

Title: **BATH & BODY ACCESSORIES (Soap Pump, Toothbrush Holder, Loofa, Sponge, Pouf, Brush, Shower Cap, Etc.)**
 Protocol Number: **KOHL'S – 218 - R Tier 1/Tier 2/Tier 3**

Test Property	Test Method	Samples	Test Principle / Requirements	Rating (Section or exec. Summary which failed items can be referenced)
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LABELING				
Labeling / Packaging Review	FPLA 16 CFR 500 & 19 CFR 134	All Samples	Should be legibly marked with the following information: <ul style="list-style-type: none"> 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	All Samples	The labeling must comply and valid with all claims.	
BPA Free Label (Children's Products Only)	Visual Check	All Samples	Must be conspicuously labeled as "BPA Free"	
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 #	
Import Permit (For Natural Materials Only)	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.	

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LABELING continued				
EPA TSCA Title VI – Composite Wood - Sample Declaration Form and Mill Certificate (if applicable)	40 CFR 770	All	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. <ul style="list-style-type: none"> • If regulated composite wood is not present in the sample, result is N/A. • If regulated composite wood is present in the sample: <ul style="list-style-type: none"> - 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: <ul style="list-style-type: none"> • Include a copy of the Sample Declaration Form in the report • Regulated composite wood includes: <ul style="list-style-type: none"> - 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. 	

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EPA TSCA Title VI – Composite Wood - Raw Panel Labeling (if applicable)	40 CFR 770.45(a)	All Samples	<ul style="list-style-type: none"> • Panels or bundles of panels must be labeled with the following: <ul style="list-style-type: none"> - 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 <p>Notes:</p> <ul style="list-style-type: none"> • 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	<p>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.</p> <p>In lieu of testing, valid certificate or test report or certificate can be submitted if dated within one year.</p>	
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	<p>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.</p> <p>In lieu of testing, valid certificate or test report or certificate can be submitted if dated within one year.</p>	



KOHL'S TEST PROTOCOL

Approved: June 26, 2020

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PHYSICAL CHARACTERISTICS				
Dimensions	Std. Measure	3 Samples	As Claimed/ measured (+5%/ - 5%)	Claim: Actual:
Capacity (fl. oz. / ml) (If Applicable)	Std. Measure	3 samples	Max. +5% / -0% of claimed capacity. Record actual data if there is no claim.	Claimed: Actual:

CONSTRUCTION QUALITIES				
Kohl's Workmanship Review	Visual Check / Actual Use	All Samples	<ul style="list-style-type: none"> 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 Product shall not tip over during casual 	

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PERFORMANCE						
Functional Use (Hinges, Moving Parts, etc) (If Applicable)	Std. Measure	1 Sample	No failure for open and close operations or intended functions/ operations after the below cycles.			
			<table border="1"> <tr> <td>Tier 1</td> <td>Tier 2</td> <td>Tier 3</td> </tr> <tr> <td>100 cycles</td> <td>200 cycles</td> <td>300 cycles</td> </tr> </table>		Tier 1	Tier 2
Tier 1	Tier 2	Tier 3				
100 cycles	200 cycles	300 cycles				
Impact Resistance (Not Applicable TO Ceramic/ Glass Items)	ASTM F963	1 Sample	4 drops from 3 feet height onto an impact medium. No adverse effect when examined visually.			
Effects of Handwashing	Kohl's TM 32	1 Sample	No color change and no adverse effects – Hand wash with detergent for no. of cycles			
			<table border="1"> <tr> <td>Tier 1/ Tier 2</td> <td>Tier 3</td> </tr> <tr> <td>5 cycles</td> <td>10 cycles</td> </tr> </table>		Tier 1/ Tier 2	Tier 3
Tier 1/ Tier 2	Tier 3					
5 cycles	10 cycles					
Humidity Test	Kohl's TM31	1 Sample	95% RH @ 100°F (38°C) for 24 hours. No major visual change. No apparent rusting stain or corrosion on metal components.			
*Cross Cut Adhesion (Applicable to metal plating and mirror tier 1ing)	ASTM D3359 Test Method A	1 Sample	Cut 2 in. cross-hatch pattern on plating surface or mirror silvering. Plating or silvering must remain affixed. Trace peeling or removal along incision or at their intersection is accepted.			
*Loading Capability (Applicable to waste can or similar container or shelf only)	Std. Measure	1 Sample	Shall withstand no. of times the volume capability or 15 lbs whichever is less for 24 hours. No failure or adverse effect.			
			<table border="1"> <tr> <td>Tier 1/ Tier 2</td> <td>Tier 3</td> </tr> <tr> <td>2 times</td> <td>3 times</td> </tr> </table>		Tier 1/ Tier 2	Tier 3
Tier 1/ Tier 2	Tier 3					
2 times	3 times					
*Handle strength – Static (If Applicable)	Kohl's TM 34	1 Sample	Shall withstand no. of times total weight of the product or 5 lbs at a minimum. No failure or adverse effect.			
			<table border="1"> <tr> <td>Tier 1/ Tier 2</td> <td>Tier 3</td> </tr> <tr> <td>2 times</td> <td>3 times</td> </tr> </table>		Tier 1/ Tier 2	Tier 3
Tier 1/ Tier 2	Tier 3					
2 times	3 times					
# Claim Verification (If Claimed)	Visual Check/ Actual Use	1 Sample	All designs and features must conform to actual claim.			

