

**PROTOCOL # 435-A**

**SMALL GARDEN TOOLS (Pruners, Shears, Small Hand Tool Shovel)**

Performance Test	Test Method	Samples	Requirement	Rating (Section or exec. Summary which failed items can be referenced)
<b>LABELING</b>				
Labeling / Packaging Review	FPLA 16 CFR 500 & 19 CFR 134	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)	
Instructional Literature/ Assembly Instruction (Needs to be provided – Lab HOLD if not provided)	Visual Check	All Samples	Shall provide safe use, or proper assembly or both, and care instruction. Shall be legible and easy to read	Provided Verified Not Provided
Maximum Weight Capacity	Visual Check	All Samples	Shall be displayed on the product conspicuously. Record data.	
Verify Label Claims	Visual Check	All Samples	The labeling must comply and valid with all claims.	
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: <a href="https://www.aphis.usda.gov/wps/portal/aphis/home/">https://www.aphis.usda.gov/wps/portal/aphis/home/</a>  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.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 #	
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.	
EPA TSCA Title VI – Composite Wood - Raw Panel Labeling (if applicable)	40 CFR 770.45(a)	All Samples	• Panels or bundles of panels must be labeled with the following: - 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: • 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	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. <i>In lieu of testing, valid certificate or test report or certificate can be submitted if dated within 1-3 years.</i>	
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>	

EPA TSCA Title VI—Composite wood-Finished good labeling	40 CFR 770.45(c) & (e)	All Samples	<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).</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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).</li> <li>- At a minimum, the label must be on the product OR the packaging</li> <li>- The label may be applied as a stamp, tag, or sticker</li> <li>- The label shall include, at a minimum, in legible English text: <ul style="list-style-type: none"> <li>1. Fabricator's name</li> <li>2. Date the finished good was produced (in month/year format)</li> <li>3. A statement of compliance to denote that the finished good complies with TSCA Title VI</li> </ul> </li> </ul> <p>Example:  XXX Company  MM/YYYY  EPA TSCA Title VI compliant for formaldehyde</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.</li> <li>- 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.</li> </ul>
CARB—Composite wood-Finished good labeling	Title 17, CA Code of Regulations §93120.7(d)	All Samples	<p>Finished goods containing regulated composite wood shall comply with the labeling requirements for fabricators found in §93120.7(d).</p> <ul style="list-style-type: none"> <li>- A finished good containing regulated composite wood requires the following: <ul style="list-style-type: none"> <li>- At a minimum, the label must be on the product OR the packaging</li> <li>- The label shall be applied as a stamp, tag, sticker, or bar code</li> <li>- The label shall include, at a minimum: <ul style="list-style-type: none"> <li>1. Fabricator's name</li> <li>2. Date the finished good was produced (in month/year format)</li> <li>3. A statement of compliance to denote that the finished good complies with the ATCM</li> </ul> </li> </ul> </li> </ul> <p>Example:  XXX Company  MM/YYYY  California 93120 phase 2 compliant for formaldehyde</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>- If a finished good is labeled with the EPA compliance statement, a separate statement of compliance to the CARB ATCM is not required.</li> <li>- It is not required for the label to state the level of emissions (Phase 2, NAF, ULEF).</li> </ul> <p>Labels for finished goods should not include the number of the TPC associated with the composite wood products contained in the finished good.</p>
Instructions	Visual Check	All Samples	Shall include clear and understandable assembly, use, maintenance, care and/or safety instructions as required. In addition, shall be provided in language appropriate to destination countries with no errors or spelling mistakes.
<b>PHYSICAL CHARACTERISTICS</b>			
Overall Dimension (LXWXH)	Std. Measure	3 Samples	Report Actual. Shall meet label claims if applicable.
Overall Weight	Std. Measure	3 Samples	Report Actual. Shall meet label claims if applicable.
Dimensions of Primary Functional Part	Std. Measure	3 Samples	Report Actual. Shall meet label claims if applicable.
Blade Thickness	Std. Measure	1 Sample	Report Actual. Shall meet label claims if applicable.
Maximum Jaw Opening between Tips	Std. Measure	1 Sample	Report the maximum jaw opening between tips. Shall meet label claims (if applicable).
Handle Dimensions	Std. Measure	1 Sample	Report actual length, width/diameter of handle. Shall meet label claims (if applicable).
Material Type	Visual Check	1 Sample	Report actual. Shall meet label claims (if applicable).
Head Dimensions (for small hand tool shovel)	Std. Measure	3 Samples	Report actual length, width (both mouth wide and shoulder width for shovel), and thickness / diameter. Shall meet label claims (if applicable).
Handle Dimensions (for small hand tool shovel)	Std. Measure	3 Samples	Report actual length, width/diameter of handle. Shall meet label claims (if applicable).
Handle Type (for small hand tool shovel)	Visual Check	1 Sample	Report type (Straight, D-handle, T-handle). Shall meet label claims (if applicable).
<b>CONSTRUCTION QUALITIES</b>			
Kohl's Workmanship Review	Visual Check / Actual Use	All Samples	<ul style="list-style-type: none"> <li>- All components shall be provided as claimed and shall not be deformed or fractured.</li> <li>- All hardware shall be provided</li> <li>- All welds shall be smoothly finished and free from pits and splatter</li> <li>- All components shall not contain any burrs or sharp edges (test by touch or sight)</li> <li>- Product shall not contain any loose components or unsecured fastening where rigidity is required</li> </ul>
Components	Visual Check	All Samples	Shall have no components missing, malformed, and/or fractured.
<b>PERFORMANCE</b>			

