

# **KOHL'S**

## **LABELING GUIDELINES FOR HOME TEXTILES**

An overview of the labeling guidelines as they apply to Kohl's Private & Licensed Brands for Home Textiles

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## **Overview**

This section is an overview of the labeling guidelines as they apply to Kohl's Private & Licensed Brands for home textiles. The requirements outlined below are in conjunction with those mandated by the Federal Trade Commission (FTC) and The Consumer Product Safety Improvement Act of 2008. All vendors are responsible for ensuring that all Private & Exclusive brand products shipped to Kohl's are in compliance with all applicable laws, rules, guidelines and regulations, as well as Kohl's Department Stores quality standards. All products which are applicable to these standards must have the following information:

### **For more details please refer to the list of federal and state regulations:**

- The Care Labeling Rule, 16 CFR Part 423
- The Textile Fiber Products Identification Act, 16 CFR Part 303
- The Wool Products Labeling Act, 16 CFR Part 300
- The Federal Fur Products Labeling Act, 15 U.S.C. 69
- The Fur Products Identification Act, 16 CFR 301
- Customs Duties - Country of Origin Marking, 19 CFR Part 134
- Leather Guide, 16 CFR 24
- Plumage Regulations, State of California Title 4 BHFTI Rules & Regulations, Article 5
- Labeling of Filling Materials, State Requirements
- Product Size Specifications
- Law Labeling, <http://www.abflo.info/>
- Voluntary Guide for Regulations on Small Parts, 16 CFR 1500 – 1501, ASTM F 963-03
- Flammability of Carpets and Rugs, 16 CFR 1630-1631
- Flammability of Mattresses and Mattress Pads, 16 CFR 1632
- Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts
- Consumer Product Safety Improvement Act of 2008 (CPSIA)
- PA Stuff Toy Regulation 47.317

### **All products which are applicable to these standards must have the following information:**

- I. Brand Name/Logo
- II. Size
- III. Fiber Content
- IV. Importer/Manufacturer Identification Number
- V. Country of Origin
- VI. Care Instruction
- VII. Mechanics of Labeling
- VIII. Law Labeling
- IX. Down & Feather Product Labeling
- X. Rug Flammability Labeling
- XI. Pillow Form Label
- XII. Tracking Label
- XIII. Small Part/Choking Hazard Disclaimer
- XIV. Disclaimers

### **Products/Categories covered per below requirement:**

Bedding – sheets/covers/blankets/comforters/pillows/pillowcases/quilts/bedspreads and pads  
Curtains, casements & draperies  
(Curtains, casements, draperies and table placemats that are made primarily of slats, rods, or strips that are composed of wood, metal, plastic, or leather are not required for labeling unless content is disclosed)  
Table cloths, napkins and doilies, placemats  
Floor Coverings – rugs/carpets/mats  
Towels, washcloths and dishcloths  
Flags – with heading or more than 216 sq. inches in size  
Cushions  
Furniture slip covers and other furniture covers

Afghans & Throws  
 Sleeping Bags  
 Hangers padded with fabric (applicable to Kohl's)  
 Hot Pads (applicable to Kohl's)  
 Oven mitts (applicable to Kohl's)  
 Wall coverings (applicable to Kohl's)  
 Wall decorations (applicable to Kohl's)

**Products/Categories exempt from below requirements:**

Bags – net bags, tote bags, bags for laundry, fabric hampers etc.  
 Beads, sequins, buttons  
 Flowers made of fabric  
 Holiday decorations & ornaments

**Additional information may be required on certain specialized products. These include but not limited to:**

Down-filled products  
 Wool & Animal Hair products

**I. Brand Name/Logo**

The appropriate brand name must be conspicuous at the point of sale. Some of Kohl's Private & Exclusive brands include Sonoma, Candies, Jumping Beans, Apt. 9, Simply Vera Vera Wang, Elle, etc.

**II. Size**

The size of the product must be indicated on the permanent content or care label if specified by Kohl's Product Manager.

**III. Fiber Content**

The following information must be adhered to when indicating the fiber content:

- Fiber names must be listed by their generic names in order of predominance by weight. Given below are the commonly used generic fiber names approved by the FTC:

Acetate	Nylon	Rubber	Silk
Acrylic	Glass	Olefin	Spandex
Alpaca	Hemp	PLA	Triacetate
Anidex	Jute	Polyamide	Vicuna
Aramid	Linen	Polyester	Vinal
Azlon	Lyocell	Polyethylene	Viscose
Bamboo	Melamine	Polypropylene	Wool
Camel Hair	Metallic	Ramie	Silk
Cashmere	Modacrylic	Rayon	Spandex
Cotton	Modal	Rayon (from bamboo fiber)	
Elastane	Mohair	Saran	

- The generic fiber names and percentages of all fibers in the product must be listed in order of predominance by weight.

Example: 95% Cotton  
 5% Spandex

- Fiber present in amount of less than 5% should not be identified by their generic names; however, labeled as “Other Fiber” **unless, the fiber has a functional significance (i.e. Spandex)**. Metallic fibers do not have a functional significance; therefore, list as “OTHER FIBER” if less than 5%. This rule does not apply to wool and wool blends. The percentage of wool must always be stated and identified by its generic name, even if it is less than 5%.

