

# Kohl's Department Stores

## Product Safety & Regulatory Standards

# **Kohl's Department Stores**

## **Product Services**

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Kohl's Department Stores has developed product safety standards for all private & exclusive brand Softlines products. **The standards outlined below apply to all private & exclusive brand merchandise.** It is the vendor's responsibility to ensure that all private label and exclusive brand products are in compliance with the applicable Kohl's Product Safety Standards.

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## **FLAMMABILITY HAZARD**

### **1. Flammability**

The Standard for the Flammability of Clothing Textiles, 16 CFR 1610, established three classes of requirements for classifying textiles. It also bans the use of textiles, which have burning characteristics unsuitable for clothing.

#### **Kohl's Performance Flammability Requirement is Class 1**

**Class 1, Normal Flammability** - The class includes textiles that meet the minimum requirements of the standard and have no unusual burning characteristics.

##### **1.1 In compliance with the federal regulation, Kohl's require the following:**

- A. Plain Surface Fabrics - **Regardless of fiber content that weighs less than 3.0 ounces per square yard** must be tested for flammability in **every colorway & print**. A plain surface fabric is defined as any fabric that does not have an intentionally raised fiber or yarn. Examples of such lightweight fabrics are Batiste, Cheesecloth, Chiffon, Gauze, Laces, Voile, Organdy, Lawn, Netting, Mesh, Georgette etc.
- B. Raised Surface Fabrics - **Containing any amount (%) of non-exempt fibers such as** Cotton, Ramie, Linen, Rayon, Acetate, Modal, Lyocell and Silk, etc. must be tested for flammability in **every colorway & print**. Examples of raised surface fabrics include, but not limited to Fleece, Flannel, Chenille, Terry, French Terry, Fake Fur, Chamois Cloth, Flock, Velvet, Velveteen, Swiss Dot, Sherpa and Corduroy.
- C. If a fabric color is supplied by multiple sources, **testing is required on each fabric color from every source**.
- D. **Reasonable Testing - It is the vendor's responsibility to assure that reasonable and representative tests have been performed to establish that products supplied from all sources have a class 1 rating.**

##### **1.2 Exemptions from Flammability Testing include:**

- A. All plain surface fabrics, regardless of fiber content that weigh **more than or equal to 3.0** ounces per square yard.
- B. All fabrics, both plain surface and raised-surface, regardless of weight, made entirely from any of the following fibers or entirely from any combination of the following fibers: acrylic, modacrylic, nylon, olefin, polyester or wool.
- C. Hats, footwear and gloves less than 14 inches and not fixed to or not forming an integral part of the garment.

##### **1.3 Flame Retardant Finishes/Chemicals**

- A. Prohibited on Adult and Children apparel/apparel accessory products.
- B. Prohibited on Children's Sleepwear

##### **1.4 Children's Sleepwear Flammability**

**Refer to the Children's Sleepwear Standard Operating Procedure (SOP) for further details and guidelines.**

## **TOXIC/CHEMICAL HAZARD**

### **2. Formaldehyde**

Formaldehyde is a chemical hazard, which can cause skin irritation and odor. Kohl's require fabrics, garments and related accessories (including but not limited to linings, cuffs, ribs, non-woven interlinings and labels) be tested for the presence of Formaldehyde in accordance with the Japanese Test Method J.I.S 1041, Law 112.

- A. All products must meet the formaldehyde standard limits of 75 ppm maximum. Below are the guidelines.
- i. Children over 4 & Adults = 75 ppm maximum
  - ii. Children 0-5T = 20 ppm maximum

### **3. Lead in Surface Coating**

In accordance with 16 CFR 1303, Consumer Product Safety Improvement Act of 2008 (CPSIA), California Proposition 65 (Cal Prop 65) and Kohl's, Adult and Children's Products must meet the following accessible Lead requirements.

The standard applies to any individual finished component which has a topical coating or scrapable material such as graphic screen print, foil and glitter application, coated trim components, etc.

#### **A. Children (size 0-20)**

- i. Apparel =  $\leq 90$  ppm (0.009% total weight)
- ii. Belt =  $\leq 90$  ppm (0.009% total weight)

#### **B. Adults (Juniors/Young Men/Women's & Men's)**

- i. Apparel =  $\leq 90$  ppm (0.009% total weight)
- ii. Belt =  $\leq 90$  ppm (0.009% total weight)

**3.1 Composite Testing** – Allowed on similar coatings/components up to a maximum of 3 coatings with an 80% safety factor applied. Composite testing is applicable to Adult and Children Apparel and Graphic Programs.  
Belts and Accessories are not permitted for composite testing.

Example: A garment with colored snap buttons and colored rivets. Red, blue and green coating of snap button can be composited. The colored rivets CAN NOT be composited with the snap buttons.

#### **A. Children & Adults - "Pass" or "Fail" criteria will be based on the number of colors within the composite.**

- 1 coating - standard is 90 ppm
- 2 coatings - standard is 36 ppm
- 3 coatings - standard is 24 ppm

If the composite test result is greater than or equal to the standard, each individual surface coating must be tested separately to ensure the 90 ppm requirement is being met.

#### **B. Children & Adult Graphic Programs - "Pass" or "Fail" criteria will be based on the number of colors within the composite.**

- 1 coating - standard is 90 ppm
- 2 coatings - standard is 36 ppm
- 3 coatings - standard is 24 ppm

If the composite test result is greater than or equal to the standard, each individual surface coating must be tested separately to ensure the 90 ppm requirement is being met.



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### 4. Total Lead in Substrate Material

In accordance with 16 CFR 1303, Consumer Product Safety Improvement Act of 2008 (CPSIA), California Proposition 65 (Cal Prop 65) and Kohl's, Adult and Children Products must meet the following accessible Lead requirements.

The standard applies to any individual finished component of the entire material such as buttons, snaps, zippers etc.

#### A. Children (size 0-20)

- i. Apparel =  $\leq 100$  ppm (0.010% total weight)
- ii. Belt =  $\leq 100$  ppm (0.010% total weight)

#### B. Adults (Juniors/Young Men/Women's & Men's)

- i. Belt =  $\leq 200$  ppm (0.020% total weight)

**\*\*For Adult and Children's Jewelry and Accessories, different Lead requirements will apply as per Cal Prop 65 and CPSIA. Please refer to the Test Protocols # 217, 218, 219 and 220.\*\***

**4.1 Composite Testing** - Allowed on similar material components up to a maximum of 3 components/materials with an 80% safety factor applied. Belts and Accessories are not permitted for composite testing.

Example: A garment with a zipper, snap buttons and rivets. The zipper teeth, bottom stop and top stop can be composited together assuming base material is the same. The snap button, rivet, zipper teeth, top/bottom stop CAN NOT be composited together because they do not share the same base material.

#### A. "Pass" or "Fail" criteria will be based on the number of colors within the composite.

- 1 component - standard is 100 ppm
- 2 components - standard is 40 ppm
- 3 components - standard is 27 ppm

If the composite test result is greater than or equal to the standard, each individual substrate must be tested separately to ensure the 100 ppm requirement is being met.

The following materials are exempt from Total Lead Substrate testing:

- a) Natural (dyed or undyed) textile fibers (excluding after-treatment applications, including screen prints, transfers, decals, or other prints) including, but not limited to, cotton, kapok, flax, linen, jute, ramie, hemp, kenaf, bamboo, coir, sisal, silk, wool (sheep), alpaca, llama, goat (mohair, cashmere), rabbit (angora), camel, horse, yak, vicuna, qiviut, guanaco
- b) Manufactured (dyed or undyed) textile fibers, including, but not limited to, rayon, azlon, lyocell, acetate, triacetate, rubber, polyester, olefin, nylon, acrylic, modacrylic, aramid, spandex
- c) Other plant-derived and animal-derived materials including, but not limited to, animal glue, bee's wax, seeds, nut shells, flowers, bone, sea shell, coral, amber, feathers, fur, leather

### 5. Phthalates

In accordance with CPSIA – Section 108, HR 2715, Cal Prop 65 and Kohl's, **ALL Adult and Children Products containing/made partially or completely of any accessible phthalate material, i.e. PVC, vinyl etc. may contain only  $\leq 0.1\%$  (1000 ppm) in each part:**

Dibutyl Phthalate (DBP)  
Benzyl Butyl Phthalate (BBP)  
Di-n-hexyl Phthalate (DnHP)  
Di-n-Octyl Phthalate (DnOP)  
Di-n-Pentyl Phthalate (DnPP)

Diethyl Hexyl Phthalate (DEHP)  
Di-Iso-Nonyl Phthalate (DINP)  
Diisodecyl phthalate (DIDP)  
Diisobutyl Phthalate (DIBP)  
Dicyclohexyl Phthalate (DCHP)

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**5.1 Composite Testing** - Allowed on similar coatings/components up to a maximum of 3 components/materials with an 80% safety factor applied. Composite Testing is applicable to both Children and Adult Apparel/Products.

Example: A garment with colored plastic buttons and colored rivets. Red, blue and green plastic button can be composited together. The plastic buttons and rivets CAN NOT be composited together because they do not share the same base material.

**A. "Pass" or "Fail" criteria will be based on the number of colors within the composite.**

- 1 component - standard is 1000 ppm (0.1%)
- 2 components - standard is 400 ppm (0.04%)
- 3 components - standard is 266 ppm (0.0266%)

If the composite test result is greater than or equal to the standard, each individual component/materials must be tested separately to ensure the 1000 ppm requirement is being met.

**Given below is a list of some materials, which may contain phthalates. The list is not all inclusive. In order for the lab to determine whether phthalate testing needs to be conducted, the vendor must indicate on the Test Request Form whether the item contains phthalates OR made from any of the below said materials.**

- Poly Vinyl Chloride (PVC), Poly Vinylidene Chloride (PVDC), Poly Vinyl Acetate (PVAC)
- Poly Urethane (PU)
- Soft Plastics such as plasticizer prints, decals, printed inks
- Synthetic Leather
- Ethylene Vinyl Acetate (EVA), Rubber, TPU, Latex, EVA / Rubber Foams, PU Foams
- Polymeric Coated Materials

**List of Materials that DO NOT normally contain phthalates UNLESS vendor claims item contains phthalate material**

- Natural (dyed or undyed) textile fibers (excluding after-treatment applications, including screen prints, transfers, decals, or other prints) including, but not limited to, cotton, kapok, flax, linen, jute, ramie, hemp, kenaf, bamboo, coir, sisal, silk, wool (sheep), alpaca, llama, goat (mohair, cashmere), rabbit (angora), camel, horse, yak, vicuna, qiviut, guanaco
- Manufactured (dyed or undyed) textile fibers, including, but not limited to, rayon, azlon, lyocell, acetate, triacetate, rubber, polyester, olefin, nylon, acrylic, modacrylic, aramid, spandex
- Other plant-derived and animal-derived materials including, but not limited to, animal glue, bee's wax, seeds, nut shells, flowers, bone, sea shell, coral, amber, feathers, fur, leather
- Natural Wood , Metal
- Natural Latex, Silicone Rubber
- Polyolefins

## 6. Heavy Metal Content

In accordance with ASTM F693-11, all Children toys must be tested for soluble heavy metals in surface coating and substrate. Children Toys are define as a consumer product designed or intended by the manufacturer for a child, for use by the child when the child plays. Kohl's require children toys of all age categories to meet the below requirements:

Antimony	60ppm maximum	Chromium	60ppm maximum
Arsenic	25ppm maximum	Lead	90ppm maximum
Barium	1000ppm maximum	Mercury	60ppm maximum
Cadmium	40ppm maximum	Selenium	500ppm maximum

Please refer to ATSM F963-11 standard for additional details on toy safety.

