



U.S. Law Label and Registration

From: General Merchandise Regulatory Compliance
To: Kroger General Merchandise Buyers, Suppliers, Product Development and Testing Lab
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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. 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 | Utah |
| Delaware | Ohio | Virginia |
| City of Detroit (MI) | Oklahoma | West Virginia |
| Massachusetts | Pennsylvania | |

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

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

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.

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 1st :

- 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 1st to fulfill registration annual renewal requirements.

Attn: Jessica Giffin
The Kroger Co. Western Region Corporate Office
Office Stop 23C
3800 SE 22nd 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



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REFERENCES

- International Association of Bedding and Furniture Law Officials www.iabflo.org