Safety of Pruner Shears	BS 5708 Clause 6	All Samples	Pruner shears shall meet the following requirements: 1) The tips and edges of the blades of the pruner shears shall not present a point or cutting edge when in the closed position. 2) The return spring, where fitted, shall be positively located and be incapable of ejection in normal use. 3) All components and the final assembly shall be free from any burrs, sharp corners or rough edges. NOTE: It is the vendor's responsibility to meet the requirements of BS 5708 Clause 6.4 as below. Lab will NOT give any verdict: - All finishing coat, covering or treatment shall have no harmful effects through contact with either skin or mouth.	1) The tips and edges of the blades of the pruner shears shall not present a point or cutting edge when in the closed position. 2) The return spring, where fitted, shall be positively located and be incapable of ejection in normal use. 3) All components and the final assembly shall be free from any burrs, sharp corners or rough edges. NOTE: It is the vendor's responsibility to meet the requirements of BS 5708 Clause 6.4 as below. Lab will NOT give any verdict: - All finishing coat, covering or treatment shall have no harmful effects through contact with either skin or mouth.								
Hardness	BS 5708 Clause 4.3	All Samples	Cutting blade of pruner shears shall be made of steel and have a minimum hardness of 450 HV.									
Handle Load Test	BS 5708 Clause 5.1	All Samples	Fully assembled pruner shears shall suffer no permanent damage to any component as a result of applying the torque shown in the table below:  NOTE: Load shall be applied as per Figure 2 in the Standard. <table border="1"><thead><tr><th>Duty Rating</th><th>Torque</th></tr></thead><tbody><tr><td>Light Duty</td><td>34 Nm</td></tr><tr><td>General Purpose</td><td>47 Nm</td></tr><tr><td>Heavy Duty</td><td>60 Nm</td></tr></tbody></table>	Duty Rating	Torque	Light Duty	34 Nm	General Purpose	47 Nm	Heavy Duty	60 Nm	
Duty Rating	Torque											
Light Duty	34 Nm											
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Cutting Test	BS 5708 Clause 5.2	All Samples	Light duty, general purpose, and heavy duty pruner shears shall be capable of clearly cutting 10 pieces respectively of 6 mm, 8 mm and 10 mm hardwood dowel (Ramin or similar). During this test the blades shall not chip or crack. Following the above test, the pruner shears shall cleanly cut through 1 mm thick card at all points along the cutting edge of the blade(s).									
Drop Test (for pruners, shears)	BS 5708 Clause 5.3	All Samples	Pruner shears shall be capable of being dropped four times (once on each face) on to a concrete floor, from a height of 2 m, without impairing their efficiency. They shall again then meet the requirement of Clause 5.2 of the Standard. The pruner shears shall be dropped in such a manner that the points of the blades do not directly strike the floor.									
Drop Test (for small hand tool shovel)	Actual use	All Samples	Small garden hand tool shall withstand 4 drops from 3 feet onto concrete floor without loss of serviceability, loosening of any components and fracturing. Small rake is dropped with teeth first and the free end of the handle loosely supported at ground level									
Functionality	Actual Use	All Samples	Shall function as intended as received.									
Fit Properties	Actual Use	All Samples	Shall be suitable for use.									
Cycle Test (for operable components)	Actual Use	1 Sample	Shall have no breakage, loss of functionality, loss of serviceability after 200 times/cycles of buttons, switches, and/or moving components.									
Effects Of Extreme Temperature/Humidity (Environmental)	Kohl's TM 30	1 Sample	24 hours @ 0° F (-18°C) and 24 hours @ 95% RH/120° F (49°C). No failure or adverse effect.									
*Wood Moisture Content (if applicable) (for wood products only)	Standard Measure	1 Sample	Should not exceed 12% for wood based material only.									