Example: 95% Cotton  
5% Spandex

Example: 97% Cotton  
3% Other Fiber

Example: 96% Nylon  
4% Spandex

- Fiber Content Labeling with Small Trace Amount of other fibers guidelines**

Option 1:

A) Traces of fiber that are embedded or impregnated in the fabric, less than 0.5% and more than 0.1% can be omitted from the content declarations. Lab will include a statement on the report “with trace amount of other fiber” on the test results. **In the “RECOMMENDED FIBER CONTENT” section, the lab will disclose as “Exclusive of Ornamentation.”**

B) Traces of fiber that are applied topically to the surface of the fabric less than 0.5% and more than 0.1% can be omitted from the content declarations. Lab will include a statement on the report “with trace amount of other fiber” on the test results. **In the “RECOMMENDED FIBER CONTENT” section, the lab will disclose as “Exclusive of Decoration.”**

C) Traces of fiber 0.1% or less can be disclosed as trace amount of other fiber and do not need to be called out on the label.

Option 2:

Traces of fiber greater than 0.5% must be rounded up to the nearest 1% and be disclosed on the fiber content label.

- There is **no tolerance** allowed on products labeled as one fiber (100%).

Example: 100% Cotton

Example: 100% Jute

- There is a +/-3% tolerance allowed by weight when two or more fibers are in the product. However for functional fibers (i.e. Spandex), **there is only a +/-2% tolerance allowed.**

Example: Labeled: 65% Polyester  
35% Cotton

Allowed 62% to 68% Polyester  
Allowed 38% to 32% Cotton

Example: Labeled: 95% Rayon  
5% Spandex

Allowed 92% to 98% Rayon  
Allowed 3% to 7% Spandex

### A. Trademarked Fiber Names

Fiber trade names may be used on garment care/fiber identification labels. Trademarked fiber names must always be used in conjunction with the generic fiber name. The trademark and generic name must appear in type or lettering of equal size and prominence.

Example: 90% Cotton  
10% Lycra® Spandex

Example: 80% Cotton  
20% Tencel® Lyocell

### B. Pile Fabrics

The fiber content of the pile and backing should be disclosed separately. If the pile and back are stated separately, the ratio between the two must be given as percentages of the fiber weight of the whole.

Example: Pile: 60% Rayon 40% Nylon  
Back: 70% Cotton 30% Rayon  
(Pile is 60% of fabric and back 40%)

### C. Sectional Disclosures

If a product has separate sections with difference fiber compositions, the content of each section should be identified separately on the label. Where ornamentation or trim forms a distinct section of the product and it is present in sufficient quantity that it is not exempt from fiber disclosure, its fiber should be disclosed as a separate section.

It is permitted to disclose fiber content by color if the section(s), provided the colors are named clearly for customer identification (e.g. "dark purple" rather than designer names such as "plum"). Disclosing by color may simplify a label when there are multiple sections of the sections are difficult to describe by function.

Example: Front: 100% Cotton  
Back: 80% Cotton 20% Polyester

Example: Red: 100% Nylon  
Blue: 100% Cotton  
Green: 80% Cotton 20% Nylon  
Ornamentation: 100% Silk

Per Kohl's, sets consisting of two or more items made of the same and/or different fibers (e.g.: ensembles consisting of table cloths and dinner napkins, etc.) each product **must** have a separate label.

Example: Tablecloth & Napkin sold as a set

Tablecloth: 100% Cotton

Napkins: 50% Cotton  
50% Polyester

#### **D. Products Containing Linings, Interlinings, Filling, and Padding**

Per Kohl's, products with filling or padding incorporated, the fiber content must be disclosed.

Any products with filling: Test all sections of the product for fiber content. Only disclose/recommend face, back, filling, and any decoration that exceeds 15% of the surface area. DO NOT disclose/recommend interlining, lining on the fiber content label.

Example: Face: 100% Cotton  
Back: 100% Cotton  
Filling: 100% Polyester

If body/base fabric and lining or interlinings are made of the same material, the fiber content will need to be disclosed separately.

Example: Shell: 100% Polyester  
Lining: 100% Polyester

#### **E. Decorative Trim or Ornamentation**

Various trims, decorations or ornamentation that are incorporated into clothing and other products are excluded from labeling. Exceptions to fiber content disclosure:

- Trims – collars, cuffs, braiding, waist bands, wrist bands, rick-rack, tape, belting, binding, labels, leg bands, gussets, gores, welts, etc.
- Findings – threads, elastics, buttons and other similar products for assembly
- Embellishments – beads, sequins, rhinestones, studs and other similar applications
  
- Decorations – decorative trims such as embroidery, overlay, appliqués. Also decorative patterns or designs that are an integral part of the fabric.

For the exemption to apply, the decoration must not exceed 15 percent (%) of the surface area of the product. If the fiber content of the decoration is not disclosed, the fiber content must be followed by the statement "Exclusive of Decoration."

Example: 100% Cotton, Exclusive of Decoration

- Ornamentation – fibers and yarns that are incorporated into the fabric, and do not exceed 5% of the total fabric weight, the term "Exclusive of Ornamentation" must be used in conjunction with the fiber content.

Example: 100% Rayon, Exclusive of Ornamentation

When the decorative trim exceeds 15% of the surface area, or ornamentation exceeds 5% of the fiber weight, the fiber of the decoration or ornamentation must be disclosed.

