Safety Data Sheet dated: 09/03/2022 - version 3



SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

Mixture identification:

Trade name: RASCO KSK HAFTGRUNDIERUNG Trade code: 9050751

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

Recommended use: Water dispersion of synthetic polymers

Uses advised against: Data not available

1.3. Details of the supplier of the safety data sheet

Company: Rasco Bitumentechnik GmbH, Otto-von-Guericke-Ring 11, D-65205 Wiesbaden, Germany phone: +49-05237 608 0 - fax: +49-05237 608 210 (office hours) Responsible: rasco@bitumentechnik.de

1.4. Emergency telephone number

Poison emergency call Berlin +4930 30686700 (Advice in German and English)

SECTION 2: Hazards identification

2.1. Classification of the substance or mixture

Regulation (EC) n. 1272/2008 (CLP)

0

The product is not classified as dangerous according to Regulation EC 1272/2008 (CLP).

Adverse physicochemical, human health and environmental effects:

No other hazards

2.2. Label elements

The product is not classified as dangerous according to Regulation EC 1272/2008 (CLP).

Special Provisions:

EUH208	Contains 1,2-benzisothiazol-3(2H)-one; 1,2-benzisothiazolin-3-one. May produce an allergic reaction.
EUH208	Contains reaction mass of: 5-chloro-2-methyl-4-isothiazolin-3-one [EC no. 247-500-7] and 2-methyl-2H - isothiazol-3-one [EC no. 220-239-6] (3:1). May produce an allergic reaction.

EUH210 Safety data sheet available on request.

Special provisions according to Annex XVII of REACH and subsequent amendments:

None.

2.3. Other hazards

No PBT, vPvB or endocrine disruptor substances present in concentration >= 0.1%.

Other Hazards: No other hazards

SECTION 3: Composition/information on ingredients

3.1. Substances

Not Relevant

3.2. Mixtures

Mixture identification: RASCO KSK HAFTGRUNDIERUNG

Hazardous components within the meaning of the CLP regulation and related classification:

Concentration (% w/w)	Name	Ident. Numb.	Classification	Registration Number
≥5 - <10 %	ethylene glycol	CAS:107-21-1 EC:203-473-3 Index:603-027- 00-1	Acute Tox. 4, H302; STOT RE 2, H373	01-2119456816-28-xxxx
≥0.025 - <0.05 %	1,2-benzisothiazol-3(2H)-one; 1,2- benzisothiazolin-3-one	CAS:2634-33-5 EC:220-120-9 Index:613-088- 00-6	Skin Irrit. 2, H315 Eye Dam. 1, H318 Aquatic Acute 1, H400 Acute Tox. 4, H302 Skin Sens. 1, H317 Aquatic Chronic 2, H411	1

Specific Concentration Limits: $C \ge 0.05\%$: Skin Sens. 1 H317

<0.0015 % reaction mass of: 5-chloro-2-methyl- CAS:55965-84-9 Aquatic Ac 4-isothiazolin-3-one [EC no. 247-500- EC:611-341-5 Chronic 1, 7] and 2-methyl-2H -isothiazol-3-one Index:613-167-[EC no. 220-239-6] (3:1) 00-5 Sens. 1A, H310 Acut

Aquatic Acute 1, H400 Aquatic Chronic 1, H410 Acute Tox. 3, H301 Skin Corr. 1C, H314 Skin Sens. 1A, H317 Acute Tox. 2, H310 Acute Tox. 2, H330 Eye Dam. 1, H318, M-Chronic:100, M-Acute:100

 $\begin{array}{l} \mbox{Specific Concentration Limits:}\\ C \geq 0.6\%: \mbox{Skin Corr. 1C H314}\\ 0.06\% \leq C < 0.6\%: \mbox{Skin Irrit. 2}\\ \mbox{H315}\\ C \geq 0.6\%: \mbox{Eye Dam. 1 H318}\\ 0.06\% \leq C < 0.6\%: \mbox{Eye Irrit. 2}\\ \mbox{H319}\\ C \geq 0.0015\%: \mbox{Skin Sens. 1A H317} \end{array}$

SECTION 4: First aid measures

4.1. Description of first aid measures

In case of skin contact:

Wash with plenty of water and soap.

