

# SAFETY DATA SHEET

according to Regulation (EC) No 1907/2006 (REACH) Article 31, Annex II as amended

# SECTION 1: IDENTIFICATION OF THE SUBSTANCE/MIXTURE AND OF THE COMPANY/UNDERTAKING

#### 1.1 Product identifier

Product name: DENTIRO® Wipes
UFI: 6E00-V04G-D00E-CT3X

Substance type: Mixture

Use of the substance/mixture: Surface disinfectant

# 1.2 Relevant identified uses of the substance or mixture and uses advised against

Identified uses: DENTIRO® Wipes are ready-to-use disinfectant wipes for the residue-free

disinfection and cleaning of small surfaces of non-invasive medical devices such as operating tables, gurneys, IV poles, and dental chairs. The highly saturated wipes have a low alcohol content of less than 50%, which not only reduces the potential for allergies but also increases material compatibility.  $DENTIRO^{®}$  Wipes

are free of aldehydes.

Uses advised against: Do not use for purposes other than those prescribed.

Recommended restrictions on

use:

For professional use only.

# 1.3 Details of the supplier of the safety data sheet

Manufacturer	EU only representative
Oro Clean Chemie AG Allmendstrasse 21 8320 Fehraltorf Switzerland	Oro Clean Chemie s.r.o. Vinohradská 2828/151 Žižkov 130 00 Praha 3 Czech Republic
+41 (0)44 226 44 44	
info@oroclean.com	info@oroclean.cz
www.oroclean.com	www.oroclean.cz
Downstream user/importer/distributo	r
Oro Clean Chemie s.r.o. Vinohradská 2828/151 Žižkov 130 00 Praha 3 Czech Republic	
info@oroclean.cz	
	Oro Clean Chemie AG Allmendstrasse 21 8320 Fehraltorf Switzerland +41 (0)44 226 44 44 info@oroclean.com www.oroclean.com Downstream user/importer/distributo Oro Clean Chemie s.r.o. Vinohradská 2828/151 Žižkov 130 00 Praha 3

#### Person responsible for preparing the SDS

Lee Moi Wong | Research & Development | Chief Research Officer (CRO)

Telephone: +41 (0)44 226 44 44

Email: ra@oroclean.com



# 1.4 Emergency telephone number

Emergency telephone number: +420 224 919 293

\* Please check the above numbers regularly as they might be subject to change.

#### **SECTION 2: HAZARDS IDENTIFICATION**

#### 2.1 Classification of the substance or mixture

Classification according to Regulation (EC) No 1272/2008

Hazard type	Hazard category	Hazard statement code(s)	Classification procedure
Physical hazard	Flam. Sol. 1	H228	On basis of test data.
Health hazard	Eye Irrit. 2	H319	Harmonised (legal) classification.

The full text for all H-statements is displayed in section 16.

#### 2.2 Label elements

#### Labelling according to Regulation (EC) No 1272/2008

Hazard pictograms:





Wear protective gloves/protective clothing/eye protection/face

		GHS02	GHS07
Signal word:	Danger		
Hazard statements:	H228 H319	Flammable so Causes serio	olid. us eye irritation.
Precautionary statements:	P210	•	om heat, hot surfaces, sparks, open sources. No smoking.
	P233	Keep containe	er tightly closed.

protection.

P305 + P351 + IF IN EYES: Rinse cautiously with water for several minutes.

P338 Remove contact lenses, if present and easy to do. Continue

rinsing.
P337 + P313 If eye irritation persists: Get medical advice/attention.

P501 Dispose of contents/container in accordance with local and national regulations.

Supplemental information: Not applicable.

#### 2.3 Other hazards

PBT or vPvB properties: This substance/mixture contains no components considered to be either

persistent, bioaccumulative and toxic (PBT), or very persistent and very

bioaccumulative (vPvB) at levels of 0.1% or higher.

Endocrine disrupting properties: The substance/mixture does not contain components considered to have

endocrine disrupting properties according to REACH Article 57(f) or Commission Delegated Regulation (EU) 2017/2100 or Commission Regulation (EU) 2018/605

at levels of 0.1% or higher.