Resistance to Corrosion (metal components only)	ASTM B117	1 Sample	Shall withstand 24 hours in 1% salt spray (fog) with no major corrosion or visual change.									
Hardness (for small hand tool shovel)	ASTM E18	1 Sample	Report actual hardness for below product. Shall meet label claims (if applicable). - Blade of small garden hand tool									
Attachment Strength (for small hand tool shovel)	Actual Use	1 Sample	Clamp and fix the handle, then apply a pulling force of 35 lbf on the whole working head for 1 minute. Small garden hand tool shall withstand the pulling force with no separation or loosening of the head.									
Torsion Test (for small hand tool shovel)	Actual Use	1 Sample	Clamp and fix the head, then apply a 10-Nm torque onto handle. Small garden hand tool shall not have any damage, distortion or pulling off of working head after the test.									
Load Test (for small hand tool shovel)	Actual Use	1 Sample	Clamp and fix the head, then apply a 45-lb load at the position of 2/3 of handle length which near the tool end, and maintain the full test load for 1 minute. Small garden hand tool shall not have any damage, distortion, pulling off of working head after the test.									
Strength test for long handled tools	GGG-S326E:1996 sec. 4.4.2.1	1 Sample	The blade shall be securely clamped and a measurement of the vertical distance (D) made before applying the load. A 175-pound weight shall then be applied to the handle at point (D) for not less than 120 nor more than 125 seconds. The weight shall then be removed and a measurement taken of vertical distance (D). The difference before and after the weight application is the amount of set or bend. Failure is deemed to have occurred when the tool fractures, breaks, or when a permanent bend or set has exceeded 1 inch.									
D-handle plastic stiffness test	GGG-S326E:1996 sec. 4.4.2.3.1	1 Sample	The wood handle shall be securely clamped horizontally at the midpoint and a vertical distance from the insert end of the handle to a reference point shall be measured. A load of 60 lbs shall be applied to 1-inch from the insert end of the handle for one-minute. Failure is deemed to have occurred when the load at one-inch deflection is less than 60 pounds or the permanent set exceeds 1/4 inch.									
D-handle plastic impact test	GGG-S326E:1996 sec. 4.4.2.3.2	1 Sample	Plastic D grip handles shall withstand an impact load of 55 ft-lb at 72°F and 35 ft-lb at 0°F without fractures or failure. Test shall be conducted in a manner so that a free falling weight shall be dropped under horizontal restraint. The impact load will be the product of known weight and the distance which shall be selected to produce the required impact loadings. The horizontal restraint shall provide as to reduce friction and assure proper impact loadings on the D-grip.									
*Cross Cut Adhesion (Plating/Surface Coating)	ASTM D 3359 (Mod.)	1 Sample	Cut 2 in. cross-hatch pattern on surface of plated and/or painted area. Plating and/or painted surface must remain affixed. Trace peeling or removal along incision or at their intersection is accepted. Modification= Scope expanded									

#Claim Verification (If Claimed)	Visual Check / Actual Use	1 Sample	All designs and features must conform to actual claim	Claim:
<b>ANALYTICAL</b>				
*Lead In Scrapable Surface Coating	CPSC-CH-E1003-09	1 Sample	≤ 90 ppm (0.009% by weight) (CPSA – 16 CFR 1303)	
*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	
*Sharp Points & Edges (If applicable)	16 CFR 1500.48 & 49	1 Sample	Products intended for children shall not exhibit non-functional sharp points and edges.	
<b>Protocol Version</b>	<b>Description of Change</b>	<b>Revised by / Date</b>		<b>Approved by / Date</b>
435-A	Initial Launch	Charlene Swanson / June 2023		Charlene Swanson / June 2023