


PROTOCOL # 802-S

Foodware/Drinkware - Wooden

Performance Test	Test Method	Samples	Requirement	Rating (Section or exec. Summary which failed items can be referenced)
THE USE OF METALLIC IS PROHIBITED IN FOODWARE / DRINKWARE ITEMS				
Initial Package				
Label Verification				
Label Review	Care Labeling 16 CFR 423 16 CFR 300/ 19 CFR 134 Textile Fiber Products Identification Act 16 CFR 303 Wool Products Labeling Act	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 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)	
Import Permit (For Natural Materials Only) If Applicable	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.	
Adult Tracking Label: **If space limitations exist, contact Kohl's Quality Assurance & Product Integrity teams to discuss minimum required information MR.QA. PJ@kohls.com	Kohl's Requirement	All Samples	Should be rated as pass/fail Can be included on packaging when necessary: Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC #	
Verify Label Claims	Visual Check	All Samples	The labeling must comply and valid with all claims.	
EPA TSCA Title VI – Composite Wood - Sample Declaration Form and Mill Certificate (if applicable)	40 CFR 770	All Samples	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. • If regulated composite wood is not present in the sample, result is N/A. • If regulated composite wood is present in the sample: - 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: • Include a copy of the Sample Declaration Form in the report • Regulated composite wood includes: - 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 Notes: <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. In lieu of testing, valid certificate or test report or certificate can be submitted if dated within one year.</p>	
<p>Labeling of Composite Wood Product - Formaldehyde Emission - 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 be labeled in accordance with the regulations and meet all applicable requirements. In lieu of testing, valid certificate or test report or certificate can be submitted if dated within one year.</p>	
<p>EPA TSCA Title VI – Composite Wood – Finished Good Labeling (if applicable)</p>	<p>40 CFR 770.45(c) /40 CFR 770.45(e)</p>	<p>All Samples</p>	<p>Finished goods containing regulated composite wood shall comply with the labeling requirements found in 40 CFR 770.45(c) unless the finished good qualifies for the de minimis exception found in 40 CFR 770.45(e). <ul style="list-style-type: none"> • A finished good does not require labeling per 40 CFR 770.45(c) if the finished good does qualify for the de minimis exception in 40 CFR 770.45(e). If the finished good does qualify for the de minimis exception, result is N/A. • A finished good does require labeling per 40 CFR 770.45(c) if the finished good does not qualify for the de minimis exception in 40 CFR 770.45(e). <p>-At a minimum, the label must be on the product OR the packaging -The label may be applied as a stamp, tag, or sticker -The label shall include, at a minimum, in legible English text:</p> <ol style="list-style-type: none"> 1. Fabricator’s name 2. Date the finished good was produced (in month/year format) 3. A statement of compliance to denote that the finished good complies with TSCA Title VI <p>Example: XXX Company MM/YYYY EPA TSCA Title VI compliant for formaldehyde</p> <p>Notes:</p> <ul style="list-style-type: none"> • A de minimis amount of regulated composite wood is defined as regulated composite wood content not exceeding 144 square inches, based on the surface area of the largest face of the finished good. • The de minimis exception is not available to finished goods or component parts that are designed to be used in combination or in multiples to create larger surfaces, finished goods, or component parts. • When a statement of compliance is necessary, the statement must denote that the finished good complies with TSCA Title VI. It is no longer acceptable to have the product labeled as compliant with CARB’s ATCM for formaldehyde in lieu of a TSCA Title VI compliance statement. </p>	

