

KOHLER®
PRODUCT ENVIRONMENTAL POLICY
RESTRICTED MATERIAL LIST
(PEP-RML-001)

24-April-2020
Version 3.0

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1.0 Policy

No products or materials are to be designed, developed, manufactured, sold, purchased or distributed worldwide by or for Kohler Co. and its affiliates (“Kohler”) without adherence to applicable product composition regulations in effect including all applicable product environmental laws such as those regulating toxic materials, air emissions, wastewater discharge, waste treatment and disposal.

2.0 Purpose

The purpose of this Product Environmental Policy is to identify applicable product chemical and product chemical composition regulations and requirements.

3.0 Scope

This Product Environmental Policy - Restricted Material List, applies to all products and materials, both direct and indirect, that are designed, manufactured or purchased worldwide by or for any Kohler business, including but not limited to all subassemblies, parts, materials, components, batteries, merchandise and packaging.

Outside the scope of this policy are Mobile Source and Stationary Source exhaust emission regulations and other material-based specifications, such as plating specifications.

4.0 Responsibilities

Product Compliance Team Responsibility

A Kohler team comprised of legal and compliance personnel with authority to manage, enforce and/or revise this policy as required.

Kohler Responsibility

Kohler businesses and associates have the responsibility to ensure;

- All Material Specifications meet applicable regulatory requirements;
- Only approved suppliers are used;
- All contractual requirements are met prior to working with any supplier.

Supplier Responsibility

Suppliers must comply with this policy and all relevant applicable law.

Upon request, suppliers must provide appropriate supporting documentation for materials, such as;

- Full Material Disclosure
- Supplier Declarations for RoHS (must meet the minimum requirements show in Appendix A)
- Supplier Declaration for REACH SVHC and Restricted List Substances
- Third party test reports demonstrating formaldehyde or ionizing radiation emissions are below restricted limits
- Conflict Minerals Reporting Template
- Safety Data Sheets for substances, mixtures or batteries
- Declarations of Conformity (European Union, Australia, etc.)
- Other test results, etc. as necessary to support Kohler product compliance obligations

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Suppliers may be contacted by a third-party data collector on behalf of Kohler Co. Suppliers are expected to cooperate by providing requested information through data collection portals, subject to receiving a letter of authorization from Kohler Co.

Suppliers must maintain awareness of all applicable regulations and immediately notify Kohler if supplied materials contain any newly regulated substances.

Suppliers must immediately notify Kohler if they make design changes to subassemblies, parts, materials, components, batteries, merchandise and packaging which could impact the compliance status of the materials, including regarding material composition.

5.0 Appendices

Appendix A – Minimum Requirements for a Supplier Declaration for EU RoHS

Appendix B – Sample of an EU RoHS Declaration

Appendix C – Formaldehyde Certification Requirements

6.0 Definitions and Acronyms

Article	An object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition. Articles that are assembled or joined together remain articles. (Defined by EU REACH Article 3)
Battery	Any source of electrical energy generated by direct conversion of chemical energy and consisting of one or more primary battery cells (non-rechargeable) or consisting of one or more secondary battery cells (rechargeable). (Defined by the EU Batteries Directive)
Candidate List	A list of substances identified in the EU REACH Regulation that have been identified as Substances of Very High Concern (SVHC) and which may become subject to authorization.
Chemical Abstracts Service (CAS) and Chemical Abstracts Service Registry No. (CAS No.)	The CAS is a division of the American Chemical Society for research in chemical and related sciences. The CAS No. is a unique identifier assigned for each chemical substance described in open scientific literature.
Complex Object	More than one Article joined or assembled together in various manners make a Complex Object. (Defined by the ECHA "Guidance on requirements for substances in articles")
Conflict Minerals	A mineral mined in an area of armed conflict and traded illicitly to finance the fighting.
European Community No. (EC No.)	A unique identifier assigned to substances for regulatory purposes within the European Union by the European Commission.
Homogeneous Material	One material of uniform composition throughout or a material, consisting of a combination of materials, that cannot be disjointed or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes. (Defined by RoHS 2011/65/EU)
International Living Future Institute (ILFI Red List)	The "worst in class" materials prevalent in the building industry as defined by the International Living Future Institute.
Material Specification	A formal Kohler requirement pertaining to the design and chemical composition of a component, subassembly or product.
Mixture	A mixture or solution composed of two or more substances. (Defined by EU REACH Article 3)