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### 7. Nickel Content

7.1 Metal components for all size range / age groups when in direct and/or prolonged contact with skin must be Nickel Free.

7.2 Metal components NOT in direct and/or prolonged contact with the skin do not have to be nickel free **however, it is highly recommended.**

### 8. Cadmium

In accordance with California Prop 65 and Kohl's, **ALL Adult and Children Products must meet the following Cadmium requirements of the total weight:**

**A. Children (size 0-20)**

- i. All Children's Products =  $\leq 40$  ppm (0.0040% total weight)

**B. Adults (Juniors/ Young Men/ Women's & Men's)**

- i. Jewelry =  $\leq 75$  ppm (0.0075% total weight)

### 9. pH Value

The pH Value is a safety concern which can cause skin irritation. Kohl's require all Children and Adult garments and related accessories to be tested for pH in accordance to AATCC 81.

**Requirements = 5.0-8.0 (with zero tolerance)**

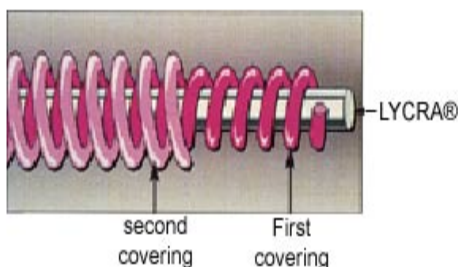
### 10. Elastics

Rubber/latex may be used in elastic as long as the rubber/latex is fully enclosed/covered and does not come in direct contact with the skin, this would be to prevent any potential allergic reactions.

**Foundations and intimates** products may not contain any latex in the elastics used.

Examples:

**Covered Yarn**



**Enclosed Waistband**



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### **11. PFAS - or per- and polyfluoroalkyl substances**

Testing Protocols have been updated to confirm compliance in accordance with new state laws taking effect January 1, 2023. Compliance with our updated RSL, including additional PFAS limits will be required for all products delivered in 2023 and beyond.

To meet these requirements, compliance actions in 2022 are needed for all upcoming development and production no later than December 31, 2022. This is a prerequisite to working with us in the future and applies to all affected products for Kohl's.

Validation testing will be applied to all products carrying the following claims:

- Stain Resistant/ Repellent
- Water Resistant/ Repellent
- Waterproof
- Non-Stick

The following supplemental Protocols will be updated or created to facilitate mandatory claims testing:

- Softlines - Protocol 401 - Performance Claims
- Soft Home - Protocol 1000 - Performance Claims for Home Textile Products
- Hardlines - Protocol 1600 - Supplemental for Hardlines (**NEW**)

## **CHOKING HAZARD**

### **12. Small Parts & Attachment Strength**

**12.1** Kohl's requires all trims, appliqués and/or decorations whether functional or non-functional on children products size 0 - 5T to comply with the small parts requirement as per 16 CFR Part 1501.

#### **For sizes 0 to 5T, no detachment at 17 lbs. for 10 seconds**

The regulation addresses small parts that present choking hazards for children under three years of age (36 months). In addition to the sharp edge and sharp point tests, other articles intended for children under three years of age are also evaluated for the presence of small parts before and after use and abuse testing. **The attachment strength test should be run before and after wash (test in original state, and after one and five washes for sizes 0-5T).** The Small Parts Cylinder, described in the regulation, is used to determine whether a particular piece is a small part. If an item or part thereof, fits entirely within the cylinder, the item fails the regulatory standard. The small parts regulation applies to items including functional and non-functional appliqués or decorations on children clothing.

Please note when fabric appliques are tested for attachment strength if the appliques completely detaches and can fit in to the standard choking tube, they should be referred as "**Regulatory Fail**".

If the **applique does not completely detach** and there is only a fabric rupture because of the pulling force, the sample should be referred as a "**Performance Fail**".

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12.2 For sizes above Toddler through Adult, please use the below as a reference:

<p><b>Performance</b></p>	<p><b>Attachment Strength*</b></p> <p>A) Applies to all Rings/Sliders</p> <p>B) Applies to Buttons, Snaps, Small Parts, Belt Loops, Zipper Tab, etc.</p> <p>C) Applies to Plastic Hanger Loops</p> <p>D) Over 5T-Adult: Fragile Trims: Beads, Rhinestones, etc</p>	<p>16 CFR 1500.51-53 Pt. F (Saf Q)</p>	<p>A) REQUIREMENT (for all garments): No detachment at 25 lbs. DATA ONLY: Report the point at which the trim fails, or if there is no detachment at 50 lbs.</p> <p>B) REQUIREMENT: Over 5T - Adult: No detachment at 17 lbs. for 10 seconds Exceptions: Buttons: 20lbs DATA ONLY: Report the point at which the trim fails, or if there is no detachment at 50 lbs.</p> <p>C) REQUIREMENT: No detachment at 5 lbs. DATA ONLY: Report the point at which the trim fails, or if there is no detachment at 50 lbs.</p> <p>D) REQUIREMENT: 5 lbs. for 10 seconds minimum</p>
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## 13. Pompom, Tassels & Fringe

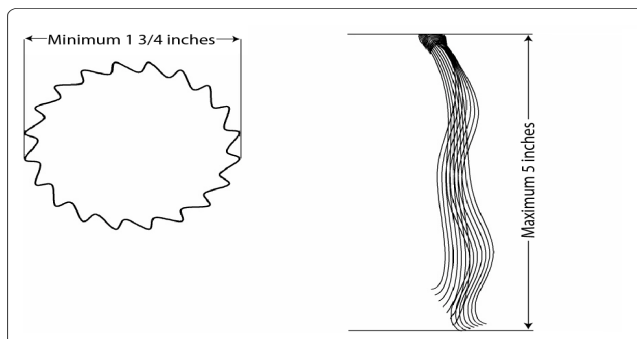
Regardless of age category, glue is not allowed to construct or attach pom poms, tassels and fringe onto apparel and apparel accessories. In addition to the above requirements, for sizes 0-5T apparel and apparel accessories, the pompom/tassel must meet the attachment strength requirement of 17 lbs. for 10 seconds, and be no smaller than 1 3/4" in diameter in the dry stage or longer than 5" for a tassel.

The use of the trims are allowed for sizes 0 – 5T, provided they meet the below guidelines for children products.

13.1 Attachment Pull Strength – Must meet 17 lbs. for 10 seconds.

13.2 Pompoms – Cannot be smaller than 1 3/4 inch in diameter in dry state.

13.3 Tassels & Fringe – Maximum length of 5 inches.

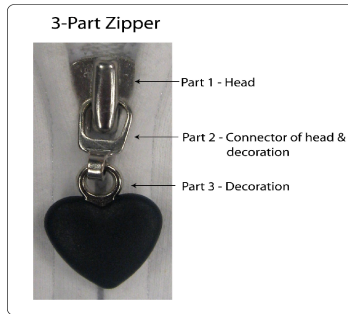


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## 14. Zippers

### For Children's & Adults –

- 14.1 Metal claw top/bottom stop zippers are not allowed in garments where the claw is exposed.
- 14.2 All open end zippers must have a safety top stop to prevent sliders from falling off.
- 14.3 All sliders must be a locking type, unless approved by Kohl's.
- 14.4 Children size 0-5T, all decorative (3 or more part zipper), zippers must meet the minimum tab twist requirement of 4 lbs., regardless of size.



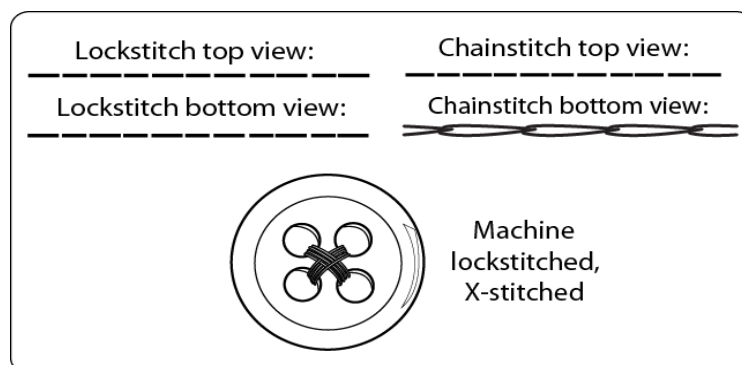
## 15. Buttons

All buttons must meet the following requirements:

Parameter	Two hole	2 or 4 hole	2 or 4 hole
For ligne size	< 14	14-21	>21
Center Thickness	0.0625 in	0.0625 in	0.0750 in

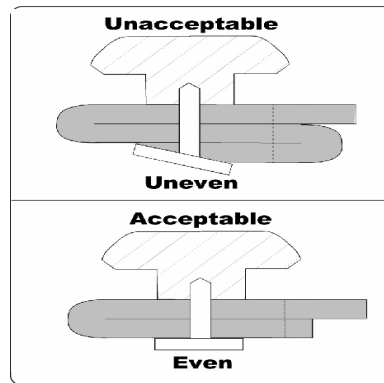
Children size **0- 5T**, all buttons must meet the following guidelines:

- 15.1 All buttons, functional or decorative, must be attached using a lockstitch buttoning machine. Hand sewn buttons or chain stitches are not permitted.
- 15.2 For four hole-configuration buttons, the lock stitch machine must pass through all four holes in a cross-stitch pattern
- 15.3 Functional button = Must use four hole button
- 15.4 Decorative button = May use two hole or four hole button



## 16. Snap Fasteners

- 16.1 No prongs should be protruding
- 16.2 Snaps must not be applied on seams or stitches, which could cause either to break
- 16.3 Only semi or fully automatic pneumatic or electric press recommended by the snap supplier should be used. Manual Application is not permitted.
- 16.4 Snaps must always be attached on even layers of fabric. They must go through a minimum of 2 plys of fabric or Reinforced by a backing.



