

KOHL'S Style ID/Commercial Label Requirements

For **First Cost** Private Label & Exclusive Brand Footwear

Marking of imported goods must comply with the rules set by U.S. Customs and Border Protection, the Federal Trade Commission (FTC), the Consumer Product Safety Commission (CPSC) and Kohl's Department Stores. U.S. Customs requires that all imported goods include a commercial label that is **permanently** placed and in a **conspicuous** location. Customs and the Federal Trade Commission (FTC) require that labels be **legible** (clear enough to be read easily by a person of normal vision without strain.) Imported footwear must be labeled on both the left and right shoe in a pair. The following information provides all labeling requirements:

Country of Origin

U.S. Customs and the Federal Trade Commission (FTC) require that every article of foreign origin, that is to be imported into the U.S., must include a marking indicating the Country of Origin of the good.

Gender and Size Requirements

U.S. Customs requires:

Gender identification to clarify the American size range. The following gender codes (in capital letters) must be used:

- MENS = men's sizes
- WMS = women's sizes
- BOY = boy's/youth sizes
- GIRL = girl's sizes
- TOD = toddler sizes
- INF = prewalk sizes

For legibility, the gender code & size need to be separated by 2 spaces.

Examples: MENS 10 W WMS 7 MED BOY L(4-5)

Numerical Sizes must be indicated numerically; half sizes using ½", Example: 8 ½

ALPHA Sizes must include both the ALPHA size, and also the Numerical Size Range inside of parenthesis. Examples: S(5-6), M (7-8), L(9-10)

Widths should be indicated for all numerically sized footwear as follows:

- M or MED for medium widths. Examples: 8 M or 8 MED
- W or WIDE for all wide widths. Examples: 9 W or 9 WIDE

Alpha sized footwear is exempt from having the width indicated since Alpha sized footwear only comes in one width, medium.

Tall boots should specify **both** foot width and calf width as follows:

- MRC for medium foot width + regular calf width
- MWC for medium foot width + wide calf width
- WRC for wide foot width + regular calf width
- WWC for wide foot width + wide calf width

Example: WMNS 6 MRC WMNS 8½ WWC WMNS 10 MWC

Material Content

Material content disclosure is required by the Federal Trade Commission (FTC). The four parts of footwear that should be disclosed are in the following order:

1. Upper
2. Lining
3. Sock Lining
4. Outersole

1. UPPER

Footwear uppers that are constructed of multiple materials, must be marked with The percentage of material content by predominate materials followed by each additional material in descending order.

Example: If the upper is made of 55% leather, 30 % man made & 15 % textile, the commercial marking would read - Upper: Leather / Man Made / Textile

Examples of exclusions: ornamentation, closures, hardware, zippers, laces, embroidery, labels, strap tabs and goring.

Fabric/Textile Upper:

Although not required by law, Kohl's requires the material content disclosure for all fabric/textile imported footwear. Fabric/textile material should be disclosed as "fabric" or "textile" not man-made materials. Special requirements exist for wool and Fur/Faux Fur:

- **FTC's Wool Products Labeling Act**

<http://www.ftc.gov/os/statutes/textile/woolact.shtm>

This act requires the disclosure of any amount of wool. Identification of a blend of fibers 5% or more must be disclosed by a common generic fiber name, including percentages of each fiber, listing the principle fiber first.

The use of specialty fibers (i.e. Alpaca, Camel Hair, Llama, etc.) and/or use of term "mohair" or "cashmere" in lieu of the word 'wool', is acceptable providing the percentage of each specialty fiber name and/or mohair or cashmere is given.

Also, the terms "new" or "virgin" or "recycled" should be used as an accurate descriptive of a wool product.

Example: Upper 56% Polyester, 24% Cotton, 20% Recycled Wool

This information must be part of the **commercial label**, not on a hangtag affixed to the imported product.

- **FTC's Fur Products Labeling Act**

<http://www.ftc.gov/os/statutes/textile/furact.shtm>

This act requires the name(s) of the animal(s) that produced the fur. Disclosure required if it contains any used fur, bleached, dyed or artificially colored fur and/or paws, tails, bellies, or waste fur. It also requires the name or other identification and registered by the FTC of one or more persons who manufacture the fur product; along with the name of the country of origin of any imported fur used in the fur product.

If imported product contains a **man-made or artificial 'faux' fur**, product marking should indicate '**faux fur**' and what part(s) are man-made or artificial fur.

Example: Upper: Textile w/ 100% Acrylic faux fur trim

Leather and/or Rubber/Plastic Upper:

Footwear uppers constructed of Leather and/or Rubber/Plastic must be marked in compliance with the FTC's Guides for Select Leather and Imitation Leather Products <http://www.ftc.gov/os/statutes/textile/gd-leath.shtm>

- **Imitation or simulated leather:** Material that simulates leather

Example: Vinyl

NOTE: All Rubber/Plastic products should be disclosed as "man-made material"

- **Embossed or process leather:** A type of leather that is embossed, dyed or processed to simulate the appearance of a different kind or type of leather

Example: Top grain cowhide processed to imitate pigskin

- **Ground, pulverized, shredded, reconstituted or bonded leather / Composition leather:** Not wholly the hide of an animal

Example: Percentages of leather fibers and the percentages of non-leather substances in material must be disclosed.

ex. Bonded Leather: 60% leather fibers and 40% non-leather substances

Kohl's requires that '**genuine**' leather content be disclosed if imported product contains "genuine" leather.

2. LINING

The FTC and Kohl's require the disclosure of all types of materials used in the lining (fabric/textile, leather, and/or man-made materials).