Example: Body – 100% Rayon  
Decoration – 100% Silk

Example: Body – 100% Rayon  
Ornamentation – 100% Silk

## F. Products with Unknown Fibers

When a textile product or finished product is made in whole or in part from scraps, clippings, rags, secondhand fibers or fabrics, remnants or other textile waste materials of unknown, the undeterminable fiber content should be disclosed with the following examples:

1. Made of remnants of undetermined fiber content.
2. Made of clippings of unknown fiber content.
3. 100% unknown fibers – rags
4. 45% Rayon, 30% Acetate, 25% Unknown fiber content
5. 60% Cotton, 40% Unknown fibers – scraps

## G. Real Fur & Faux Fur Labeling

In August 2007, the New York State Governor signed a Fur Labeling Bill which requires all apparel sold in the State of New York containing either real or faux fur be labeled with the terms “Real Fur” or “Faux Fur”. The states of Delaware, Wisconsin, Massachusetts, and New Jersey also followed suit in 2010 with their own requirements. The labeling requirement applies to all items of apparel and apparel accessories (gloves, scarves etc.) regardless of the quantity of real or faux fur used and price value on the end product. For Kohl’s, it will also include the Home Textile and Footwear products. In late December 2010, The Truth in Fur Labeling Act was signed into legislation which will take effect March 2011.

**Real and Faux Fur Policy: Kohl's does not allow the use of Real Fur in any of our private and exclusive brand products. The use of faux fur is permitted. However, the faux fur material used MUST meet all criteria outlined in the Kohl's Product Safety and labeling guidelines for home textile products.**

### Definitions of Real and Faux Fur:

- **"Real Fur"** shall mean animal skin or part thereof with hair, fleece, or fur fiber attached thereto, either in its raw or processed state.
- **"Faux Fur"** shall mean artificially manufactured fur which is made to resemble real fur but which is not derived from animals.
  - Examples: micro-mink, shearling, Sherpa etc.

The label stating **"Faux Fur"** must be:

- Clearly and legibly stated in English
- Conspicuous at the point of sale to the consumer
- Must be a permanent tag as per Kohl's requirements.

## H. Wool Products Labeling Act

The Wool Products Labeling Act, 16 CFR 300, is a law that requires all products containing any amount of wool to be labeled. This Act works in conjunction with the Textile Fiber Products Identification Act. The Wool Act differs from the Textile Act in that all wool products must be labeled, including hats.

The Wool Act does not provide any tolerance for the content of wool products. For practical purposes, the Commission will apply the three percent tolerance allowed for other textile products to wool products. The tolerance will not apply if the label indicates that the product is entirely wool, e.g. 100% wool, 100% cashmere, all wool or all cashmere.

The percentage of wool must always be stated and identified by its generic name, even if it is less than 5%.

The Wool Act applies to hair and fleece that is not attached to a skin. Products made from hair or fleece attached to skin are covered by the Fur Rules.



### **“Wool” Fiber Names**

“Wool” may be used to describe fibers from the fleece of sheep or lambs and the hair of the Angora goat, Cashmere goat, camel, alpaca, llama or vicuna.

Example: 60% Wool  
30% Fur Fiber  
10% Alpaca

Example: 70% Wool  
30% Fur Fiber

### **Specialty Wool Fibers**

In addition to the simple “wool” term above, fibers from the sheep, lamb and hair from goats, camels, alpacas, llamas and vicuna may be called by their specialty names. If the specialty name is disclosed, the percentage of the fiber must be listed.

Example: 55% Alpaca  
45% Camel Hair

If specialty fiber names are used, they must appear on the required fiber content label and on any other references to the fibers. If the required label simply states “wool”, a specialty fiber name cannot be used in other non-required information such as hang tags, advertising labels etc. that may appear anywhere on the product.

Example: Advertising hand tag states “Fine Cashmere Jacket”

#### Acceptable Fiber Content Label

97% Wool  
3% Cashmere

#### Unacceptable Fiber Content Label

100% Wool

### **Reclaimed or Recycled Wool**

Reclaimed or recycled wool fibers must be identified as “recycled wool.” Recycled specialty fibers must also be identified as “recycled.” The percentage of each must always be stated no matter what the amount is.

Example: 50% Recycled Camel Hair  
30% Wool  
20% Cotton

Example: 65% Recycled Llama  
35% Recycled Vicuna

### **Other Hair or Fur Fibers**

The term fur fiber may be used to describe the hair or fur fiber of any animals other than sheep, lamb, Angora goat, Cashmere goat, camel, alpaca, llama and vicuna. The name of another animal may be used if its hair or fur fiber comprises more than 5% of the fiber weight.

Example: 60% Wool  
30% Fur Fiber  
10% Angora Rabbit Hair

## I. Real Leather and Non-Leather with Coating Application

Below are the guidelines for fiber content labeling for real leather and non-leather with coating application:

- **Non-Leather/Imitation leather**

### Option 1:

**No** fiber content disclosure of the Coating – IF Coating is used for aesthetic purpose only, i.e. sheen or shiny appearance AND weight of coating is less than 35% of the weight of the base fabric. HOWEVER, the fiber content of the base fabric must be disclosed on the fiber content label. Also the label will need to call out that the fabric is imitation leather.

Example: Shell: Faux leather: 100% Polyester  
Lining: 100% Acetate

### Option 2:

Fiber content disclosure of the Coating **required** – IF Coating looks like leather, then the verbiage used to disclose the content of the coating is "**Imitation Leather**." Both coating and base fabric must be disclosed on the fiber content label.