## 17. Faux Fur

Faux Fur can present an aspiration and/or choking hazard.

- 17.1 Children size 0-12 months, it is recommended that faux fur not be used anywhere on the garment especially around the head and neck area. If faux fur is used, pile length should be limited to 1/2".
- 17.2 Children size over 12 months to 5T, faux fur pile length should be limited to a maximum of 2 1/2".

## 18. Pumice Stone Wash Garments

- 18.1 For sizes 0-5T the use of pumice stones are only permitted if the pockets are basted closed prior to washing.
- 18.2 For children sizes above 5T, and adults, pumice stones are permitted provided all pockets are free of stones at the point of sale.

## 19. Attachment of Fragile Trims

Kohl's define **fragile trims** (embellishments) as beads, sequins, rhinestones, glitter, gems, and diamantes etc., which are generally applied by hand. Fragile trims, which cannot be subject to the Attachment Strength test, must be subject to an extended Durability Wash test. Refer to the Kohl's Appearance Evaluation & Durability Evaluation SOP for more details on the guidelines.

- 19.1 Durability Evaluation
  - A. Children size 0-5T = Must withstand 10 home laundering
  - B. Children size 4 and Up = Must withstand 5 home laundering

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19.2 The following are guidelines for the use of embellishments.

- A. Children sizes 0-5T = Can not be applied by hand, must be mechanically applied by machine.
- B. Children sizes 4-20 = Can be applied by hand and machine.

Below are the most commonly used embellishments that can be applied to the following children size ranges. Embellishments not listed should be consulted with Kohl's Product Integrity Team.

Embellishment	0-3 months	6-9 months	Toddlers (12mo - 5T)	4-7X	7 to 20	Image
Sugar Glitter		X	X	X	X	See image 18a
Colored Glitter	X	X	X	X	X	See image 18b
Crystalline	X	X	X	X	X	See image 18c
Hot Melt Glitter			X	X	X	See image 18d
Fog Foil	X	X	X	X	X	See image 18e
Sequins				X	X	See image 18f
Sequin (w/Safety Attachment)		X	X			See image 18g
Heat Transfer Sequins		X	X	X	X	See image 18h
Gel Sequins	X	X	X	X	X	See image 18i
Rhinestones (hand sewn)				X	X	See image 18j

Embellishment	0-3 months	6-9 months	Toddler (12mo - 5T)	4-7X	7 to 20	Image
Heat Transfer Rhinestuds/Rhinestones		X	X	X	X	See image 18k
Heat Transfer Studs		X	X	X	X	See image 18l
Beads				X	X	See image 18m
Paillettes				X	X	See image 18n
Brooch/Pins				X	X	See image 18o
Detachable Necklaces (sold with garments)				X	X	See image 18p
Googly Eyes (must be stitched down)	X	X	X	X	X	See image 18q
Foil	X	X	X	X	X	See image 18r
Embossing	X	X	X	X	X	See image 18s
Hook and Eye					X	See image 18t



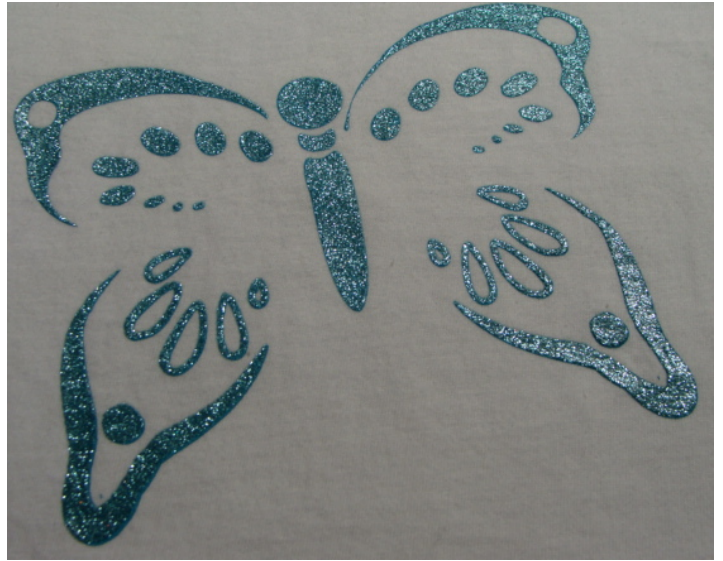
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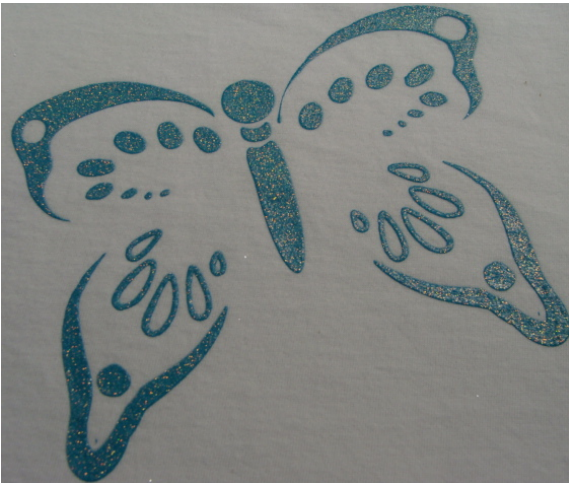
19a. Sugar Glitter



19b. Colored Glitter



19c. Crystalline Glitter



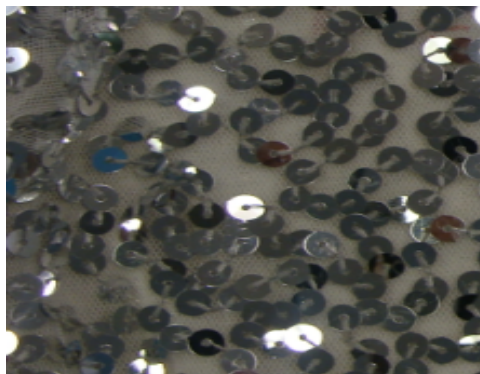
19d. Hot Melt Glitter



19e. Fog Foil



19f. Sequins

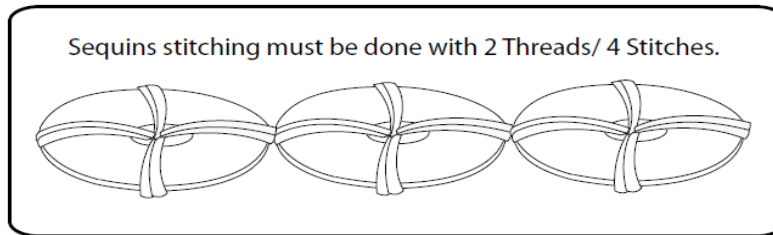


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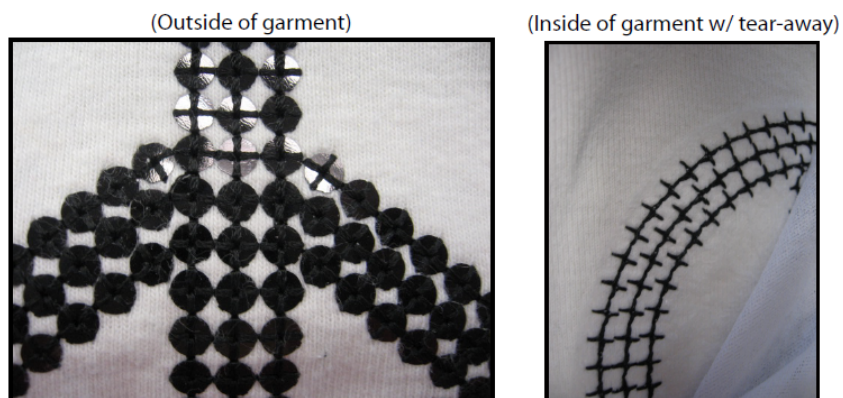
## 19g. Sequin with Safety Attachment

- i. Children's sizes 6 months – 5T: Sequins may be used as long as it is applied by machine, 2 threads/4 stitches **and use of over-the-back embroidery cover on the garment.** See picture 1A- 1C below. For further sewing construction details please consult with the Kohl's Tech Designer.
- ii. Children's sizes 4 - 20 and Adults: Fragile trims may be used, but must meet Kohl's Durability SOP and attachment strength requirements of 5 lbs. for 10 seconds minimum (if graspable). Use of over-the-back embroidery cover is required if fragile trim is attached by sewing to reduce irritation on the skin.

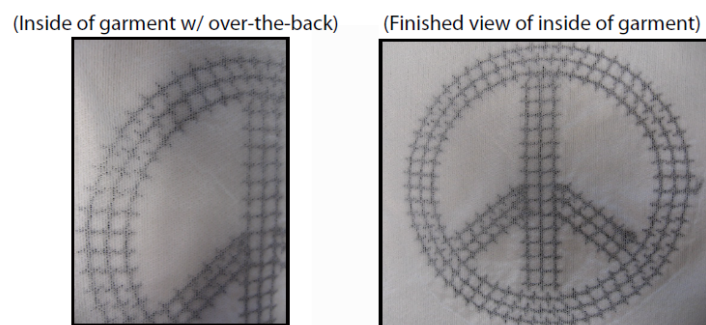
Pic. 1A



Pic. 1B



Pic. 1C

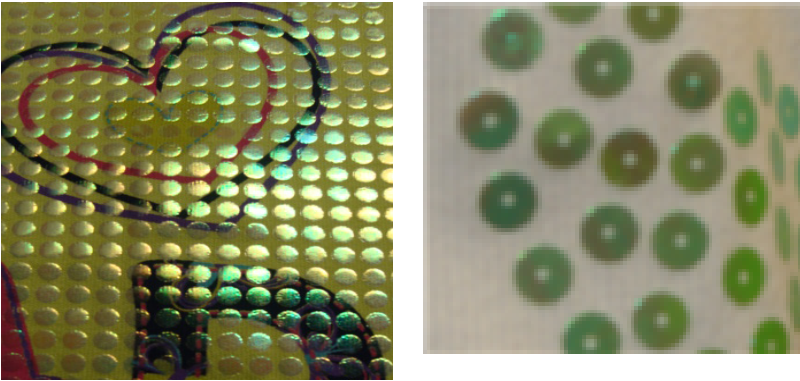




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**19h. Heat Transfer Sequins**



