



Kroger General Merchandise Children's Product

Regulatory Compliance Checklists

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The Kroger Co.

General Merchandise Regulatory Compliance

GMCompliance@kroger.com

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1. Introduction

As a part of the Kroger Customer 1st promise, we strive to provide safe and compliant general merchandise to consumers. It is an essential requirement that all general merchandise supplied to Kroger comply with all US federal and state legislations, laws and regulations.

In recent years, more and more legislation and regulations are published concerning children's product safety. It is a challenge for the supply chain to keep up with changes and new regulations, especially for vendors and suppliers with limited resources. The regulatory compliance checklists are developed as a screening tool to assist vendors and suppliers to review and identify applicable regulations and laws for children's products.

There is a total of 19 regulatory compliance checklists for children's products included in this manual. Each checklist is designed for the specific product category as indicated in the checklist. It contains the minimum regulatory requirements. When multiple regulations are applicable for the same item, such as phthalate, the most stringent requirement is included.

It should be noted that:

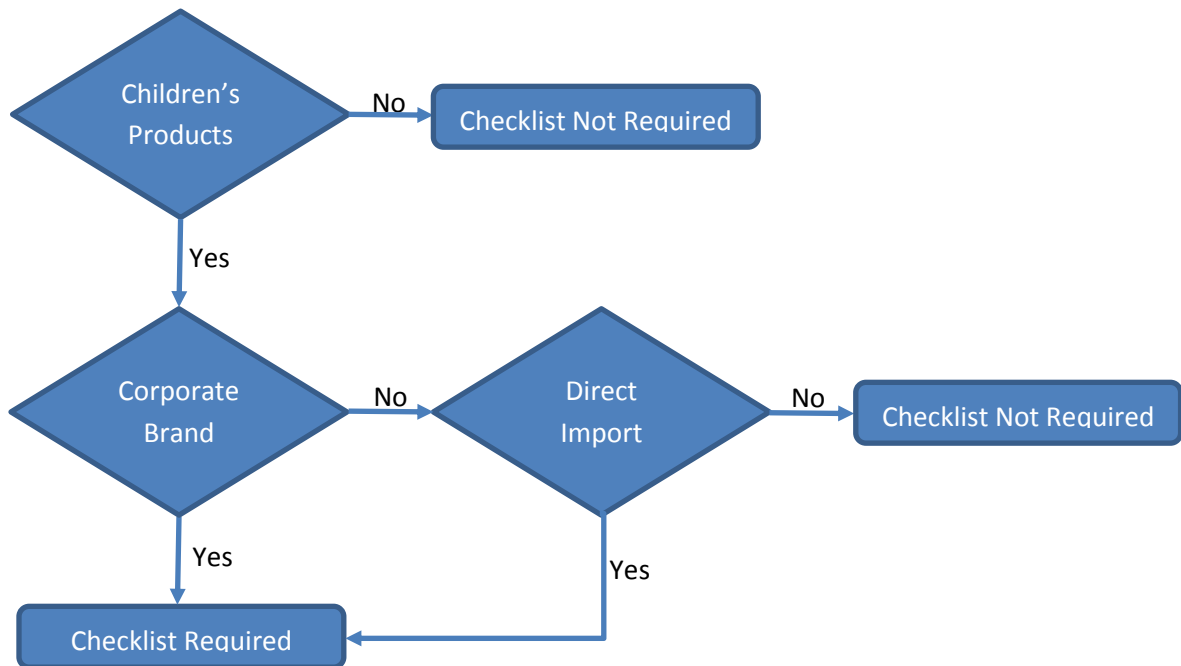
- The checklist is not a testing protocol. Private label or directly imported products are required to test according to [Kroger testing protocols](#).
- As a screening tool, the checklists do not accommodate comprehensive compliance requirements. They should not be construed as law. All vendors and suppliers are required to comply with all applicable regulations and perform testing, labeling, certification, documentation, licensing, registration and reporting responsibility as applicable.
- The checklist is developed for The Kroger Co. approved vendors, factories and suppliers and CANNOT be distributed outside of the Kroger supply chain.

2. Who needs the regulatory compliance checklists?

All vendors and suppliers providing Kroger the following product will need to review the checklist and follow the process specified in Section 3.

- Corporate brand products, or
- Directly imported products

The following flow chart identifies products needing the checklists.



