


PROTOCOL # 809.1-R

Flatwear-Metal / Wood

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:
BPA Free Label (Children's Products Only)	Visual Check	All Samples	Must be conspicuously labeled as "BPA Free"	
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.	Pass/Fail
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 #	

<p>EPA TSCA Title VI – Composite Wood - Sample Declaration Form and Mill Certificate (if applicable)</p>	<p>40 CFR 770</p>	<p>All Samples</p>	<p>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.</p> <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 <p>Notes:</p> <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. 	
<p>EPA TSCA Title VI – Composite Wood - Raw Panel Labeling (if applicable)</p>	<p>40 CFR 770.45(a)</p>	<p>All Samples</p>	<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. 	
<p>Formaldehyde Emission of Composite Wood Product - State of California (if applicable)</p>	<p>Airborne Toxic Control Measure (ATCM), California Code of Regulations, Title 17, § 93120</p>	<p>All Samples</p>	<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><i>In lieu of testing, valid certificate or test report or certificate can be submitted if dated within 1-3 years.</i></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	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. <i>In lieu of testing, valid certificate or test report or certificate can be submitted if dated within 1-3 years.</i>	
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	<p>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:</p> <ol style="list-style-type: none"> 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 <p>See example below:</p> <div 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>	
PHYSICAL CHARACTERISTICS				
Dimensions	FPLA/ UPLR	3 Samples	As claimed/ measured (+3% / -0%)	Claim: Actual:
CONSTRUCTION QUALITIES				
Kohl's Workmanship Review	Visual Check / Actual Use	1 Sample	<p>All components shall be provided as claimed and shall not be deformed or fractured.</p> <p>All hardware shall be provided</p> <p>All welds shall be smoothly finished and free from pits and splatter</p> <p>All components shall not contain any burrs or sharp edges (test by touch or sight)</p> <p>Product shall not contain any loose components or unsecured fastening where rigidity is required</p>	
PERFORMANCE				
Effects of Handwashing	Kohl's TM 32-effects	3 Samples	No color change and no adverse effects - Hand wash with detergent for below defined cycles.	
			Tier 1	5 cycles

			Tier 2	10 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	10 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	30 min	
			Tier 2	2 hours	
Resistance to Hot Water	Actual Use	1 Sample	Pour 25 mls 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 Method B is made in the film to the substrate, pressure sensitive tape is applied over the lattice and then removed.		
			Tier 1	3B	
			Tier 2	4B	
*Wood Moisture Content (if applicable) (for wood products only)	Standard Measure	1 Sample	Should not exceed 12% for wood based material only.		
Metal					
ANALYTICAL					
*Lead In Scrapable Surface Coating	ASTM E1613/E1645	1 Sample	≤90 ppm (0.009% by weight). (CPSA - 16 CFR 1303)		
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		
Food Contact Supplemental Protocol (State Regulations Only)	Refer to Protocol 1800	All Samples	All samples shall be reviewed against the requirements of Food Contact 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		

* Stainless Steel Composition (Applicable if product does not comply GRAS test)	Acid Digestion / ICP / ASTM E1019	1 sample	Stainless steel composition (Carbon, Manganese, Phosphorus, Sulfur, Silicon, Chromium, Nickel, Nitrogen, Molybdenum) test is to be conducted. 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	

OTHER METAL (FOOD CONTACT ONLY)

* Leachable lead (Applicable to food contact metal only)	ASTM C738 / AOAC methods 973.32 and 973.82	1 Sample	With reference to CPG Sec. 545.500 (CPG 7117.05) Lead: ≤ 7.0 µg/mL, average of 6 units (product intended for adult) ≤ 0.5 µg/mL, all 6 units (product intended for infants and children)	
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PLASTIC

ANALYTICAL

*Lead in Scrapable Surface Coating	ASTM E1613/E1645	1 Sample	≤90 ppm (0.009% by weight). (CPSA - 16 CFR 1303)	
*Toxicology (Plastics and polymeric coating)	21 CFR 175/177	1 Sample	Must comply with applicable requirements of FDA	
*Bisphenol A (BPA) Content (if BPA free is claimed)	Solvent extraction and analysis by LC/MS	1 Sample	Prohibited 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	
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	
Food Contact Supplemental Protocol (State Regulations Only)	Refer to Protocol 1800	All Samples	All samples shall be reviewed against the requirements of Food Contact Supplemental Protocol (State Regulation Only) to determine if additional testing or labeling is required	