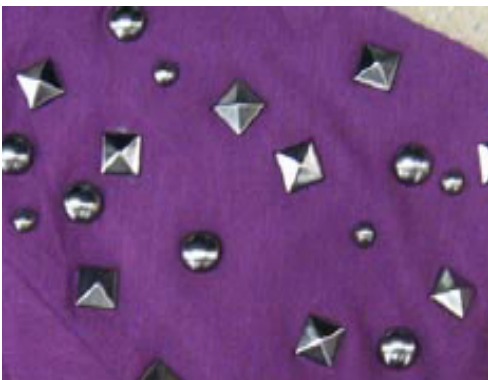
**19i. Gel Sequins**



**19j. Rhinestones (hand sewn)**



**18k. Heat Transfer Rhinestuds/Rhinestones**

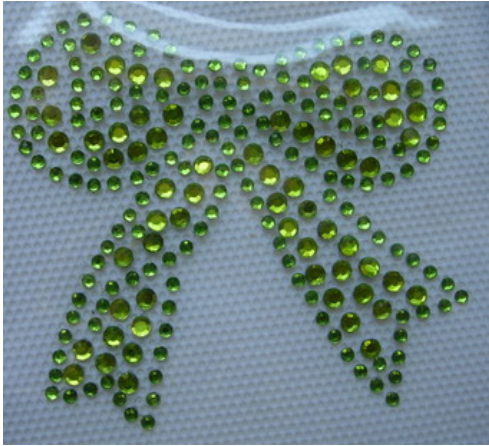


**18l. Heat Transfer Studs**



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**19m. Beads**



**19n. Paillettes**



**19o. Brooch/Pins**



**19p. Detachable Necklaces (sold with garments)**



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19q. Googly Eyes



19r. Foil



19s. Embossing



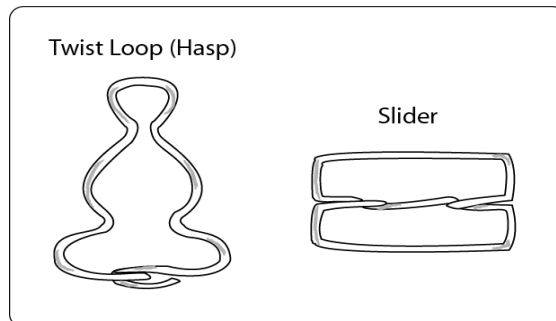
19t. Hook and Eye



**LACERATION HAZARD**

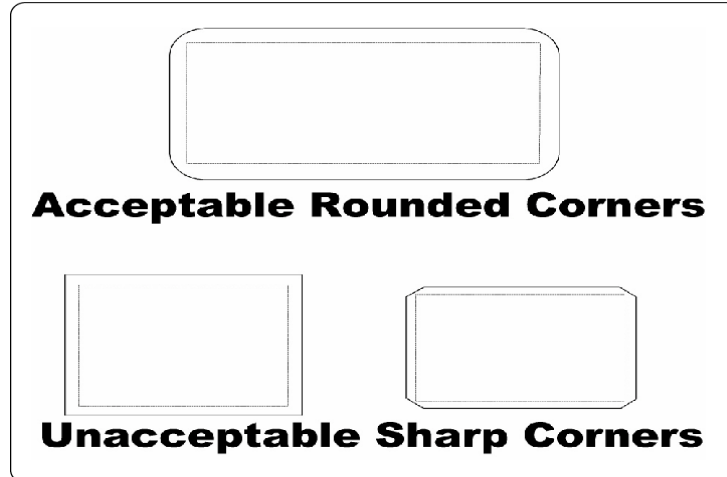
**20. Hasp & Sliders**

For children's products please refer to Kohl's Preferred Supplier document for requirements.



## 21. Hook & Loop Fasteners

All hook & loop fasteners on children's garments must be rounded to prevent sharp edges and scratching. They can be die cut or hand trimmed.

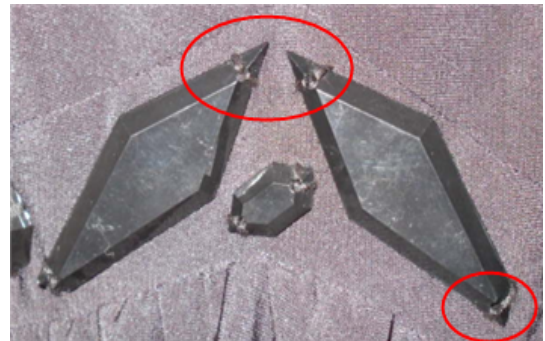
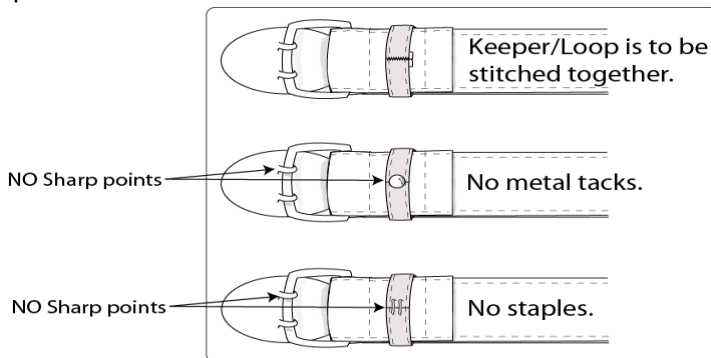


## 22. Sharp Points and Sharp Edges

22.1 Children size 0-20 trims and products may not have any sharp points or sharp edges in accordance to 16 CFR 1500.48-49. Points and edges of trim must be smooth and rounded.

22.2 Adult trims and products are not regulated to meet sharp point and sharp edges per 16 CFR 1500.48-49 however, Kohl's expects there should be **NO** sharp points and sharp edges.

Examples:





## Kohl's Department Stores Product Services

**22.3 Sequins** - All sequins on children and adult garments must be smooth and/or rounded. To prevent laceration, NO sharp points are to be due to trimming and/or cutting.

A. Two types of Sequins: Direct Attached (Type A) and Tab Attached (Type B).



Direct Attach  
Type A



Tab Attached  
Type B

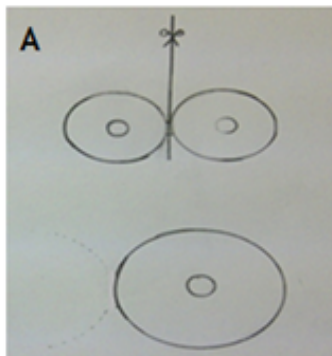
B. Children's Products – Sequin type A must be used.

Adult's Products – Sequin type A is highly recommended but, not required.

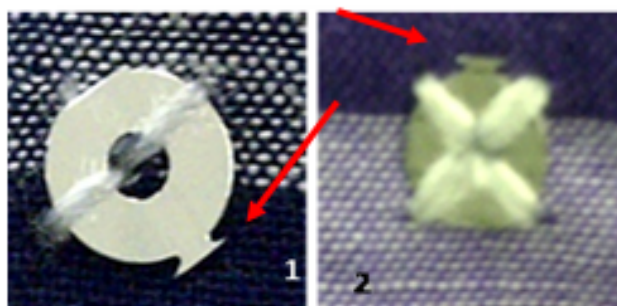
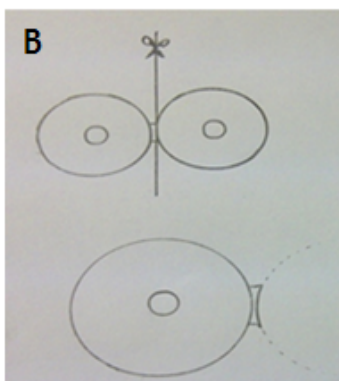
C. Knife/Blade must be adjusted to ensure precision cut.

D. Sharpness of the blades must be regularly reviewed.

Acceptable - No Sharp Points/  
Sharp Edges



Unacceptable - Sharp Points/  
Sharp Edges



## 23. Zipper Guards

To prevent **zipper** lacerations/skin entrapment on children's apparel where zippers come in close contact with the skin, below are guidelines when designing children's apparel.

23.1 Invisible Zipper – Not recommended for Children's styles. Due to the properties of invisible zippers, the zipper tab twist requirements usually cannot be met, resulting in a failure.

### 23.2 Zipper Pull Shape

- A. Children's sizes 0 to 7 – ALL zipper pulls must have a rounded zipper pull shape. No sharp points/sharp edges.
- B. Children's sizes 7 to 20 – Rounded zipper pull is recommended, but not mandatory.



### 23.3 Full Length Zipper Guard

- A. Children's Sleepwear/Base Layer Apparel size 0 to 7 - Garments designed to fit next to skin must have a zipper guard between zipper teeth and body for entire length of the zipper.
- B. Children's Layering Apparel size 0 to 7 - Zipper guard is recommended, but not mandatory for garments designed to be worn over other clothing as layering pieces
- C. Children's Outerwear size 0 to 20 - All insulated outerwear such as coats and jackets must have full length zipper guard/interior storm flap for performance of keeping out snow/cold air.
- D. ALL Children's Apparel/Outerwear with metal zipper must have a zipper guard.
- E. Reversible Outerwear is exempt from having a full length zipper guard

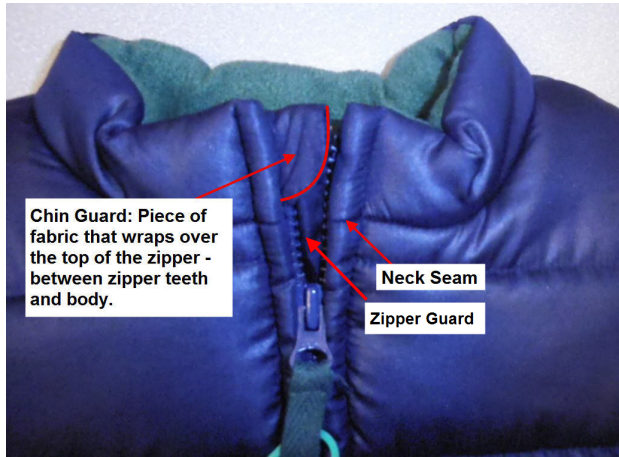




# Kohl's Department Stores Product Services

## 23.4 Chin Guard

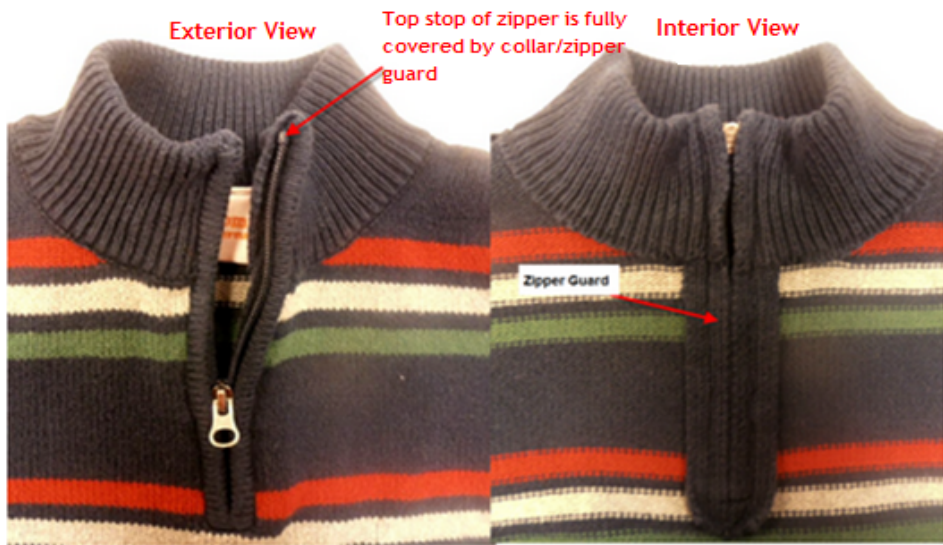
- A. Children sizes 0 to 5T – ALL garments with zipper that extends above the neck seam must have a chin guard with either a full length or partial zipper guard.