3. Is there a process in place for vendors to follow?

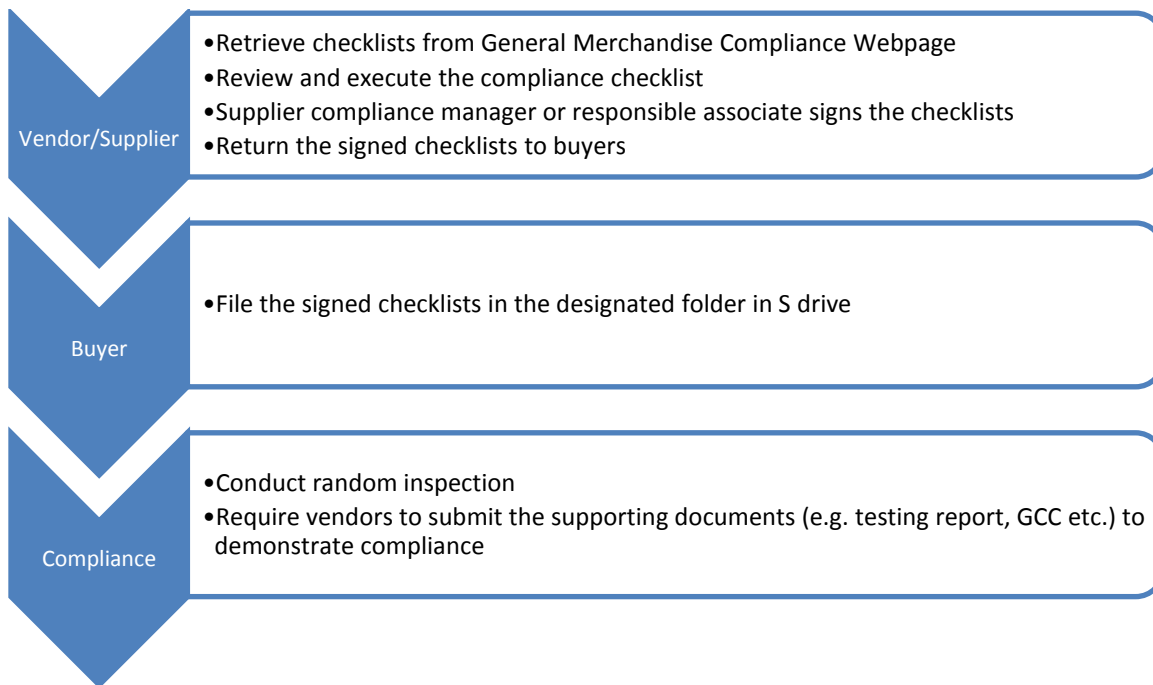
The vendor should select all applicable checklists for their product categories and understand requirements outlined in the checklists. The supplier compliance manager or the dedicated compliance associate in the company shall sign each applicable checklist to acknowledge the receipt of checklist, confirm the understanding of requirements, and agree to perform testing, labeling, certification, documentation, registration, licensing and reporting obligations as applicable.

The signed checklists shall be sent to buyers. The file name shall be “vendor business name_year_month”, for instance, “ABCcompany_2016_05”. Then, the vendor is eligible to accept purchase orders. If checklist not completed, PO will not be processed.

Each vendor only needs to submit one signed copy of each applicable checklist to the buyer. DO NOT submit checklist for each individual order, shipment or product.

For example, if you produce children’s jewelry and clothing only (without sleepwear and costumes), the vendor needs to submit one signed jewelry checklist and one signed clothing checklist.

The following flow chart demonstrates the process and responsibility of each party.



4. Where to find the checklists?

All regulatory compliance checklists for children’s products are maintained on the following Kroger General Merchandise Compliance webpage.

<http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>

The checklists will be updated upon the changes of regulations and Kroger’s policy. It is recommended to visit the webpage before meeting buyers for the most updated versions.

Buyers can also find the checklists in S drive at the following location:

<S:\BUY\ GM\Compliance\Regulatory Compliance Checklists\Master Checklist and SOP>

5. As a vendor/supplier, how should I use the checklists?

A checklist includes minimum regulatory requirements and should be used as a screening tool. A product needs to be classified appropriately to identify the applicable checklist(s). The vendor is recommended to review each product against the applicable checklist to make sure all regulatory requirements are met or fulfilled.

6. Do I have to test to the checklists?

Yes, tests have to be done to demonstrate compliance and product quality. Corporate brand or direct imported products must be tested per [Kroger testing protocols](#). The checklist outlines regulatory requirements and recommended testing methods.

7. What should I do if checklists are updated?

Key updates of checklists will be communicated to vendors/suppliers through the buying team. The vendor shall review the update and implement the change. The updated checklist shall be signed and sent to buyers.

8. As a buyer, where should the signed checklists be filed and maintained?

A folder in the S drive has been created to facilitate management of signed checklists. Each buying desk has a designated folder in the following location to file and manage the signed checklists.

<S:\BUY\ GM\Compliance\Regulatory Compliance Checklists>

9. Do you have an example of signed checklists?

An example of a signed checklist is attached at the end of this manual.

10. How does Kroger monitor the process?

The compliance team conducts the random inspection. Vendors will be contacted by the compliance team and are required to submit supporting documents, such as testing reports and Certificate of Compliance, to demonstrate compliances.

11. What checklists are available?

19 checklists are included in this manual for the following children's products.

- Children's Accessories
- Children's Art Materials and School Supplies
- Children's Clothing
- Children's Costumes
- Children's Food Contact Articles
- Children's Footwear
- Children's Furniture
- Children's Furniture – Upholstery
- Children's Home Textiles
- Children's Jewelry
- Children's Mattress and Mattress Pad
- Children's Rugs and Carpets
- Children's Sleeping Bags
- Children's Sleepwear
- Children's Sunglasses
- Children's Toys
- Children's Toys - Cosmetics

- Children's Toys - Electronics
- Children's Toys - Plush
- Example of a Signed checklist

If you are not sure which checklist is applicable for your product, please contact General Merchandise Regulatory Compliance Team at GMCompliance@kroger.com.

If the above checklists are not applicable for your products, also contact GMCompliance@kroger.com to let them know.



Regulatory Compliance Checklist for Children’s Accessories

This checklist identifies US regulatory requirements for children’s accessories, such as belt, handbag, headwear, excluding jewelry and sunglasses, sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and paint/coating	≤ 90 ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-C1001-09.3
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Fiber Label (if wool or real fur present)	Meet 16 CFR 300/301	Review by lab
Leather Labeling Guide	Meet 16 CFR 24	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Feather or down label	Meet USA-2000 labeling standards	Review by lab
Uniform Packaging and Labeling Regulations (on package)	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Reporting		
Washington Children’s Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Others		
Special functional claim	Need substantiation test	Determined based on claims
General Certification of Conformity	Follow Kroger specification	Prepared by vendor

1. Kroger requirements available on Kroger General Merchandise Compliance webpage <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If other category product attached to or packed with accessories, such as toy, other applicable checklist(s) should be reviewed as well.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com .