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 appealing primarily to children, requires additional testing per Kohl's Testing Protocol # 601**

PROTOCOL VERSION	DESCRIPTION OF CHANGE	Revised By	Approved By
809 – 0	Initial Release	CY Chan Feb 10, 2004	Roger Mayerson Mar 08, 2004

809 – 1	Changed Protocol Title to Include Napkin Ring. Added Use & Care Label for Napkin Ring; Country of Origin Marking & Stainless Steel Composition Test for Flatware. Removed Metal Plating Thickness Test. Price Adjustment	Simon Leung Oct. 31, 2008	Ro Jain Oct. 31, 2008
809-A	Changed protocol number from 809-1 to 809-A. changed lead in surface coating to 90ppm from 600ppm, price adjustment	Elizabeth Armstrong April 1, 2010	Ro Jain April 1, 2010
809-B	Added BPA Testing	Elizabeth Armstrong November 11, 2010	Ro Jain November 11, 2010
809.1-C	Removed the scope for Napkin Ring	Elaine Smaczniak Sep 18, 2012	Ro Jain Oct 4, 2012
809.1-D	Updated Dishwasher Safe Test from 5 cycles to 10 cycles	John Wong Nov. 30,2012	Rufus Moberly Dec 3, 2012
809.1-E	Updated Dishwasher Safe Test. FDA – GRAS Stainless Steel Test Updated Added Corrosion Test	John Wong Jul 18, 2013	Rufus Moberly Jul 23, 2013
809.1-F	Differentiate the performance rating to Tier 1/Tier 2/Tier 3 Changed the test method of Cross Cut Adhesion Updated the package price & working days	Jeetendra Shelatkar Oct 4, 2013	Ro Jain Dec 16, 2013
809.1-G	Updated lead and resistance to corrosion tests pricing	Candy Chan Jul 30, 2014	Jeetendra Shelatkar Aug 4, 2014
809.1-H	Renamed in-house methods	Birkoff Chen Sep. 4, 2014	Elaine Smaczniak October 30, 2014
809.1-I	Updated BPA testing to test all accessible components if BPA Free is claimed	Elizabeth Armstrong July 30, 2015	Elizabeth Armstrong July 30, 2015
809.1-J	Added Leachable Lead for Other Metals (Food Contact Only) Updated Cross Cut Adhesion (Paint and Coating on Metal parts) , Toxicology (Plastics and polymeric coating) and BPA Content Removed Country of Origin Marking, Use & Care Label	Gigi Au May 20, 2016	Elizabeth Armstrong May 23, 2016
809.1-K	Added “open stock” labeling requirements – product only needs to have COO – address not required	Elizabeth Armstrong Sept 26, 2017	Elizabeth Armstrong Sept 26, 2017
809.1-L	Updated GRAS evaluation test line	Elizabeth Armstrong Jan 11, 2019	Elizabeth Armstrong Jan 11, 2019
809.1-M	Added adult tracking label	Elizabeth Armstrong June 24, 2020	Elizabeth Armstrong June 24, 2020
809.1-N	Added PFAS & updated tiering	Jackie Deppisch March 2022	Jackie Deppisch March 2022

809.1 - O	Added import Permit Requirements	Elizabeth Armstrong June 2023	Elizabeth Armstrong June 2023
809.1-P	Added Wood Moisture Content testing, EPA TSCA Title VI – Composite Wood, Formaldehyde Emission of Composite Wood Product, Labeling Composite Wood testing	Charlene Swanson June 2023	Charlene Swanson June 2023
809.1-Q	1) Added Chemical Disclosure / Labeling in Cookware test line	Violet Nelson / Dec 2023	Violet Nelson / Dec 2023
809.1-R	1) Added new Food Contact Supplemental protocol (1800) requirements	Jackie Deppisch September 2024	