Lap Zipper – Another alternative to Chin Guard



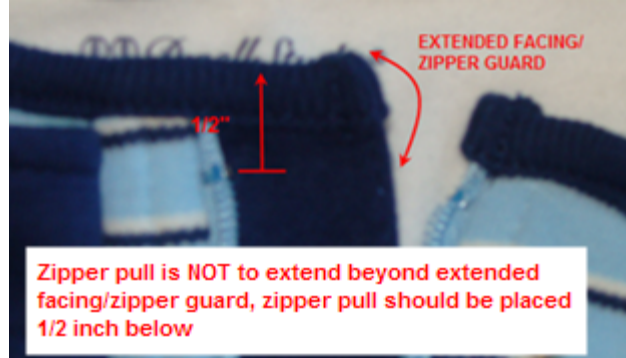
Chin Guard for Sweater Construction



# Kohl's Department Stores Product Services

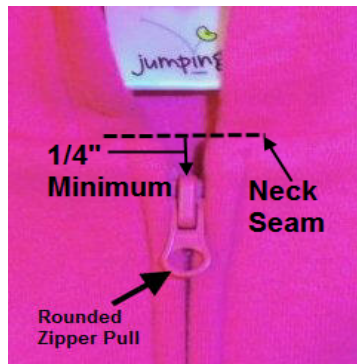
## 23.5 Zipper Snap Tab

- A. Infant sizes 0 to 24 months – Sleepwear garments with zipper must have Snap Tab over top of zipper pull to prevent pull from flipping up or poking child during sleeping.



## 23.5 Top Zipper Gap Minimum

- A. Children's size 0 to 5T – Garments with zipper ends at neck seam must have a minimum 1/4" gap between top stop of zipper and neck seam.



## **STRANGULATION/ENTRAPMENT HAZARD**

### **24. Drawstrings, Circular Draw Cords, and Ties**

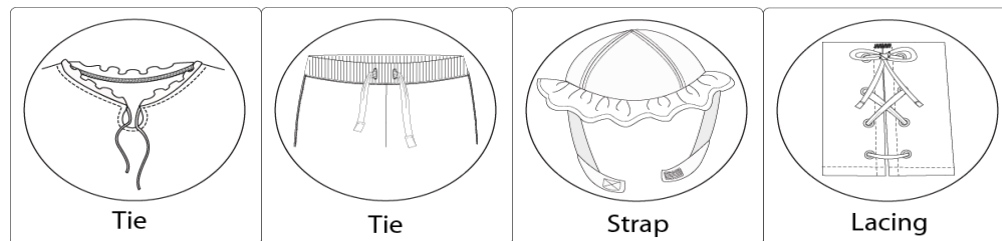
In order to help prevent children from strangling or becoming entangled due to drawstrings or draw cords, Kohl's exceeds the requirements of ASTM F1816-97 "Standard Safety Specification for Drawstrings on Children's Upper Outerwear" and "CPSC Guidelines for Drawstrings on Children's Upper Outerwear".

Effective August 18, 2011, CPSC issued a rule 16 CFR 1120, on Drawstrings and Ties. Refer to Section 20.1 for definition of Drawstrings and Ties.

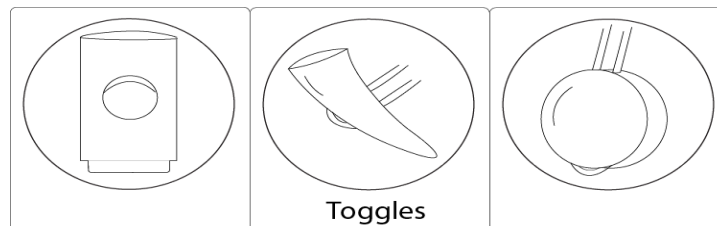
The two standards will apply to children's outerwear and clothing for size ranges **Newborns 0-24 Months, , Toddlers 12 months - 5T, Girls 4-16 and Boys 4-20. Certain detachable accessories, i.e. belts, are exempt from this requirement.**

#### **24.1 Definitions**

- **Drawstring & Tie** – Under the rule 16 CFR 1120, Drawstring is defined as a non-retractable (not capable of drawing back) cord, ribbon, or tape of any material to pull together parts of outerwear to provide for closure. Under this definition ties are considered drawstrings, as well as traditional tunneled drawstrings.



- **Circular Draw cord** – includes any cording or trim, which may be elastic and has no ends outside of the channel. The draw cord appears as a continuous loop outside of the channel. Circular draw cords may be channeled through a hem or casing to tighten or control fullness of the apparel.
- **Toggles** are defined as a wooden, plastic, metal or other composed material, which is attached to the loose end of a drawstring/tie for either decorative purposes or to prevent the drawstring/tie from being pulled out of the channel or fraying.

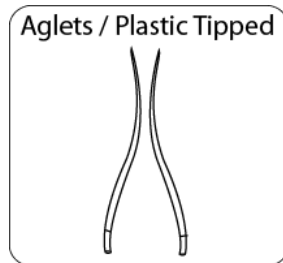




## Kohl's Department Stores Product Services

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- **Aglets (plastic tipped)** are defined as any tube-shaped material used to bind the end of a drawstring/tie to prevent fraying. An aglet shall not be construed as a toggle. Therefore, aglets are permissible.



- **Outerwear** is defined as a garment intended to be worn on the exterior of other garments for warmth purposes. It can be worn outdoors or indoors such as coats and jackets.



- **Layering Piece** is defined as a garment which can be worn over a shirt, dress etc. such as puffer vest, hoodie, sweatshirt, sweater, cardigans and swim cover ups.



# Kohl's Department Stores

## Product Services

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### 24.2 Requirements

This section will address the requirements for use of drawstring, draw cord and tie in regards to applicable age/size range, garment types, placement, length, construction and finishing of ends.

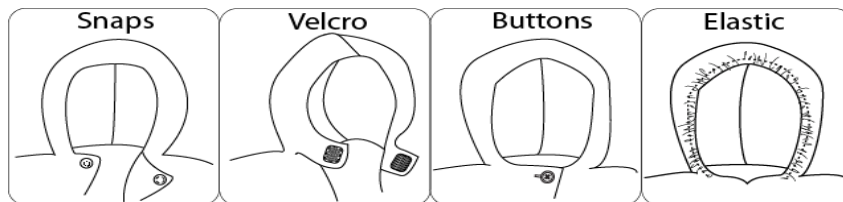
**Applicable age/size range and length requirements provided in the Chart are for maximum length on each side of the garment.**

#### 1) Children's Upper Outerwear

##### A. Head/Neck/Shoulder Area

- i. Drawstring/Drawcord = Not Allowed
- ii. Ties = Not Allowed

Note: An alternative closure must be used such as snaps, buttons, elastic or hook and loop fastener, etc.



##### B. Waist/Hip



- i. Drawstring/Drawcord/Ties (External) = Not Allowed.
- ii. Drawstring/Drawcord/Ties (Internal) = Allowed with Restrictions.  
Must meet the minimum constructions:
  - **Not more than 2 1/2 inches of any drawstring/tie is outside the tunneled channel when the garment is fully extended and the waistband is flat/ straight and then measured in a relaxed state.**
  - The drawstring must be sewn to the garment at the midpoint of the channel so the drawstring cannot be pulled out of the channel.

##### C. Bottom Hem

- i. Drawstring/Drawcord/Ties = Not Allowed.
- ii. Pretack Bows = Allowed with Restrictions.

**Drawstring, Draw cord and Tie Maximum Length Requirement are for Each Side.**

**Kohl's Department Stores  
Product Services**

DRAWSTRING & DRAWCORD						
Product Category		Placement	Newborn/Infant 0-24 months	Toddlers (12 mo-5T)	Little Girl/ Boy 4-7x	Girls 7-16 / Boys 8-20
<b>Outerwear</b> (coat, jackets, cardigans, hoodie, sweatshirt, layering piece etc.)		Head/Neck/ Shoulder	NA			
		Bottom Hem	NA			
		Waist/ Hip	NA	AWR – INTERNAL WAIST ONLY 2 ½ IN. MAX		
TIES						
<b>Outerwear</b> (coat, jackets, cardigans, hoodie, sweatshirt, layering piece etc.)		Head/Neck/ Shoulder	NA			
		Waist/Hip	NA	Toddlers INTERNAL WAIST ONLY 2 1/2 IN. MAX	AWR = INTERNAL WAIST ONLY 2 1/2 IN. MAX	
		Bottom Hem	NA		AWR PRETACK BOW ONLY LOOP = 2 IN. MAX TAIL = 2 1/2 IN. MAX	

A = Allowed	NA = Not Allowed	AWR = Allowed with Restrictions
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# Kohl's Department Stores Product Services

## 2) Children's Non-Outerwear (Apparel)

### A. Tops/Dresses

#### i. Head/Neck/Shoulder Area

- a. Drawstring/Drawcord = Not Allowed.
- b. Ties/Pre-tack Bows = Allowed with Restrictions.

