Protocol 708-1

Chalk

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) / LHAMA / ASTM D4236	All Samples	Art materials as defined by 16 CFR 1500.14(b)(8) shall meet all applicable requirements regarding minimize the potential risk associated with the use of art materials that present chronic, long-term health hazards. 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.	
Import Permits (for natural materials only) (if applicable)	US Department of Agriculture Animal & 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.	Pass/Fail
Adult Tracking Label **If space limitations exist, contact Kohl's Quality Assurance & Product Integrity team to discuss minimum required information (quality.assurance@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:
Overall Weight	Std. Measure	3 Samples	Report Actual Shall meet label claims	Claim: Actual:
Net Content	Std. Measure	3 Samples	Report Actual Shall meet label claims	Claim: Actual:
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 (test by touch or sight) Shall not contain any loose pen cap, components or unsecured enclosure where structural rigidity and product sealing is required	
Sharp Points / Edges	With reference to 16 CFR 1500.48 / 1500.49	All Samples	Shall have no sharp points or edges as received, other than those required for function.	
Components	Visual Check / Actual Use	All Samples	Shall have no components missing, malformed, and/or fractured.	
Wrapping (if applicable)	Visual Check / Actual Use	All Samples	Wrapping of crayon or chalk shall be free of defects.	
PERFORMANCE				
Functionality	Actual Use & Visual Check	1 Sample	Shall function as intended.	
Writing Performance	JIS S6037 Clause 6.3	1 Sample	Draw three 12-inch lines. Then shade a 45 in2 area with no significant pressure. Coloration drawn by crayon or chalk shall be uniform with no voids.	
Breaking Strength	Std. Measure & Visual Check	1 Sample	Apply force at the mid-point of crayon or chalk, record the force causing it to break	
Wipe off Ability (If applicable)	Actual Use & Visual Check	1 Sample	Use wipe-off crayon, marker or chalk to draw on intended surface or nonporous surface such as glass or plastics. Markings shall be wiped off with a clean paper towel or rag	
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:
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.	
*Toxicity & Irritancy by Toxicological Risk Assessment (TRA) Applicable to below components : All toy cosmetics, liquids, pastes, putties, gels and powders regardless of claim Other materials bearing a “NON-TOXIC” claim on samples and/or its packaging	ASTM F963 / 16 CFR 1500.3 / 16 CFR 1500.14 / 16 CFR 1500.121	1 Sample	Toxicity Risk Assessment shall be conducted to substantiate the compliance of the regulation. In lieu of testing, test report can be submitted if dated within two years.	
Microbiological Examination of Non-sterile Products - Microbial Enumeration Tests and Tests for Specified Microorganisms	USP <61> & <62>	1 Sample	The cleanliness of liquids, pastes, putties, gels, and powders shall not exceed 1000 cfu/mL or cfu/gm. (Due to the variability introduced by the dilution process, up to 5000 cfu/mL or cfu/gm can be considered to be an acceptable result.) In addition, Pseudomonas sp., Escherichia coli, coagulase positive Staphylococcus sp., and Salmonella sp. shall not be detected.	
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.’	
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**	
708-1	Initial Release	Charlene Swanson November 2026	Charlene Swanson November 2026	