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PERFORMANCE- Continued				
*Wood Moisture Content (If Applicable)	Std. Measure	1 Sample	Should not exceed 12% for wood based material only	
Strength Of Attachment/Joints (If Applicable)	Loading	1 Sample	Shall withstand min. 20 lbs static load with no failure.	
*Water Absorption (Applicable for Loofa, Sponge, Pouf only)	Std. Measure	1 Sample	Record the following water absorption characteristics (by weight), after immerse the product to 37 deg C water for 5 minutes : <ul style="list-style-type: none"> Wet weight (oz) Percent absorption (%) Water retention after hand squeezing for 1 Time (oz) Weight after hand squeezing for 1 Time (oz) Percent retention (%) 	
*Narrow elastics - load elongation and recovery (Applicable for elastics only)	Std. Measure	1 Sample	Recovery: 85% minimum Record modulus at 20, 40, 60 and 80% elongation	
* Rust Resistance Claim Verification (If Claimed and applicable to metal components only)	ASTM B117 / Kohl's Requirement	1 Sample	Shall withstand 120 hours in 5% salt spray (fog) with rust rating 5 or above as per SGS In-house Method, check and record the evaluation every 24 hours. Note: Photograph ALL visual changes in report.	

<u>Bath Brush and Back Scrubby:</u>				
Bristle Softness	Visual Check	2 sample	Bristle shall be soft and suitable for use.	
Bristle Durability	Actual Use	2 samples	Bristle shall withstand 50 cycles of the actual uses on skin (e.g. hand) without excessive bristle loss.	
Attachment Strength for Teeth, Bristles and Tufts	16 CFR 1500.53	2 samples	Teeth / tufts / bristles shall withstand the following tensile force when pulled as one unit from the block: - Block type with pinch set teeth / tufts / bristles - 5 lbf. - Cushion type with push in teeth / tufts / bristles - 2.5 lbf.	
* Attachment Strength of Joint or Handle	Force Gauge	2 samples	Joint or handle shall withstand 25 lbs pulling force for 10 seconds without separation.	

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PEFORMANCE – Continued					
<u>Bath Brush and Back Scrubby:</u>					
Bending Strength	Actual Use	2 samples	Apply 5-lb force at the mid-point of the brush barrel. No damage of the brush barrel		
* Drop Test (For nonfragile items)	ASTM F963 Modified	2 samples	No breakage or separation after 4 drops from 3 feet onto vinyl-tiled concrete floor.		
* Resistance to Corrosion (For metal component)	ASTM B117	2 samples	Metal component shall withstand 24 hours in 5% salt spray (fog) with no major corrosion or visual change.		
Resistance to water leakage (for items that would come in contact with water – including toilet bowl brush holder)	Kohl's TM 39	1 Sample	Fill product with water to 2/3 of capacity. No leakage after no of hours		
			Tier ½	Tier 3	
			24 hours	36 hours	
<u>Loofah, Sponge, and Pouf:</u>					
Water Absorption	Std. Measure	2 samples	For loofah, sponge, or pouf: Measure the dry weight. Immerse it in water for 1 minute and then allow it to drain for 1 minute. Record the percentage of absorbed water.		
<u>Inflatable Bath Pillow:</u>					
Leakage Test (For inflatable product)	Actual Use	2 samples	Inflatable product shall be inflated to nominal size. Record the pressure. Leave it at ambient environment for 24 hours. Shall have no visible change in shape or any sign of leakage.		
Inflation and Deflation - Cyclic Test	Actual Use	2 samples	Inflatable product shall be inflated to its normal inflation pressure then fully deflated. Total 10 cycles. No loss of functionality.		
Resistance to Puncture	Std. Measure	2 samples	Record the average puncture force of five plastic film specimens of inflatable product.		
<u>Bath Cap:</u>					
Leakage Test (For bath cap)	Actual Use	2 samples	Invert bath cap and fill with water to the maximum level where possible. Hold for 30 seconds. Shall have no leakage.		