#### ii. Sleeves

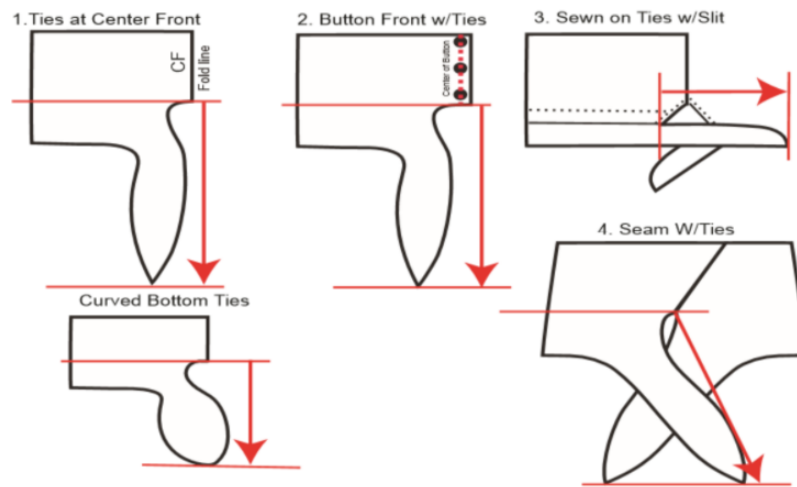
- a. Drawstring/Drawcord = Not Allowed.
- b. Ties/Pre-tack Bows = Allowed with Restrictions.

#### iii. Waist/Hem/Sweep

- a. Drawstring/Drawcord = Allowed with Restrictions.
- b. Ties/Pre-tack Bows = Allowed with Restrictions.
- c. Lacing = Allowed with Restrictions.

**How to Measure functional tie lengths as the waist for tops only.**

## POM A539 UNKNOTTED TIE LENGTHS






1. Ties at Center Front - Fold garment in half aligning side seam and hem. Place ruler Perpendicular to Center front. Place ruler Perpendicular to Center front.
  2. Button Front w/Ties - Button and Buttonholes are the center front of garment. Place ruler Perpendicular to Center front. Place ruler Perpendicular to Center front.
  3. Sewn on Ties w/Slits- Measure from slit and seam to end of tie
  4. Seam w/Ties - Measure from end of seam to end of tie
- NOTE: Measure to longest point of tie or lowest point of tie curve.



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Product Services**




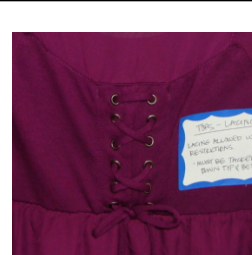
**Drawstring, Draw cord and Tie Maximum Length Requirement are for Each Side.**

<b>DRAWSTRING &amp; DRAWCORD</b>						
<b>Product Category</b>		<b>Placement</b>	<b>Newborn/Infant 0-24 months Toddlers (12 mo-5T)</b>	<b>Little Girl/ Boy 4-7x</b>	<b>Girls 7-16 / Boys 8-20</b>	
<b>Non-Outerwear</b>  (top, blouse, dresses etc.)		<b>Head/Neck/Shoulder</b>	NA			
		<b>Sleeves on Top</b>	NA			
		<b>Lacing</b>	NA			
		<b>Waist/ Hem/ Sweep on Top</b>	NA	AWR 2 1/2 IN. MAX		
<b>TIES</b>						
<b>Non-Outerwear</b>  (top, blouse, dresses etc.)		<b>Head/Neck/Shoulder</b>	AWR PRE-TACK BOW LOOP= 1 1/2 IN. PRE-TACK BOW TAIL=2 1/2 IN.	AWR MAX LENGTH =5 IN. PRE-TACK BOW LOOP= 2 IN. PRE-TACK BOW TAIL=3 IN.	AWR MAX LENGTH = 7 IN. PRE-TACK BOW LOOP= 3 IN. PRE-TACK BOW TAIL= 6 IN.	
		<b>Sleeves on Top</b>	AWR PRE-TACK BOW LOOP=1 1/2 IN. PRE-TACK BOW TAIL=2 1/2 IN.	AWR MAX LENGTH = 5 IN. (above the elbow)  PRE-TACK BOW LOOP= 2 IN. PRE-TACK BOW TAIL= 3 IN.	AWR MAX LENGTH = 7 IN. (above the elbow)  PRE-TACK BOW LOOP= 3 IN. PRE-TACK BOW TAIL= 6 IN.	

<b>A = Allowed</b>	<b>NA = Not Allowed</b>	<b>AWR = Allowed with Restrictions</b>
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**Kohl's Department Stores  
Product Services**

**Tie and Pre-tack Bow Maximum Length Requirement is for Each Side.**

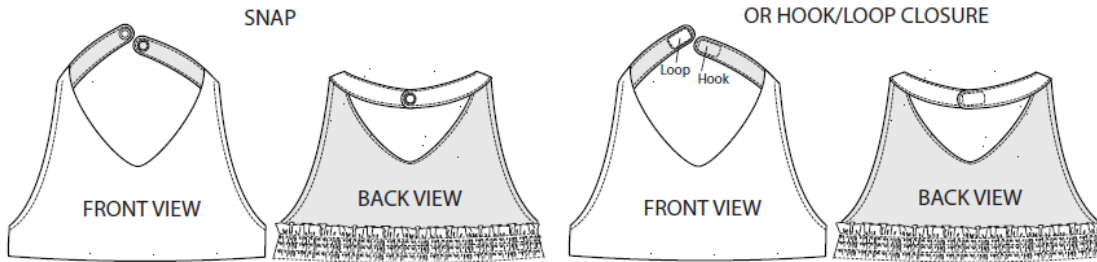
<b>TIES</b>					
<b>Product Category</b>		<b>Placement</b>	<b>Newborn/Infant 0-24 months Toddlers (12 mo-5T)</b>	<b>Little Girl/ Boy 4-7x</b>	<b>Girls 7-16 / Boys 8-20</b>
		<b>Waist/Hem/ Sweep of Top</b>	AWR  PRE-TACK BOW LOOP=1 1/2 IN. PRE-TACK BOW TAIL=2 1/2 IN.	<b>AWR MAX LENGTH = 5 in.</b>  PRE-TACK BOW LOOP=3 IN. <b>PRE-TACK BOW TAIL=2 1/2 IN.</b>	<b>AWR MAX LENGTH = 8 in.</b>  PRE-TACK BOW LOOP= 3 IN. <b>PRE-TACK BOW TAIL= 2 1/2 IN.</b>
<b>Non- Outerwear</b>  (top, blouse, dresses etc.)		<b>Top w/Side Ties at Waist</b>	NOT ALLOWED FOR 0-9 MOS.  AWR for 12mo-5T = 7 in. max length	AWR  14 IN. MAX EACH SIDE	AWR  Size 7-8 = 16 in. Size 10-12 = 18 in. Size 14-16 = 20 in.
		<b>Dress w/Side Ties at Waist</b>	NOT ALLOWED FOR 0- 9 MOS.  AWR For 12 mo-5T = should not hang below hem of dress	<b>AWR SHOULD NOT HANG BELOW HEM OF DRESS</b>	
		<b>Lacing</b>	<b>NA</b>	AWR  Tie should be permanently tacked at the first and last eyelet when lacing up. Number of cross point is 3 max. Pre-tack Bow loop = 3 in. max Pre-tack Bow Tail = 5 in. max  Lacing not allowed at fly front area.	

<b>A = Allowed</b>	<b>NA = Not Allowed</b>	<b>AWR = Allowed with Restrictions</b>
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**Kohl's Department Stores  
Product Services**


**B. Halter Tops/Dresses**

- i. Drawstrings/Draw Cords = Not Allowed for all ages.
- ii. Ties = Allowed with Restrictions.
  - a. Size 0 to 9 months – Must have breakaway feature, i.e., snap buttons, hook and loop fastener.
  - b. Size over 12 months to 5T – Must have breakaway feature, i.e., snap buttons, hook and loop fastener OR elasticize strap.
  - c. Size 4 to 20 – Allowed with Restrictions.



Elasticize Strap

**Drawstring, Draw Cord, Tie and Pre-tack Bow Maximum Length Requirement is for Each Side.**

DRAWSTRING & DRAWCORD				
Product Category	Placement	Newborn/Infant 0-24 months Toddlers (12mo-5T)	Little Girl/ Boy 4-7x	Girls 7-16 / Boys 8-20
	Neck Area	NA		
Non-Outerwear  Halter Tops/ Halter Dresses	<b>TIES</b>			
		Neck Area	AWR BREAK AWAY FEATURE-SNAP BUTTONS/VELCRO OR ELASTICIZE STRAP  No Elasticize Strap for 0-9 mos.	AWR  BOW LOOP=3 IN.MAX BOW TAIL=5 IN.MAX AFTER TIES ARE TIED INTO BOW

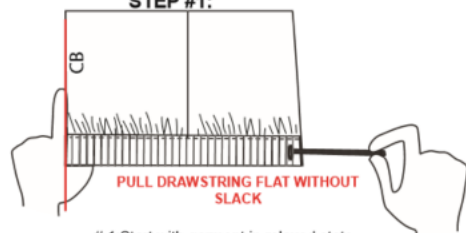
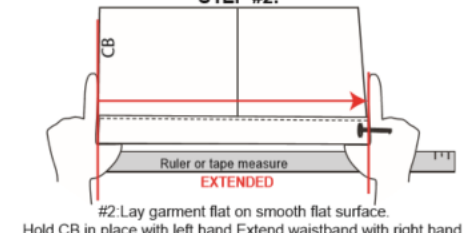


**A = Allowed      NA = Not Allowed      AWR = Allowed with Restrictions**

**Bottoms**

i. **Waist**

a. **Drawstrings:**

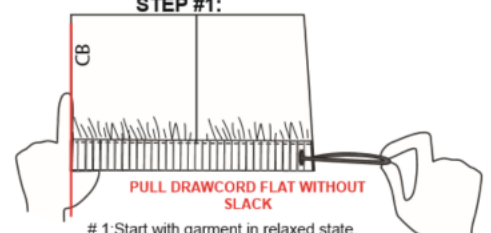
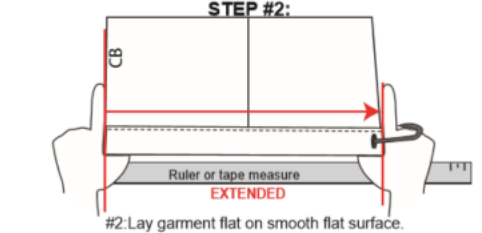
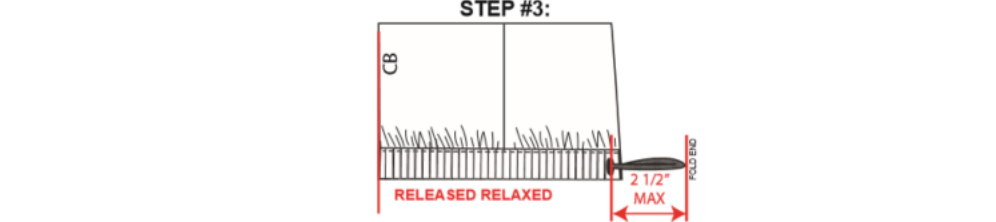
**MEASUREMENT STEPS: POM A403 EXP CHILDRENS DRAWSTRING EXPOSED LENGTH CRITICAL/PRIMARY**