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children’s Art Materials and School Supplies
(Excluding Electronics and Toys)

This checklist identifies US regulatory requirements for art materials and school supplies, excluding electronics and toys, sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Hazardous Liquids	Not Allowed 16CFR 1500.231	Best lab practices or Certificate
Hazardous Substances	Meets 16 CFR 1500.3(a)(15)	Review by vendor/factory/supplier
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Flame Retardants	Not Allowed	Best lab practices or certificate
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
LHAMA evaluation in art materials	Meet 16 CFR 1500.14 label requirements and testing or document review	ASTM D4236
Lead in Paint, Coating and Substrate	If Lead is present at or above 40ppm, label required for Illinois	CPSC CH-E1003-09.1
CARB Label and Certificate	Composite Wood Title 17 California section 93120.7(d) documentation and label requirement	Review by lab
Uniform Packaging and labeling regulations	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Pressurized container label	Meet requirements of 16 CFR 1500.130	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Suffocation Warning Label for Plastic Bags	Meet Massachusetts and Kroger requirements ¹	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
Flammability	16 CFR 1500.44	16 CFR 1500.44
Flash point of combustible liquids	16 CFR 1500.3(c)(6)(iii) For Ages 8 or younger shall have flash point of 150°F or 65.6°C	16 CFR 1500.43(a)
Flammability of pressurized containers	16 CFR 1500.3(c)(6)(viii) For ages 8 and over only	16 CFR 1500.45
Reporting		
Washington Children’s Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Mechanical Hazards	Meet 16 CFR 1500.18 and 16 CFR 1501	Reviewed by vendor/supplier/lab
Sharp point and sharp edge	Not Allowed	16 CFR 1500.48 and .49
Small Parts	Not Allowed	16 CFR 1501
Others		
Antimicrobial	If pesticide used, need to register with EPA	NA
Label Claim	Need substantiation test	Determined based on claim
General Certification of Conformity	Follow Kroger specification	Prepared by vendor

1. Kroger requirements available on Kroger General Merchandise Compliance webpage <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If other category product attached to or packed with art materials and school supplies, other applicable checklist(s) should be reviewed as well.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com .

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children’s Clothing
(Excluding Sleepwear and Costumes)

This checklist identifies US regulatory requirements for children’s clothing, including scarves and gloves, but excluding sleepwear and costumes but sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal:CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Sum of lead, cadmium, mercury and hexavalent chromium	<u>≤ 100ppm for disposable package</u>	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Care Instruction Label	Meet 16 CFR 423	Review by lab
Country of Origin	Meet 19 CFR 134/16 CFR 303	Review by lab
Fiber Label	Meet 16 CFR 300/301/303	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Leather Labeling Guide	Meet 16 CFR 24	Review by lab
Feather or down label	<u>Meet USA-2000 labeling standards</u>	Review by lab
Uniform Packaging and Labeling Regulations (on package)	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
Flammability of clothing	Class 1	16 CFR 1610
Reporting		
Washington Children’s Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Drawstring requirements	16 CFR 1120, WI ATCP 139.06 and NY 391.b	ASTM F1816-97
Others		
Licensing requirements at Utah	<u>Filled or quilted garments with fillings must be licensed with State of Utah</u>	Review by lab
General Certification of Conformity	<u>Follow Kroger specification</u>	Prepared by vendor
Special functional claim	Need substantiation test	Determined based on claims
Antimicrobial	If pesticide used, need to register with EPA	Vendor register with EPA

1. Additional information available on Kroger General Merchandise Compliance webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
 2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
 3. If other category product attached to or packed with clothing, such as jewelry, other applicable checklist should be reviewed as well.
- For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com.

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children's Costumes

This checklist identifies US regulatory requirements for children's costumes sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Heavy metals	Meet ASTM F963-11 requirements	ASTM F963-11
Cadmium	≤ 40ppm	Best lab practices
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Care Instruction Label	Meet 16 CFR 423	Review by lab
Country of Origin	Meet 19 CFR 134/303	Review by lab
Toy Labels (e.g. warning label, age label etc.)	Meet ASTM F963-11 requirements	Review by lab
Lead in Paint, Coating and Substrate	If Lead ≥ 40ppm, label required for Illinois	CPSC CH-E1003-09.1
Fiber Label	Meet 16 CFR 300/301/303	Review by lab
Warning label as applicable	ASTM F963-11	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Leather Labeling Guide	Meet 16 CFR 24	Review by lab
Feather or down label	Meet USA-2000 labeling standards	Review by lab
Uniform Packaging and labeling regulations	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Stuffed Toy Label	Meet State requirements Pennsylvania, Ohio and Massachusetts, Toy licensing and labeling	Review by lab
Flammability		
Flammability of clothing	Class 1	16 CFR 1610
Reporting		
Washington Children's Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
All Toys Mechanical and Physical Hazards	Meet ASTM F963-11 requirements	ASTM F963-11
Others		
Licensing requirements at Utah	Filled or quilted garments with fillings must be licensed with State of Utah	Review by lab
General Certification of Conformity	Follow Kroger specification	Prepared by vendor
Special functional claim	Need substantiation test	Determined based on claims
Antimicrobial	If pesticide used, need to register with EPA	Vendor register with EPA

1. Kroger requirements available on Kroger General Merchandise Compliance webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>

2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.

3. If other category product attached to or packed with costumes, such as jewelry, other applicable checklist should be reviewed as well.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com.