#### **SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS**

P280

#### 3.1 Substances

See below.

flames and



#### 3.2 Mixtures

#### Classification according to Regulation (EC) No 1272/2008

Substance name	Identification	Classification	SCL, M-factor, ATE	Concentration
Ethanol	CAS no.: 64-17-5 EC no.: 200-578-6 Index no.: 603-002-00-5 REACH no.: 01-2119457610-43-0350	Flam. Liq. 2, H225	No data available.	30% - < 50%
Propan-2-ol	CAS no.: 67-63-0 EC no.: 200-661-7 Index no.: 603-117-00-0 REACH no.: 01-2119457558-25-0000	Eye Irrit. 2, H319 Flam. Liq. 2, H225 STOT SE 3, H336	No data available.	15% - < 30%

The full text for all H-statements is displayed in section 16.

#### **SECTION 4: FIRST AID MEASURES**

#### 4.1 Description of first aid measures

General notes: Never give anything by mouth to an unconscious person. Place patient in

recovery position and ensure airway patency. When in doubt or if feeling unwell seek medical assistance. Show the safety data sheet and label to the physician.

After inhalation: Remove patient to fresh air - move out of dangerous area. Obtain professional

medical help.

After contact with skin: Take off all contaminated clothing. Areas of the body that have come into contact

with the product must be rinsed with water. If symptoms develop and persist, seek

medical attention.

After contact with eyes: Immediately flush eyes with running water, keeping eyelids apart. If irritation

persists, seek professional medical attention.

After ingestion: Do not induce vomiting. Rinse mouth thoroughly with water. Never give anything

by mouth to an unconscious person. Consult a physician. Show the physician the

safety data sheet or label.

# 4.2 Most important symptoms and effects, both acute and delayed

See section 11 for more detailed information on health effects and symptoms.

# 4.3 Indication of any immediate medical attention and special treatment needed

Treat symptomatically.

## **SECTION 5: FIREFIGHTING MEASURES**

# 5.1 Extinguishing media

Suitable extinguishing media: Carbon dioxide. Dry chemical powder. Water spray. Alcohol resistant foam.

Unsuitable extinguishing media: Full water jet.

# 5.2 Special hazards arising from the substance or mixture

Specific hazards during

In case of a fire toxic gases can be generated; do not inhale gases/smoke.

firefighting:

Hazardous combustion products: No data available.

## 5.3 Advice for firefighters

Special protective equipment for

firefighters:

Firefighters should wear appropriate protective clothing for firefighters (including helmets, protective boots and gloves) (BS EN 469) and self-contained breathing

apparatus (SCBA) with a full face-piece (BS EN 137).



In case of fire or heating do not breathe fumes/vapours. No action shall be taken Additional information:

involving any personal risk or without suitable training. Prolonged heating can cause an explosion. Vapours can form explosive mixtures with air. Cool containers at risk with water spray. If possible remove containers from

endangered area.

#### **SECTION 6: ACCIDENTAL RELEASE MEASURES**

#### 6.1 Personal precautions, protective equipment and emergency procedures

Advice for non-emergency

personnel:

Use personal protective equipment (section 8). Ensure adequate ventilation. Keep away from sources of ignition and/or heat; No smoking. No action shall be taken involving any personal risk or without suitable training. Prevent access to

unprotected personnel. Evacuate the danger zone. Do not breathe vapour or mist.

Avoid contact with skin, eyes and clothing.

Advice for emergency

responders:

Use personal protective equipment.

#### 6.2 **Environmental precautions**

Do not allow to enter drains or waterways. Prevent product from getting into subsoil/soil.

#### 6.3 Methods and material for containment and cleaning up

Stem the spill if this does not pose risks. Absorb product (with inert material), collect it in special container and dispose it to a licensed hazardous-waste disposal contractor. Use only explosion-proof instruments and equipment. Use spark-proof tools. Prevent release into the sewer, water, basements or confined areas. Ventilate the premises. Clean contaminated area with plenty of water.

#### 6.4 Reference to other sections

See also sections 7, 8 and 13.

#### SECTION 7: HANDLING AND STORAGE

#### 7.1 Precautions for safe handling

General advice: Use general or local exhaust ventilation to prevent inhaling vapours and aerosols.

Do not discharge into drains, surface water and soil. After use immediately close

container tightly.