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; width: fit-content; margin: 10px auto;"> <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>
Analytical			
*Lead In Scrapable Surface Coating	ASTM E1613/E1645	1 Sample	≤ 90 ppm (0.009% by weight) (CPSA – 16 CFR 1303)
Total Lead	Metal: CPSC-CH-E1001- 08.3 Non Metal: CPSC-CH-E1002-08.3 Surface Coating: CPSC-CH-E1003-09.1	1 Sample	<p>90ppm Minnesota 325E.3892 (HF 2310)</p> <p>Products preempted by federal & state law (e.g., CPSC, FDA, etc) are exempt from testing</p> <p>Product exemptions for CPSC (16 CFR 1500.91 (d) and (e), 16 CFR 1500.88 and 16 CFR 1252)</p>
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
Toxicology (Wood/ Wood With Finish)	21 CFR 175.300/ 178.3800	1 Sample	Resinous and polymeric coatings on wood must comply with applicable requirements of FDA. Bare wood item must comply with PCP limit of 50 ppm Max.
*Bisphenol A (BPA) Content Scope: 1) Reusable food or beverage containers (ie, food contact), including lid, cup, etc). 2) Sports bottles	Solvent extraction and analysis by LC/MS Various US State Laws (CT, WA, NY, DE, IL, MA, MD, ME, MN, NV, VT, WI, the District of Columbia, Chicago City)	All Samples & All Colorways	<p>Shall not contain any detectable level of Bisphenol A</p> <p>Remark: Actual testing shall be done on all accessible plasticized material including coatings and plastic.</p> <p>Exempt Materials: Glass, Metal, Wood, Textiles.</p> <p>Plastic layer or coating on exempt material shall need to be tested. Vendor shall be responsible for compliance of other materials.</p>
Wood GRAS evaluation	FDA Food Code 2017 4-101.17 (A) and (B) / FDA Opinion	1 Sample	<p>Wood and wood wicker may not be used as a food contact surface, except hard maple or an equivalently hard, close-grained wood that meets the FDA GRAS requirement.</p> <p>Note: - Oak and hickory are also considered hard, however, pine is not. - Client shall provide documentation of the type of wood.</p>
Untreated wood-Doc	FDA Food Code 2017 4-101.17 (D)(1)	1 Sample	Guarantee letter should be provided to prove the wood(s) is/are untreated if it is used as container to hold the whole, uncut, raw food, which the nature of food requires removal of rinds, peels, husks or shells before consumption.
Preservatives for treated wood-Doc	FDA Food Code 2017 4-101.17 (D)(2) / 21 CFR 178.3800 / CPSPD-GB-00001-MTHD	1 Sample	<p>If treated wood is used as container to hold the whole, uncut, raw food, which the nature of food requires removal of rinds, peels, husks or shells before consumption, all ingredients for the treated wood shall be generally recognized as safe (GRAS) or listed in 21 CFR as a food additive ingredient, including 21 CFR 178.3800 for wood preservatives.</p> <p>If any preservatives were used during the manufacturing and/or handling of finished product, a guarantee letter shall be provided confirming that they comply with the appropriate sections of 21 CFR.</p>

*CA Prop 65 (if applicable)	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.	
*PFAS Supplemental Protocol	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	
Physical Characteristics				
Capacity (fl. oz. / mL)	FPLA/ UPLR	3 Samples	As claimed/ measured (+3%/ -0%)	Claim: Actual:
Dimensions	FPLA/ UPLR	3 Samples	As claimed/ measured (+3%/ -0%)	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) Product shall not contain any loose components or unsecured fastening where rigidity is required	