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____

Date _____



Regulatory Compliance Checklist for Children's Food Contact Articles
(Excluding Electronics and Toys)

This checklist identifies US regulatory requirements for food contact articles, excluding electronics, and toys, sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Total Lead in Substrate and Coating/Print materials	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Hazardous Liquids	Not Allowed 16 CFR 1500.231, Limited amounts 16 CFR 1500.14(a)(1-5)	Best lab practices or Document
Hazardous Substances	Meet 16 CFR 1500.3(a)(15)	Review by vendor/factory/supplier
Polymers and resins	Meet FDA food contact requirements for all polymers and resins 21 CFR 175-177, 181.32	21 CFR 170-189
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Leachable Cadmium and lead in Ceramic	Meet FDA CPG 7117.06 and 7117.07 and FDCA Section 402(a)(2)(c) requirements	ASTM 927
Leachable Cadmium and Lead in enamel metalware , pewter, porcelain or stoneware	Meet California 108870 requirements	ASTM C738
Total Cadmium	≤ 40 ppm	Best lab practices
BPA Content (for polycarbonate and epoxy coating)	Not Detected	Best lab practice
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Lead in Paint, Coating and Substrate	If Lead ≥ 40ppm, label required for Illinois	Review by lab
Food additive / food ingredient list	Meets Food labeling and ingredient list, FDA 21 CFR 101/21 CFR 73,74,82,170-189, ASTM F963-11	Review by lab
Uniform Packaging and labeling regulations	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Suffocation Warning Label for Plastic Bags	Meet Massachusetts and Kroger requirements ¹	Review by lab
All Tableware	California 108870, permanent mark required if lead or cadmium is intentionally or unintentionally present	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
Flammability	Meets 16 CFR 1500.44	16 CFR 1500.44
Reporting		
Washington Children's Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
All metal components are constructed of FDA grade of stainless steel	Metal Articles FDA Substances Generally Recognized as Safe (GRAS) 21 CFR 175-177	21 CFR 170.39/ASTM E1086-94 or document review
General Certification of Conformity	Follow Kroger specification	Prepared by vendor
Mechanical hazards	Meet 16 CFR 1500.18	Review by vendor/supplier/lab
Sharp point, sharp edge and small part	Not allowed	16 CFR 1500.48 and .49 and 16 CFR 1501
Closures with sealing gaskets	Meets FDA 21 CFR 177.1210 requirements	Best lab practices
Food contact surfaces for Equipment, Utensils and Linens, material and uses list.	Meet Food Code 2009: Chapter 4-101. Includes Wood, Cast Iron, Copper, Galvanized Metal etc.	Review by lab

1. Kroger requirements available on [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If other category product attached to or packed with food contact articles, other applicable checklist(s) should be reviewed as well.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com .

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____

Date _____



Regulatory Compliance Checklist for Children’s Footwear

This checklist identifies US regulatory requirements for children’s footwear sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal:CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Uniform Packaging and Labeling Regulations	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Leather Labeling Guide	Meet 16 CFR 24	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Fiber Label (if wool present)	Meet 16 CFR 300	Review by lab
Reporting		
Washington Children’s Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Others		
Special functional claim	Need substantiation test	Determined based on claims
General Certification of Conformity	Follow Kroger specification	Prepared by vendor

1. Kroger requirements available on [Kroger General Merchandise Compliance webpage](#).

<http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>

2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.

3. If other product category attached to or packed with footwear, other applicable checklists should be reviewed. When electronic component included, additional requirements may apply.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com .

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children’s Furniture
(Excluding Upholstered)

This checklist identifies US regulatory requirements for children’s furniture, excluding upholstered, sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Flame Retardants	Not Allowed	Best lab practices or certificate
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Toy Chest	Meet ASTM F963-11 incorporated by reference ASTM F834 section 3 label requirement	Review by lab
Bunk Beds	Meet 16 CFR 1513.5	Review by lab
Lead in Paint, Coating and Substrate	If Lead ≥ 40ppm, label required for Illinois	CPSC CH-E1003-09.1
CARB Label and Certificate	Composite Wood Title 17 California section 93120.7(d) documentation and label requirement	Review by lab
Uniform Packaging and labeling regulations	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Hazardous Substances	Meet 16 CFR 1500.14(b)(1-5) Labeling	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Suffocation Warning Label for Plastic Bags	Meet Massachusetts and Kroger requirements ¹	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
Flammability	16 CFR 1500.44	16 CFR 1500.44
Reporting		
Washington Children’s Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Mechanical Hazards	Meet 16 CFR 1500.18 and 16 CFR 1501	Reviewed by vendor/supplier/lab
Sharp point and sharp edge	Not Allowed	16 CFR 1500.48 and .49
Small Parts	Not Allowed	16 CFR 1501
Toy Chest	Meet ASTM F963-07e1 section 4.27, ASTM F834 incorporated by reference	ASTM F834
Bunk Beds	Meets 16 CFR Part 1513/ASTM F1427	16 CFR Part 1513.4 (w/appendix)
Durable Infant or Toddler’s Product	CPSC Mandatory ASTM requirements 16 CFR 1215-1227 with Product Registration Cards 16 CFR Part 1130 Infant and Toddler List	16 CFR 1215-1227
Others		
Label Claim	Need substantiation test	Determined based on claim
General Certification of Conformity	Follow Kroger specification	Prepared by vendor
Product Safety Standards	Meets ASTM and other voluntary product safety standards, including labeling. US Code Title 15 Chapter 47 section 2056 (b)(1-2)	Safety standard based test method

1. Kroger requirements available on Kroger General Merchandise Compliance webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If other category product attached to or sold together with furniture, other applicable checklist(s) should be reviewed as well.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com.

