



## U.S. Law Label and Registration

**From:** General Merchandise Regulatory Compliance  
**To:** Kroger General Merchandise Buyers, Suppliers, Product Development and Testing Lab  
**Issue Date:** January 6, 2017  
**Effective Date:** Immediately

### INTRODUCTION

Law Labels are primarily used to disclose stuffing and/or filling materials in consumer products, concealed or not concealed. There are 32 States in the U.S. requiring law Labels. Many of these States also require manufacturers to register with their State prior to offering filled products for sale.

### COVERED PRODUCTS

Stuffed and/or filled products are required to meet Law Label and/or registration requirements. The following are examples of applicable products:

Upholstered furniture	Stuffed toys
Mattresses and futons	Bike seats
Mattress pads, cushions	Decorative and bed pillow
Sleeping bags	Sleeping pads
Quilts and comforters	Filling materials in bulk
Pet beds	Bean bags
Apparel and footwear	Home decorations

### LAW LABEL

Suppliers are required to meet all Law Label content disclosures and format requirements specific to each State. Labels must be made of Tyvek or other durable material of similar quality and secured to the finished product prior to shipping any purchase order. Kroger Co. does not allow any secondhand or recycled filling materials to be used in our Private Label Products.

The summarized Uniform Law Label requirements can be found at [www.iabflo.org](http://www.iabflo.org). It is strongly recommended to consult with your Legal Counsel, professional Law Label service provider, or individual States for exact mechanics of the Law Label for your product types.



**REGISTRATION**

Kroger Co. requires suppliers register with all States requiring registration. States requiring registration are as follows:

California	New York North	Rhode Island
Connecticut	Carolina	Texas
Delaware	Ohio	Utah
City of Detroit (MI)	Oklahoma	Virginia
Massachusetts	Pennsylvania	West Virginia

Each factory location must be registered and a Uniform Registry Number (URN or REG. NO.) assigned. Registration with each State is required to remain current and for a minimum of two consecutive years after purchase order shipment. Yearly renewal fees apply.

\*Please note: Not all product types are required to register with all States. Suppliers need to contact each State agency for clarification.

**UNIQUE STATE REQUIREMENTS**

**Stuffed Toy Label**

Pennsylvania, Ohio and Massachusetts require registration of stuffed toys. Manufacturers must register independently with all three States. It is recommended to register first with the State of Pennsylvania. Ohio and Massachusetts will accept Pennsylvania’s assigned registration number printed on the law label. All filling materials including stiffeners such as cardboard, wire, wood, etc. must be disclosed. Stuffed Toy Law Label format can be found at [www.iabflo.org](http://www.iabflo.org)

**Home Decorations**

The State of Ohio requires that all non-toy stuffed/filled decorative items, including holiday articles, have a law label securely attached. A stuffed toy law label format can be used for these items, however, Kroger requires “NOT A TOY. For Decorative Use Only.” to be printed on the label in addition to the other required information.

**Filled Apparel and Footwear**

The State of Utah requires that Manufacturers of quilted clothing and filled slippers register with the State. The filling material should be declared using acceptable generic material names. Filled Apparel and Footwear Label formats can be found at [www.iabflo.org](http://www.iabflo.org)

**Upholstered Furniture**

In California, upholstered furniture is required to have a flammability label following TB 117-2013 and flame retardant disclosures following SB1019. The furniture law label format can be found at <http://iabflo.org>.



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**Sterilization for Down, Feather and Wool Filling**

Down, Feather and Wool filled products require the statement "CONTENTS STERILIZED" and a sterilization permit number must be obtained for each manufacturer. This permit number is in addition to the URN and must be printed on the law label. Permit numbers are approved only after processing plant inspection. Permit numbers can be obtained thru the State of Pennsylvania at <http://www.dli.pa.gov/Individuals/Labor-Management-Relations/bois/Pages/default.aspx> . Sterilization permits must be registered with each State that requires sterilization.

Utah requires the sterilization permit number to be present on the label of quilted clothing and filled slippers.

**DOCUMENTS FOR KROGER**

To ensure full legal compliance of Kroger Enterprise with the various State regulations regarding uniform law labels, Kroger requires its suppliers to maintain an accessible library of State registration certificates for any applicable products sold to Kroger Enterprise. Upon request, suppliers must submit copies of all certificates within 24 hours to [GMCompliance@kroger.com](mailto:GMCompliance@kroger.com).

Kroger must also register every year as the retailer of filled products and maintain certification separately. To support Kroger's annual registration process, the following documents need to be submitted by December 1<sup>st</sup> :

- Four physical Law Labels per sku and per factory. No photo copies, please.
- Law labels must be from an open order. Please do not send product samples.
- A photo copy of current Registration Certificate(s) for each factory
- Each Vendor/Manufacturer name, contact person name, email address and phone number

The law label and vendor/manufacturer information as requested above shall be mailed to the following address by December 1<sup>st</sup> to fulfill registration annual renewal requirements.

Attn: Jessica Giffin  
The Kroger Co. Western Region Corporate Office  
Office Stop 23C  
3800 SE 22<sup>nd</sup> Ave., Portland, OR 97202 USA

This guide is designed to help understand Kroger's expectations and requirements. All suppliers are required to prepare law labels for products sold to Kroger Co. stores following all applicable laws.

If you have any question, please do not hesitate to contact Kroger General Merchandise Regulatory Compliance at [gmcompliance@kroger.com](mailto:gmcompliance@kroger.com)



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**REFERENCES**

- International Association of Bedding and Furniture Law Officials [www.iabflo.org](http://www.iabflo.org)