Example: Shell – Fabric: 100% Polyester  
Coating: Imitation Leather  
Lining: 100% Acetate

- Any product with faux suede/faux leather patch that is less than 15% of the surface area does NOT need to be disclosed on the fiber content label. Proceed with "Exclusive of Decoration."
- **Leather** – Fiber content **must** be disclosed

## J. Fiber Content Labeling (Recycled Cotton, Recycled Poly, Organic, Rayon from Bamboo, Premium, or Trademarked Content)

If submitting a product for testing that contains sustainable or trademarked content (i.e. Recycled cotton, poly, organic, Tencel™ Lyocell, Rayon from Bamboo, etc.), vendors must provide the proper certificate to be attached to the testing report. If vendor is using a product that contains premium fibers, they must submit a certificate for the premium fiber (i.e. Egyptian Cotton, Turkish Cotton, Pima Cotton, etc.).

If certificate is **PROVIDED** at the time of testing:

- Fiber content claim is to be marked: Content claim is recommended only based on the certificate provided and not by actual testing
- Fiber content will be marked as PASSED, once fiber content is tested and verified
- Certificate is attached at the end of the testing report
- 

If certificate is **NOT PROVIDED** at the time of testing:

- Fiber content should be marked as FAILURE

## IV. Registered Identification Number

The name or RN# (registered identification number) of the manufacturer or importer of record is required on the label. Wool Products Labeling (WPL) numbers for wool products, although no longer issued may be used.

Example: RN # 73277

Example: WPL # 12345

### Exceptions: Home Textiles

Li & Fung - Kohl's RN# (73277)

Domestic Importer - Vendor's RN#

Exclusive Brands – Kohl's RN# (73277)

## **V. Country of Origin**

The country of origin is required to be on the label.

Example: Made in Hong Kong

- Imported products must identify the country where they were processed or manufactured.
- Products made entirely in the USA of materials also made in the USA must be labeled “Made in U.S.A.”
- Products made in the USA of imported materials must be labeled to show the processing or manufacturing that takes place in the USA as well as the imported component.

Example: Made in U.S.A of Imported Fabric

- Products manufactured in part in the USA and in part abroad must identify both aspects.

Example: Made in Hong Kong  
Finished in U.S.A

## **VI. Care Instruction**

Please refer to Kohl’s Care Label Policy.

## **VII. Mechanics of Labeling**

The following information must be adhered to when preparing a label:

- Label must be in **English**. All parts of the label must be **permanent, legible, in one consistent font style and size**. No abbreviations, asterisks, footnotes or “ditto” marks are to be used
- Country of Origin must always be on the **front side** of the label
- All information pertaining to fiber content and RN # **may appear either at the front or back of the label**. Fiber content and RN# may appear along with other information i.e. care instructions.
- **Labels must be easily accessible at the point of purchase.**

**\*\*Please note, the usage of care symbols is NOT required.**

## **VIII. Law Label**

The Federal Trade Commission (FTC) “Textile Fiber Products Identification Act” 16 C.F.R. Section 303.2 governing textiles, fiber and wool products states that all products containing filling materials, except those exempt or excluded under the Act, shall be labeled in conformity with the Act.

In compliance with the Act, Kohl’s requires all bedding vendors to have proof of registration in law labeling. Registration must be continually renewed according to the individual states’ requirements. Kohl’s Agent/Vendor is responsible for ensuring that all vendors are properly registered.

For more information contact the International Association of Bedding & Furniture Law Officials at [www.iabflo.org](http://www.iabflo.org)  
Filled bedding, furniture, sleeping bags & toys sold in the USA require a special label. These labels must meet specific requirements.

**If law label cannot be easily accessed, please provide a law label on the outer packaging as well for point of sale.**

### **Mechanics of Law Labels for Bedding & Furniture:**

1. **SIZE:** The minimum size of the label shall not be less than 2” x 3”, but may be larger as needed. The length starts at the beginning of the word “UNDER” and ends at the country of origin on the bottom of the law label.
2. **PRINTING:** All printing shall be in the English language. The minimum size of type shall be 1/8 inch in capital letters. The color of the print must be black on a white label.

- “**ALL NEW MATERIAL**” needs to be capitalized.
  - The label material shall be Tyvek or another material of comparable quality, which will not flake, abrade, or tear.
  - There shall be no text or print on the back side of the law label.
  - At the top of the label the following statement must appear “**UNDER PENALTY OF LAW THIS TAG NOT TO BE REMOVED EXCEPT BY THE CONSUMER**”
  - The phrase “consisting of” can be upper or lower case of the same font used for “**ALL NEW MATERIAL**”. If in lower case, it may not meet 1/8 an inch, but will need to be in bold print.
  - Registration number must be abbreviated and read “**REG. NO.**” and be in caps and bold print. The “#” symbol is not acceptable.
  - The following guaranty statement must be shown “**Certification is made by the manufacturer that the materials in this article are described in accordance with law.**” The certification language can be in all upper and lowercase fonts. All uppercase fonts must meet the minimum of 1/8 inch. Lowercase fonts may be less than the minimum 1/8 inch.
3. **DESCRIPTION:** The description of the filling materials shall be its true generic name, grade, or definitions as accepted and approved by the states. When more than one kind of filling material is used, the percent by weight of each shall be listed in order of predominance. All terms need to be in caps and bolded.

\*\*For Filling Material Terminology, refer to the [Classification and Terminology of Filling Materials](http://iabflo.org) document at <http://iabflo.org> under Uniform Law Labels: Terminology.