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____

Date _____



Regulatory Compliance Checklist for Children’s Furniture - Upholstery

This checklist identifies US regulatory requirements for children’s upholstered furniture, such as upholstered arm chair, bean bag chair etc., sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and paint/coating	≤ 90 ppm	Metal:CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-C1001-09.3
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Flammable Retardants	Not allowed	Best lab practices or Certificate
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Fiber Label	Meet 16 CFR 300/301/303	Review by lab
Uniform Law Label	Meet state requirements	Review by lab
Flammability label	Meet California CCR Title 4 Division 3 Article 13 §1374.3	Review by lab
Flame retardant label	Meet CA SB 1019 to label if flame retardants present or absence	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Feather or down label	Meet USA-2000 labeling standards	Review by lab
Uniform Packaging and Labeling Regulations (on package)	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
California CARB certificate and label	Composite Wood Title 17 California section 93120.7(d) documentation and label needed	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
CA Technical Bulletin 117	Meet TB 117 requirements	CA TB 117-2013
Reporting		
Washington Children’s Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Others		
Licensing requirements at 15 states	Register with 15 states	Review by lab
General Certification of Conformity	Follow Kroger specification	Prepared by vendor
Special functional claim	Need substantiation test	Determined based on claims
Antimicrobial	If pesticide used, need to register with EPA	Vendor register with EPA

1. Additional information available on [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If other category product attached to or packed with furniture, such as toy, other applicable checklist(s) should be reviewed as well.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com .

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children’s Home Textiles
(Excluding Upholstered Furniture, Mattress and Mattress Pad)

This checklist identifies US regulatory requirements for children’s home textiles (such as pillow, bed sheet, towel etc.) excluding upholstered furniture, mattress and mattress pad, sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as laws. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and paint/coating	≤ 90 ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-C1001-09.3
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Sum of lead, cadmium, mercury and hexavalent chromium	<u>≤ 100ppm for disposable package</u>	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Country of Origin	Meet 19 CFR 134/16 CFR 303	Review by lab
Fiber Label	Meet 16 CFR 300/301/303	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Uniform Law Label (if stuffed)	<u>Meet state requirements</u>	Review by lab
Feather or down label	<u>Meet USA-2000 labeling standards</u>	Review by lab
Uniform Packaging and Labeling Regulations	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Reporting		
Washington Children’s Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Others		
Licensing requirements at 15 states	<u>Register with 15 states</u>	Review by lab
General Certification of Conformity	<u>Follow Kroger specification</u>	Prepared by vendor
Special functional claim	Need substantiation test	Determined based on claims
Antimicrobial	If pesticide used, need to register with EPA	Vendor register with EPA

1. Kroger requirements available on [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If other category product attached to or packed with home textiles, such as toy, other applicable checklist(s) should be reviewed as well. For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com.

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children’s Jewelry

This checklist identifies US regulatory requirements for children’s jewelry sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or Kroger requirement ¹	Review by lab
Uniform Packaging and Labeling Regulations	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Leather Labeling Guide	Meet 16 CFR 24	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Warning for lead	Illinois Lead Poisoning Prevention Act requires warning if lead is above 40ppm	Review by lab
Flammability		
Flammability of solid	Not greater than 0.1 in/sec	16 CFR 1500.44
Reporting		
Washington Children’s Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Others		
Special functional claim	Need substantiation test	Determined based on claims
General Certification of Conformity	Follow Kroger specification	Prepared by vendor

1. Kroger requirements available on [Kroger General Merchandise Compliance webpage](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance). <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If toy jewelry, the toy checklist shall be reviewed as well. When electronic component included, additional requirements may apply.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com .

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children’s Mattress and Mattress Pad

This checklist identifies US regulatory requirements for children’s mattresses and mattress pads sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and paint/coating	≤ 90 ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-C1001-09.3
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Flammable Retardants (TDCPP, TCEP, TDBPP, TCPP, PentaBDE, OctaBDE, DecaBDE, HBCD, TRIS, TBBPA)	Not allowed	Best lab practices or certificate
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Uniform Law Label	Meet state requirements	Review by lab
Country of Origin	Meet 19 CFR 134/16 CFR 303	Review by lab
Fiber Label (for mattress pad)	Meet 16 CFR 300/301/303	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Flammability Label	Meet 16 CFR 1632/1633 labeling requirements	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Warning for lead	Illinois Lead Poisoning Prevention Act requires warning if lead is above 40ppm	Review by lab
Flammability		
Flammability of Mattress and Mattress Pad	Meet 16 CFR 1632/1633	16 CFR 1632/1633
Reporting		
Washington Children’s Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshol ¹	Best lab practices
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Others		
Licensing requirements at 15 states	Register with 15 states	Review by lab
General Certification of Conformity	Follow Kroger specification	Prepared by vendor
Special functional claim	Need substantiation test	Determined based on claims
Antimicrobial	If pesticide used, need to register with EPA	Vendor registers with EPA

1. Kroger requirements available on [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>

2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.

3. If other category product attached to or sold with mattress or mattress pad, other applicable checklist(s) should be reviewed as well. For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com .

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children’s Rugs and Carpets

This checklist identifies US regulatory requirements for children’s carpets and rugs sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate	≤ 100 ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3
Lead in paint/coating	≤ 90 ppm	Coating: CPSC-CH-C1001-09.3
Flammable Retardants (TDCPP, TCEP, TDBPP, TCPP, PentaBDE, OctaBDE, DecaBDE, HBCD, TRIS, TBBPA)	Not allowed	Best lab practices or certificate
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Country of Origin	Meet 19 CFR 134/16 CFR 303	Review by lab
Fiber Label	Meet 16 CFR 300/301/303	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Label on flame retardant	Meet 16 CFR 1630/1631, label “T” if treated with fire-retardants	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Uniform Packaging and Labeling Regulations	Meet NIST Uniform Laws and Regulations Handbook 130	Review by lab
Flammability		
Flammability of Carpets and Rugs	Meet 16 CFR 1630/1631	16 CFR 1630/1631
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Others		
Special functional claim	Need substantiation test	Determined based on claims
General Certification of Conformity	Follow Kroger specification	Prepared by vendor

1. Kroger requirements available on the [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage.
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If other category product attached to or sold with carpets or rugs, other applicable checklist(s) should be reviewed as well.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com.