Performance				
Effects Of Handwashing	Kohl's TM-32	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)	Kohl's TM 57	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
Heat Resistance & heat insulation test (for item that may function as a trivet)	Actual Use	3 Samples	A 150°C aluminum block shall be placed on the test sample for 1 hour. No visual change or failure after the test and the underneath temperature shall not be more than 60°C within 1 minute.	
Stain Resistance	Actual Use	3 Samples	No objectionable stain after below timing placement: - Ketchup, mustard & cooking oil (Foodware) - Red wine, grape juice & coffee (Drinkware)	
			Tier 1	1 hour
			Tier 2	2 hours
Loading Capacity	Actual Use	1 Sample	Shall withstand a static loading (i.e. 1.5 times the capacity of the basket) for 1 hour. No breakage, permanent deformation or bending. No adverse effect.	
*Handle Strength - Static	Kohl's TM-34	3 Samples	Should withstand below defined the volume capacity weight.	
			Tier 1	2 x volume capacity weight
			Tier 2	3 x volume capacity weight
Wood Moisture Content	Standard Measure	1 Sample	Should not exceed 12% for wood based material only	
# Claim Verification (if claimed)	Visual Check/ Actual Use	1 Sample	All designs and features must conform to actual claim.	
Protocol Version	Description of Change		Revised by / Date	Approved By / Date
802 – 0	Initial Release		CY Chan Feb 10, 2004	Roger Mayerson Mar 08, 2004
802 – 1	Added Capacity, Effects of Handwashing & Handle Strength Tests. Updated Toxicology Test. Price Adjustment.		Simon Leung Oct. 31, 2008	Ro Jain Oct. 31, 2008
802-A	Changed protocol number from 802-1 to 802-A. changed lead in surface coating to 90ppm from 600ppm, price adjustment		Elizabeth Armstrong April 1, 2010	Ro Jain April 1, 2010
802-B	Added BPA testing		Elizabeth Armstrong November 11, 2010	Ro Jain November 11, 2010
802-C	Added FDA – GRAS Stainless Steel requirements Removed BPA Free labeling requirement Price adjustment		Elaine Smaczniak Sep 18, 2012	Ro Jain Oct. 4, 2012
802-D	Updated Handwashing test and Dishwasher Safe Test		John Wong June 02, 2013	Rufus Moberly Jul 23, 2013
802-E	Differentiate the performance rating to Tier 1/Tier 2/Tier 3 Updated the package price & working days		Jeetendra Shelatkar Oct 4, 2013	Ro Jain Dec 13, 2013
802-F	Updated lead content test pricing		Candy Chan Jul 30, 2014	Jeetendra Shelatkar Aug 4, 2014
802-G	Renamed in-house method		Birkoff Chen Sep. 4, 2014	Elaine Smaczniak October 30,
802-H	Updated BPA testing to test all accessible components if BPA Free is claimed		Elizabeth Armstrong July 30, 2015	Elizabeth Armstrong July 30, 2015
802-I	Updated the test method of Dishwasher safe to Kohl's TM57 and BPA Content		Gigi Au May 20, 2016	Elizabeth Armstrong May 23, 2016
802-J	Added loading capacity test and heat resistance testing		Elizabeth Armstrong Jan 4, 2017	Elizabeth Armstrong Jan 4, 2017
802-K	Added Import Permit & Adult Tracking Label Requirements		Jackie Deppisch April 24, 2019	Jackie Deppisch April 24, 2019
802-L	Add in wood FDA test lines		Elizabeth Armstrong April 23, 2020	Elizabeth Armstrong April 23, 2020
802-M	Updated adult tracking label		Elizabeth Armstrong June 24, 2020	Elizabeth Armstrong June 24, 2020
802-N	1) Added PFAs/PFOs Supplement Requirement 2) Added Import Permit requirement 3) Updated adult tracking label requirement to a pass/fail 4) Removed Tier 3 requirements 5) Added Claim Verification 6) Added composite wood labeling		Charlene Swanson March 2022	Charlene Swanson March 2022
802-O	1) Added disclaimer for metallic 2) Updated BPA testing		Charlene Swanson September 2023	Charlene Swanson September 2023
802-P	1) Added total lead and total cadmium test lines under analytical section		Charlene Swanson November 2023	Charlene Swanson November 2023
802-Q	1) Added Chemical Disclosure / Labeling in Cookware test line		Elizabeth Armstrong Dec 2023	Elizabeth Armstrong Dec 2023
802-R	1) Updated Minnesota test lines under analytical section		Charlene Swanson March 2024	Charlene Swanson March 2024
802-S	1) Added new Food Contact Supplemental protocol (1800) requirements		Jackie Deppisch September 2024	

