charlene Swanson March 2022
434-B	1) Updated warning labels to be compliant of 16 CFR 1261 2) Added Consumer Information for Physical Points of Sale, Packaging, and On-product test line 3) Added Consumer Information Requirements for Online Points of Sale test line 4) Added *Labeling (For tipover restraint) test line 5) Updated Tip Over restraints to be complaint of ASTM F2057 & ASTM F3096 6) Added Stability Rating following 16 CFR 1261 requirements 7) Updated Tipover Restraints for Clothing/Garment Rack to follow ASTM F2057	Elizabeth Armstrong & Charlene Swanson March 2023	Elizabeth Armstrong & Charlene Swanson March 2023
434-C	Removed year from ASTM F963 test methods	Violet Nelson Feb 2024	Violet Nelson Feb 2024
434-D	Updated 1800 Hardlines Regulatory Supplement for additional State & Federal Regulations	Isaac Grossman Feb 2025	Isaac Grossman Feb 2025
434-E	Updated Tip Over restraints to be complaint of ASTM F2057 & ASTM F3096	Brett Peplinski August 2025	Brett Peplinski August 2025