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children's Sleeping Bag (Excluding Infant Sleep Sack)

This checklist identifies US regulatory requirements for children's sleeping bags, excluding infant sleep sack, sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and paint/coating	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Paint/coating: CPSC-CH-E1003-09.1
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Flammable Retardants (TDCPP, TCEP, TDBPP, TCPP, PentaBDE, OctaBDE, DecaBDE, HBCD, TRIS, TBBPA)	Not Allowed	Certificate or Best Lab Practices
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Uniform Law Label	Meet state requirements	Review by lab
Country of Origin	Meet 19 CFR 134/16 CFR 303	Review by lab
Fiber Label	Meet 16 CFR 300/301/303	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Uniform Packaging and Labeling Regulations (on package)	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Feather or down label	Meet USA-2000 labeling standards	Review by lab
Flammability Label	Meet CPAI 75 requirements	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
Flammability of sleep bag	Meet CPAI 75 requirements	CPAI 75
Reporting		
Washington Children's Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Others		
General Certification of Conformity	Follow Kroger specification	Prepared by vendor
Licensing requirements at 15 states	Register with 15 states	Review by lab
Special functional claim	Need substantiation test	Determined based on claims

1. Kroger requirements available on [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If other category product attached to or packed with sleep bag, other applicable checklist should be reviewed as well. For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com.

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children's Sleepwear

This checklist identifies US regulatory requirements for children's sleepwear sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Flammable Retardants (TDCPP, TCEP, TDBPP, TCPP, PentaBDE, OctaBDE, DecaBDE, HBCD, TRIS)	Not allowed	Best lab practices or certificate
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 and/or Kroger requirements ¹	Review by lab
Care Instruction Label	Meet 16 CFR 423/16 CFR 1615/1616	Review by lab
Country of Origin	Meet 19 CFR 134/16 CFR 303	Review by lab
Fiber Label	Meet 16 CFR 300/301/303	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Tight Fitting - Snug-fitting, not flame resistant	16 CFR 1615.1(o)(11)/1616.2(m)(11)	Review by lab
Tight Fitting – hangtag/package	16 CFR 1615.1(o)(10)/ 1616.2(m)(10)	Review by lab
Loose fitting - FPU/GPU	Meet 16 CFR 1615/1616	Review by lab
Size	Meet 16 CFR 1615/1616	
Precaution label if any agent or treatment cause deterioration of flame resistance	Meet 16 CFR 1615/1616	Review by lab
Warning for lead	Illinois Lead Poisoning Prevention Act requires warning if lead is above 40ppm	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
Flammability – Tight Fitting Sleepwear	Class 1	16 CFR 1610
Flammability – Loose fitting sleepwear	Average char length ≤ 7 in No individual char length of 10 in	16 CFR 1615/1616
Reporting		
Washington Children's Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Drawstring requirements	Meet WI ATCP 139.06 and NY 391.b	ASTM F1816-97
Others		
General Certification of Conformity	Follow Kroger specification	Prepared by vendor
Licensing requirements at Utah	Filled or quilted garments with fillings must be licensed with State of Utah	Review by lab
Special functional claim	Need substantiation test	Determined based on claims
Antimicrobial	If pesticide used, need to register with EPA	Vendor register with EPA

- Kroger requirements available on [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
 - Lab usually performs screening test based on existing settlements (base measure) It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
 - If other category product attached to or packed with sleepwear, such as toy, other applicable checklist(s) should be reviewed as well. If leather, down or feather present, additional requirements may apply.
- For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com .
Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____

Date _____



Regulatory Compliance Checklist for Children’s Sunglasses

This checklist identifies US regulatory requirements for children’s sunglasses sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and paint/coating	≤ 90 ppm	Metal:CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-C1001-09.3
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Labeling requirement for over-the-counter sunglasses	Meet 21 CFR 801.1, 60, 61 and 62	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Uniform Packaging and Labeling Regulations (on package)	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Len’s impact resistance	No Fracture	21 CFR 801.410
Others		
General Certification of Conformity	Follow Kroger specification	Prepared by vendor
Special functional claim	Need substantiation test	Determined based on claims

1. Kroger requirements available on [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If other category product attached to or packed with children’s sunglasses such as toy, other applicable checklist(s) should be reviewed as well.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com .

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children's Toys

(Excluding Electronics, Costumes, Art Materials, Cosmetics, Food Contact Articles and Plush Toys)

This checklist identifies US regulatory requirements for toys, excluding electronics, costumes, art materials, cosmetics, food contact articles and plush toys, sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Hazardous Substances	Meets ASTM F963-11 Section 4.3.1	Review by vendor/factory/supplier
Heavy Metals	Meets ASTM F963-11 section 4.3.5	ASTM F963-11
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Flame Retardants	Not Allowed	Best lab practices or certificate
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Toy Labels (e.g. warning label, age label etc.)	Meet ASTM F963-11 requirements	Review by lab
Lead in Paint, Coating and Substrate	If Lead ≥ 40ppm, label required for Illinois	CPSC CH-E1003-09.1
Chemistry & Science Set	Meet 16 CFR 1500.83(a)(23)	Review by lab
CARB Label and Certificate	Composite Wood Title 17 California section 93120.7(d) documentation and label requirement	Review by lab
Uniform Packaging and labeling regulations	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Pressurized container label	Meet requirements of 16 CFR 1500.130	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Suffocation Warning Label for Plastic Bags	Meet Massachusetts and Kroger requirements ¹	Review by lab
Stuffed Toy Label	Meet State requirements Pennsylvania, Ohio and Massachusetts, Toy licensing and labeling	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
Flammability of solids, soft toys and fabrics	ASTM F963-11	ASTM F963-11
Flash point of combustible liquids	16 CFR 1500.3(c)(6)(iii) For Ages 8 or younger shall have flash point of 150°F or 65.6°C	16 CFR 1500.43(a)
Flammability of pressurized containers	16 CFR 1500.3(c)(6)(viii) For ages 8 and over only	16 CFR 1500.45
Reporting		
Washington Children's Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Mechanical Hazards	Meet 16 CFR 1500.18	Reviewed by vendor/supplier/lab
All Toys Mechanical and Physical Hazards	ASTM F963-11	ASTM F963-11
Others		
General Certification of Conformity	Follow Kroger specification	Prepared by vendor
Licensing for stuffed toy	Meet Licensing Requirements in Pennsylvania, Ohio and Massachusetts Toy licensing and labeling	Review by lab
Toy Gun Marking	Meet 15 CFR 1150 ASTM F963-11 section 4.3	Review by lab