For Kohl’s, proceed with the below statement. Private Brand Home Textiles RN# Requirements:

**A) Direct Import / Li & Fung - Kohl’s RN# 73277**  
Law labeling - Options

- 1) **MADE FOR KOHL’S INC. (preferred term - accepted by all states)**
- 2) **IMPORTED BY KOHL’S INC.**

**B) Domestic Import - Vendor’s RN#**  
Law labeling - Option

- 1) **MADE FOR KOHL’S INC.**

4. **OTHER INFORMATION:** The “Other Information” section at the bottom of the label is where all federal requirements and any additional information shall be listed. Not only do some states required the below information, this is also a Kohl’s requirement to assure we are meeting all state requirements. The Country of Origin needs to be all caps, bold, and 1/8 inch in font height. The words “Date of Delivery” are not required to be bold and can be in upper and lower case. All upper and lower case font must meet the minimum of 1/8 inch. Please note that care instructions are NOT allowed on the law label.

- **Date of Delivery**\_\_\_\_\_ - Please note that this is still required on the law label but not required to be filled in.
- **Finished Size** – The finished size of the articles must be shown. Width and length dimensions are to be expressed in inches. Decorative pillows are excluded from the size requirement.
- **Net weight of filling** – Must be stated in pounds and ounces. The weight shall be expressed to the nearest pound, with the excess expressed on ounces. If the weight does not equal a pound, the weight may be expressed only in ounces. The weight is not to be expressed in grams.
- **Federal RN Number**
- **\*MADE IN** – Must be in all capital letters, bold print, and 1/8 inch font.

\* PLEASE NOTE: If a product is made in the U.S., either in whole or in part of imported materials the law label shall disclose these facts:

EXAMPLE: "MADE IN U.S.A. OF IMPORTED MATERIALS"

If a product is partially manufactured in a foreign country or some components are manufactured in a foreign country and then finished in the U.S. the law label shall disclose this information:

EXAMPLE: "MADE IN CHINA, FINISHED IN U.S.A." or "SHELL MADE IN CHINA, FILLED AND FINISHED IN THE U.S.A."

No advertising or company logo is permitted on the law label. The label shall be securely affixed to the article in a location which is clearly visible to the consumer.

**These labels are EXAMPLES ONLY; please contact the states in which you are going to sell your products before printing labels.**

**A. FLAMMABILITY NOTICE**

IABFLO approved that the California Flammability Warning, TB 116, TB 117 (for upholstered furniture) may be printed on the same label. The location can be side-by-side separated by a thick black line. The law label should be on the left and the warning notice on the right. The notice may also be printed at the bottom of the law label, separated by a thick black line.

The minimum size of the type for the flammability notice shall be 1/8" in height or 9 point type. All type shall be in capital letters.

This regulation applies to:

- Upholstered furniture including cushions
- Mattresses
- Decorated pillows sold with (as a cushion) large furniture items in a set of large enough to act as stand-alone furniture

**B. BLENDED FILLINGS**

As per IABFLO, Blended Filling Products are pillows, comforters, and featherbeds which have 2 different kinds of fillings blended together (i.e. down & polyester blend pillow).

The Uniform Law Tag shall list the different types of fillings which are blended together in order of highest percentage by weight of the filling:

*BLENDED PRODUCTS where neither filling is plumage (down & feathers)*

The blended materials are listed in order of highest percentage by weight. For example if a filling contains 7 oz. of polyester and 3 oz. of cotton, the correct label is:

70% POLYESTER FIBER  
30% COTTON FIBER

*For PLUMAGE (down & feathers) blended with other fillings*

The plumage part and the non-plumage part are listed in order of highest percentage by weight.

The percent of the plumage part is described as follows:

75+% down cluster: DOWN  
50-74% down cluster: DOWN & FEATHERS  
5-49 % down cluster: FEATHERS & DOWN  
< 5% down cluster: WATERFOWL FEATHERS

After the above declaration, the % of down and/or feathers shall be further described. Also, the species of the feathers or the term "WATERFOWL FEATHERS" must be used in the further description.

For this information and more examples please refer to <http://iabflo.org>

**C. CHAMBERED BEDDING PRODUCTS**

As per IABFLO, Chambered Products are pillows, comforters, and featherbeds which have 2 or more separate compartments or layers. The separate chambers are normally filled with different materials. The materials can be different grades of down and feathers or completely different materials such as foam & feathers.

The following is required labeling for such products on the Uniform Law Tag labels:

1. Each chamber shall be listed separately on the law tag label.
2. The percent by weight of each chamber shall be listed.

The different chambers shall be listed in order of their highest weight. For example, if a product contained 3 oz. polyester in the outer chamber and 7 oz. goose feathers in an inner chamber the correct label would be:

INNER CHAMBER 70%: GOOSE FEATHERS  
 OUTER CHAMBER 30%: POLYESTER FIBERS

3. The approved terms for the different parts of the pillow:

<u>Typical Pillow</u>	<u>Feather Bed</u>	<u>3-different Chambers</u>
OUTER CHAMBER(S) INNER CHAMBER	TOP CHAMBER BOTTOM CHAMBER	QUILTED OUTER CHAMBER MIDDLE CHAMBER INNER CHAMBER

For this information and more examples please refer to <http://iabflo.org>

**IX. Down and Feather Product Labeling**

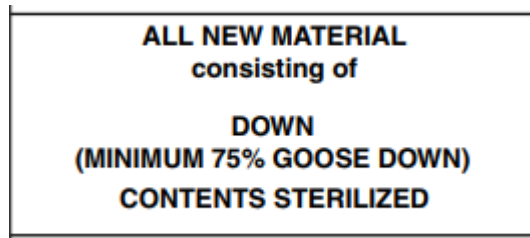
The Uniform Law labeling requirements for Feather & Down product is the same as Bedding & Furniture, EXCEPT the statement "CONTENTS STERILIZED" must be added to the label, as well as the sterilization permit number. Some states required a separate license to sterilize.