Instructions for protection against

fire and explosion:

Ensure adequate ventilation. Keep away from sources of ignition - no smoking. Use spark-proof tools. Take precautionary measures against static discharges. Vapours are heavier than air and spread along the floor. They form explosive

mixtures with air.

Advice on general occupational

hygiene:

Use good personal hygiene practices – wash hands at breaks and when done working with material. Do not eat, drink or smoke while working. Do not breathe vapours/mist. Avoid contact with skin, eyes and clothes. Remove contaminated clothes and wash them before reuse. Wear suitable protective equipment; see

section 8.

#### 7.2 Conditions for safe storage, including any incompatibilities

Requirements for storage room

and containers:

Close opened containers after use. Put the containers upright to prevent from leaking. Do not store in unlabelled containers.

Further information about storage conditions:

Keep in a cool, dry and well ventilated place. Protect from open fire, heat and direct sunlight. Keep away from food, drink and animal feeding stuffs. Keep away



from oxidising substances. Keep away from sources of ignition - no smoking.

Store only in original container.

Stocking with different products: Store separately from beverages, food and feed. Store separately from strong

acids, bases and oxidation agents.

# 7.3 Specific end use(s)

See identified uses in section 1.

# **SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION**

# 8.1 Control parameters

#### Occupational exposure limits

Please refer to the latest edition of the appropriate source text and consult an industrial hygienist or similar professional, or local agencies, for further information.

#### **Biological limit values**

No biological exposure limits noted for the ingredient(s).

#### **DNEL values**

Substance name	Pattern of exposure	Route of exposure	Limit value
Ethanol CAS no.:64-17-5	Worker (long term, systemic effects)	Inhalation	380 mg/m³
	Worker (short term, local effects)	Inhalation	1900 mg/m³
	Consumer (long term, systemic effects)	Inhalation	114 mg/m³
	Consumer (short term, local effects)	Inhalation	950 mg/m³
	Worker (long term, systemic effects)	Dermal	343 mg/kg bw/day
	Consumer (long term, systemic effects)	Dermal	206 mg/kg bw/day
	Consumer (long term, systemic effects)	Oral	87 mg/kg bw/day
Propan-2-ol CAS no.:67-63-0	Worker (short term, systemic effects)	Inhalation	1000 mg/m³
	Worker (long term, systemic effects)	Inhalation	500 mg/m³
	Consumer (short term, systemic effects)	Inhalation	178 mg/m³
	Consumer (long term, systemic effects)	Inhalation	89 mg/m³
	Worker (long term, systemic effects)	Dermal	888 mg/kg bw/day
	Consumer (long term, systemic effects)	Dermal	319 mg/kg bw/day
	Consumer (short term, systemic effects)	Oral	51 mg/kg bw/day
	Consumer (long term, systemic effects)	Oral	26 mg/kg bw/day

#### **PNEC values**

Substance name	Route of exposure	Limit value	
Ethanol CAS no.:64-17-5	Fresh water	960 µg/L	
	Marine water	790 μg/L	
	Intermittent release (fresh water)	2.75 mg/L	
	Sewage treatment plant	580 mg/L	
	Sediment (fresh water)	3.6 mg/kg dw	
	Sediment (marine water)	2.9 mg/kg dw	
	Soil	630 µg/kg dw	
	Secondary poisoning	380 - 720 mg/kg food	
Propan-2-ol CAS no.:67-63-0	No data available.	No data available.	

# 8.2 Exposure controls

#### Appropriate engineering controls

See section 7. No additional measures necessary.

#### Individual protection measures

Eye/face protection: Wear protective glasses during use.



Hand protection: Short-term contact: Gloves with Protection Index of at least Class 2 (Norm EN

374, permeation time > 30 min) for substances of Class A. Long-term contact: Gloves with Protection Index of at least Class 6 (Norm EN 374, permeation time >

480 min) for substances of Class A. (Class A: primary alcohols).

Body protection: Not required during normal use.

Respiratory protection: Do not inhale gas/vapours/aerosol.

Thermal hazards: No data available.

Hygiene measures: Use good personal hygiene practices – wash hands at breaks and when done

working with material. Handle in accordance with good industrial hygiene and safety practice. Avoid contact with skin, eyes and clothes. Do not eat, drink or

smoke while working. Do not breathe vapours/aerosols.

