

Crayon 706-G				
Test Property	Test Method	Samples	Test Principle/Requirements	Rating (Section or Executive 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 of 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)	
Art Materials	16 CFR 1500.14 (b) (8)	All Samples	Shall have statement of conformance - "Conforms to ASTM D-4236"	
Instruction for Use (If Applicable)	Visual Check	All Samples	Should be legible, accurate and complete.	
Verify Label Claims (If Applicable)	Visual Check	All Samples	The labeling must comply and valid with all claims.	
Adult Tracking Label **If space limitations exist, contact Kohl's Quality Assurance & Product Integrity team to discuss minimum required information (MR.QA.PI@kohls.com)	Kohl's Requirement	All Samples	MUST BE MARKED AS A PASS/FAIL Can be included on packaging when necessary: Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC #	
PHYSICAL CHARACTERISTICS				
Overall Dimensions (Length x Diameter/Cross Sectional Area In Inch)	Std. Measure	3 Samples	Max. +5% / -0% of the claimed dimension. Record actual data if there is no claim.	Claim: Actual:
CONSTRUCTION QUALITIES				
Kohl's Workmanship Review	Visual Check / Actual Use	All Samples	All components and hardware shall be provided as claimed and shall not be deformed or fractured. All components shall not contain any burrs or sharp edges (test by touch or sight) All welds shall be smoothly finished and free from pits and splatter Shall not contain any loose pen cap, components or unsecured enclosure where structural rigidity and product sealing is required No ink shall drip off or leak out of the pen body or cap	
PERFORMANCE				
Flaking	Actual use	1 Sample	When the crayon is used in a back and forth manner (10 cycles), report if there is / is not a flaky buildup at the start / stop point of the area being colored or spotting in the center of the area being colored.	

Break strength	ASTM F963 section 8.10 modified	1 Sample	Shall withstand 3 lb of compression applied at the midpoint.	
Tip durability	Actual use	1 Sample	Crayon held at 45° angle to desk top downward pressure applied and recorded. Minimum requirement of 3 lb.	
Impact Resistance	16 CFR 1500.53	1 Sample	4 drops onto an impact medium from 3 feet height. No loss of serviceability. No accessible sharp edges or sharp points.	
Effects Of Extreme Temperature/Humidity	Kohl's TM 15 / Simulative Use	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	Claim:
ANALYTICAL				
*Lead In Scrapable Surface Coating	ASTM E1613/E1645	1 Sample	≤90 ppm (0.0090% by weight) (CPSA – 16 CFR 1303)	
*LHAMA Toxicological Review	16 CFR 1500.14 (b) (8)	1 Sample	Art material product formulation (s) and associated label shall have a chronic health hazard review by a certified toxicologist. In lieu of testing, a 3rd party test report can be submitted to lab for document review.	
Total Lead	Metal: CPSC-CH-E1001-08.3 Non Metal: CPSC-CH-E1002-08.3 Surface Coating: CPSC-CH-E1003-09.1	1 Sample	90ppm Minnesota 325E.3892 (HF 2310) Products preempted by federal & state law (e.g., CPSC, FDA, etc) are exempt from testing. Product exemptions for CPSC (16 CFR 1500.91 (d) and (e), 16 CFR 1500.88 and 16 CFR 1252)	
Total Cadmium	Substrate & Surface Coating: EPA or ASTM method from AFIRM or CPSC methods	1 Sample	40ppm (children) Washington State CHCC	
Total Cadmium	Substrate & Surface Coating: EPA or ASTM method from AFIRM or CPSC methods	1 Sample	75ppm Minnesota 325E.3892 (HF 2310) Product Exemptions by federal & state law (e.g., CPSC, FDA, etc) are exempt from testing.	
*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.	
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	
ADDITIONAL NOTE:				
*Please refer to Kohl's preferred third party labs for individual pricing and samples.				
Protocol Version	Description of Change	Revised by/Date	Approved by/Date	
706 – A	Initial Release	Zoe Yeung Mar 15, 2016	Jeetu Shelatkar Mar 15, 2016	
705-B	Added adult tracking label req	Elizabeth Armstrong June 23, 2020	Elizabeth Armstrong June 23, 2020	
706-C	Transferred protocol from word to google sheet	Violet Nelson July 12, 2023	Violet Nelson July 12, 2023	

706-D	Added MN Law testing requirements for lead and cadmium	Elizabeth Armstrong Nov 2023	Elizabeth Armstrong Nov 2023
706-E	Removed year from ASTM F963 test	Violet Nelson / Feb 2024	Violet Nelson / Feb 2024
706-F	Updated MN Law to include product exemptions	Elizabeth Armstrong March 2024	Elizabeth Armstrong March 2024
706-G	Added 1800 Hardlines Regulatory Supplement for additional State & Federal Regulations	Isaac Grossman February 2025	Isaac Grossman February 2025