These labels are EXAMPLES ONLY; please contact the states in which you are going to sell your products before printing labels.

**A. DOWN PRODUCTS**

Any product that is labeled "DOWN" must contain a minimum of 75% down and plumules. Manufacturers must disclose the minimum percentage of down in a product.

**EXAMPLE:**



Down products normally contain small amounts of other components. If these other components exceed the following MAXIMUMS, the percentages of each must be labeled.

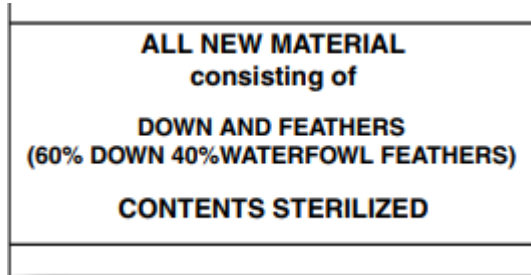
Down fiber.....	maximum 10%
Feather Fiber.....	maximum 10%
Chopped, damaged & Crushed Feathers.....	maximum 2%
Landfowl Feathers.....	maximum 2%
Residue.....	maximum 2%

**Quill Feathers are not permitted.**

**B. DOWN AND FEATHER BLENDED PRODUCTS**

Down and Feather blended products containing between 50% and 74% down and plumules require that the actual percentages of each component be labeled.

**EXAMPLE**



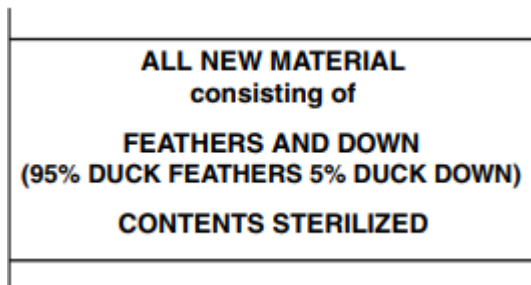
Down and Feather products normally contain small amounts of other components. If these other components exceed the following MAXIMUMS, the percentages of each must be labeled.

- Down fiber..... maximum 10%
- Feather Fiber..... maximum 10%
- Chopped, damaged & Crushed Feathers..... maximum 7% of feather portion
- Landfowl Feathers..... maximum 5% of feather portion
- Residue..... maximum 2%

**C. FEATHER AND DOWN PRODUCTS**

Feather and Down blended products contain between 5% and 49% down and plumules require that the actual percentages of each component be labeled.

**EXAMPLE**



Feather and Down products normally contain small amounts of other components. If these other components exceed the following MAXIMUMS, the percentages of each must be labeled.

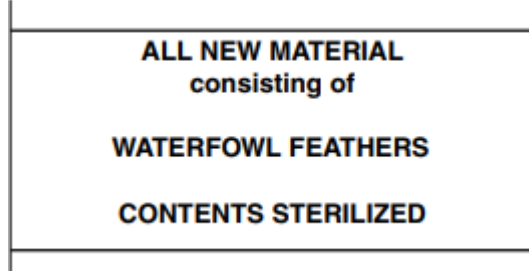
- Down fiber..... maximum 10%
- Feather Fiber..... maximum 10%
- Chopped, damaged & Crushed Feathers..... maximum 7% of feather portion
- Landfowl Feathers..... maximum 5% of feather portion
- Residue..... maximum 2%

**Quill Feathers are not permitted.**

**D. WATERFOWL PRODUCTS**

The term "WATERFOWL FEATHERS" may be used to designate any industry plumage product containing a minimum of 80% waterfowl feathers and less than 5% down. (The terms "DUCK FEATHERS" and "GOOSE FEATHERS" can also be used if they meet the 90% specie requirement.) The remaining 20% may contain down, down fiber, feather fiber, chopped and damaged feathers, and non-waterfowl feathers.

**EXAMPLE:**



If other components exceed the following maximums, the percentages of each must be labeled.

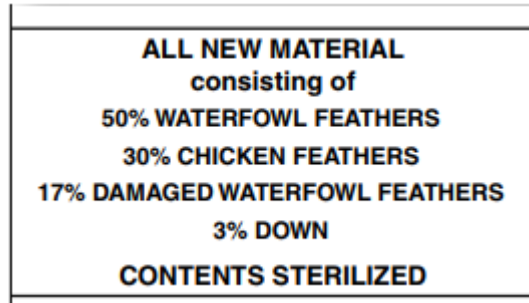
- Down fiber..... maximum 10%
- Feather Fiber..... maximum 10%
- Chopped, damaged & Crushed Feathers..... maximum 7%
- Landfowl Feathers..... maximum 5%
- Residue..... maximum 2%

**Quill Feathers are not permitted.**

**E. OTHER PLUMAGE PRODUCTS**

Plumage products which do not meet requirements for any of the above categories must be labeled accurately with each component listed separately.

**EXAMPLE:**





## F. NOTES TO CONSIDER...

- **PERCENTAGE CLAIMS:** A plumage product should not be designated as “100% Down,” “All Down,” “Pure Down,” or by other similar terms unless it in fact, contains 100% down.
- **TOLERANCES:** No tolerance is allowed for the minimum percentage of down as stated in the above listed categories.
- **DESIGNATION OF SPECIES:** A plumage product may be labeled by the name of the designated waterfowl species if a minimum of 90% of the waterfowl plumage contained therein is of that species.
- **CLEANLINESS:** All plumage products must have an oxygen number of no greater than 10 as determined by Kohl’s approved third party testing lab.
- **ADULTERATION:** The maximum content for certain components listed above are not to be construed to permit intentional adulteration of plumage products.
- **TEST METHODS:** Testing shall be conducted according to test methods published by IDFB and listed on each respective Kohl’s testing protocol.

