


PROTOCOL # 827-M

FOODWARE - METAL (NON INSULATED)

Performance Test	Test Method	Samples	Test Principle/Requirements	Rating (Section or exec. Summary which failed items can be referenced)
LABELING				
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 (if applicable) -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:
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	Can be included on packaging when necessary: Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC #	
Capacity (If Applicable)	FPLA/ UPLR	3 Samples	Max. +3% / -0% of claimed capacity. For measuring cups or spoons only: Max. -0%/+5% of claimed capacity. Record actual data if there is no claim.	Claim: Actual:
Dimensions	FPLA/ UPLR	3 Samples	As claimed/ measured (+3% / -0%)	Claim: Actual:
Chemical Disclosure / Labeling in Cookware	CA AB-1200 article 2 (mod) / CO HB-22 1345 sec. 25-15-604 (2)a-f (mod)/ Visual	All Samples	Cookware chemical disclosure labeling provided for CA AB-1200 and/or CO HB-22-1345 compliance pertaining to handles or any surface that comes into contact with food, foodstuff, or beverages shall meet the following: 1) List of chemicals is introduced by the phrase ""The product contains:"" 2) List of chemicals is followed by the phrase ""For more information about chemicals in this product, visit: / Para obtener más información sobre las sustancias químicas de este producto, visite: ""www.kohls.com/chemicaldisclosure"" and QR code which leads to that web address 3) Lab must verify that all disclosed chemicals are present on the Kohl's TRF 4) Labeling must be incorporated into retail packaging or printed on a sticker / hangtag which is affixed to retail packaging or the product. Fold out ""butterfly"" labels are acceptable. Printing on the inside of retail packaging or an information insert are not acceptable formats See example below: <div data-bbox="820 1690 1226 1837" style="border: 1px solid black; padding: 5px;"> <p>This Product Contains: (Este producto contiene:) Chemical 1, Chemical 2, Chemical 3, Chemical 4, etc. For more information about chemicals in this product, visit: (Para obtener más información sobre las sustancias químicas de este producto, visite:) https://cs.kohls.com/app/answers/detail/a_id/4243?cid=ISMQR246&utm_medium=ISM</p>  </div>	
CONSTRUCTION QUALITIES				

Kohl's Workmanship Review	Visual Check /Actual Use	1 Sample	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 TESTING				
Effects of Handwashing	Kohl's TM 32	3 Samples	No color change and no adverse effects - Hand wash with detergent for below defined cycles Tier 1: 5 Cycles Tier 2: 15 cycles	
Dishwasher Safe (if Claimed)	Actual Use	3 Samples	Dishwasher / Detergent below defined cycles - no color change or adverse effects. Report if label is not durably marked Tier 1: 5 cycles Tier 2: 15 cycles	
Stain Resistance	Actual Use	3 Samples	No objectionable stain by sauce and oil after below timing placement (ketchup, mustard, and cooking oil) Tier 1: 30min Tier 2: 4 Hours	
Resistance to Hot Water	Actual Use	1 Sample	Pour 25 ml of boiling water and allow to cool. Dried surface shall have no graying or spotting	
Cross Cut Adhesion (Metal Plating) (if applicable)	ASTM D3359 Method B	1 Sample	A lattice pattern with six cuts in each direction is made in the film to the substrate, pressure-sensitive tape is applied over the lattice and then removed Client Requirement: Tier 1: 3B Tier 2: 5B	
Handle Strength – Static (If Applicable)	Kohl's TM 34	3 Samples	Min. 10 lbs. static load (less than 1000 ml.) Min. 20 lbs. static load (greater than 1000 ml.)	
Lid Fitting (If Applicable)	Actual Use	3 Samples	No failure—100 cycles on / off.	
*Freezer Safe (If Claim)	Actual Use	3 Samples	Fill with water (if applicable). Shall withstand a freezer temperature of 0°F (-18°C) without cracking, deformation or adverse effects.	
*Oven Safe (If Claimed)	Temperature	3 Samples	Place empty in preheated 350° F (177° C) oven, (include lid), remove @ 1 hour, cool. Repeat if claimed oven safe temperature is higher than 350° F (177° C). Shall exhibit no cracking, crazing, melting, deformation, or color change	
#Claim Verification (If Claimed)	Visual Check / Actual Use	1 Sample	All designs and features must conform to actual claim	
Cycle Test/Test for Button, Switches, and/or Moving Components – Excludes Hinge Features (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.	
*Drop Test (for non-fragile items)	Actual Use	1 Sample	No breakage or separation after 3 drops from 3 feet onto vinyl-tiled concrete floor.	
*Tip Impact (exclude fragile article)	Actual Use	1 Sample	For free-standing plastic ware, metal ware, and wooden ware with its maximum height to minimum base ratio greater than three: Fill with water up to 80% of its maximum capacity. Close the enclosure as intended. Apply a horizontal force at the top of the enclosure in order to tip the container onto vinyl-tiled concrete floor. Total 4 times. No breakage or separation.	