<p><b>STEP #1:</b></p>  <p># 1: Start with garment in relaxed state. Fold garment in half at Center Back. Pull drawstring flat without slack.</p>	<p><b>STEP #2:</b></p>  <p>#2: Lay garment flat on smooth flat surface. Hold CB in place with left hand Extend waistband with right hand until waistband is aligned with hip width relaxed measured by size (A412/A415) and not beyond.</p>
<p><b>STEP #3:</b></p>  <p>RELEASED RELAXED</p> <p>#3: Release waistband. Measure Both Ends of the Exposed Drawstring from Opening to End. For Safety, Each Exposed Drawstring Length Must Not Exceed 2 1/2" including finished end.</p>	<p><b>NON FUNCTIONAL/FAUX DRAWSTRING:</b></p>  <p>Non-Functional/Faux: Measure Both Ends of Exposed Drawstring from where drawstring is tacked to garment to End. For Safety, Each Exposed Drawstring Length Must Not Exceed 2 1/2" including finished end.</p>

**\*\*Garments with internal drawstrings will need to be turned inside out.**

b. **Drawcords:**

**MEASUREMENT STEPS: POM A403C EXP CHILDRENS DRAWCORD EXPOSED LENGTH CRITICAL/PRIMARY**

<p><b>STEP #1:</b></p>  <p># 1: Start with garment in relaxed state. Fold garment in half at Center Back. Pull drawcord flat without slack.</p>	<p><b>STEP #2:</b></p>  <p>#2: Lay garment flat on smooth flat surface. Hold CB in place with left hand Extend Waistband with right hand until waistband is aligned with hip width relaxed measured by size (A412/A415) and not beyond.</p>
<p><b>STEP #3:</b></p>  <p>#3: Release waistband. Measure from opening to Fold end of the Exposed Drawcord. For Safety, Exposed Drawcord Length Should Not Exceed 2 1/2".</p>	

**\*\*Garments with internal drawstrings will need to be turned inside out.**

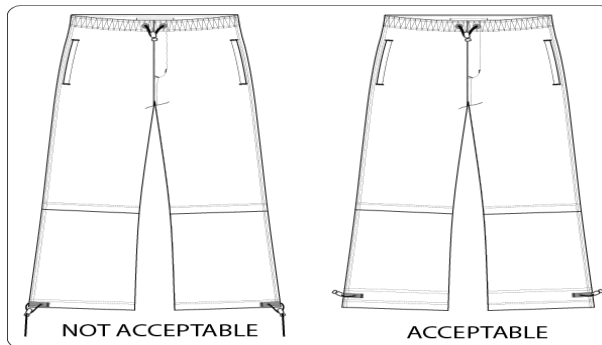
# Kohl's Department Stores Product Services

- c. Ties/Pre-tack Bows = Allowed with Restrictions.  
Must meet minimum constructions:
  - Must be sewn and stitched down to the garment at center front therefore, poses as a Non-Functional/Faux Drawstring.



ii. **Hem**

- a. Drawstrings/Draw Cords = Allowed with Restrictions.
- b. Ties/Pre-Tack Bows = Allowed with Restrictions.


Note: The length **may not** extend/expand beyond the hemline and **can not** drag onto the floor.



**Drawstring, Draw Cord, Tie and Pre-tack Bow Maximum Length Requirement is for Each Side.**

DRAWSTRING & DRAWCORD					
Product Category	Placement	Newborn/Infant 0-24 months Toddlers (12mo-5T)	Little Girl/ Boy 4-7x	Girls 7-16 / Boys 8-20	
Non-Outerwear  (pants/shorts/skirts/capris etc.)		Waist	AWR 2 1/2 IN. MAX		
		Hem of Full Length Bottoms	NA		AWR 2 1/2 IN. MAX
		Hem of Capri/Short/Skirts	NA	AWR 2 1/2 IN. MAX	AWR 2 1/2 IN. MAX
<b>TIES</b>					
		Waist	AWR MAX LENGTH = 2 1/2 IN. MAX PRE-TACK BOW LOOP=1 1/2 IN. PRE-TACK TAIL= 2 1/2 IN. MAX	AWR MAX LENGTH = 2 1/2 IN. MAX PRE-TACK BOW LOOP=3 IN. PRE-TACK TAIL= 2 1/2 IN. MAX	AWR MAX LENGTH = 2 1/2 IN. PRE-TACK BOW LOOP=3 IN. PRE-TACK TAIL= 2 1/2 IN. MAX

# Kohl's Department Stores Product Services

<b>Non-Outerwear</b>  (pants/shorts /skirts/capris etc.)		<b>Hem of Full Length Bottoms</b>	AWR PRE-TACK BOW LOOP= 1 1/2 IN. PRE-TACK TAIL= 1 1/2 IN.	AWR MAX LENGTH = 2 1/2 IN. PRE-TACK BOW LOOP= 2 IN. PRE-TACK TAIL= <b>2 1/2 IN.</b>	AWR MAX LENGTH = <b>2 1/2 IN.</b> PRE-TACK BOW LOOP= 2 IN. PRE-TACK TAIL= <b>2 1/2 IN.</b>
		<b>Hem of Capri/Short/Skirts</b>	AWR PRE-TACK BOW LOOP= 1 1/2 IN. PRE-TACK TAIL= 2 1/2 IN.	AWR MAX LENGTH = <b>2 1/2 IN.</b> PRE-TACK BOW LOOP= 2 IN. PRE-TACK TAIL= <b>2 1/2 IN.</b>	AWR MAX LENGTH = <b>2 1/2 IN.</b> PRE-TACK BOW LOOP= 2 IN. PRE-TACK TAIL= <b>2 1/2 IN.</b>

A = Allowed	NA = Not Allowed	AWR = Allowed with Restrictions
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### 3) Children's Accessories 0-20

#### A. Hem of Gloves/Mittens


- i. Drawstrings/Ties = Not Allowed.
- ii. Draw cords = Allowed with Restrictions.

Note: As an alternative, use snaps, buttons, elastic or hook and loop fastener.

#### B. Hats

- i. Drawstrings, Draw cords = Not Allowed.
- ii. Ties = Allowed with Restrictions
  - a. Ties/Straps are permitted on any headgear (hats/caps, etc.) provided there is a breakaway configuration, such as a use of a snap or hook and loop fastener.
  - b. Ties allowed on 4-20 with restrictions on max length












**Drawstring, Draw Cord and Tie Maximum Length Requirement is for Each Side.**

<b>DRAWSTRING &amp; DRAWCORD</b>					
Product Category	Placement	Newborn/Infant 0-24 months Toddlers (12mo-5T)	Little Girl/ Boy 4-7x	Girls 7-16 / Boys 8-20	
<b>Accessories</b>  	<b>Hats</b>	NA			
	<b>Hem of Gloves/Mittens</b>	NA		AWR Draw cords Only 1/2 IN. MAX	
	<b>Scarves</b>	NA			
	<b>TIES</b>				
	<b>Hats</b>	AWR = BREAK AWAY FEATURE	AWR 7 IN. MAX	AWR 9 IN. MAX	
	<b>Hem of Gloves/Mittens</b>	NA			
	<b>Scarves</b>	NA	AWR – 58” MAX	AWR – 60” MAX	



# Kohl's Department Stores Product Services

## 4) Drawstring/Drawcord and Tie Finishing

DRAWSTRING, DRAWCORD & TIES					
Product Category	Placement	Newborn/Infant 0-24 months	Toddler 12mo-5T	Little Girl/ Boy 4-7x	Girls 7-16 / Boys 8-20
<b>Finishing of drawstrings / ties</b>  <b>A = Allowed</b>  <b>NA = Not Allowed</b>  <b>AWR = Allowed with Restrictions</b>		Heat Sealed	A No sharp points/sharp edges		
		Turned & Stitched	A No sharp points/sharp edges		
		Bartacking	A No sharp points/sharp edges		
		Thread-Wrapped (Toddler +)	NA 0- 24 mos.	A No sharp points/sharp edges	
		Thread-Wrapped with Secure Stitch	A No sharp points/sharp edges (30 washes and Use and Abuse Testing required)		
		Plastic Tipping	NA 0- 24 mos.	A No sharp points/sharp edges	
		Dipped (Non-Functional)	A No sharp points/sharp edges (30 washes and Use and Abuse Testing required)		
		Dipped (Functional)	NA 0-9mo	A No sharp points/sharp edges (30 washes and Use and Abuse Testing required)	
		Knotted	NA		
		Beading	NA		
	Toggles	NA			

## 25. Float Lengths/Float Yarns

To prevent entrapment, the following float lengths/float yarns guideline must be taken into consideration when designing children's apparel.

24.1 Apparel – Sizes 0 to 5T = Float length should be 3/8" maximum.

24.2 Apparel – Sizes 4 to 20 = Float length should be 1/2" maximum.

24.3 Apparel – Adults = Float length should be 1 inch maximum.

24.3 Socks - Sizes 0 to 5T = Float length should be 3/8" maximum below the heel area and free sewing threads should be no longer than 1/4" maximum.

**Swing tacks** are allowed for apparel – Sizes 12 mo to 20 = length should be 3/4" maximum.



## 26. Monofilament Thread

For apparel and apparel accessories, the use of monofilament thread, i.e., clear thread such as fishing line, to construct any product is prohibited on all children sizes 0-20. See Minimum Construction Standards for guidelines on thread type per application.

## 27. Hanger Straps

Hanger straps, i.e. clear, satin or self fabric, are allowed for structural support provided the straps are at an appropriate length as specified by Kohl's Tech Designer. The following size groups are allowed to use hanger straps:

26.1 Adults – Juniors, Young Men, Women & Men

- Hanger Straps = Allowed

26.2 Children – sizes 4 to 20

- Hanger Straps = Allowed
- Clear Stretch Hanger straps must be able to detach at a maximum of 5 lbs. for 10 seconds.