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Packaging	Products used for the containment, protection, handling, delivery and presentation of raw materials to processed goods.
Products	Final assemblies or service parts, including manufactured and branded products. For purposes of product chemical compliance, Products are considered separately from Packaging.
Prohibited	May not be present in any concentration.
Restricted	Must not exceed the specified maximum concentration limits.
Reportable	Not currently restricted by applicable regulations, but presence must be reported to Kohler if it exceeds the specified maximum concentration limits where applicable.
Substance	A chemical element and its compounds in the natural state or obtained by any manufacturing process. (Defined by EU REACH Article 3)
Substance of Very High Concern (SVHC)	A chemical substance (or part of a group of chemical substances) for which it has been proposed that the use within the EU be subject to authorization under REACH. Often referred to in conjunction with the “Candidate List” from the EU REACH Regulation. (Defined by EU REACH)
Very Complex Object	A combination of simpler complex objects plus further articles. (Defined by the ECHA “Guidance on requirements for substances in articles”)

7.0 Full Material Disclosure

Kohler collects composition information for items it purchases from suppliers to minimize the need to reach out for each new restriction and to allow for proactive management of substances of concern, as well as product transparency communications with customers. Upon request, Kohler will collect “Full Material Disclosure” including the following information:

- The complete chemical composition of all materials provided to Kohler including the trade name, supplier name and concentration of each substance
- Upon request, supplier will provide additional documentation and data including certifications, compliance declarations and test data to demonstrate or verify compliance
- Supplier is also expected to notify Kohler of any changes to the material composition in the future

Common Extensible Markup Language (XML) templates for providing “full material disclosure” include IPC-1752A, IPC-1754, and IEC 62474.

8.0 Restricted / Controlled / Reportable Substance Regulations

No products or materials are to be designed, developed, manufactured, sold, purchased or distributed worldwide by or for Kohler without, at a minimum, adherence to the following regulations.

8.1 European Union REACH Regulation (1907/2006)

The title of the EU REACH Regulation (1907/2006) is “Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)”. EU REACH applies both to substances on their own, and to “articles” composed of substances (see definitions).

<https://echa.europa.eu/regulations/reach/understanding-reach>

Suppliers are required to provide information about the presence of EU REACH substances in materials provided to Kohler, referencing the most current revision of the EU REACH Regulation.

Note that the EU REACH Regulation changes frequently. Suppliers are expected to monitor the changing requirements and provide Kohler with updated information for the materials they provide to

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Kohler whenever the regulation changes. For a list of current substances regulated by EU REACH, please reference the European Chemicals Agency website (links below).

REACH Regulation = “Registration, Evaluation, Authorisation and Restriction of Chemicals”

- EU REACH Restricted List – Annex XVII:
 - <https://echa.europa.eu/substances-restricted-under-reach>
 - Substances on the “Restricted List” may only be restricted from certain applications. If the supplier utilizes any of the substances on this list, for example Pb (lead), they are expected to review the specific REACH Annex XVII entry to ensure that the usage is allowed for the items they supply to Kohler.

- EU REACH Authorisation List – Annex XIV:
 - <https://echa.europa.eu/authorisation-list>
 - Suppliers who provide substances or mixtures to Kohler (see definitions in section 5.0) for use or sale within the European Economic Area (EEA) or United Kingdom must notify Kohler of the presence of any of the substances on the REACH Authorisation List (Annex XIV). This list does NOT apply to “articles” supplied to Kohler Co.

- EU REACH Candidates for Authorisation List – “Substances of Very High Concern” (SVHC)
 - <https://echa.europa.eu/candidate-list-table>
 - SVHC’s are listed on the “Candidates for Authorisation” list within the REACH Regulation. While the use of these substances is not restricted, other requirements are mandated. Therefore, **suppliers must notify Kohler if they are utilizing any of the Candidate List substances in concentrations greater than 0.1% weight by weight.**
 - The substance concentration threshold of 0.1% (w/w) applies to **every article** (see definition in section 5.0) or substance supplied. This threshold applies to each individual article of a “complex object” or “very complex object” made up of more than one article, which were joined or assembled together.

8.2 European Union RoHS Directive (2011/65/EU) – “Restriction of Hazardous Substances”

The full title of the EU RoHS Directive is “Restriction of the use of certain hazardous substances in electrical and electronic equipment”.