In case of eyes contact:

Wash immediately with water.

In case of Ingestion:

Do not induce vomiting, get medical attention showing the SDS and the hazard label.

In case of Inhalation:

Remove casualty to fresh air and keep warm and at rest.

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

Not available

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

Treatment:

Not available (see paragraph 4.1)

SECTION 5: Firefighting measures

5.1. Extinguishing media

Suitable extinguishing media:

Water.

Carbon dioxide (CO2).

Extinguishing media which must not be used for safety reasons:

None in particular.

5.2. Special hazards arising from the substance or mixture

Do not inhale explosion and combustion gases.

5.3. Advice for firefighters

Use suitable breathing apparatus.

SECTION 6: Accidental release measures

6.1. Personal precautions, protective equipment and emergency procedures

Wear personal protection equipment. Remove persons to safety.

6.2. Environmental precautions

Do not allow to enter into soil/subsoil. Do not allow to enter into surface water or drains. Limit leakages with earth or sand.

6.3. Methods and material for containment and cleaning up

Suitable material for taking up: absorbing material, organic, sand Retain contaminated washing water and dispose it.

6.4. Reference to other sections

See also section 8 and 13

SECTION 7: Handling and storage

7.1. Precautions for safe handling

Avoid contact with skin and eyes, inhalation of vapours and mists. Do not eat or drink while working.

See also section 8 for recommended protective equipment.

7.2. Conditions for safe storage, including any incompatibilities

Keep away from food, drink and feed.

Incompatible materials:

None in particular.

Instructions as regards storage premises:

Adequately ventilated premises.

7.3. Specific end use(s)

Recommendation(s) None in particular Industrial sector specific solutions: None in particular

SECTION 8: Exposure controls/personal protection 8.1. Control parameters

List of components with OEL value

Component	OEL Type	Country	Ceiling	Long Term mg/m3	Long Term ppm	Short Term mg/m3	Short Term ppm	Behaviour	Note
ethylene glycol	National	SWEDEN		25	10	50	20		SWEDEN, Short-term value, 15 minutes average value
	National	FINLAND		50	20	100	40		FINLAND, hud
	National	NORWAY		52	20	104	40		NORWAY, H5
	National	SWEDEN		25	10	50	20		SWEDEN, Short-term value, 15 minutes average value
	EU	None		52	20	104	40		Skin
	National	NORWAY		10	10	20	20		
	ACGIH	None	С			100			(H), A4 - URT and eye irr
	National	NORWAY		26		52			
	DFG	GERMANY	С			52	20		
	ACGIH				25	10	50		A4 - Not Classifiable as a Human Carcinogen;upper respiratory tract irritation
	National	SWEDEN		25	10				
	National	FRANCE		52	20	104	40		
	National	SPAIN		52	20	104	40		
	National	GREECE		125	50	125	50		
	National	DENMARK		26	10				
	National	DENMARK		10	10				
	National	FINLAND		50	20	100	40		
	National	PORTUGAL		52	20	104	40		
	National	NORWAY		52	20	104	40		
	NDS	POLAND		15					
	NDSCh	POLAND				50			
	National	PORTUGAL	С			100			
	CHE	SWITZERLAND				52	20		
	NDS	NETHERLANDS		52		104			
	NDS	NETHERLANDS		10		104			
	National	GERMANY		26	10				
	National	CZECH REPUBLIC		50					
	National	HUNGARY		52		104			

National SLOVAKIA		52	20				
National SLOVENIA		52	20	104	40		
National UNITED KINGDOM		10	20	104	40		
National UNITED KINGDOM		10	20	30	40		
Malaysi MALAYSIA a OEL	С			100	39.4		
National ESTONIA		52	20	104	40		
National LATVIA		52	20	104	40		
National CZECH REPUBLIC	С			100			
National SLOVAKIA	С			104			
National CROATIA		52	20	104	40		
EU		52	20	104	40	Indicative	Possibility of significant uptake through the skin
National UNITED KINGDOM		52	20	104	40		
National BULGARIA		52	20	104	40		
National ROMANIA		52	20	104	40		
TUR TURKEY		52	20	104	40		
National LITHUANIA		25	10	50	20		
(===)							