#### **Environmental exposure controls**

Observe the usual precautions for handling chemicals.

# **SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES**

# 9.1 Information on basic physical and chemical properties

Physical state: Liquid

Form: Liquid absorbed on fleece

Colour: Colourless Odour: Lemon

Melting point:

Freezing point:

No data available.

No data available.

No data available.

No data available.

and boiling range:

Flammability:

The product is flammable.

Lower explosion limit: No data available.
Upper explosion limit: No data available.

Flash point: 23 °C

Auto-ignition temperature: Not self-igniting.

Decomposition temperature: Not applicable.

pH-value (undiluted product): 6.5 - 7.5

pH-value (diluted product): Not applicable (ready-to-use solution).

Kinematic viscosity: No data available.

Solubility: Completely miscible with water.

Partition coefficient n-

octanol/water:

Not applicable.

Vapour pressure at 50 °C: No data available.

Density: 0.92 g/cm<sup>3</sup>
Relative density: 0.92

Relative vapour density at 20 °C: No data available.



#### 9.2 Other information

Oxidising properties: Not oxidising.

Explosive properties: Vapours can form explosive mixtures with air.

Evaporation rate: No data available.

Miscibility: Completely miscible with water.

Other information: No data available.

#### **SECTION 10: STABILITY AND REACTIVITY**

#### 10.1 Reactivity

The mixture is not reactive.

#### 10.2 Chemical stability

Stable at normal temperatures and pressure at least up to the expiry date printed on the container. Contact with open flame may cause ignition.

# 10.3 Possibility of hazardous reactions

No dangerous reaction known under conditions of normal use.

#### 10.4 Conditions to avoid

Avoid heat, flames, sparks and other sources of ignition. Containers may rupture or explode if exposed to intense heat. Avoid conditions beyond those mentioned in section 7.

#### 10.5 Incompatible materials

Avoid contact with materials sensitive to alcohols.

#### 10.6 Hazardous decomposition products

No dangerous decomposition products occur under normal storage and use.

#### SECTION 11: TOXICOLOGICAL INFORMATION

### 11.1 Information on hazard classes as defined in Regulation (EC) No 1272/2008

## Information on likely routes of exposure

Inhalation: Information on effects are given below.

Skin contact: Information on effects are given below.

Eye contact: Information on effects are given below.

Ingestion: Information on effects are given below.

**Acute toxicity** 

Mixture: ATEmix: LD50 (rat, ingestion) > 5000 mg/kg

Component: No data available.

Skin corrosion/irritation

Mixture: No irritation is expected. Repeated exposure may cause skin dryness or cracking.

Component: No data available.

Serious eye damage/irritation

Mixture: Irritating to eyes.

Component: No data available.



Respiratory or skin sensitization

Mixture: The product is not classified as sensitising.

Component: No data available.

Germ cell mutagenicity

Mixture: Not a mutagen. Does not contain ingredients with known mutagenic properties.

Component: No data available.

Carcinogenicity

Mixture: Does not contain ingredients with known carcinogenic properties.

Component: No data available.

Reproductive toxicity

Mixture: This product contains no ingredients with known reproductive toxicity effects.

Component: No data available.

STOT-single exposure

Mixture: This product exhibits no known STOT-single exposure.

Component: No data available.

STOT-repeated exposure

Mixture: This product exhibits no known STOT-repeated exposure.

Component: No data available.

**Aspiration hazard** 

Mixture: This product exhibits no known aspiration hazard.

Component: No data available.

#### 11.2 Information on other hazards

### **Endocrine disrupting properties**

Mixture: The substance/mixture does not contain components considered to have

endocrine disrupting properties according to REACH Article 57(f) or Commission Delegated Regulation (EU) 2017/2100 or Commission Regulation (EU) 2018/605

at levels of 0.1% or higher.

Component: No data available.

Other hazards

Mixture: No data available. Component: No data available.

# **SECTION 12: ECOLOGICAL INFORMATION**

### 12.1 Toxicity

The release of amounts present in our packaging is not expected to have any ecotoxic effects. The release of several packages of this product can have temporary and localized toxic effects on aquatic and terrestrial organisms. This product is not expected to negatively affect the function of sewage treatment plants. There is no data available from ecotoxicological tests regarding the entire product. The ecotoxicological risk has been estimated based on available data on product ingredients and concentrations, where available.