RoHS applies to all components, subassemblies and products used in the final product that is within the scope of the Directive. This is required even if the component, subassembly or product by itself is outside of the scope of the Directive (for example, a gasket or fastener). Kohler Co. requires RoHS information for all purchased materials regardless of whether or not the purchased item is “electronic”. http://ec.europa.eu/environment/waste/rohs_eee/legis_en.htm

In the absence of providing “full material disclosure” (see section 7.0) for the materials provided to Kohler, suppliers are required to provide an “absence declaration” (see appendices A and B) which reflects the status of the materials to the most current version of the EU RoHS Directive (2011/65/EU as well as subsequent amendments, including 2015/863 which adds substances to the list of restricted substances).

RoHS thresholds for the restricted materials must be evaluated at the “homogeneous” level for the items covered by the declaration, not at the “finished goods” level (see definition in section 5.0). RoHS declarations MUST include disclosure of any approved RoHS exemptions that are being utilized to allow the presence of RoHS substances.

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8.3 Formaldehyde

All suppliers of composite wood products that are affected under [Title VI of the EPA Toxic Substances Control Act \(TSCA\)](#) and/or the [California Air Resources Board \(CARB\) Airborne Toxic Control Measure \(ATCM\)](#) must acknowledge that they are compliant with the two previous regulations during the supplier registration process on the Kohler Supplier Management Platform. TSCA Title VI and the ATCM are applicable, but not limited to, manufacturers, importers, distributors, retailers, panel producers, fabricators, third party certifiers, and accreditation bodies. More details are provided in Appendix C.

8.4 Supplier Radiation Requirements

All purchased materials must satisfy current governmental and safety requirements for hazardous materials such as Class 7 Radioactive Materials. To prevent radioactive contamination into Kohler Co. processes and products, all incoming metallic materials and components, including scrap being recycled for new uses, must not emit ionizing radiation at levels above 0.05 mrem/hr (0.5 uSv/hr) beyond background levels in the location of production.

If any of the materials and components supplied to Kohler Co. are found to not meet this requirement, the Supplier will at minimum be responsible for proper disposal and immediately providing Kohler Co. with nonhazardous replacement product, at the expense of the Supplier.

8.5 Additional hazardous substance regulations

There are many other hazardous substance regulations emerging globally which regulate other “substances of concern”. Suppliers will be cooperative in assessing the status of Kohler products in relation to these regulations. As indicated in the description, some regulations only require notification of the presence of certain substances while others require restriction of specific substances.

Regulation	Description	Link
California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)	Notification required. Businesses are required to provide “clear and reasonable” warning before exposing anyone to a listed chemical.	https://oehha.ca.gov/proposition-65
China RoHS (GB/T-26572)	Notification and restriction required. Suppliers must provide information about China RoHS substances in components in the format of the China RoHS “Hazardous Substances Content Disclosure Table”	
EU Batteries Directive (2006/66/EC)	Restriction required. Includes restrictions for hazardous substances in batteries (mercury, cadmium)	http://ec.europa.eu/environment/waste/batteries/index.htm
EU Biocidal Properties Regulation (BPR) (Regulation (EU) 528/2012)	Authorization required. All biocidal products require an authorization by European Chemicals Agency (ECHA) before they can be placed on the EU market, and the active substances contained in that biocidal product must be previously approved.	https://echa.europa.eu/regulations/biocidal-products-regulation/understanding-bpr
EU Packaging Directive (94/62/EC)	Restriction required. Includes restrictions for substances in packaging.	http://ec.europa.eu/environment/waste/packaging/legis.htm
Ozone Depleting Substances (ODS) (Regulation (EC) 1005/2009)	Restriction required. Prohibits / restricts use of Ozone Depleting Substances (ODS) in accordance with the Montreal Protocol.	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=LEGISSUM:ev0021
Persistent Organic Pollutants (POPs) (Regulation (EC) 850/2004)	Restriction required. Prohibits/restricts the use of Persistent Organic Pollutants (POPs) in accordance with the UNECE Protocol and the Stockholm Convention	http://ec.europa.eu/environment/chemicals/international_conventions/index_en.htm

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US EPA Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) 7 U.S.C. §136 et seq. (1996)	Authorization Required Provides for federal regulation of pesticide distribution, sale, and use. All pesticides distributed or sold in the United States must be registered (licensed) by EPA	https://www.epa.gov/laws-regulations/summary-federal-insecticide-fungicide-and-rodenticide-act
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9.0 Additional hazardous substance compliance and notification requirements

Kohler closely monitors for the presence of substances that may pose health/or and environmental concerns whether they are currently restricted or have the potential to be regulated in the future. Suppliers must adhere to existing regulatory requirements that prohibit or restrict specific substances as indicated below and inform Kohler if substances listed as “reportable” are contained in the items they are providing.