Predicted No Effect Concentration (PNEC) values

Component	CAS-No.	PNEC Limit	Exposure Route	Exposure Frequency Remark
ethylene glycol	107-21-1	10 mg/l	Fresh Water	
		1 mg/l	Marine water	
		1.53 mg/kg	g Soil	
		37 mg/kg	Freshwater sediments	
		10 mg/l	Intermittent release	
		199.5 mg/l	Microorganisms in sewage treatments	
		3.7 mg/kg	Marine water sediments	

Derived No Effect Level. (DNEL)							
Component	CAS-No.	Worker Worke Industr Profes y ional		Exposure Route	Exposure Frequency Remark		
ethylene glycol	107-21-1	106 mg/kg	53 mg/kg	Human Dermal	Long Term, systemic effects		
			53 mg/kg	Human Oral	Long Term, systemic effects		
		35 mg/m3	7 mg/m3	Human Inhalation	Long Term, local effects		

8.2. Exposure controls

Eye protection:

Not needed for normal use. Anyway, operate according good working practices. Protection for skin:

No special precaution must be adopted for normal use.

Protection for hands:

Suitable materials for safety gloves; EN ISO 374:

Polychloroprene - CR: thickness >=0,5mm; breakthrough time >=480min. Nitrile rubber - NBR: thickness >=0,35mm; breakthrough time >=480min. Butyl rubber - IIR: thickness >=0,5mm; breakthrough time >=480min. Fluorinated rubber - FKM: thickness >=0,4mm; breakthrough time >=480min. Respiratory protection:

Personal Protective Equipment should comply with relevant CE standards (as EN ISO 374 for gloves and EN ISO 166 for goggles), correctly maintained and stored. Consult the supplier to check the suitability of equipment against specific chemicals and for user information.

Not needed for normal use. Anyway, operate according good working practices.

Hygienic and Technical measures

Not available

Appropriate engineering controls:

Not available

SECTION 9: Physical and chemical properties

9.1. Information on basic physical and chemical properties Physical state: Liquid Appearance: liquid Color: white Odour: Characteristic Odour threshold: Melting point / freezing point: Not available Initial boiling point and boiling range: Not available Flammability: Not available Upper/lower flammability or explosive limits: Not available Flash point: Not available Auto-ignition temperature: Not available Decomposition temperature: Not available pH: 8.40 Viscosity: 1,500.00 cPs Kinematic viscosity: Not available Solubility in water: dispersible Solubility in oil: insoluble Partition coefficient (n-octanol/water): Not available Vapour pressure: Not available Relative density: 1.10 g/cm3 Vapour density: Not available **Particle characteristics:** Particle size: Not available

9.2. Other information

Miscibility: Not available Conductivity: Not available No other relevant information

SECTION 10: Stability and reactivity

10.1. Reactivity

Stable under normal conditions

10.2. Chemical stability

Stable under normal conditions

10.3. Possibility of hazardous reactions

None.

10.4. Conditions to avoid

Stable under normal conditions.

10.5. Incompatible materials

None in particular.

10.6. Hazardous decomposition products

None.

Date

SECTION 11: Toxicological information

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

Toxicological information of the mixture:

a) acute toxicity		Not classified
		Based on available data, the classification criteria are not met
b) skin corrosion/irritation		Not classified
		Based on available data, the classification criteria are not met
3/29/2022	Production Name	RASCO KSK HAFTGRUNDIERUNG

c) serious eye damage/irritationd) respiratory or skin sensitisation		amage/irritation	Not classified				
			Based on available data, the classification criteria are not met				
		skin sensitisation	Not classified				
			Based on available data, the classification criteria are not met				
	e) germ cell mut	tagenicity	Not classified				
			Based on available data, the classification criteria are not met				
	f) carcinogenicity	у	Not classified				
			Based on available data, the classification criteria are not met				
	g) reproductive	toxicity	Not classified				
			Based on available data, the classification criteria are not met				
	h) STOT-single e	exposure	Not classified				
			Based on available data, the classification criteria are not met				
	i) STOT-repeate	d exposure	Not classified				
			Based on available data, the classification criteria are not met				
	j) aspiration haz	ard	Not classified				
			Based on available data, the classification criteria are not met				
Toxico	ological informati	ion on main com	ponents of the mixture:				
ethyler	ne glycol	a) acute toxicity	LC50 Inhalation Rat > 2.50000 mg/l 6h				
			LD50 Skin Rat > 3500.00000 mg/kg				
1,2-benzisothiazol-3(2H)- a) acute toxicity one; 1,2-benzisothiazolin- 3-one			LD50 Oral Rat = 1020 mg/kg				
reaction mass of: 5- a) acute toxicity chloro-2-methyl-4- isothiazolin-3-one [EC no. 247-500-7] and 2- methyl-2H -isothiazol-3-			LC50 Inhalation Rat = 2.36000 mg/l 4h				