Linings of multiple materials must be disclosed by percentage of predominant material followed by each additional material in descending order.

Example: If the lining is made of 60% man made (quarters) & 40% textile (vamp), the commercial marking would read: Lining Content: Man-made / Textile

Example: If the lining is faux fur, the commercial marking would read:
Lining Content: 100% Acrylic Faux Fur

3. SOCK LINING

The FTC and Kohl's require the disclosure of all materials used in the sock lining (fabric/textile, leather, and/or man-made materials).

Sock Linings of multiple materials must be disclosed by percentage of predominate material, followed by each additional material in descending order.

Example: If the sock lining is made of 80% textile (heel to ball) & 20% man-made (ball to toe), the commercial marking would read: Sock Lining Content: Textile/Man/made

4. OUTERSOLE

The FTC and Kohl's require the disclosure of all materials used in the construction of the outersole (fabric/textile, leather, and/or man made materials).

Outersoles constructed of multiple materials must be disclosed by predominate materials of the external surface area* of the outersole (* that comes in contact with the ground surface) first, followed by each additional material in descending order.

Example: If the wear surface of a TPR outsole is textile flocked, the commercial marking would read: Outsole Content: Textile / Man-Made

Outersoles constructed of leather or composition leather follow the same marking Rules as the upper. Please see the leather marking requirements above.

NOTE: Per the Federal Trade Commission (FTC), if all 4 parts of footwear (upper, lining, socklining, & outersole) are wholly the same type of Material, i.e. all parts top grain or split leather – or – all parts are PVC or Rubber/Plastic, it's OK to disclose as "All Leather" – or "All Man Made Materials" instead of listing material content for each part.

5. Registered Number (RN#)

The RN# of the "importer of record" appears on the commercial markings.

Consumer Product Safety Commission (CPSC)

<https://www.cpsc.gov/>

In order to ensure compliance with the CPSC's Consumer Product Safety Improvement Act (CPSIA) requirements, Kohl's requires that the business name **KOHL'S**, the Kohl's Style Name, the Kohl's Factory #, and the Production Date (Month/Year) are included as part of the commercial markings for **Children's Footwear**. However Kohl's requires this information on both children's and adult footwear. One format for both.

Example:	KOHL'S	}	- Kohl's business name
	CBCARLTONBLACK		- Kohl's Style Name
	96201		- Factory #
	09/09		- Production Date (Month/Year)

Note: If the space for available commercial labeling requires that the required labeling be split, the CPSIA content must stay together. The above content is specific to CPSIA and must always be printed in the order provided. The factory and product date can be printed next to each other, on the same line.

Footwear Labeling Format/Examples

(Kohl's Required Formats)

Private Label/Exclusive Brands Format

Gender/Size/Width
Country of Origin
Upper Material Content
Lining Material Content
Socklining Material Content
Outersole Material Content
KOHL'S RN# 73277
Kohl's Style Name
Factory# Production Date (Month/Year)
Kohl's UPC#

National Brands Format

Gender/Size/Width
Country of Origin
Upper Material Content
Lining Material Content
Socklining Material Content
Outersole Material Content
KOHL'S RN# 73277
Kohl's Style Name
Factory# Production Date (Month/Year)
Kohl's UPC#
US Patent#
TradeMark Name

Standard Label Example:

MENS 10 MED Made in China Upper: Leather Lining: Man Made Socklining: Textile Outersole: Man Made KOHL'S RN# 73277 CBCARLTONBLACK 96201 09/09 400891637284
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Split Label Example:

MENS 10 MED Made in China Upper: Leather Lining: Man Made Socklining: Textile Outersole: Man Made	KOHL'S RN# 73277 CBCARLTONBLACK 96201 09/09 400891637284
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Please note that all material content information must be kept together. All CPSIA information must be kept together.

Size of label will vary depending on location on imported product.
(See additional examples on next page.)

Footwear Labeling Format/Examples

<p>Printed Label on Strap</p>			
<p>Sticker Seperate Labels</p>			
<p>Sew-In Seperate Labels</p>			

Label type and location preferences:

Color of ink must contrast against the color of what it's printed on and/or background of what it's being adhered to (i.e. outsole) when a clear plastic adhesive sticker is used. U.S. Customs requires size and clarity of print to be **legible** – “easy to read by a person of normal vision without strain”.

If the bottom of the outsole has a lot of design work on it, Kohl's requests that a clear plastic adhesive sticker **not** be used because of non-legibility issues.

1. Direct Print (ink color must contrast with background color)
 - a. on back of vamp/tongue or vamp/tongue lining
 - b. on outside quarter or outside quarter lining
 - c. on counter lining, at outside quarter (do not print at center of counter lining, it gets distorted in lasting)
 - d. on back of strap(s) or strap lining(s)
2. Woven/Printed Label stitched down on all 4 sides (ink color must contrast with label background color)
 - a. vamp/tongue lining
 - b. outside quarter lining
 - c. strap lining
3. Woven/Printed, Folded Loop Label stitched across the top (ink color must contrast with label background color)
 - a. below vamp opening
 - b. outside quarter or outside quarter lining, below topline, or boot shaft opening
 - c. top edge of strap or strap lining
4. Woven/Printed with strong adhesive back (ink color must contrast with label background color)
 - a. back of vamp/tongue
 - b. back of strap
5. Plastic/Printed with strong adhesive back, adhesive must be compatible with outsole material (clear plastic label & ink color must contrast with background color). **This label option is only for adult footwear. Adhesive back commercial marking labels/stickers CANNOT be used for children's footwear.**
 - a. arch area of outsole
 - b. edge of heel, center back