## TERMS NOT ALLOWED ON LAW TAG LABELS:

- **SYNTHETIC DOWN:** Not allowed on packaging or in advertising.
- **CURLED FEATHERS**
- **FEATHERS:** This term is explicitly prohibited in Texas. State officials in other states also will not accept just “FEATHERS”.

**ACCEPTABLE TERMS:** WATERFOWL FEATHERS, LANDFOWL FEATHERS, GOOSE FEATHERS, DUCK FEATHERS, CHICKEN FEATHERS. It is acceptable to use the term FEATHER if a further description is part of the down and feather labeling.

For more information on down and feather labeling please refer to <http://iabflo.org>

For more information on labeling down please see FTC’s website on content labeling under “Down But Not Out Advertising Labeling Feather Down”: <https://www.ftc.gov/>

## **X. Rug Flammability Labeling**

Federal Regulations 16 CFR 1630 and 16 CFR 1631 both apply to the flammability of carpets and rugs. 16 CFR 130 covers carpets and rugs and 16 CFR 1631 covers small carpets and rugs (rugs with no dimension greater than 6 feet and an area not greater than 24 square feet). As per 16 CFR 1631, small carpets & rugs not meeting the acceptance criterion of the standard may still be sold if they carry a permanent warning label with the following statement:

FLAMMABLE  
(FAILS U.S. DEPARTMENT OF COMMERCE STANDARD FF 2-70):  
SHOULD NOT BE USED NEAR SOURCES OF IGNITION.

The required cautionary statement must be permanently affixed to the small carpet/rug. It may be affixed to the small carpet/rug on the required fiber content label, if the label is permanent. The label may also be a separate permanent label affixed to the small carpet/rug in immediate proximity to the fiber/care label. A label on the front of the small carpet/rug is considered in immediate proximity to the label on the back, provided they are directly opposite each other and are in immediate proximity to the edge of the small carpet/rug.

If the small carpet/rug is sold in packages and the cautionary statement is not readily visible to the customer, the packages must also be prominently, conspicuously, and legibly labeled with the above information.

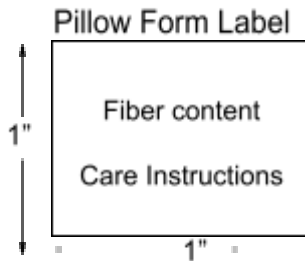
Carpets with one dimension larger than 6 feet and 24 square feet that fail the requirements may not be sold in the USA.

## **XI. Pillow Form Label**

For all pillow forms that are sold with a decorative pillow cover there will need to be an additional label with the fiber content as well as the care instructions. The information only needs to be on the front/face of the label.

The label must be printed with permanent ink and be washable or dry cleanable to follow the care instructions of the product. All information must be legible. The size of the label must be 1" x 1"

### **EXAMPLE:**



## **XII. Tracking Labels:**

### **A. Adult Tracking Label:**

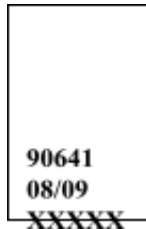
Kohl's will require all Kohl's private and exclusive brand Adult products to contain a label that includes the manufacturer's factory number and the month and year the product was manufactured. Kohl's expects this information to be laid out in the following order on the existing UPC tag:

**Kohl's Assigned Factory Number  
Manufacture Date (Month/Year)  
UPC #**

**\*\*If space limitations exist, contact Kohl's Quality Assurance & Product Integrity teams to discuss minimum required information ([quality.assurance@kohls.com](mailto:quality.assurance@kohls.com), [product.integrity@kohls.com](mailto:product.integrity@kohls.com)).**\*\*

**EXAMPLE (for quality tracking purposes):**

Factory #  
Date of Manufacture (mm/yy)  
UPC#



### **B. Children's Tracking Label:**

Kohl's will require all Kohl's private and exclusive brand **children's products (sizes 0- 20)** to contain a label that includes "Kohl's", the product style number or name, the manufacturer's factory number and the month and year the product was manufactured. Kohl's expects this information to be laid out in the following order:

**Kohl's  
Style No. OR Style Name  
Kohl's Assigned Factory Number  
Manufacture Date (Month/Year)  
UPC #**

It is important to note that the required Factory Number is a unique; Kohl's supplied factory identification number. It is not the Vendor Number. While all factories used to produce Kohl's merchandise should be well aware of their Kohl's-assigned Factory Number, requests for confirmation of Factory Numbers can be directed to Kohl's Corporate Governance/Factory Compliance team – Attention: [Socialcompliance@kohls.com](mailto:Socialcompliance@kohls.com).

Kohl's generally expects this tracking label information to be included either as part of the existing sewn-in paper label that contains the product's UPC number or on a separate, new sewn-in label. It is expected that this label will most often be attached beneath a care/content label. For those products without a care/content label, the tracking label will most likely be attached to a side seam.

If a vendor's product includes one or more parts (for example, but not limited to, sheet sets, etc.), it is the vendor's responsibility to ensure all components are properly labeled or otherwise comply with the CPSIA's tracking label requirements.