LD50 Skin Rabbit = 660.00000 mg/kg LD50 Oral Rat = 53.00000 mg/kg

11.2 Information on other hazards

methyl-2H -isothiazol-3one [EC no. 220-239-6]

Endocrine disrupting properties:

No endocrine disruptor substances present in concentration >= 0.1%

SECTION 12: Ecological information

12.1. Toxicity

(3:1)

Adopt good working practices, so that the product is not released into the environment. Eco-Toxicological Information:

List of Eco-Toxicological properties of the product

Not classified for environmental hazards

Based on available data, the classification criteria are not met

List of components with eco-toxicological properties

Component	Ident. Numb.	Ecotox Infos
ethylene glycol	CAS: 107-21-1 - EINECS: 203-473-3 - INDEX: 603-027- 00-1	a) Aquatic acute toxicity: EC50 Daphnia > 100 mg/L 48
		a) Aquatic acute toxicity: EC50 Algae > 100 mg/L 96
		a) Aquatic acute toxicity : LC50 Fish > 100 mg/L 96
		b) Aquatic chronic toxicity : NOEC Fish > 100 mg/L - 7 d
		b) Aquatic chronic toxicity : NOEC Daphnia > 100 mg/L - 7 d

b) Aquatic chronic toxicity : NOEC Algae > 100 mg/L 72 a) Aquatic acute toxicity : LC50 Fish Oncorhynchus mykiss = 41000 mg/L 9 IUCLID a) Aquatic acute toxicity: LC50 Fish Oncorhynchus mykiss 14 mL/L 96h EP. a) Aquatic acute toxicity : LC50 Fish Lepomis macrochirus = 27540 mg/L 9 EPA a) Aquatic acute toxicity : LC50 Fish Oncorhynchus mykiss = 40761 mg/L 9 **TUCLTD** a) Aquatic acute toxicity: LC50 Fish Pimephales promelas 40000 mg/L 96h FPA a) Aquatic acute toxicity : LC50 Fish Poecilia reticulata = 16000 mg/L 96h IUCLID a) Aquatic acute toxicity : EC50 Daphnia Daphnia magna = 46300 mg/L 48 IUCLID a) Aquatic acute toxicity: EC50 Algae Pseudokirchneriella subcapitata 6500 mg/L 96h IUCLID 1,2-benzisothiazol-3(2H)-one; 1,2-CAS: 2634-33-5 a) Aquatic acute toxicity : LC50 Fish = 2.15000 mg/L benzisothiazolin-3-one EINECS: 220-120-9 - INDEX: 613-088-00-6 b) Aquatic chronic toxicity : NOEC Algae = 0.04030 mg/L 72h b) Aquatic chronic toxicity : EC50 Algae = 0.11000 mg/L 72h b) Aquatic chronic toxicity : EC10 Algae = 0.04000 mg/L 72h b) Aquatic chronic toxicity : EC50 Daphnia = 3.27000 mg/L 48h NOEC Daphnia = 1.20000 mg/L 21d a) Aquatic acute toxicity : EC50 Daphnia = 0.12 mg/L 48 reaction mass of: 5-chloro-2-CAS: 55965-84-9 methyl-4-isothiazolin-3-one [EC EINECS: 611-341-5 no. 247-500-7] and 2-methyl-2H - - INDEX: 613-167isothiazol-3-one [EC no. 220-239- 00-5 6] (3:1) a) Aquatic acute toxicity : LC50 Fish = 0.22 mg/L 96 a) Aquatic acute toxicity : EC50 Algae = 0.048 mg/L 72 b) Aquatic chronic toxicity : NOEC Algae = 0.0012 mg/L 72 b) Aquatic chronic toxicity : NOEC Fish = 0.098 mg/L - 28 d b) Aquatic chronic toxicity : NOEC Daphnia = 0.004 mg/L - 21 d 12.2. Persistence and degradability Not available 12.3. Bioaccumulative potential Not available 12.4. Mobility in soil Not available 12.5. Results of PBT and vPvB assessment No PBT, vPvB or endocrine disruptor substances present in concentration >= 0.1%. 12.6 Endocrine disrupting properties No endocrine disruptor substances present in concentration >= 0.1%12.7 Other adverse effects Not available **SECTION 13: Disposal considerations**