1. Kroger requirements available on [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>

2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.

3. If other category product attached to or packed with the toy, other applicable checklist(s) should be reviewed as well.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com.

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____

Date _____



Regulatory Compliance Checklist for Children's Toys - Cosmetics

This checklist identifies US regulatory requirements for children's cosmetics as toy, sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Hazardous Substances	Meet ASTM F963-11 section 4.3.1	Review by vendor/factory/supplier
Heavy Metals	Meet ASTM F963-11 section 4.3.5	ASTM F963-11
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Mercury	Not Detected 21 CFR 700.13, Illinois Mercury added Prohibition Act	Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
FDA Ingredient list and label	Meet 21 CFR 73,74,81,82,700-740, ASTM F963-11	Review by lab
Lead in Paint, Coating and Substrate	If Lead ≥ 40ppm, label required for Illinois	CPSC CH-E1003-09.1
Uniform Packaging and labeling regulations	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Suffocation Warning Label for Plastic Bags	Meet Massachusetts and Kroger requirements ¹	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
Flammability	16 CFR 1500.44	16 CFR 1500.44
Reporting		
FDA Cosmetic Registration	VCRP ingredient registration	ASTM-F963-11
California Safe Cosmetics Act	Reporting requirements for 904 Chemicals	Reviewed by supplier/factory/lab
Washington Children's Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Specific Cosmetic Products	Meets 21 CFR 700-740 requirements	Best lab practices
Color Additives	Meets 21 CFR 73, 74, 81, and 82 requirements	Best lab practices
Sharp point and sharp edge	Not Allowed	16 CFR 1500.48 and .49
Small Parts	Not Allowed	16 CFR 1501
Others		
General Certification of Conformity	Follow Kroger specification	Prepared by vendor
Color Additives	Meets FD&C Act Sec 721;21USC 379e; 21 CFR Parts 70 and 80	Review by lab
Special Label Claim	Need substantiation test	Determined based on claim

1. Kroger requirements available on [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If other category product attached to or packed with cosmetics, such as jewelry, other applicable checklist(s) should be reviewed as well.

For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com .

Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children's Toys - Electric
(Excluding, Costumes, Art Materials, Cosmetics and Food Contact Articles)

This checklist identifies US regulatory requirements for electronic toys, excluding costumes, art materials, cosmetics and food contact articles toys, sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Heavy Metals	Meets ASTM F963-11 section 4.3.5	ASTM F963-11
Mercury Content in Batteries	Not allowed in button cell. Meets Public Law 104-142 regarding phase out of mercury content, marking and labeling	Best lab practice
Hazardous Substances	Meets ASTM F963-11 Section 4.3.1	Review by vendor/factory/supplier
Sum of lead, cadmium, mercury and hexavalent chromium	<u>≤ 100ppm for disposable package</u>	Certificate of Compliance or Best lab practices
Flame Retardants (TDCPP, TCEP, TDBPP, TCPP, PentaBDE, OctaBDE, DecaDBE, HBCD, TRIS, TBBPA)	Not Allowed	Best lab practices or Certificate
Labeling		
Tracking Label	Meet CPSIA Section 103 and/or Kroger requirements ¹	Review by lab
Toy Labels (e.g. warning label, age label etc.)	Meet ASTM F963-11 requirements	Review by lab
Label requirements for electrically operated toys	Federal Hazardous Substance Act (FHSA) 16 CFR 1505.3	Review by lab
Lead in Paint, Coating and Substrate	If Lead ≥40ppm, label required for Illinois	Review by lab
CARB Label and Certificate	Composite Wood Title 17 California section 93120.7(d) documentation and label requirement	Review by lab
Uniform Packaging and labeling regulations	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
FCC Part 15	Meet Label and documentation requirements	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Suffocation Warning Label for Plastic Bags	Meet Massachusetts and Kroger requirements ¹	Review by lab
Stuffed Toy Label	Meet Pennsylvania, Ohio and Massachusetts <u>toy licensing and labeling</u> requirements.	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
Flammability	ASTM F963-11	ASTM F963-11
Reporting		
Washington Children's Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
Mechanical Hazards	Meet 16 CFR 1500.18	Reviewed by vendor/supplier/lab
All Toys Mechanical and Physical Hazards	ASTM F963-11	ASTM F963-11
Battery operated toys	ASTM F963-11 section 4.25	ASTM F963-11
Electrically operated toys	ASTM F963-11 section 4.4 & 16 CFR 1505	16 CFR 1505
Electrically Operated Toys	Meet FHSA 16 CFR Part 1505.4—8	Executed by factory
Others		
General Certification of Conformity	<u>Follow Kroger specification</u>	Prepared by vendor
Licensing for stuffed toy	Meet Licensing Requirements in Pennsylvania, Ohio and Massachusetts <u>Toy licensing and labeling</u>	Review by lab
Toy Gun Marking	Meet 15 CFR 1150 ASTM F963-11 section 4.3	Review by lab