## 12.2 Persistence and degradability

The product ingredients possess good biodegradation properties. Based on available data, the biodegradability in sewage treatment plants can be categorized as high.

Substance name	Biodegradation	Basis	Remark
Ethanol	94%	OECD 301 E	No data available.
Propan-2-ol	95%	21 D	Readily biodegradable.



# 12.3 Bioaccumulative potential

Mixture: Based on available data, no product ingredient is expected to exhibit

bioaccumulative potential.

Component: No data available.

12.4 Mobility in soil

Mixture: The product is not expected to be mobile over long distances because all product

ingredients possess good biodegradability. Surface tension and absorption /

desorption kinetics are not relevant to the product.

Component: No data available.

# 12.5 Results of PBT and vPvB assessment

This substance/mixture contains no components considered to be either persistent, bioaccumulative and toxic (PBT), or very persistent and very bioaccumulative (vPvB) at levels of 0.1% or higher.

# 12.6 Endocrine disrupting properties

The substance/mixture does not contain components considered to have endocrine disrupting properties according to REACH Article 57(f) or Commission Delegated Regulation (EU) 2017/2100 or Commission Regulation (EU) 2018/605 at levels of 0.1% or higher.

#### 12.7 Other adverse effects

The product contains no ingredients with ozone depletion potential or global warming potential. The product contains no heavy metals or their compounds as defined in 2006/11/EG. The product contains no absorbable organic halogens (AOX). The product contains volatile organic compounds (VOC).

#### **SECTION 13: DISPOSAL CONSIDERATIONS**

#### 13.1 Waste treatment methods

Disposal methods: Dispose of according to national and regional provisions. Waste code EWC Nr:

070699 (Group: waste material of MFSU from fats, lubricants, soaps, detergents,

disinfectants and personal protection products).

Contaminated packaging: Empty packaging can be treated like household waste or recycled after cleaning

with water. Handle the packaging containing the product in the same way as the product itself. Where available, references to local regulations regarding disposal

are given in section 15 of the SDS. The user has sole responsibility for

acquaintance and compliance with the applicable regulations.

#### **SECTION 14: TRANSPORT INFORMATION**

Land transport (ADR/ADN/RID)

#### 14.1 UN number

UN 3175

# 14.2 UN proper shipping name

SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S. (Ethanol, Propan-2-ol)

## 14.3 Transport hazard class(es)

4.1



# 14.4 Packing group

II | Danger label: 4.1 | LQ: 1 kg

#### 14.5 Environmental hazards

Environmental hazards: No

# 14.6 Special precautions for user

See sections 6 to 8.

# Sea transport (IMDG/IMO)

# 14.1 UN number

UN 3175

# 14.2 UN proper shipping name

SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S. (Ethanol, Propan-2-ol)

# 14.3 Transport hazard class(es)

4.1

#### 14.4 Packing group

II | Danger label: 4.1 | LQ: 1 kg

#### 14.5 Environmental hazards

Environmental hazards: No Marine pollutant: No

# 14.6 Special precautions for user

See sections 6 to 8.

# 14.7 Maritime transport in bulk according to IMO instruments

Not applicable for product as supplied.

Air transport (IATA)

#### 14.1 UN number

UN 3175

# 14.2 UN proper shipping name

SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S. (Ethanol, Propan-2-ol)

# 14.3 Transport hazard class(es)

4.1

# 14.4 Packing group

II | Danger label: 4.1 | LQ: 1 kg



# 14.5 Environmental hazards

Environmental hazards: No

#### 14.6 Special precautions for user

See sections 6 to 8.

### **SECTION 15: REGULATORY INFORMATION**

# 15.1 Safety, health and environmental regulations/legislation specific for the substance or mixture

The product has been classified and marked in accordance with Regulation (EC) No.1272/2008 (CLP). The product complies with requirements of Regulation (EC) No. 1907/2006 (REACH), Regulation (EC) No. 648/2004 (Detergents Regulation), Regulation (EU) No. 528/2012 (Biocides Regulation), Directive 93/42/EC (Medical Devices Directive), and Regulation (EU) No. 2017/745 on medical devices (MDR), if applicable.