13.1. Waste treatment methods

The generation of waste should be avoided or minimized wherever possible. Recover if possible. A waste code (EWC) according to European List of Waste (LoW) cannot be specified, due to dependence on the usage. Contact and send to an authorized waste disposal service. Methods of disposal:

Disposal of this product, solutions, packaging and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements.

Dispose of surplus and nonrecyclable products via a licensed waste disposal contractor.

Do not dispose of waste into sewers.

Clean waste packaging should be recycled when possible and authorized by the authority.

Hazardous waste: No

Disposal considerations:

Do not allow to enter drains or watercourses.

Dispose of product according to all federal, state and local applicable regulations.

If this product is mixed with other wastes, the original waste product code may no longer apply and the appropriate code should be assigned.

Dispose of containers contaminated by the product in accordance with local or national legal provisions. For further information, contact your local waste authority.

Special precautions:

This material and its container must be disposed of in a safe way. Care should be taken when handling untreated empty containers. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

Empty containers or liners may retain some product residues. Do not re-use empty containers.

SECTION 14: Transport information

Not classified as dangerous in the meaning of transport regulations.

14.1. UN number or ID number

Not Applicable

14.2. UN proper shipping name

Not Applicable

14.3. Transport hazard class(es)

Not Applicable

14.4. Packing group

Not Applicable

14.5. Environmental hazards Not Applicable

14.6. Special precautions for user

Not Applicable

Road and Rail (ADR-RID) :

Not Applicable

Air (IATA) :

Not Applicable

Sea (IMDG) :

Not Applicable

14.7. Maritime transport in bulk according to IMO instruments

Not Applicable

SECTION 15: Regulatory information

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

VOC (2004/42/EC) : N.A. g/l Dir. 98/24/EC (Risks related to chemical agents at work) Dir. 2000/39/EC (Occupational exposure limit values) Regulation (EC) n. 1907/2006 (REACH) Regulation (EU) n. 2020/878 Regulation (EC) n. 1272/2008 (CLP) Regulation (EC) n. 790/2009 (ATP 1 CLP) and (EU) n. 758/2013 Regulation (EU) n. 286/2011 (ATP 2 CLP) Regulation (EU) n. 618/2012 (ATP 3 CLP) Regulation (EU) n. 487/2013 (ATP 4 CLP) Regulation (EU) n. 944/2013 (ATP 5 CLP) Regulation (EU) n. 605/2014 (ATP 6 CLP) Regulation (EU) n. 2015/1221 (ATP 7 CLP) Regulation (EU) n. 2016/918 (ATP 8 CLP) Regulation (EU) n. 2016/1179 (ATP 9 CLP) Regulation (EU) n. 2017/776 (ATP 10 CLP) Regulation (EU) n. 2018/669 (ATP 11 CLP) Regulation (EU) n. 2019/521 (ATP 12 CLP)

Regulation (EU) n. 2018/1480 (ATP 13 CLP) Regulation (EU) n. 2020/217 (ATP 14 CLP) Regulation (EU) n. 2020/1182 (ATP 15 CLP)

Provisions related to directive EU 2012/18 (Seveso III):

Not available

Restrictions related to the product or the substances contained according to Annex XVII Regulation (EC) 1907/2006 (REACH) and subsequent modifications:

Restrictions related to the product: None.

Restrictions related to the substances contained: 75

SVHC Substances:

1

No data available

German Water Hazard Class (WGK)

15.2. Chemical safety assessment

No Chemical Safety Assessment has been carried out for the mixture.