1. Kroger requirements available on [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
 2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
 3. If other category product attached to or packed with the toy, other applicable checklist(s) should be reviewed as well.
- For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com .
Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____



Regulatory Compliance Checklist for Children's Toys - Plush
(Excluding, Electronics, Costumes, Art Materials, Cosmetics and Food Contact Articles)

This checklist identifies US regulatory requirements for plush toys, excluding electronics, costumes, cosmetics, art materials and food contact articles, sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as law. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Heavy Metals	Meets ASTM F963-11 section 4.3.5	ASTM F963-11
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Hazardous Substances	Meets ASTM F963-11 Section 4.3.1	Review by vendor/factory/supplier
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Flame Retardants	Not Allowed	Best lab practices or Certificate
Labeling		
Tracking Label	Meet CPSIA Section 103 or/and Kroger requirements ¹	Review by lab
Toy Labels (e.g. warning label, age label etc.)	Meet ASTM F963-11 requirements	Review by lab
Lead in Paint, Coating and Substrate	If Lead ≥40ppm, label required for Illinois	Review by lab
CARB Label and Certificate	Composite Wood Title 17 California section 93120.7(d) documentation and label requirement	Review by lab
Uniform Packaging and labeling regulations	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Country of Origin	Meet 19 CFR 134	Review by lab
Suffocation Warning Label for Plastic Bags	Meet Massachusetts and Kroger requirements ¹	Review by lab
Stuffed Toy Label	Meet Pennsylvania, Ohio and Massachusetts toy licensing and labeling requirements.	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
Flammability of solids, soft toys and fabrics	ASTM F963-11	ASTM F963-11
Reporting		
Washington Children's Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold ¹	Best lab practices
Physical Requirements		
All Toys Mechanical and Physical Hazards	ASTM F963-11	ASTM F963-11
Mechanical Hazards	Meet 16 CFR 1500.18	Reviewed by vendor/supplier/lab
Others		
General Certification of Conformity	Follow Kroger specification	Prepared by vendor
Licensing for stuffed toy	Meet Licensing Requirements in Pennsylvania, Ohio and Massachusetts Toy licensing and labeling	Reviewed by lab

1. Kroger requirements available on [Kroger General Merchandise Compliance](http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance) webpage. <http://www.thekrogerco.com/vendors-suppliers/general-merchandise-compliance>
2. Lab usually performs screening test based on existing settlements (base measure). It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
3. If other category product attached to or packed with toy, such as jewelry, other applicable checklist(s) should be reviewed as well. For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com . Vendor Name, Contact Name, Title, email and phone number:

Acknowledgement signature _____ Date _____

Example of Signed Checklist



Vendor Name ABC Company

Regulatory Compliance Checklist for Children's Clothing (Excluding sleepwear and costumes)

This checklist identifies US regulatory requirements for children's clothing, including scarves, but excluding sleepwear and costumes but sold in Kroger stores to help vendors, buyers and developers screen potential non-compliant items. This checklist shall not be construed as laws. All Kroger vendors are required and responsible to comply with all applicable regulatory requirements.

Item	Requirements	Testing Method
Restricted chemicals		
Lead in Substrate and Coating/Print	≤ 90ppm	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Coating: CPSC-CH-E1003-09.1
Sum of 6 Phthalate	≤ 1000ppm	CPSC-CH-C1001-09.3
Cadmium	≤ 40ppm	Best lab practices
Sum of lead, cadmium, mercury and hexavalent chromium	≤ 100ppm for disposable package	Certificate of Compliance or Best lab practices
Labeling		
Tracking Label	Meet CPSIA Section 103 or Kroger requirements ¹	Review by lab
Care Instruction Label	Meet 16 CFR 423	Review by lab
Country of Origin	Meet 19 CFR 134/16 CFR 303	Review by lab
Fiber Label	Meet 16 CFR 300/301/303	Review by lab
Suffocation Warning Label	Meet Massachusetts and Kroger requirements ¹	Review by lab
Leather Labeling Guide	Meet 16 CFR 24	Review by lab
Feather or down label	Meet USA-2000 labeling standards	Review by lab
Uniform Packaging and Labeling Regulations (on package)	Meet NIST uniform Laws and Regulations Handbook 130	Review by lab
Prop 65 warning label ²	Only required if chemical content above threshold	Assessed by lab
Flammability		
Flammability of clothing	Class 1	16 CFR 1610
Reporting		
Washington Children's Safe Product Act CHCC	Report to Department of Ecology if one or more of 66 CHCC above threshold**	Best lab practices
Physical Requirements		
Sharp Point and sharp edges	Not allowed	16 CFR 1500.48 and 49
Small part	Not allowed	16 CFR 1501
Drawstring requirements	16 CFR 1120, WI ATCP 139.06, NY 391.b	ASTM F1816-97
Others		
Licensing requirements at Utah	Filled or quilted garments with fillings must be licensed with State of Utah	Review by lab
Special functional claim	Need substantiation test	Determined based on claims
Antimicrobial	If pesticide used, need to register with EPA	Vendor register with EPA

1. Additional information available on [Kroger General Merchandise Compliance](#) webpage.
 2. Lab usually performs screening test based on existing settlements. It is recommended to be assessed by lab and test accordingly. Testing results will suggest if warning label required.
 3. If other category product attached to or packed with clothing, such as jewelry, other applicable checklist should be reviewed as well.
- For any question, please contact General Merchandise Regulatory Compliance GMCompliance@kroger.com.

Vendor Contact Name, Title, email and phone number:

Megan Liu, Compliance Manager, megan.liu@abc.com, 503-XXX-XXXX

Acknowledgement signature

Date

5/4/16