*Leakage Test – for container with enclosure (if applicable)	Actual Use	1 Sample	Fill the container with ink-stained water up to claimed maximum capacity (if no claim, fill to 80% of its normal capacity). Close the container with the enclosure (e.g. lid, seal-lock, cap, or pour spout, etc.) as intended as received. Place a white blotting paper on a horizontal surface. Lay the filled container on the white blotting paper for 1 hour. Water shall not spill or leak out at the enclosure. The white blotting paper shall have no damage or stain mark.	
Stability	Actual Use	1 Sample	For free-standing products with its maximum height to minimum base ratio greater than three: Shall remain stable with tipping at 10° incline.	
*Resistance to Corrosion (for metal components)	ASTM B117	1 Sample	Metal components shall withstand 24 hours in 5% salt spray (fog) with no major corrosion or visual change.	
ANALYTICAL				
*Lead in Scrapable Surface Coating	ASTM E1613/E1645	1 Sample	≤90 ppm (0.009% by weight). (CPSA - 16 CFR 1303)	
* 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.	
*Bisphenol A (BPA) Content Scope: 1) Reusable food or beverage containers (ie, food contact), including lid, cup, etc). 2) Sports bottles	Solvent extraction and analysis by LC/MS Various US State Laws (CT, WA, NY, DE, IL, MA, MD, ME, MN, NV, VT, WI, the District of Columbia, Chicago City)	All Samples & All Colorways	Shall not contain any detectable level of Bisphenol A Remark: Actual testing shall be done on all accessible plasticized material including coatings and plastic. Exempt Materials: Glass, Metal, Wood, Textiles. Plastic layer or coating on exempt material shall need to be tested. Vendor shall be responsible for compliance of other materials.	
*Silver Plated Hollowware – Leachable Lead	FDA CPG 7117.05	1 Sample	Food contact silver plated hollowware shall not release lead exceeding below limit: -7.0 ppm (adults) -0.5 ppm (intended for children and infants)	
*Stainless Steel (if applicable)	With reference to NSF/ANSI 51	1 Sample	Food contact stainless steel shall be a type of the AISI 200, 300 or 400 series provided that the minimum chromium content is 16%. If chromium content of the stainless steel is <16% but ≥11.5%, it shall meet the requirement of the GRAS – Leachable heavy metal test. NOTE: In lieu of testing, valid test report issued within 1 year by a third party lab shall be provided. If no test report is provided, actual test will be conducted. Cutlery, blades, and similar applications requiring a sharp edge, stainless steel with chromium content lower than 16% shall be acceptable provided that the stainless meets the hardness requirements specified in	
*GRAS – Leachable Heavy Metal – For stainless steel (if applicable)	Generally Recognized As Safe (GRAS)	1 Sample	For food contact stainless steel with chromium content within 11.5% to 16%: -Release of Arsenic (As), Cadmium (Cd), Lead (Pb), and Mercury (Hg): Not detected	
Aluminum Alloy (if applicable)	With reference to NSF-ASNI 51	1 Sample	The following series of aluminum alloys are acceptable for food contact article: Wrought alloys (sheet and extrusion: 1xxx series alloys, 3xxx series alloys, 4xxx series alloys, 5xxx series alloys; 6xxx series alloys. Casting alloys: 218.x; 356.0; 308.0; 360.0; 520.0; 319.0; 413.0; 713.0; 332.0; B443.0. NOTE: It is the vendor's responsibility to meet this requirement.	