SECTION 16: Other information

Code	Description	
H302	Harmful if swallowed.	
H373	May cause damage to organs through pro	olonged or repeated exposure if swallowed.
Code	Hazard class and hazard category	Description
3.1/4/Oral	Acute Tox. 4	Acute toxicity (oral), Category 4
3.9/2	STOT RE 2	Specific target organ toxicity — repeated exposure, Category 2

If appropriate, specific provisions in relation to possible training for workers are mentioned in section 2. Any training related to safety in the workplace must in any case refer to a risk assessment that must be carried out by a company safety officer taking into account the specific operating and environmental conditions in which the products are used.

This document was prepared by a competent person who has received appropriate training.

Main bibliographic sources:

ECDIN - Environmental Chemicals Data and Information Network - Joint Research Centre, Commission of the European Communities

SAX'S DANGEROUS PROPERTIES OF INDUSTRIAL MATERIALS - Eight Edition - Van Nostrand Reinold

The information contained herein is based on our state of knowledge at the above-specified date. It refers solely to the product indicated and constitutes no guarantee of particular quality.

It is the duty of the user to ensure that this information is appropriate and complete with respect to the specific use intended.

This SDS cancels and replaces any preceding release.

Legend to abbreviations and acronyms used in the safety data sheet:

ACGIH: American Conference of Governmental Industrial Hygienists

ADR: European Agreement concerning the International Carriage of Dangerous Goods by Road.

AND: European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways

ATE: Acute Toxicity Estimate

ATEmix: Acute toxicity Estimate (Mixtures)

BCF: Biological Concentration Factor

BEI: Biological Exposure Index

BOD: Biochemical Oxygen Demand

CAS: Chemical Abstracts Service (division of the American Chemical Society).

CAV: Poison Center

CE: European Community

CLP: Classification, Labeling, Packaging.

CMR: Carcinogenic, Mutagenic and Reprotoxic

COD: Chemical Oxygen Demand

COV: Volatile Organic Compound

CSA: Chemical Safety Assessment

CSR: Chemical Safety Report

DMEL: Derived Minimal Effect Level

DNEL: Derived No Effect Level.

DPD: Dangerous Preparations Directive

DSD: Dangerous Substances Directive

EC50: Half Maximal Effective Concentration

ECHA: European Chemicals Agency

EINECS: European Inventory of Existing Commercial Chemical Substances. ES: Exposure Scenario GefStoffVO: Ordinance on Hazardous Substances, Germany. GHS: Globally Harmonized System of Classification and Labeling of Chemicals. IARC: International Agency for Research on Cancer IATA: International Air Transport Association. IATA-DGR: Dangerous Goods Regulation by the "International Air Transport Association" (IATA). IC50: half maximal inhibitory concentration ICAO: International Civil Aviation Organization. ICAO-TI: Technical Instructions by the "International Civil Aviation Organization" (ICAO). IMDG: International Maritime Code for Dangerous Goods. INCI: International Nomenclature of Cosmetic Ingredients. IRCCS: Scientific Institute for Research, Hospitalization and Health Care KSt: Explosion coefficient. LC50: Lethal concentration, for 50 percent of test population. LD50: Lethal dose, for 50 percent of test population. LDLo: Leathal Dose Low N.A.: Not Applicable N/A: Not Applicable N/D: Not defined/ Not available NA: Not available NIOSH: National Institute for Occupational Safety and Health NOAEL: No Observed Adverse Effect Level OSHA: Occupational Safety and Health Administration. PBT: Persistent, Bioaccumulative and Toxic PGK: Packaging Instruction PNEC: Predicted No Effect Concentration. **PSG:** Passengers RID: Regulation Concerning the International Transport of Dangerous Goods by Rail. STEL: Short Term Exposure limit. STOT: Specific Target Organ Toxicity. TLV: Threshold Limiting Value.

TWATLV: Threshold Limit Value for the Time Weighted Average 8 hour day. (ACGIH Standard).

vPvB: Very Persistent, Very Bioaccumulative. WGK: German Water Hazard Class.

* Sheet model entirely changed in compliance to regulatory update.