In the event that a vendor discovers challenges in attaching the required permanent tracking label to any particular product(s) and/or a vendor believes that this type of labeling is not practical for any particular product(s), the relevant Kohl's Product Manager should immediately be contacted. It is Kohl's expectation that, in any such event, the vendor will provide suggested corrective actions.

Please be advised that this summary of the CPSIA requirements is provided for informational purposes and should not be construed as legal advice on any specific requirement. As stated at the beginning of this summary, and as set forth in Kohl's Merchandise Purchase Order Terms and Conditions, Kohl's vendors must comply with any changes in existing laws or regulations, including – but not limited to – the legal requirements set forth in the CPSIA.

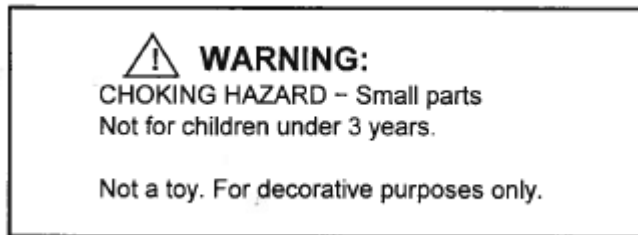
**EXAMPLE**

	<b>Kohl's Stores:</b>	<b>Fila Outlet Stores:</b>
Style #	<b>Kohl's</b>	<b>Fila Outlets</b>
Factory #	<b>BJX12345T</b>	<b>BJX12345T</b>
Date of Manufacturer (mm/yy)	<b>90641</b>	<b>90641</b>
UPC#	<b>08/09</b>	<b>08/09</b>
	<b>XXXXX</b>	<b>XXXXX</b>

**XIII. Small Parts/Choking Hazard Label**

Products which have a child play value or child appeal must have the appropriate cautionary or statement label if the product includes a small part as per 16 CFR 1501 and 1500.50, 51, 52 and 16 C.F.R. 1500.18(a) (9). This regulation prevents deaths and injuries to children under three from choking on, inhaling, or swallowing small objects they may “mouth”. The following guidelines for the warning label must be followed:


- 1) Safety labeling shall consist of an alert symbol (an exclamation mark within an equilateral triangle), a signal word (CAUTION or WARNING), and text that describe the hazard that is present.
- 2) The signal word WARNING shall be used to indicate a potential hazard.
- 3) The signal word shall be in all uppercase sans serif letters not less than 1/8 inch (3.2 mm) in height and shall be center of left aligned.
- 4) The height of the triangle shall be at least the same height as the signal word.
- 5) The height of the exclamation point shall be at least half the height of the triangle and shall be centered vertically in the triangle.
- 6) Text describing the hazard and hazard avoidance behavior shall be appeared in sans serif lettering and shall be either left aligned or center justified. Capital letters shall be no less than 1/16 inch (1.6 mm.). Where possible, such text should begin on the next line below the signal word, and that a new line should be used for each subsequent statement or separate thought.



For more information on Small Parts Warning Label please refer to 16 CFR 1501 and 1500.50, 51, 52 and 16 C.F.R. 1500.18(a) (9).

## **XIV. Disclaimers**

**A. Tree Skirts and Stockings:** The following label is to be included on the printed label attached to the stocking/tree skirt.

<p>Example only, material content subjected to actual material used by each vendor</p>	<p>ALL NEW MATERIALS SHELL : 50% POLYESTER, 50% ACRYLIC EXCLUSIVE OF DECORATION LINING : 100% POLYESTER SPOT CLEAN ONLY THE DEEP RICH COLOR OF THIS PRODUCT IS ACHIEVED BY USING SPECIAL DYES. THESE DYES MAY TRANSFER WHEN WET OR DAMP. REG.NO. PA-6488 (RC) MADE IN CHINA DISTRIBUTED BY KOHL'S DEPARTMENT STORE MENOMONEE FALLS WI 53051</p>	<p> <b>WARNING :</b> CHOKING HAZARD – Small parts Not for children under 3 years THIS IS NOT A TOY, FOR DECORATIVE PURPOSES ONLY. FOR INDOOR USE ONLY. PRODUCT SHOULD NOT COME IN CONTACT WITH WATER.</p>	<p>For skus with small parts - buttons, jingle bells, sequins... etc.</p>
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**B. For all other disclaimers, please reference our Disclaimer Tag document, available on K-Link.**

## **XV. Revision History**

2/22/19 – Added information on Adult Tracking Label Guidelines & Children Tracking Label Guidelines on pages 21 and 22.

*Revised by Jackie Deppisch*

2/25/19 – Updated requirements and mechanics for Law Labels section on page 11 and 12, removed examples of: Bedding Law Label on page 13, Flammability Label on page 14, and Feather and Down or Animal Hair Law Label on page 16.

*Revised by Charlene Swanson*

9/25/19 – Added information on Real Leather and Non-Leather with Coating Applications, added section on Fiber Content Labeling for recycled, organic, or trademarked products.

*Revised by Charlene Swanson*

11/7/19 – Updated Law Label Requirements section

*Revised by Charlene Swanson*

6/11/20 – Updated Section J (Recycled Cotton, Recycled Poly, Organic, Premium, or Trademarked Content) to include Premium Fibers.

*Revised by Charlene Swanson*

7/28/20 – Updated Section J to include Rayon from Bamboo.

*Revised by Charlene Swanson*

10/7/22 – Changed Kohl's Department Stores to Kohl's Inc.

*Revised by Charlene Swanson*