All substances listed in the table are either categorically **prohibited**, **restricted** at a specific threshold, or **reportable** (not restricted, but supplier must inform Kohler of the presence of these substances).

Substance	CAS Registry Number	Control Level
Antimony Trioxide	1309-64-4	Reportable
Asbestos, including brown, blue and white asbestos, Tremolite <i>Materials supplied to Kohler may not contain or be exposed to asbestos.</i>	Multiple	PROHIBITED
Bis (2-ethylhexyl)phthalate (DEHP)	117-81-7	Restricted
Bisphenol A (BPA) – 4,4' -isopropylidenediphenol	80-05-7	Reportable
Brominated Flame Retardants	Multiple	Reportable
Butyl benzyl phthalate (BBP)	85-68-7	Restricted
Cadmium and its compounds	7440-43-9 and others	Restricted
Chlorinated hydrocarbons	Several	PROHIBITED
Cobalt metal	7440-48-4	Reportable
Cyanide and its compounds	57-12-5	Restricted
Diarsenic trioxide	1327-53-3	Restricted
Dibutyl phthalate (DBP)	84-74-2	Restricted
Diisobutyl phthalate (DIBP)	84-69-5	Restricted
Fluorinated greenhouse gases (PFC, SF6, HFC)	Several	PROHIBITED
Halogenated materials	Multiple	Reportable
Chromium VI compounds	Multiple	Restricted
ILFI Red List and Watch List Materials (definition in section 6.0) See https://living-future.org/declare/declare-about/red-list	Multiple	Reportable
Lead and its compounds	7439-92-1 and others	Restricted
Mercury and its compounds	7439-97-6 and others	Restricted
Nickel and its compounds	7440-02-0 and others	Reportable
Perchlorates	Multiple	Restricted
Polybrominated biphenyls (PBB)	Multiple	Restricted
Polybrominated diphenyl ethers (PBDE) (Includes DecaBDE)	Multiple	Restricted
Polychlorinated Biphenyls (PCB's)	1336-36-3, 11097-69-1, 2437-79-8, 11096-82-5, 53469-21-9	PROHIBITED
Poly- and perfluoroalkyls (PFAS including PFOA and PFOS)	335-67-1, 1763-23-1 There are over 5000 PFAS substances – Kohler requires knowledge of any being used	Restricted or Reportable
Polychlorinated naphthalenes (PCN)	Several, for example 70776-3-3	Restricted

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Polyvinyl Chloride (PVC)	9002-86-2	Reportable
Short chain and medium chain chlorinated paraffins (Alkanes C10-13 and C14-17, chloro)	85535-84-8, 85535-85-9	Restricted
Silicones	Multiple	Reportable
Tetrabromo-Bisphenol A (TBBPA)	79-94-7	Reportable

10.0 Conflict Minerals

While these minerals are not “restricted, controlled or hazardous substances”, their sourcing is regulated under US SEC Dodd-Frank Act requirements as well as Regulation (EU) 2017/821 of the European Parliament.

Under both the US and EU regulations for so-called “conflict minerals”, the current minerals of concern are:

- Cassiterite (tin) – CAS No. 7440-31-5
- Wolframite (tungsten) – CAS No. 7440-33-7
- Coltan (tantalum) – CAS No. 7440-25-7
- Gold – CAS No. 7440-57-5

Suppliers must provide Kohler with information regarding whether these minerals are present and the original source, if applicable. The reporting should be completed using the industry-standard “Conflict Minerals Reporting Template” which can be completed at the supplier level (CMRT).

<http://www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template/>

Other countries and US states have additional responsible supplier requirements regarding Conflict Minerals sourcing. Suppliers may be requested to provide documentation to comply with developing declaration requirements for Conflict Minerals.