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PERFORMANCE – Continued				
<i>Bath Cap:</i>				
Retention of Elasticity	Actual Use	2 samples	Fully stretch and relax the elastic band of bath cap for 50 cycles. Shall be no loss of elasticity or loosened stitches. Report any change of perimeter of the band at the end of 50 cycles.	
<i>Soap Dispenser:</i>				
Dispenser Operability	Actual Use	1 Sample	Shall provide good dispensing of soap with no adverse effects, clogging, etc. after 100 cycles of actual use	
Ease of operability Pump top Dispenser	Actual Use	2 Samples	Shall require no more than 10lb force to operate	
Drop Test (For non-fragile items)	ASTM F963 Modified	2 Samples	No breakage or separation after 4 drops from 3 feet onto vinyl-tiled concrete floor	
Resistance to Corrosion (for Metal components)	ASTM B117	2 Samples	Metal component shall withstand 24hr in 5% salt spray (fog) with no major corrosion or visual change	

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ANALYTICAL				
*Lead In Scrapable Surface Coating	CPSC-CH- E1003-09	1 Sample	≤90 ppm (0.0090% by weight) (CPSA – 16 CFR 1303)	
Bisphenol A (BPA) Content <i>(Any adult or children's reusable food or beverage container, such as but not limited to: plates, cups, bowls, sippy cups, bottles, etc.) Exempt Materials: Glass, Metal, Wood, Textiles, Etc.</i>	Solvent extraction and analysis by LC/MS	1 Sample	Prohibited	
* 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.	
<i>Remark: In addition to this test protocol, tumblers (cups for mouth rinsing) made of all kind of materials require additional FDA and Proposition 65 leachable lead and cadmium testing per Kohl's test protocol #801 or 813. Plastic tumblers also require additional FDA food grade plastic testing per Kohl's test protocol #803.</i>				

ADDITIONAL NOTE:

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

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Protocol Version	Description of Change	Revised by / Date	Approved by / Date
224 – 0	Initial Release	CY Chan Feb 10, 2004	Roger Mayerson Mar 08, 2004
224 – 1	Changed Protocol Title to Bath & Body Accessories. Deleted Ingredient and Color Additive Review and pH Value Tests. Updated Workmanship Review. Added Capacity, Effects of Handwashing, Humidity, Cross Cut Adhesion, Loading Capacity & Handle Strength Tests.	Simon Leung Jun 08, 2009	Ro Jain Jun 15, 2009
218-A	Changed protocol number from 224-1 to 218-A, price adjustment	Elizabeth Armstrong April 1, 2010	Ro Jain April 1, 2010
218-B	Added BPA testing	Elizabeth Armstrong November 11, 2010	Ro Jain November 11, 2010
218-C	Updated test method for scrapable surface coating to CPSC method. Lowered lead in scrapable surface coating from 600 to 90ppm	Elizabeth Armstrong September 15, 2011	Ro Jain September 15, 2011
218-D	Added Functional Use and Impact Resistance Updated price	John Wong Aug 12, 2013	Ro Jain Sep 6, 2013
218-E	Differentiate the performance rating to Tier 1/Tier 2/Tier 3 Updated the package prices	John Wong Oct. 4, 2013	Ro Jain Dec. 20, 2013
218-F	Updated lead content pricing	Candy Chan Jul 30, 2014	Jeetendra Shelatkar Aug 5, 2014
218-G	Rename all in-house methods	Birkoff Chen Sep. 4, 2014	Teana Robinette Oct 27, 2014
218-H	Added Wood Moisture Content, Strength Of Attachment/Joints, Dimensions, Water Absorption, Narrow elastics – load elongation and recovery, updated Impact Resistance	Zoe Yeung Jan 19, 2015	
218-I	Added wood moisture content, strength of attachment/joints, water absorption, Inflatable Bath Pillow, Loofa/sponge, bath cap	Dana Leair February 17, 2016	Jeetendra Shelatkar February 17, 2016
218-J	Add Rust Resistance test	Teana Robinette March 30, 2017	Teana Robinette March 30, 2017
218-K	Added Labeling – US EPA Formaldehyde Emission	Cindy Ng May 4, 2017	Elizabeth Armstrong May 8, 2017

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218-L	Modified Loading Capability to include shelf , also added performance testing for soap dispenser (dispenser operability, ease of operability, drop test, resistance to corrosion)	Elizabeth Armstrong May 31, 2017	Elizabeth Armstrong May 31, 2017
218-M	Added leakage testing for applicable products	Elizabeth Armstrong Oct 9, 2017	Elizabeth Armstrong Oct. 9, 2017
218-N	Updated CARB & EPA Labeling	Teana Robinette Sept 6, 2018	Teana Robinette Sept 6, 2018
218-O	Deleted packaging test line	Teana Robinette Feb 28, 2019	Teana Robinette Feb 28, 2019
218-P	Added Import Permit requirement if applicable. Added Adult tracking information.	Becky Becker April 24, 2019	Becky Becker April 24, 2019
218-Q	Deleted packaging test line, updated formatting	Charlene Swanson December 2019	Charlee Swanson December 2019
218-R	Updated adult tracking label requirements and contact information, updated composite wood requirements	Charlene Swanson June 26, 2020	Charlene Swanson June 26, 2020