*GRAS – Leachable Heavy Metal – For aluminum or aluminum alloy (if applicable)	Generally Recognized As Safe (GRAS)	1 Sample	For food contact aluminum alloy that the composition thereof does not fulfill the grading requirements: -Release of Arsenic (As), Cadmium (Cd), Lead (Pb), and Mercury (Hg): Not detected.
Pewter Alloy – Lead Content (if applicable)	FDA Food Code Chapter 4 Part 101.13	1 Sample	Food contact pewter alloy shall not contain lead exceeding 500 ppm.
*Solder and Flux Component – Lead Content (if applicable)	FDA Food Code Chapter 4 Part 101.13	1 Sample	Food contact solder and flux component shall not contain lead exceeding 2000 ppm.
*GRAS – Leachable Heavy Metal – For Steel, Tin Plated, Chromium Plated, Silver Plated, Gold Plated, and Cast Iron (if applicable)	Generally Recognized As Safe (GRAS)	1 Sample	Food contact steel, tin plated, chromium plated, silver plated, gold plated, and cast iron: -Release of Arsenic (As), Cadmium (Cd), Lead (Pb), and Mercury (Hg): Not detected
PFAS Supplemental Protocol (1600)	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
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.
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
STAINLESS STEEL (IF CLAIMED & FOOD CONTACT ONLY)			
Claimed Chromium Content < 16%			
* Stainless Steel Composition (Applicable To Food Contact Surfaces Only)	Acid Digestion / ICP / ASTM E1019	1 Sample	Stainless steel composition (Carbon, Manganese, Phosphorus, Sulfur, Silicon, Chromium, Nickel, Nitrogen, Molybdenum) test is to be conducted.
* Stainless Steel - Resistance To Corrosion (Applicable if result of composition test does not meet the claimed specification)	ASTM B117 (Mod.)	1 Sample	Shall withstand 48 Hours in 1% Salt Spray (Fog) with no major visual change, pitting or corrosion. Modification = % of salt spray
Claimed Chromium Content ≥ 16%			
*FDA – GRAS Stainless Steel (Applicable To Food Contact Surfaces Only)	Acid Digestion / ICP / ASTM E1019	1 Sample	Shall meet Stainless Steel Claim (Chromium and Nickel content) AND Minimum of 16% Chromium to be considered FDA GRAS.
GRAS evaluation	FDA Generally Recognized as Safe (GRAS) Guidelines/FDA Opinion / ASTM E1086-14 / ASTM E415-17 / CPSD-GB-00003-MTHD / CPSD-AN-00295-MTHD		Metal intended to come into contact with food shall meet FDA GRAS requirement. Metal composition is conducted and evaluated if it is GRAS. Must meet 16% Chromium, if not conduct stainless steel - resistance to corrosion testing
* Stainless Steel - Resistance To Corrosion (Applicable if product does not comply GRAS test)	ASTM B117 (Mod.)	1 Sample	Shall withstand 48 Hours in 1% Salt Spray (Fog) with no major visual change, pitting or corrosion. Modification = % of salt spray

PRICING AND ADDITIONAL NOTE:

*Please refer to Kohl's preferred third party labs for individual pricing and sample size.

In addition to this protocol, any products designed for, intended for or appeal primarily to children, requires additional testing per Kohl's Testing Protocol #601.

PROTOCOL VERSION	DESCRIPTION OF CHANGE	Revised By	Approved By
827 – A	Initial Release	Zoe Yeung Jul 27, 2015	Elizabeth Armstrong July 28, 2015
827-B	Updated GRAS evaluation	Teana Robinette Sept 25, 2018	Teana Robinette Sept 25, 2018
827-C	Updated GRAS evaluation for s/s composition	Elizabeth Armstrong Jan 14, 2019	Elizabeth Armstrong Jan 14, 2019
827-D	Added Cycle Test, Drop Test, Tip Impact Test, Leakage Test, Stability Test, Resistance to Corrosion (for metal components), Stainless Steel, GRAS for stainless steel and aluminum alloy, Pewter Alloy Testing, Solder and Flux Component Testing, and GRAS testing for leachable heavy metals.	Charlene Swanson August 2019	Charlene Swanson August 2019
827-E	Updated Tip Impact Test to show 80% instead of 8-%	Charlene Swanson October 2019	Charlene Swanson October 2019
827-F	Added adult tracking label	Elizabeth Armstrong June 24, 2020	Elizabeth Armstrong June 24, 2020
827-G	Added PFAS supplemental protocol requirements and removed tier 3	Elizabeth Armstrong March 2022	Elizabeth Armstrong March 2022
827-H	Updated BPA Content test line	Violet Nelson / Oct. 2023	Violet Nelson / Oct. 2023
827-I	Added test methods Total Lead and Total Cadmium (Adults & Childrens)	Violet Nelson / Nov. 2023	Violet Nelson / Nov. 2023
827-J	1) Added Chemical Disclosure / Labeling in Cookware test line	Violet Nelson / Dec 2023	
827-K	Updated MN Law to include exemptions	Elizabeth ARMstrong March 2024	
827-L	1) Added new Food Contact Supplemental protocol (1800) requirements	Jackie Deppisch September 2024	
827-M	Updated 1800 Hardlines Regulatory Supplement for additional State & Federal Regulations	Isaac Grossman February 2025	