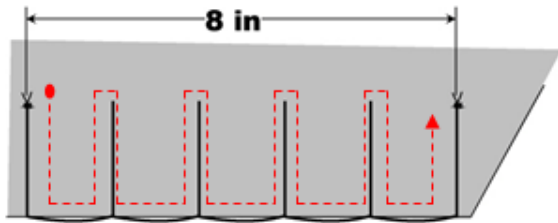
26.3 Newborn, Infant & Toddlers (0-5T)

- Hanger Straps = **Not Allowed**

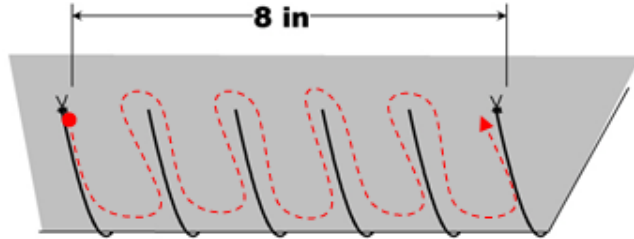


## **28. Blanket Stitch/Whip Stitch**

For Children sizes 0-5T, all garments and accessories with a blanket or whipstitch must be tacked or knotted **every 8" of blanket or whip stitching thread**. Line tack is to be perpendicular (non-parallel) to the edge of the garment. Knotting is to be done on the inside/non-fashion side of the garment or accessory.



**Blanket Stitch**



**Whip Stitch**

## **29. Revision History**

### **29.1 1/2013 Updates**

- A. Updated section 1.3 & 1.4– Flammability
  - Added statement on Children Sleepwear Flammability
  - Added Flame Retardant Finishes/Chemicals
- B. Updated section 2- Formaldehyde
  - Added formaldehyde requirements
- C. Updated section 3.1.A- Composite Testing on Lead in Surface Coating
  - Corrected standard on 2 coating composition, should be 240 ppm.
- D. Updated section 5- Phthalates
  - Removed list of products and added list of materials that contain phthalates.
- E. Updated section 6 – Heavy Metal Content
  - Changed method from ASTM F963-08 to ASTM F963-11.
- F. Added section 9 – pH Value requirements
- G. Updated section 11- Pompoms & Tassels
  - Added Fringe to the standard
- H. Updated section 17.1- Attachment of Fragile Trim
  - Added Durability Evaluation requirements.
  - Clarified rhinestone trims to heat transfer rhinestone.
- I. Updated section 20.2- Sharp points/Sharp Edges
  - Added standards for Adult trim and products
- J. Updated section 20.3- Sequins
  - Provided clarifications and guidelines
- K. Updated section 21 – Zipper Guards
  - Changed guidelines, to be effective for Spring/Summer 2014 and thereafter.
- L. Updated section 22 – Drawstring, Draw Cords & Ties
  - Provided clarification on guidelines and added Length requirements.
- M. Added section 23 – Float Length/Float Yarn Requirements
- N. Updated section 25.2- Hanger Straps
  - Changed attachment strength requirement for Children from minimum to a maximum of 5 lbs. for 10 seconds

### **29.2 5/2013 Updates**

- A. Updated section 2- Formaldehyde
  - Changed JIS method to AATCC 112.
  - Changed Children 0-4T requirement to 20 ppm.
- B. Updated section 3.1.A & B- Composite Testing on Lead in Surface Coating
  - Effective Spring 2014, all adult products must meet a standard of 90 ppm instead of 600 ppm.
- C. Added section 10 - Elastics
- D. Updated section 24 – Float Length/Float Yarn Requirements
  - Specified length requirements for kids and adults.

### **9/2014 Update**

- A. Updated section 10 – Elastics
  - Updated the type of elastic that we will allow – rubber/latex is not allowed when in direct contact with the skin.
  - Updated the example photos

### **12/2014 Update**

## Kohl's Department Stores

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- Updated section 11 small parts and attachment strength- clarified on the fabric applique test result ratings.
- **5/2015 Update**
  - Updated section 18 Attachment of Fragile Trims – added Hot Melt Glitter and fog foil application
- **6/2016 Update**
  - Updated section 3 – Lead in Surface Coating
    - 3.1 – took out Adults composite testing because as of spring 2014, composite testing for children's and adults is the same
  - Updated section 18 – Attachment of Fragile Trims
    - Added hook and eye to embellishment list – okay 7-20 as long as passes attachment strength
    - 18t - Added picture of hook and eye attachment
  - Updated section 23 – Drawstrings, Circular Draw Cords and Ties
    - Under section 4 – Drawstring/ Draw Cord and Tie Finishing – added Thread Wrapped finishing for ages 3 months and up
  - Updated section 24 – Float Lengths/ Float Yarns
    - Added swing tack information – allowed sizes 2T+ - Maximum length 3/4”
- **1/2017 Update**
  - Updated section 6 – Heavy Metal Content
    - Changed Cadmium requirement to 40ppm per Washington State Regulation
  - Updated section 8 – Cadmium
    - Changed Cadmium requirement to 40ppm (0.0040% total weight) per Washington State Regulation
  - Updated section 11 – Small Parts & Attachment Strength
    - Added testing requirement for both before and after wash
  - Updated section 16 – Faux Fur
    - Removed “Real Fur” wording, as no real fur is allowed in any Kohl's Private/ Exclusive Brand product
- **2/2017 Update**
  - Updated section 8 – Heavy Metal Content
    - Added Cadmium requirement for Adults to 75ppm (0.0075% total weight)
  - Updated section 11 - Small Parts & Attachment Strength
    - Added before and after wash requirements for sizes 0 – 5T
  - Updated the 0-4T size requirements to read “0-5T” as the toddler size range increased for our private brands.
  - Updated section 16 – Faux Fur
    - Removed “Real Fur” wording
- **4/2017 Update**
  - Updated Drawstrings – Drawcords & Ties requirements for 0-4T to “0-5T” as the toddler size range increased for our private brands
  - Updated section 2 – Formaldehyde
    - Updated the 0-4T size requirements to read “0-5T” as the toddler size range increased for our private brands.
- **6/2017 Update**
  - Updated Section 23 - Drawstrings – Drawcords & Ties requirements to reflect new maximum length at waist of 2 ½ inches. **(Bolded in RED)**

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- Updated minimum construction verbiage for Drawstrings – “Not more than **2 1/2 inches** of any drawstring/tie is outside the tunneled channel when the garment is extended/expanded to its fullest width and then measured in a relaxed state”
- Updated minimum construction verbiage for Drawcords – “Not more than 2 ½ inches doubled, for a total of 5 inches, of any draw cord should be outside the draw cord channel when the garment is extended/expanded to its fullest width and then measured in a relaxed state.”
- Updated Section 22 - Zipper Guards
  - Added Invisible Zipper– Not recommended for Children’s styles. Due to the properties of invisible zippers, the zipper tab twist requirements usually cannot be met, resulting in a failure.
- **8/2017 Update**
  - Updated Section 23 - Drawstrings, Circular Draw Cords, and Ties to reflect updated minimum construction verbiage and sketches for Drawstrings & Drawcords
    - Minimum Construction verbiage for Drawstrings – “Not more than 2 1/2 inches of either drawstring is outside the drawstring channel when the garment is fully extended, and waistband is flat/ straight, then measured in a relaxed state.”
    - Minimum Construction verbiage for Draw Cords – “Not more than 2 1/2 inches doubled, for a total of 5 inches, of any draw cord is outside the draw cord channel when the garment is fully extended, and waistband is flat/ straight, then measured in a relaxed state.”
    - Updated sketches to be the same as POM sketches for A403 EXP and A403C EXP Points Of Measure
- **3/2018 Update**
  - Updated Section 23 Drawstrings, Circular Draw Cords and Ties to reflect updated sketches for HTM Drawstrings and Drawcords.
- **9/2018 Update**
  - Section 9 – pH Value – updated requirements to 5.0-8.0 (zero tolerance)
  - Section 23 – Drawstrings and Ties – Updated functional ties for Children’s non-outerwear tops at the waist/ sweep measurements and added how to measure guides for reference
  - Section 5 – Phthalates- Updated Phthalates Listed
- **1/2019 Update**
  - Updated Section 23 Drawstrings, Functional Drawstrings and Ties to reflect updated sketches for HTM Drawstrings. Added #4 to include how to measure non-functional ties as well.
  - Added allowable functional drawstrings at the waist for bottoms to include all size ranges with a 2 ½” length max.
- **8/2019 Update**
  - Updated Section 23 Drawstrings, Functional Drawstrings and Ties for Children’s Hats for size ranges 4-20.
    - Sizes 4-6x : Allow up to 7 in. ties on each side
    - Sizes 7-20: Allow up to 9 in. ties on each side
  - Updated Section 11 Small Parts/ Choking Hazard
    - Updated regulatory failure to only include 0-5T.
    - All other sizes as a performance failure.
      - Applies to all Rings/Sliders –

## Kohl's Department Stores Product Services

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REQUIREMENT (for all garments): No detachment at 25 lbs.

DATA ONLY: Report the point at which the trim fails, or if there is no detachment at 50 lbs.

- Applies to Buttons, Snaps, Small Parts, Belt Loops, Zipper Tab, etc. -

REQUIREMENT:

Over 5T - Adult: No detachment at 17 lbs. for 10 seconds

DATA ONLY: Report the point at which the trim fails, or if there is no detachment at 50 lbs.

\*\*Must test in original state, after 1 wash, and after 5 washes

- Applies to Plastic Hanger Loops –

REQUIREMENT: No detachment at 5 lbs.

DATA ONLY: Report the point at which the trim fails, or if there is no detachment at 50 lbs.

- Over 5T – Adult -

Fragile trims: beads, rhinestones, etc. = 5 lbs. for 10 seconds minimum

- **11/2019 Update**

- Updated Section 23.2 Drawstrings, Functional Drawstrings and Ties for Children's Non-outerwear (Apparel)
  - Ties for size range 0-24 mos. And Toddlers (2T – 5T) to 2 ½ in for pre-tac bow tail measurement at waist/ hem/ sweep of top, head/ neck shoulder and sleeves on top
- Updated Section 18 Fragile Trim Evaluation
  - Hot Melt Glitter – updated to allow in 12-24 months

- **08/2021 Update**

- Updated size ranges for Infant (0-9mos.) and Toddler (12mos. – 5T) throughout the entire document to align with the current toddler size range in house.
- Updated How To Measure guides for functional ties as the waist for tops, functional drawstrings on bottoms and functional drawcords on bottoms.
- Updated Section 23.2 Drawstrings, Functional Drawstrings and Ties for Children's

- 4) Drawstring/Drawcord and Tie Finishing

- Thread wrapped finishing for ties/ drawstrings:
  - Not Allowed for 0 - 9 month sizes
  - Allowed for Toddler (12 months – 5T) sizing and up

- **10/2021 Update**

- Re-Updated size ranges for Infant (0-24mos.) and Toddler (12mos. – 5T) throughout the entire document to align with the current infant / toddler size range in house.

- **03/2022 Update**

- Updated zipper guard requirements for reversible outerwear
- Updated Finishings of Drawcords/Drawstring & Ties pg 35.
  - Thread-Wrapping with Secure stitch has been added
  - Dipped tips has been added

- **03/2022 Update**

- Added PFAS Requirements