### 15.2 Chemical safety assessment

No chemical safety assessment was carried out for this product.

#### SECTION 16: OTHER INFORMATION

# Indication of changes

- 1.1 Product identifier Updated.
- 1.2 Relevant identified uses of the substance or mixture and uses advised against Updated.
- 1.3 Details of the supplier of the safety data sheet Updated.
- 1.4 Emergency telephone number Updated.
- 4.1 Description of first aid measures Updated.
- 5.2 Special hazards arising from the substance or mixture Updated.
- 5.3 Advice for firefighters Updated.
- 6.1 Personal precautions, protective equipment and emergency procedures Updated.
- 6.2 Environmental precautions Updated.
- 7.1 Precautions for safe handling Updated.
- 7.2 Conditions for safe storage, including any incompatibilities Updated.
- 8.1 Control parameters Updated.
- 8.2 Exposure controls Updated.
- 9.1 Information on basic physical and chemical properties Updated.
- 9.2 Other information Updated.
- 11.1 Information on hazard classes as defined in Regulation (EC) No 1272/2008 / Information on toxicological effects Updated.
- 15.1 Safety, health and environmental regulations/legislation specific for the substance or mixture Updated.

#### Abbreviations and acronyms

- ADN European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways
- ADR European Agreement concerning the International Carriage of Dangerous Goods by Road
- ASTM American Society for Testing and Materials
- AwSV Ordinance on facilities for handling substances that are hazardous to water
- BOD Biochemical Oxygen Demand
- c.c. Closed cup
- CAS Chemical Abstract Services
- CESIO European Committee of Organic Surfactants and their Intermediates
- COD Chemical Oxygen Demand
- DMEL Derived Minimum Effect Level
- DNEL Derived No Effect Level



EbC50 - Median concentration in terms of reduction of growth

EC - Effective concentration

EINECS - European Inventory of Existing Commercial Chemical Substances

EN - European Norm

ErC50 - Median concentration in terms of reduction of growth rate

GGVSEB - German ordinance for road, rail and inland waterway transportation of dangerous goods

GGVSee - German ordinance for sea transportation of dangerous goods

GLP - Good Laboratory Practice

GMO - Genetic Modified Organism

IATA - International Air Transport Association

ICAO - International Civil Aviation Organization

IMDG - International Maritime Dangerous Goods

ISO - International Organization For Standardization

LD/LC - Lethal dose/concentration

LOAEL - Lowest Observed Adverse Effect Level

LOEL - Lowest Observed Effect Level

LQ - Limited Quantity

M-Factor - Multiplying factor

NOAEL - No Observed Adverse Effect Level

NOEC - No Observed Effect Concentration

NOEL - No Observed Effect Level

o.c. - Open cup

OECD - Organisation for Economic Cooperation and Development

OEL - Occupational Exposure Limit

PBT - Persistent, bioaccumulative, toxic

PNEC - Predicted No Effect Concentration

**REACH - REACH registration** 

RID - Convention concerning International Carriage by Rail

SVHC - Substances of Very High Concern

TA - Technical Instructions

TRGS - Technical Rules for Hazardous Substances

vPvB - Very persistent, very bioaccumulative

WGK - Water Hazard Class

#### Key literature references and sources for data

No data available.

# Classification for mixtures and used evaluation method according to regulation (EC) No 1272/2008 [CLP]

Hazard category	Hazard statement code(s)	Classification procedure
Flam. Sol. 1	H228	On basis of test data.
Eye Irrit. 2	H319	Harmonised (legal) classification.

# List of relevant phrases

H225 Highly flammable liquid and vapour.

H228 Flammable solid.

H319 Causes serious eye irritation.

H336 May cause drowsiness or dizziness.

### **Training information**

Comply with national laws regulating employee instruction.

The above information describes exclusively the safety requirements of the product and is based on our present-day knowledge. The information is intended to give you advice about the safe handling of the product named in this safety data sheet, for storage, processing, transport and disposal. The information cannot be transferred to other products. In the case of mixing the product with other products or in the case of processing, the information on this safety data sheet is not necessarily valid for the new made-up material.