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HISTORY

VERSION	DATE	DESCRIPTION
1.0	13-May-2019	Initial release drafted by Cally Edgren: <ol style="list-style-type: none"> 1. Establishing Kohler Co. product environmental requirements 2. Include product chemical and composition regulations and substances of concern 3. Clarifies expectations from suppliers 4. Clarifies documentation requirements.
2.0	6 September-2019	Initial draft revised by Cally Edgren, Michael Read & Chelsie Warner: <ol style="list-style-type: none"> 1. Refined Kohler Co. functional areas impacted by this policy 2. More granularly defined the Scope of this policy 3. Updated reference date of REACH SVHC list in Appendix F to reflect July 2019 update 4. Removed references to Quality responsibilities as this is managed differently by various Kohler Co. business groups 5. Final Legal review modifications accepted
3.0	24 April 2020	Revision by Cally Edgren <ol style="list-style-type: none"> 1. Clarified Supplier Responsibilities in section 4.0 to address requirements for formaldehyde and radiation requirements, submission of composition data through third-party data collection activities, and design change management notifications 2. Clarified Supplier Radiation Requirements and renumbered remaining sections accordingly 3. Added section 7.0 outlining Full Material Disclosure requirements 4. Added RoHS substances to section 8.0 5. Added US EPA Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) to section 8.5 6. Added reference to EU "Conflict Minerals" requirements in section 9.0 7. Added references to the United Kingdom in addition to European Union 8. Added clarification for "Full Material Disclosure" in definitions instead of as Appendix A 9. Created a separate section for formaldehyde requirements and added an appendix with specific requirements 10. Removed Appendices A, E and F and relabeled others accordingly 11. Other minor points for clarification

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Appendix A - Minimum Requirements for a Supplier Declaration for EU RoHS

In most situations, a supplier-provided “Certificate of Conformity” (CoC) declaration for the EU RoHS Directive is acceptable documentation for the technical file to support compliance. Guidance for a Certificate of Conformity is provided below, with an example following in Appendix B.

Depending on the component and supplier risk, additional documentation, including a “Full Material Disclosure” (FMD) and/or analytical test report may also be requested by Kohler in order to meet our obligations under harmonized standards EN 50581:2012 / IEC 63000:2016 / EN IEC 63000:2018 “*Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances*”.

Supplier Declaration “Certificate of Conformance”

A supplier RoHS declaration provided to Kohler (also known as a “Certificate of Compliance” or RoHS CoC) must include (at a minimum) the following:

- A reference to the Directive against which compliance is claimed (EU RoHS Directive 2011/65/EU).
 - The declaration should also include a reference to amendment 2015/863 (“phthalates”) and any subsequent amendments that change the substances listed in the EU RoHS Directive Annex II.
- A declaration confirming that the restricted substance content of the material, part or subassembly is within the levels permitted by the regulation referenced
 - If a substance is present above the level permitted, an allowable (and non-expired) application exemption **must** be identified on the declaration.
- Part number and description of the item(s) provided to Kohler
 - The declaration shall cover a specific material, part and/or sub-assembly, or a specific range of materials, parts and/or subassemblies.
 - It is acceptable to list multiple parts on the same certificate using a table format.
- Date of first manufacture for meeting the material restrictions.
- Signature of a company representative.
- Date of issue for the declaration.
- The declaration must be on company letterhead (company name, address, phone).
- The declaration must be provided in English or another approved language of a European Union Member State.

Other suggested information:

- Contact information for follow-up questions.
- Suggested alternatives for parts that do not meet restrictions.
- Method used to determine compliance of parts (i.e. third-party material testing or supply chain and manufacturing process evaluation).
 - If analytical testing has been completed (preferably in accordance with IEC/EN 62321), it is requested that a dated copy of results be included with the documentation.

Analytical Test Results

Analytical test results using methods described or referenced in IEC 62321:2008 and subsequent updates may be requested for certain components or commodities.

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Appendix B – Sample EU RoHS Declaration

Environmental Affairs Department
101 First Avenue
Chicago, IL 60611

ABC Enterprises

1 April 2020

Dear Kohler,

ABC Enterprises hereby certifies that the product(s) listed below are compliant with the restricted substance requirements of the European Union Directive 2011/65/EU – Restriction of Hazardous Substances (RoHS) Directive, and its subsequent amendments, including 2015/863 amending Annex II of the Directive. Below is the RoHS status for specific products.

