

## Touch Up Paint Pen for Furniture

### 707-D

Test Property	Test Method	Samples	Test Principle/Requirements	Rating (Section or Executive Summary which failed items can be referenced)
<b>LABELING</b>				
Labeling / Packaging Review	FPLA 16 CFR 500 & 19 CFR 134	All Samples	Shall 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)	
Verify Label Claims	Visual Check/ Performance Claims	All Samples	The labeling must be valid and comply with all claims.	Claim: Actual:
Instruction for Use (If Applicable)	Visual Check	All Samples	Should be legible, accurate and complete.	
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	Kohl's Requirement	All Samples	Can be included on packaging when necessary: Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC #	
<b>PHYSICAL CHARACTERISTICS</b>				
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:
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	
<b>PERFORMANCE</b>				
Actual use - functionality	Actual Use	1 Sample	Shall function as intended as received. Testing is limited to verification of basic function. Only function failures will be reported. NT rating shall be given to product that cannot be tested due to testing cannot be replicated in laboratory conditions.	
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:
<b>ANALYTICAL</b>				

*Lead In Scrapable Surface Coating	CPSC-CH-E1003-09	1 Sample	≤ 90 ppm (0.009% by weight) (CPSA – 16 CFR 1303)	
*Toxicological Risk Assessment (TRA) On The Formulation	16 CFR 1500.3	All Samples	Evaluate the safety of the product by a toxicologist. Review the hazard, exposure and risk associated with the ingredient. Vendor can submit a 3rd party test report for review if it is within two years of the report issue date.	
*Flash Point (if applicable)	ASTM D92	1 Sample	Report actual. The product must be labeled appropriately as follows: Extremely flammable – Flashpoint is at or below 20oF. Flammable – Flashpoint is above 20oF and below 100oF Combustible – Flashpoint is at or above 100oF to and including 150oF.	
*16 CFR 1500.14 – Labeling for certain products (applicable to liquid samples)	16 CFR 1500.14	1 Sample	16 CFR 1500.14 Products containing substance above the respective requirement shall have special labeling:  ≥ 10% (Diethylene glycol) ≥10% (Ethylene glycol) ≥5% (Benzene) ≥10% (Toluene) ≥10% (Xylene) ≥10% (Petroleum Distillate) ≥4% (Methanol) ≥10% (Turpentine)  In lieu of testing, test report dated within ONE year can be submitted for review.	
* CA Prop 65 (if applicable)	KHLS-AN-PTCL-01300-US	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.

In addition to this protocol, any products designed for, intended for or appealing to children, requires additional testing per Testing Protocol # 601.  
**KOHL'S, AGENT'S & VENDORS USE ONLY**

Protocol Version	Description of Change	Revised by/Date	Approved by/Date
707-A	Initial Release	Elizabeth Armstrong Aug 5, 2016	Elizabeth Armstrong Aug 17, 2016
707-B	Added adult tracking label req	Elizabeth Armstrong June 23, 2020	Elizabeth Armstrong June 23, 2020
707-C	Transferred protocol from word to google sheets	Violet Nelson July 12, 2023	Violet Nelson July 12, 2023
707-D	Added 1800 Hardlines Regulatory Supplement for additional State & Federal Regulations	Isaac Grossman February 2025	Isaac Grossman February 2025