ABC Enterprises Product Model Number	Product Description	RoHS Status	Date of Manufacture for meeting RoHS material restrictions	EU RoHS exemptions used for meeting RoHS material restrictions
A2X33	Plastic housing	Meets EU RoHS material restrictions without the use of exemptions	July 2006	None
SNJ401	Aluminum mounting frame	Meets EU RoHS material restrictions with the use of exemptions	November 2011	6(b)

If you have any additional questions please contact Sarah Smith, Manager of Supplier Compliance, at 202-202-2000. For more information on ABC Enterprises' environmental programs, please visit our website at <http://www.abcenterprises.com/productstewardship>.

Sincerely,

James A. Gray

James Gray
Director, Environmental Affairs
ABC Enterprises
jagray@abcenterprises.com

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Appendix C – Formaldehyde Certification Requirements

Toxic Substances Control Act Title VI (40 CFR Part 770)

Formaldehyde Emission Standards for Composite Wood Products.

The purpose of this final rule is to reduce formaldehyde emissions from composite wood products, and finished goods containing these products, that are sold, supplied, offered for sale, or manufactured (including imported) in the United States. The composite wood products covered by this final rule include hardwood plywood, medium-density fiberboard and particleboard, and finished goods containing these products.

TSCA Title VI is applicable but not limited to manufacturers, importers, distributors, retailers, panel producers, fabricators, third party certifiers, and accreditation bodies of composite wood products, and finished goods containing these products, that are sold, supplied, offered for sale, or manufactured (including imported) in the United States.

<https://www.epa.gov/formaldehyde/formaldehyde-emission-standards-composite-wood-products>

REGULATION REQUIREMENTS INCLUDE:

- Panels or bundles of panels must be labelled with the panel producer's name, the lot number, the number of the EPA TSCA Title VI TPC, and a statement that the products are TSCA Title VI certified.
- Fabricators of finished goods must label every finished good they produce or every box or bundle containing finished goods.
- Product labelling shall be applied as a stamp, tag, or sticker.
- The labelling must include, at a minimum, in legible English text, the fabricator's name, the date the finished good was produced (in month/year format) and a statement that the finished goods are TSCA Title VI compliant.
- All applicable invoices must include a statement that the composite wood products, component parts or finished goods are TSCA Title VI compliant.
- For imports, be prepared to produce upon request records identifying the panel producer and the date the composite wood products were produced.

California Code of Regulations §93120 through 93120.12

Airborne Toxic Control Measure (ATCM) to Reduce Formaldehyde Emissions from Composite Wood Products

The purpose of this airborne toxic control measure is to reduce formaldehyde emissions from composite wood products, and finished goods that contain composite wood products, that are sold, offered for sale, supplied, used, or manufactured for sale in California. The composite wood products covered by this regulation are hardwood plywood, medium density fiberboard, and particleboard.

The ATCM applies to manufacturers, distributors, importers, fabricators, retailers, and third-party certifiers of composite wood products, and finished goods that contain composite wood products, which are destined for use in California market.

<https://www.arb.ca.gov/toxics/compwood/compwood.htm>

REGULATION REQUIREMENTS INCLUDE:

- Kohler Co. suppliers/vendors must certify the composite wood products and finished goods supplied are compliant with the regulation including the applicable emissions standards, third-party certification, and the applicable record keeping requirements.

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- Each panel or bundle of composite wood products must be clearly labelled to indicate compliance with the emission standards. The label should include, at a minimum:
 - Manufacturer name;
 - Product lot number or batch produced;
 - A marking to denote that the composite wood product complies with the emission standards or was made using ULEF or NAF resins; and
 - Where applicable, the ARB assigned number of the approved third-party certifier.
- The manufacturer for each composite wood product must include on the bill of lading or invoice:
 - The ARB assigned number of the approved third-party certifier, if applicable; and
 - A statement that the composite wood products comply with the emission standard and, if applicable, were made using ULEF or NAF resins.
- Distributors, fabricators and importers must label their finished goods. (If a finished good is not modified by a distributor or importer, no additional labelling is required.) Product labelling shall be applied as a stamp, tag, sticker or bar code on every finished good produced, or on every box containing finished goods. The label shall include, at a minimum:
 - The fabricator's name;
 - The date the finished good was produced;
 - A marking to denote that the product complies with CARB Phase 2 emission standards.
- Distributors, fabricators, and retailers must document the precautions taken to ensure the composite wood products and composite wood products contained in finished goods comply with applicable emission standards.
- Be prepared to produce all records upon request.